

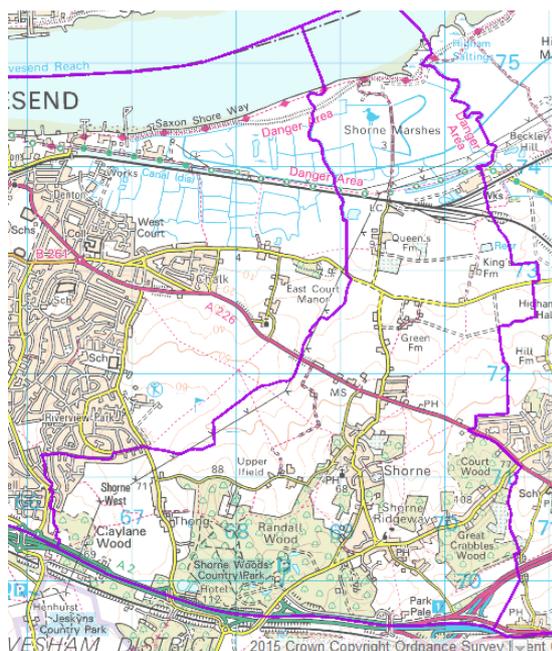
SHORNE PARISH COUNCIL

RESPONSE TO HIGHWAYS ENGLAND STATUTORY CONSULTATION (October to December 2018) REGARDING THE LOWER THAMES CROSSING

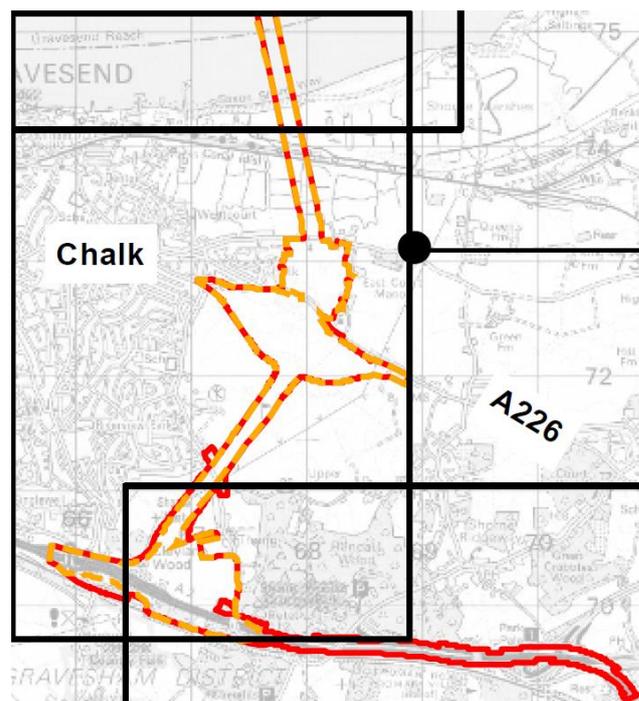
SECTION 1: INTRODUCTION

Shorne Parish Council is a Local Authority constituted under the Local Government Acts. The Parish is located to the east of Gravesend, in the Borough of Gravesham in the north-west of the county of Kent and is therefore in the western part of the Thames Gateway and Thames Estuary.

Shorne village (including also Lower Shorne, Thong/Riverview, Shorne Ridgeway and Pear Tree Lane) is an ancient settlement and Parish located in the Green Belt (plus including other supposedly higher protection designation land types). It is bounded by Chalk and the urban border of Gravesend to its west, and Higham Parish and the Medway Towns to the east. It extends from the A2 in the south to the middle of the Thames in the north and therefore additionally encompasses part of the North Kent Marshes Special Protection Area and the adjacent part of the Ramsar site.



Boundaries of Shorne Parish



Highways England "Red Line" Boundary

The Parish Council has responded to all the previous iterations of the Lower Thames Crossing proposals, including the November 2017 Planning Inspectorate consultation on the Environmental Impact Assessment Scoping Opinion.

As can be seen from comparing the two maps above, Shorne Parish will, if Highways England's proposal goes forward, lose a very large area of land: Green Belt that is supposed to be protected

from development and designated as a Strategic Gap preventing urban sprawl between the built up areas of Gravesend and the Medway Towns. It is the first remaining piece of countryside north of the A2 as one heads east from central London. The proposal would divide Shorne Parish either side of a massive road and junction complex, permanently taking and destroying Green Belt land (that we and others have spent decades working to protect) as well as highly productive agricultural land, ancient woodlands, sites of special scientific interest etc. The clean air and tranquillity of the area will be destroyed forever, as will the amenity of local parks, walking routes and the Area of Outstanding Natural Beauty.

The proposals presently under consultation involve very much greater take of land, including woodland and ancient woodland, than previously suggested. It is a matter of great concern locally that participants in the 2016 Consultation feel that they were misled about the size of the junction with the A2, and that there was no suggestion previously that the bilateral service roads would also be needed.

In order to prepare our response, Parish Councillors met with Parishioners individually and at the Highways England Information Events and Mobile Information unit, and also met with Officers at Gravesham Borough Council and Kent County Council. We have read through the published documents associated with the present 2018 Consultation however we cannot practicably raise in this response every point that we have identified.

The Parish Council therefore submits the following comments as its official response to the present Consultation (October to December 2018).

SECTION 2: STRUCTURAL ISSUES

2.1 TUNNEL ENTRANCE LOCATION

Although the tunnel portal and entrance has been moved a few hundred yards further south, it is still very close to Chalk Church and Crematorium, residential houses on the A226 and the A226 itself thereby subjecting them to noise, air and light pollution.

Moving the tunnel entrance even further south would mean:

- Reduced noise, light and air pollution to Chalk Church, Crematorium, local residents, the A226 and North Kent Marshes.
- Less excavation would be needed, either due to longer tunnelling or if cut-and-cover is used rather than banked sides. Suitable spoil materials could be used to backfill behind the retaining walls and over the top so reducing landscape impact
- Improved ambience of footpath NG7, which would not need to be permanently diverted
- Remove the need for, costs of and risks from a footpath bridge for the diverted NG7
- The Emergency Marshalling area could be partly undercover
- Gain of dirty water by the roadway, and consequent risk to the North Thames Marshes and Ramsar site would both be reduced.

The tunnel entrance should be moved even further south, whether by further tunnelling or by cut-and-cover, as far south as headroom for signage allows. This would have a number of significant environmental and construction advantages.

2.2 “GREEN BRIDGE” STRUCTURE DESIGN

There is a difference in views regarding what constitutes a “Green Bridge” between what Highways England presently show on their plans and what local people regard as meeting the description. To us a “Green Bridge” is a significantly wide grassed and planted corridor for people and wildlife to cross the line of the new/wider roads without much realising that the road is there.

Having them wider also reduces noise, light and air pollution for close nearby residents and improves the ambience of the route for pedestrians, cyclists and horses/riders.

In particular we would mention where Thong Lane crosses the line of the LTC as needing to be much wider (as wide as physically possible) and with green areas on both sides of the lane. Similarly, Brewers Road A2 overbridge area is characterised by wide grassy verges and these should be continued across the bridge.

“Green Bridges” must be much wider and with a significant amount of landscaping such that users might not realise at all that they are crossing a motorway.

2.3 GRAVESEND EAST JUNCTION FUNCTIONALITY AND THE SOUTH-SIDE TWO-WAY SIDE ROAD (OLD WATLING STREET)

The plans involve removing direct access to and from the A2 at Gravesend East and instead requiring large volumes of traffic to go complex and long routes to achieve the same directions of traffic movements as at present. Although designers have said they have included all the existing and future functions, what is proposed is not functional and exacerbates traffic flow issues that already exist at Gravesend East. The number of drivers wishing to access the A2 eastbound in the mornings and westbound in the evenings (different publicly available sources provide varying numbers, appears to be approximately 5,000 24h ADT each direction recently) greatly exceeds those who might want to use the LTC both in opening year and later year traffic volume scenarios.

While regretting the land take from the Country Park, we can see that the eastbound service road on the north side of the A2/M2 does increase slip-road safety at the Shorne/Cobham junction.

However, we consider that the presently proposed design will cause a number of problems:

- The only eastbound slip road to remain at Gravesend East connects directly with the LTC, this will cause confusion for local drivers who would then be forced to go north and then south via the LTC (with two charges being levied) in order to recover their journey – this should be addressed in the charging regime, that any such rapid two-way journeys detected should be free of charge as clearly undertaken in error.
- The difficulty of transit and the large traffic volumes newly required to use the expanded roundabouts system will impede the function of the roundabouts making it impossible to get across them at peak times when the dominant traffic flows will be high.
- The additional traffic flows on old Watling Street (connecting Henhurst and Halfpence roundabouts) will increase all forms of pollution to the SSSI and Ashenbank Wood Ancient Woodland.
- Pedestrians etc wishing to cross the new two-way link road will need some kind of facilitated crossing point, activating these will hold up the traffic.
- Any accident or breakdown will cripple the Gravesend East junction.
- In order to avoid the difficulties and risks created by the expanded roundabouts system, increased traffic will be induced to rat-run out of Gravesend East via Riverview Park and Thong

Lane. Increased traffic will also be induced through other local villages of Shorne, Cobham and Sole Street and also on the A226 via Higham to the A289

- Traffic will also be induced to travel from Gravesend East to the A2:A227 junction via Hever Court Road, Singlewell Road and Chalky Bank or by heading westbound on the A2 to turn back eastbound via the Gravesend Central junction. This “junction hopping” will further impact on the slip roads and roundabouts there, which are already very busy and the principal cause of traffic congestion on the A2 westbound in the mornings.
- The off-slip from the M2 westbound has an impractically tight curve.
- There is a new T-junction at Thong Lane which will be difficult for drivers to turn into and out of when trying to move against/across the dominant flow of traffic. Similarly, at Brewers Road on the north side of the A2, the existing T-junction with the A2 on and off-slip is already problematic. These layouts cause drivers to take risks and result in accidents through misjudgement of vehicle speeds and gap timings. They also result in queues on slip roads. Alternative, more functional and safer layouts are needed.

While we are already aghast at the land take and environmental impact of the LTC:A2 junction (including changes on both sides of the A2 from Gravesend East to M2 Junction 1), the overall outcome does need to be functional for local residents. We do not see why it would not be possible to redesign the layouts to restore the direct connections to and from the A2 at Gravesend East. At the Consultation Events it was said that Highways England might need to run a further mini-Consultation just about the A2 junction – that would be welcome as would prior discussion of any altered design proposals.

The Gravesend East junction must be redesigned to restore previous functions as regards the slip roads to and from the coastbound A2 and to improve traffic flows, accompanied by simplification of the layouts of the associated new two-way side road system. A facilitated crossing point for pedestrians will need to be added.

The new T-junction at Thong Lane and the existing T-junction at the Brewers Road north-side A2 on and off slips should be redesigned to improve traffic flows, movements and safety - these may require additional roundabouts.

2.4 FOOTPATHS, CYCLE ROUTES AND BRIDLEWAYS AFFECTED BY THE PROJECT; NON-MOTORISED USERS OF THE LTC

The proposed excavation of a very deep cutting severs Gravesend from its green lung and recreation area.

Footpath NG7 from Gravesend heading east to the five-ways footpath interconnection is one of the most used footpaths in the area, its proposed diverted route crosses over the tunnel entrance chasm by a long and very high footbridge, which will be unpleasant for walkers etc and dangerous for drivers below – it would need to be a high sided or caged design and therefore would be difficult to landscape in an advantageous manner.

NS174/167/169 and the cycle track are shown as passing through a tunnel, which is undesirable, and presently shown with an impractical sharp right angle bend. Both of these create safety hazards.

Bridleway NS174 has not been accommodated adequately. It needs to be linked up to other bridleways in an extended network.

This area is used recreationally by a variety of cyclists, both individually and in organised groups. We have two major national cycling routes crossing Shorne Parish: Route NCN 177 on the north side of

the A2, and Sustrans Route 1 along the Thames and Medway Canal northern towpath. In addition, the A226 is a UK historic "Tour de France" route which cyclists also follow.

Overall, the ambience of local footpaths, cycle routes and bridleways is being greatly reduced by the proposals. Several will have to cross the line of the new LTC motorway and use or cross assorted service roads and the two-way link road, which will all act as a discouragement to users.

The ambience of our very busy footpaths and cycle routes impacted by the LTC needs to be considerably increased over what has been presently designed. A continuous north-south footpath and cycle track should be provided on the west side of the line of the LTC. A continuous bridleway should also be provided, to create more of a bridleways network, and other opportunities should be taken to increase connectivity by NMU's.

There should be provision for non-motorised users, especially cyclists, to be able to use the LTC crossing as that would provide valuable additional routes between Kent and Essex.

2.5 CONSTRUCTION

We are unhappy about some aspects of the proposed construction site/processes:

- The plans show a construction compound north of the A226, between Church Lane and Castle Lane. This causes **concern about the nature of proposed activities in the Chalk part of the Construction Compound** and potential for consequences to fresh water flow and incidents of pollution to the North Kent Marshes SPA and the Ramsar Site.
- **Having the works compound split across the A226 could cause traffic problems** if traffic has to be stopped for plant etc to cross.
- Dewatering is shown near Chalk Church causing **concern about structural impact on the historic Church building**. The dewatering similarly raises **concerns about adverse effect on the water supply to the marshes** as does the drainpipe shown to be co-using an important supply ditch.
- The documents state that Thong Lane will be used for initial construction access – **use of Thong Lane is not suitable, possible or acceptable**.
- Where the construction compound abuts residential housing, particularly in the Thong Lane area, **protective bunds, fences and plantings must be put in place well before works commence**.

SECTION 3: TRAFFIC ISSUES

3.1 INCREASED TRAFFIC ON M2, WITH REDUCED SPEEDS

The proposals greatly increase the traffic on the M2 between junctions 1 and 3 and state that they will cause significant slowing of traffic, down to 48kph (from 94kph) eastbound between J1-2 in the 2026 core pm peak hour, 42kph in 2031, and 31kph in 2041. The M2 is supposed to be a motorway – speeds that low will cause traffic to queue back on all roads that feed into the severely constrained area, including the A2 and the Lower Thames Crossing itself. Rat-running will be induced along the eastbound service road and elsewhere. HE say that the capacity of the M2 up to J7 is adequate despite predicting an increase in AADT of up to 23,000, however increased HGV's needing to move up long inclines will disproportionately compromise traffic flows.

We fail to understand how slowing of traffic on the M2 motorway to the severe extent predicted can constitute a functional or successful outcome of the project. We reject the approach (as regards all roads adversely affected) that consequences of the project are outside of its remit. The

adverse effect of the project on M2 traffic flows and on other parts of the Strategic Road Network in Kent need to be taken into account and addressed prior to making the decision on viability and whether to proceed with the project.

3.2 EFFECT ON ALREADY COMPROMISED “A” ROUTES AND JUNCTIONS

Cross connecting routes between the M20 and M2 are already carrying increased traffic which is compromising their function, particularly the A228 and A229. The modelling predicts major increases in traffic on the A228 and A229 (5000 and 4000 AADT respectively) and it is hard to see how these roads and their junctions would be able to cope.

Traffic must be actively discouraged from using the A227 as an interconnecting route as, although an A road, it is in many places physically unsuitable to accommodate increased traffic especially HGV's.

The increased adverse effect of the project on the A227, A228 and A229 routes and junctions should be taken into account and addressed prior to making the decision on viability and whether to proceed with the project.

3.3 EFFECT ON LOCAL ROADS

The project information suggests that there will be increased traffic on local roads and again attempts to say that the theoretical capacities of the roads are adequate to take such an increase. However, direct examination of these residential and rural roads shows narrow sections and width restrictions, traversing of Conservation Areas, absence of pavements and verges, houses opening directly onto the roadway etc and that the roads are not in fact suitable to take additional traffic.

We are particularly concerned about the area around Shorne Woods Country Park as it is a recreational area used by local people and many thousands of visitors per year who are attracted to visit the area but who are not familiar with the traffic hazards they might expect to encounter. Footpaths open onto or cross busy roads that are also used by horses/riders, and individuals and groups of walkers, hikers and cyclists including children in organised (and disorganised) groups. To suggest that these roads are suitable to receive a significant increase in traffic flow (between 150% and 650% for Brewers Road/Pear Tree Lane) is not credible or safe.

Local villages and recreational areas need to be protected from safety hazards arising from increased traffic and rat-running. We do not consider it acceptable that the project plans to increase traffic through villages without also planning in suitable protective solutions.

3.4 TRAFFIC DATA AND TRAFFIC MODELLING

The traffic data used in these Consultation materials is already at best more than two years out of date although we know that traffic volumes locally have been rising by 2.5% per annum. We fail to understand how an accurate model can result from using outdated input figures.

HE has created what they consider to be the ultimate computer program for traffic modelling however other government guidance warns against such models: we noted with interest the discussion on the validity of using traffic modelling predictions to be found on page 23 of the Department for Transport's January 2018 Consultation document "Proposals for the creation of a major road network".

The specially developed model used in this Consultation might be the best and most modern available but that doesn't mean that it is predicting reality. The data is presented in a completely

different format from that in the 2016 Consultation, which makes comparison impossible. In some instances the data presentation seems chosen in order to mislead.

The modelling is supposed to predict what happens on the strategic road network at a regional level or higher and cannot predict with accuracy what will actually happen on individual links or local roads, yet that is where the impact will be most severe and where the success or failure of the project in practical terms will actually be determined.

The model considers journey cost to be the biggest influencer on journey decisions/traffic movements however we do not believe this to be true in the present day. It also does not take account of the human behaviour of drivers, e.g. use of adaptive sat-navs, preference to keep moving even if it makes the journey longer and more personally costly – most drivers do not ascribe monetary value to their time.

The model focuses on three example individual hours that are considered representative on a regional basis but we question the validity of this approach in an area that is non-standard (being the route to Dover, in close proximity to the major London orbital route and also to a very busy regional shopping centre which has different peaks of traffic flow and is proposed to be expanded).

The project focuses on putative relief to Dartford and the A2 west of the LTC but does not give sufficient weight to the harms that the project will cause. The LTC will also induce traffic from south-east London and Ebbsfleet to travel eastwards to the LTC, which will compromise function of the eastbound A2 to a greater extent than any imagined westbound relief. Many of these consequences are glossed over yet are critical to whether the project will succeed.

Some of the modelling outputs are vague with wide confidence limits, and some are subjected to adjustment factors, e.g. to get the results to cross check with air quality data, which should not be necessary if the data and model are robust.

We were disappointed that the local traffic data that we had been requesting since it was collected (October 2016) was not provided as part of the Consultation, as had previously been promised, and could not be obtained to assist ourselves and parishioners responding to the Consultation.

The traffic modelling should focus on and give consideration to the adverse effects in the receiving area of the LTC and not just on distant and imaginary benefits. Local traffic data should be published, as factual information we can see no reason why it should not be.

3.5 RESILIENCE

Providing increased resilience to the Dartford Crossing is supposed to be one of the core objectives of the project yet is barely mentioned in the documentation. For the first time in the proposals, there is mention of using gantry signage (and charging) to direct traffic however the proposals do not consider the likely routes traffic will take to get to the LTC, how impractical these are and the congestion and gridlock which will ensue.

At the Consultation events we were told that the project only considers average good scenarios and does not take into account what will happen in any bad ones. This means that the proposals and modelling does not include contingency planning, which is an inadequate approach.

All possible scenarios of contingency/resilience planning and modelling should be included in all future Consultation materials and taken into account prior to making the decision on viability and whether to proceed with the project.

3.6 OTHER TRAFFIC ISSUES:

- M25 J2 – **Improvements are required to enable traffic to get off the M25 clockwise** or traffic will be held up on the M25, which will encourage instead use of M26 and A227/A228 to reach LTC.
- Differential direction of tankers and other difficult loads. It has been said that tankers and other difficult loads might be directed to use the LTC rather than the Dartford Crossing. Tankers and heavy loads disproportionately hold up traffic and cause adverse effect on traffic flow. They would also have to get off the M25 and use the eastbound A2 to access the LTC or cross from the M20 to the M2. These manoeuvres would themselves cause increased traffic problems on approaches to the LTC and **the functioning of the A2/M2 should not be disproportionately compromised by tankers and heavy loads.**
- **Local housing etc developments are not adequately taken into account**, e.g. Rochester Riverside and in the Hoo area. Such is the scale of housing development locally, including all the Ebbsfleet Garden City development (and the continuing threat of the possible London Resort), that it reduces credibility of the predicted traffic figures and the interlinked air quality discussions.
- Overall, we consider that **local residents and North Kent as a whole will be left by HE to flounder with consequences of this project that are actually completely predictable** but being treated by HE as just not their problem and therefore not of interest.

SECTION 4: ENVIRONMENTAL ISSUES

The PEIR is clearly very preliminary indeed, it contains very little real information and in places just consists of descriptions of proposed work.

4.1 RAINFALL AND CONTAMINATED WATER RUN-OFF AND DRAINAGE

The data for rainfall that is presented relates to Heathrow. While the annual rainfall totals may be similar (this requires to be proved), the important aspect which has not been discussed as regards drainage of contaminated water from the road surfaces is about what is the maximum rainfall on a daily and periodic basis that must be accommodated by the drainage ponds without risk of contaminated water overflowing into the North Kent Marshes ecosystem. We have concerns as to whether the drainage ponds will be adequate in size.

Another issue is the particularly damaging effect of salt and other de-icer chemicals that might be applied in winter. As well as minimising road surface that will be collecting water (see next paragraph), consideration could be given to using heated road surfaces.

Extending the amount of cut-and-cover at the tunnel entrance and widening the “Green Bridges” has an advantage in reducing water gain by the road surfaces and therefore in reducing generated contaminated water volumes.

The plans show a discharge pipe to the Thames, it is not clear whether that is just during construction or permanently. It is unclear how water collecting in the lowest part of the tunnel is handled. We are concerned about contaminated water being discharged into the Thames where it can cause pollution to river waters and damage to marine biodiversity, which has greatly increased in recent years.

More thought needs to be given to minimising contaminated water gain by the road surfaces and to increasing the surge capacity of the treatment ponds, and to wider ecological consequences.

4.2 INTERFERENCE WITH WATER SUPPLY TO THE NORTH KENT MARSHES

The water supply to the North Kent Marshes SPA and the Ramsar site arises in the higher ground in the Shorne Woods Country Park area and intervening farmland, drains northwards into the marshes and then flows largely west to east. Many of the streams are seasonal, drying up in the summer, and some appear to be culverted. We note that streams were only looked for in August 2017 and September 2018, i.e. the driest times of the year when they would be at their lowest/driest.

One of the principal fresh water supplies is in a culvert that now runs south-east to north-west from Ifield Place to pass close by the west side of Chalk Church and continue onwards to the marsh ditches. We are very concerned that this should not be compromised. We are aware that water pressure testing studies are being undertaken, detail of these was requested but by the time of writing this information had not been supplied.

Better understanding is needed about how the fresh water supply to the marshes is provided as the project must not interfere in any way with these or it risks damaging the Ramsar site.

4.3 AIR QUALITY; WIND DIRECTION

The modelling on air quality is so complex that it has become impossible for the reasonably educated/intelligent layperson to understand. The overview document is very general, and the other documents are much too detailed but there is nothing in-between couched in wording to suit those who can understand more but who are not air quality experts.

The predicted figures appear to be based on outputs from the traffic model, which reconverts them to AADT rather than using actual AADT figures. Individual and highly varied adjustment factors were applied to individual major roads.

Given that the traffic model is only relevant at a regional level it must also be the case that the air quality modelling is also not accurate at local level yet the figures are held up to be true. We were told that factors like inclines and junctions have been included in the calculations this time but that requires to be evidenced, particularly on the A2/M2 east of the LTC where congestion is to be increased.

We know that some regulatory limits locally are already breached, hence local people find it very difficult to understand how the predicted figures are magically below limits. For local ancient woodlands, the project is apparently considered satisfactory because regulatory levels are already being breached, so making them worse does not matter, rather than the project being required to reduce the levels to pass figures. For “Nell’s Café”, we find it hard to believe that a currently breaching figure will improve – the project view is that this is because traffic on the nearby westbound A2 will reduce, however the adjacent junction at Gravesend East will be much busier as will the eastbound A2, hence a prediction that NO2 levels will fall is not regarded as credible.

It is a fact however that for some of the “receptors” a noticeable deterioration in air quality is predicted, for populations that currently have clean air.

As with other data in the documentation, the project relies on the “average” situation. For wind direction, the commonest situation is for wind to blow from the south-west, however the wind charts show that wind direction is actually highly variable. The 200m regulatory distance limit is only relevant on completely still days, on other days the distance that pollution travels is much greater - more often than average the air pollution will be blowing over the nearby Chalk Church and

Crematorium onto the North Kent Marshes and Ramsar site. On other days it will be blowing to leisure areas, schools and dense residential areas.

The air quality data needs to accurately predict local conditions and be better presented so that greater detail is understandable by average readers.

4.4 NOISE AND TRANQUILITY

The project will destroy the tranquillity of the area and, particularly depending on weather conditions, will cause dense residential areas to be subjected to noise pollution, including at night. Further detail and better noise contour maps are needed, also taking into account wind direction.

Better and more detailed, more realistic noise information is needed including more detailed noise contour diagrams.

4.5 LIGHT POLLUTION

The project will introduce light pollution in an area presently very dark. Lighting levels should be reduced during night hours and low height and shielded lighting used as much as possible.

Extensive use must also be made of bunds, fences, hedges and plantings.

The lighting of the turnaround route should only be of low height and only switched on when absolutely needed.

Light pollution must be minimised.

4.6 THONG VILLAGE LAND TAKE

Thong village is particularly badly affected by this proposal. Historically, it has been comprised of agricultural holdings including the post-WW1 model farms. Many of the residents keep livestock and horses, for which they need sufficient grazing and paddocks. Compulsory purchase of such land, even for mitigation, will affect local lifestyles and livelihoods so land use there needs to be very carefully planned.

The needs of residents of Thong Village need to be very carefully taken into account in the mitigation proposals.

4.7 VISUAL IMPACT; LANDSCAPING; MITIGATION MEASURES

The visual impact drawings are misleading as they do not show lighting, traffic cameras, road signs and gantries, electronic information signs etc. We note that two electricity pylons are shown as being moved closer to houses, this seems unnecessary and should be avoided if possible. It should be formally explored as to whether these cables could instead be buried underground while there is a construction opportunity.

We are disappointed at the proposed loss of the trees in the A2 central reservation and at the edge of Shorne Woods Country Park, which presently provide visual and noise screening.

Landscaping needs to be increased to further protect Thong and Chalk, and to screen the visual impact to and from the A226 and Chalk Church. This may require creation of raised ground/hills where there are none presently. While this will alter the historic landscape, we consider that mitigating the effects on the local residents is of paramount importance.

Areas of landscaped plantings must be permanent, with land ownership vested in bodies other than local authorities (who have unachievable housing targets) and with Planning Conditions imposed ensuring that the mitigation land is permanent and cannot subsequently be developed.

Extensive use of local-type hedging should be made, not just bare fencing as presently shown.

The landscape mitigation areas include some areas of existing valuable wildlife habitat including hedges and rough scrub, these should be retained as much as possible rather than being bulldozed and replanted. Areas such as the former chalk pit on Muggins Lane by Ifield Place need careful consideration due to roosting bats.

Plantings should as much as possible be of large/sufficiently mature trees and bushes rather than twigs that will spend decades struggling to grow.

Plans for mitigation need to be refined with greater detail and in more protective locations, with more mature trees and hedges. Mitigation areas must be safeguarded from future development.

SECTION 5: CONCLUDING COMMENTS

Highways England's latest version of their Lower Thames Crossing proposals will take a huge amount of land in Shorne Parish, land that is "Green Belt" and therefore supposedly protected from development. Parts of SSSI's and Ancient Woodland, and Shorne Woods Country Park are to be directly destroyed and the North Kent Marshes and Ramsar site are being threatened with pollution. The tranquility of the area will be permanently damaged as will the lives of residents by air, noise and light pollution and loss of/degradation of their clean air and recreational areas.

This project will cost billions of pounds yet will not solve the problems at the Dartford Crossing and in particular will be unable to provide practical resilience to the M25/A282.

The proposals will increase traffic on local motorways, A, B and minor roads. The adverse impacts on local villages and residents' lives seem to be recognised but are not being minimised or adequately addressed as an integral part of the project.

Traffic volumes are already too high in the North-West Kent area, particularly on the M2 between junctions 1 and 3, in both directions. There are already very large planned increases in residential and commercial building development (including at Bluewater and the possible London Resort) in the area which will further increase traffic. This proposal will then attract even more traffic onto the already congested A2 and M2.

Overall, we remain unconvinced that this area immediately to the east of Gravesend is the right location for a strategic crossing of the Thames that can achieve the (flawed) core objectives of the project or ultimately deliver a crossing that will actually work in practice. It would be the worst possible outcome should the destruction of our local environment be later proved to have served no useful purpose.

*Councillor Susan Lindley,
Chair of Planning and Highways Committee
On behalf of Shorne Parish Council
19th December 2018*