

Response ID ANON-7HFQ-MHQ9-N

Submitted to **Lower Thames Crossing consultation 2020**

Submitted on **2020-04-02 11:55:18**

South of the river in Kent

Q1a Do you support or oppose the proposed changes south of the river? Please refer to section 3 of the guide.

Strongly oppose

Q1b Please let us know the reasons for your response to Q1a and any other comments you have on the proposed changes south of the river.

Please let us know the reasons for your response to Q1a:

1.1 CPRE Kent responded to the 2016 consultation and those comments are summarised below:

1.1.1 We expressed the view that additional capacity at Locations A (exiting Dartford Crossing) or this location was unacceptable in terms of longer-term induced traffic growth, congestion and reduction in air quality. We have not changed our view.

1.1.2 We also made the following comments:

- Much of the traffic using the channel crossing has its UK origins or destinations in places remote from Kent, such as the Midlands. This results in the fundamentally unsustainable position of facilitating and encouraging the unconstrained growth of road-borne traffic and we suggested that full consideration be given to dispersing this traffic to other modes and ports of access.
- The piecemeal nature of the proposals, in that they paid scant regard to the longer-term consequences on the wider roads network.
- Post Opening Performance Evaluation (POPE) studies for new road schemes have repeatedly shown that new roads do not just relieve congestion but create and attract new traffic. This is confirmed by CPREs 2017 report 'The end of the road?' which is based on research by Transport for Quality of Life (TfQL) and examines whether road building: delivered the congestion and relief promised; damaged the landscape as much as feared; and boosted local economies as hoped. The research showed that road schemes:

- induce traffic often far above background trends over the longer term
- lead to permanent and significant environmental and landscape damage
- show little evidence of economic benefit to local communities

<https://www.cpre.org.uk/resources/the-end-of-the-road-challenging-the-road-building-consensus/>

- The proposals would have a particularly damaging impact on the environment, which include ancient woodland and Metropolitan Green Belt.

1.2 The Climate Change Committee have submitted annual Progress Reports to Parliament. A common theme has been the need to deliver car-km reductions. Our suggestion that alternative modes of transport especially for freight, such as rail, or ports of access would help support this approach:

1.2.1 The Climate Change Committee June 2016 Progress Report to Parliament at Table 5.1 'Transport sector recommendations for the Government's emission reduction plan' identifies that a "new policy" and "stronger implementation" are required for 'Domestic that National and local policies to reduce demand, sufficient to deliver car-km reductions of around 5% below the baseline trajectory, including through shifts to public transport, cycling and walking.'

<https://www.theccc.org.uk/publication/meeting-carbon-budgets-2016-progress-report-to-parliament/>

1.2.2 The Climate Change Committee June 2018 Progress Report to Parliament Key messages and recommendations for Transport on page 147 states "Opportunities to reduce demand for travel must be exploited. Demand reduction is generally highly cost-effective and has many co-benefits. Cities and towns can take the lead in encouraging sustainable travel choices, including walking, cycling and public transport, which can improve congestion, air quality and public health."

<https://www.theccc.org.uk/publication/reducing-uk-emissions-2018-progress-report-to-parliament/>

1.2.3 The Climate Change Committee July 2019 Progress Report to Parliament at page 84 states: "Overall our policy indicators for 2017, the last year of the second carbon budget, suggest there was limited progress in most areas outside of the EU ETS (Table 4.2):

- Transport. None of our high-level indicators were met. New car emissions, registrations of electric vehicles, uptake of biofuels, and distances travelled were all behind schedule."

<https://www.theccc.org.uk/publication/reducing-uk-emissions-2019-progress-report-to-parliament/>

1.3 The UKFIRES report Absolut Zero (Delivering the UK's climate change commitment with incremental changes to today's technologies) published in November 2019 sets out that for the UK to achieve zero carbon emissions by 2050 road use will need to be at 60% of 2020 levels - through reducing distance travelled or reducing vehicle weight; and that total energy required to transport food will need to be reduced to 60%. <https://ukfires.org/absolute-zero/>

1.4 There does not appear to be any consideration of the government's commitment to tackle the climate change crisis, nor the recent Court of Appeal ruling on plans for a third at Heathrow Airport (27 February 2020). These will need to be taken into consideration.

1.5 We have not changed our view and our response to this Supplementary Consultation should not be taken as support for the project. We are commenting on this Supplementary Consultation with the aim of reducing the impact on the environment and local communities.

1.6 Our comments are based on a reading of the publicly available Supplementary Consultation documents and discussions with HE staff and consultants at the Cascades consultation event.

1.7 We are concerned that not all the information is publicly available. It is therefore not possible to have a full understanding of the implications of the project, including local implications. For example:

- the limited nature of the Traffic Modelling update, including assumptions behind the traffic modelling are not available, and it therefore not possible to know if they are reasonable (see our response to question 7)
- the Hydrological Modeling Report is not available
- very limited details are available the Non Motorised User routes (see our response to question 3).
- Limited information on mitigation measures. Land is identified on the maps but no explanation given as to the use(s) they will be given to, or the impact on farm viability. (see our response to question 4).

1.8 It is clear from the documents and discussions that the project is still 'work in progress' and that there may be further changes. For example:

- we understand from discussions at the consultation event that further ecological studies are due to be undertaken. These may influence the design or have cost implications; and
- discussions are continuing with utilities providers and may result in changes.

1.9 We have concerns regarding NMU routes, environmental impacts, traffic modelling, climate change, construction and these are set out in our response to questions 3, 4, 5, 6, 7, and 8.

1.10 It is noted that there has been no update of the 2016 business case for the project. Not only has the scheme been amended but there has been a significant change in government view to climate change. Other updates, such as ecological studies are still to be undertaken and may affect the project design, including costs.

1.11 We are concerned that the business case does not give consideration to the cost of additional mitigation measures required beyond the scheme envelope, such as improvements to A2 in east Kent or the A227, A228 or A229, or the Tollgate interchange, nor any implications in Essex. This is surprising given that this is badged as a Highway England project. The project will require mitigation work to protect Kent residents which will also need to be taken into consideration. We are also concerned that the scheme may overestimate the benefits of the scheme (see CPREs 2017 report 'The end of the road?'). CPRE Kent considers that it is important that the business case is updated to give full consideration to these factors otherwise the true cost will be hidden.

1.12 We have serious reservations about the proposed reduction of the A2 eastbound from four to two lanes between Gravesend East Junction and Thong Lane as this will in our view create a pinch point increasing congestion and air pollution.

1.13 From the information available the scheme brings no benefits to Gravesham.

2. Revised development boundary

Q2a Do you support or oppose the changes to the proposed area of land that would be required to build the Lower Thames Crossing?

Strongly oppose

Q2b Please let us know the reasons for your response to Q2a and any other comments you have on the proposed changes to land that would be required to build the Lower Thames Crossing. This includes feedback on the impact the project would have on any land that you own or have another legal interest in.

Please let us know the reasons for your response to Q2a:

2.1 The extension to the red line boundary includes land around the southern tunnel portal and south of A2 including Ashenbank Wood, Jeskyns Community Woodland and farmland west of Henhurst Road, Ifield. The extension includes land for mitigation planting, land for temporary works or permanent retention for utility diversions.

2.2 We have concerns regarding land identified for mitigation and utilities. Our comments on these issues are set out at questions 4 and 6.

3. Walkers, cyclists and horse riders

Q3a Do you support or oppose our proposals for walkers, cyclists and horse riders?

Strongly oppose

Q3b Please let us know the reasons for your response to Q3a and any other comments you have on our proposals for walkers, cyclists and horse riders.

Please let us know the reasons for your response to Q3a:

3.1 We share the concerns about the Non-Motorised User (NMU) routes expressed by the Dartford and Gravesham Cycling Forum. More information is required on the NMU routes and should have been provided for the consultation. It is important that safe NMU routes are maintained during the construction phase.

4. Environmental impacts and how we plan to reduce them

Q4a Do you support or oppose the change to the environmental impacts of the Lower Thames Crossing?

Strongly oppose

Q4b Please let us know the reasons for your response to Q4a and any other comments you have on the environmental impacts of the changes to the Lower Thames Crossing.

Please let us know the reasons for your response to Q4a :

4.1 It is understood from discussion with the Ecologist at the Cascades consultation event that additional ecological studies are due to be undertaken this spring. This indicates that the environmental assessment update (EAU) is incomplete as it does not include the findings of these ecological studies. The outcome of these studies may well necessitate changes to the project, including the proposed utilities route, and require the EAU to be updated. We consider that this will require a further supplementary consultation prior to submitting the application.

4.2 Based on the information provided and discussion with the Ecologist at the Cascades consultation CPRE Kent has a number of concerns:

Shorne Country Park and Jeskyns Community Woodland.

4.3 These facilities were funded by public money and are publicly accessible. These are well used recreational facilities. CPRE Kent is concerned that the proposals will result in the loss of land at Shorne Country Park and that the northern part of Jeskyns Community Woodland, including the car park and café which is included within the development boundary. Every effort should be taken to limit loss at these locations.

Green bridges at Thong Lane and Brewers Road

4.4 The stated purpose of the Thong Lane Green Bridge (Environmental Impacts Update 2020) is to provide connectivity of woodland planting with substantial tree planting to benefit wildlife as well as providing access for walkers, cyclists and horse riders.

4.5 From the General Arrangement Plan Sheet 2 it would appear that the proposed green bridges are 35-40m wide. The Natural England Technical Guidance Note 09/2015 December 2015 states that 'Bridges aiming to achieve connections at a landscape/ ecosystem level should be over 80m in width.'

4.6 Given the purpose of the green bridges it is considered that they are too narrow to meet their stated purpose and will need to be widened.

Environmental mitigation

4.7 Whilst the maps identify areas for environmental mitigation there is no explanation about how the land will be used or the impact addressed in the Environmental Impacts Update. It needs to be remembered that land identified for mitigation is already open countryside has existing use(s) and provides habitats for existing wildlife, flora and fauna. Has the impact on these uses and wildlife been considered? Will additional mitigation be required?

4.8 We are concerned that land identified for mitigation includes land set aside as mitigation for High Speed 1. This land has already been used to mitigate one scheme and should not be used to mitigate this project.

Use of agricultural land for mitigation measures

4.9 Best and most versatile agricultural land is identified as potential sites for ancient woodland compensation at:

- West of Henhurst Road (Map book 1 at sheets 3 and 3b). The agricultural classification map shows the area as Grade 1 agricultural land.
- North side of Shorne Woods Country Park (Map book 1 at sheet 5). The agricultural classification map shows the area as Grade 1 agricultural land.

4.10 Grade 1 agricultural land forms the best and most versatile agricultural land of which there is a finite amount nationally. There does not appear to be any assessment of the impact of the loss of this land for mitigation purposes on the commercial viability of the farm holdings. This needs to be understood.

4.11 As mentioned at 6.4 once an ancient woodland is lost it cannot be replaced, only in 400 plus years-time will it qualify.

4.12 There is no information on impact on viability of farms where farmland will be used for environmental mitigation; for example: land west of Jeskyns Community Woodland. It will be important to ensure that farm viability will not be compromised.

Loss of Ancient Woodland

4.13 See our comments in question 6 at paragraphs 6.2 to 6.5.

Air quality

4.14 Our response to the 2016 consultation set out concerns regarding air quality and the need to take account of the April 2014 Court of Justice of the European Union ruling that the UK must act quickly to clean up illegal levels of air pollution.

4.15 The Guide to the Supplementary Consultation at Section 6 on Environmental Impacts states:

"Furthermore, the air quality modelling inputs, including scheme monitoring data and the vehicle emission factors and pollution background maps provided by the Department for Environment, Food and Rural Affairs, have been updated since the PEIR was undertaken. We are working to understand the effects of these changes and ensure the project complies with the National Policy Statement for National Networks."

4.16 The Royal College of Physicians report 'Every breath we take: the lifelong impact of air pollution' published in February 2016 "starkly sets out the dangerous impact air pollution is currently having on our nation's health. Each year in the UK, around 40,000 deaths are attributable to exposure to outdoor air pollution which plays a role in many of the major health challenges of our day. It has been linked to cancer, asthma, stroke and heart disease, diabetes, obesity, and changes linked to dementia. The health problems resulting from exposure to air pollution have a high cost to people who suffer from illness and premature death, to our health services and to business. In the UK, these costs add up to more than £20 billion every year."

<https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution>

4.17 The Royal College of Physicians Reducing Air Pollution in the UK Progress Report 2018 states that:

- 40,000 deaths a year are attributable to exposure to outdoor air pollution: 80,000 since our report launched.
- Air pollution is harmful to everyone. However, some people suffer more because they:
 - o live in deprived areas, which often have higher levels of air pollution
 - o live, learn or work near busy roads
 - o are more vulnerable because of their age or existing medical conditions.
- Air pollution has an estimated total social cost of £22.6 billion per year.

<https://www.rcplondon.ac.uk/news/reducing-air-pollution-uk-progress-report-2018>

4.18 Air Quality News in January 2020 referred to research by King's College London and Imperial College London which found that brake pad emissions make up a fifth of PM2.5 air pollution at roadsides. They also believe that brake pad dust could be contributing to coughs and colds suffered by Londoners. Non-exhaust emissions (NEE) are expected to rise from 7.4% today to 10% of all UK PM2.5 emissions by 2030, in part due to increased regulations on exhaust emissions as well the further take-up of electric vehicles (EVs).

<https://airqualitynews.com/2020/01/09/air-pollution-from-brake-pads-as-bad-for-the-lungs-as-diesel-exhausts/>

4.19 We find it disturbing that the effects of the proposal on air quality were not established prior to this Supplementary Consultation. These will need to be consulted on prior to submitting the application.

Public Rights of Way

4.20 Public Rights of Way (PROW) were assessed as part of the Preliminary Environmental Information Report (PEIR) Table 14.8. There is no update in the Environmental Impacts Update. We have concerns that the following PROW have not been included in the PEIR or the consultations: NS174 and NS 376, given their location near the A2 this will be needed.

Design of Lower Thames Crossing

4.21 The 2018 PEIR at paragraph 2.2.3 states:

"Currently, the main road of the Project between the A2 and the M25 is being designed as an all lane running motorway, with three lanes in each direction. An all lane running motorway is a high-standard free-flowing route, with grade separated junctions, and safety levels matching the highest standards of the network. The road will not have hard shoulders for most of its length but will have hard strips, emergency areas and technology providing lane control and variable speed limits. The same vehicle restrictions as on other motorways will apply. There will also be a rest and service area (RaSA) along the route of the Project (see section 2.20)."

4.22 At the Cascades consultation event CPRE Kent members were advised that the road will now be a 'Trunk Road' using smart technology. As far as can be seen this change in status is not set out in the 2020 consultation documents. Could you please clarify the situation and explain how this has been taken into account in the Environmental Impact?

5. Building the Lower Thames Crossing

Q5a Do you support or oppose our revised proposals for how we plan to build the Lower Thames Crossing?

Strongly oppose

Q5b Please let us know the reasons for your response to Q5a and any other comments you have on our revised plans for how to build the Lower Thames Crossing.

Please let us know the reasons for your response to Q5a:

5.1 At the 2016 consultation we expressed concern about the requirement for dewatering and the impact this would have on the marshes which have RAMSAR and SSSI status.

5.2 In the absence of the Code of Construction Practice it is impossible to assess the impact of the building works. We assume that it will be widespread and disruptive to the entire area. Whilst the statements of intent to limit dust and pollution to the immediate environment are noted it is not clear how this will be monitored or what process will be available to residents to highlight such problems and ensure compliance.

5.3 The Supplementary Consultation introduces the notion of the Ground Preparation Tunnel. This is an exception to the Preliminary Environmental Information Report which does not appear to have been specifically addressed in the Environmental Impacts Update. Since the Ground Preparation Tunnel is to be drilled under the RAMSAR protected wetlands, which may have potentially damaging effects, we are unable to assess let alone support the assessment of environmental impacts caused by the construction of the project.

5.4 More detail is required on how Non-Motorised Unit routes are going to be kept open and safe.

6. Utilities

Q6a Do you support or oppose our revised proposals for the utility works required to build the Lower Thames Crossing?

Strongly oppose

Q6b Please let us know the reasons for your response to Q6a and any other comments you have on changes to the utility works proposed for the Lower Thames Crossing. When responding to this question, please identify the section of utility works you are referring to.

Please let us know the reasons for your response to Q6a:

6.1 Whilst it is noted from the Utilities Update that the proposals are not finalised and work is underway to reduce working areas, minimise the environmental impact, and using the same corridors to combine multiple utilities CPRE Kent has serious reservations about the proposals set out in this consultation.

Loss of ancient woodland

6.2 It is noted that on page 10 with regard to Gas Works the Utilities Update states: 'Works are likely to use some open space at Claylane Wood, which would include clearing a portion of ancient woodland and we would maximise opportunities for replanting where possible.'

6.3 The National Planning Policy Framework February 2019 defines an ancient woodland as 'An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS).'

6.4 Ancient woodlands are a finite national resource and once an ancient woodland has been lost it cannot be replaced as any new tree planting would not provide the range and variety of habitat that has grown up in association with the woodland over a 400 year period.

6.5 The location and route of utilities can be change and in this case be rerouted to avoid areas of Ancient Woodland.

Shorne and Ashenbank Wood SSSI, Brewers Wood SSSI, and Claylane Ancient Woodland

6.6 It is understood from discussion with the Ecologist at the Cascades consultation event that additional ecological studies are due to be undertaken this spring. The outcome of these studies may necessitate changes to the proposed utilities route.

6.7 The two proposed utilities routes through Ashenbank Woods will result both in the loss and the fragmentation of this ancient woodland. The Gas diversion north of A2 will result in the loss of ancient woodland at Shorne Woods SSSI and Brewers Wood SSSI. Given that ancient woodlands cannot be replaced it will be important to avoid their loss and find solutions that do not impact on the ancient woodlands.

Jeskyns Community Woodland

6.8 CPRE Kent is concerned that the northern part of Jeskyns Community Woodland, including the car park and café, is included within the development boundary. The Utilities Update 2020 on pages 14 and 15 indicate that this is because two underground multi-utilities alignments are required. The Community Woodland is an important and well used community facility. The southern route continues on to Ashenbank Wood. Given the important community role played by the Community Woodland and the importance of Ashenbank Wood there is increased need to find a solution that protects both areas.

7. Using the crossing

Q7a Taking into account the updated traffic information included within the supplementary consultation, do you support or oppose the view that the Lower Thames Crossing would improve traffic conditions on the surrounding road network?

Strongly oppose

Q7b Please let us know the reasons for your response to Q7a and any other comments on how the changes to the Lower Thames Crossing would affect traffic conditions on the surrounding road network.

Please let us know the reasons for your response to Q7a:

7.1 Based on the published Traffic Modelling Update and conversations with Highways England staff at the Cascades consultation event CPRE Kent has concerns about the modelling in terms of the limited geographical boundary used and the data collected as this will influence the output.

The Traffic Modelling Update 2020

7.2 Figure 3.1. sets out the location of residential, employment and other developments used in the model. It is noted that significant development in East London that has been identified in the London Plan since 2011 has not been taken into consideration. For example:

North of the river Thames:

London Riverside: 16,000 jobs and at least 26,500 new homes.

South of the river Thames:

Bexley Riverside: 7,000 jobs and at least 4,000 new homes.

Thamesmead and Abbey Wood: 4,000 jobs and at least 3,000 new homes.

7.3 This scale of growth is likely to have implications for the strategic road network. Some of the firms providing these 27,000 jobs may well do business with Europe and use the Dartford Crossing, the proposed new Lower Thames Crossing and the A2/M2 corridor.

7.4 No consideration is given to or the development of logistics facilities along the M20 corridor serving the channel crossings and the additional traffic that this may generate nor to the expansion of Western Docks Dover. Given the location of the Western Docks to the A20/M20 traffic may be much more inclined to use this route rather than the A2/M2 corridor. This raises not only the question of the suitability of routes such as A227, A228 and A229 for this additional traffic but also the cost and who will pay.

7.5 At the 2016 consultation CPRE Kent expressed concern about the piecemeal nature of the proposals, in that they paid scant regard to the longer-term consequences on the wider roads network: These concerns have not been allayed and we remain concerned.

7.6 It is understood that the traffic modelling does not consider the effect of closure of the Dartford Crossing be that an incident on the approach roads to the Crossing (both north and southbound) or in the tunnels, or the closure of the QEII bridge due to high winds or an incident.

7.7 Essexlive indicates that since the beginning of the year:

- The QEII Bridge was closed for Storms Ciara and Dennis and were closed to traffic for 21 hours and 16.5 hours respectively. There was also an HGV breakdown and an abandoned car both resulted in closures, for HGV resulted in a 7.5 hours closure.
- There have been five accidents/incidents on the crossing approach roads leading to delays.

A look of this site indicates that there are incidents and closures throughout the year.

7.8 Climate change is likely to result in high winds during the winter period and could result in the length of delays experienced during Storms Ciara and Dennis. The modelling should consider the effect of such closure on traffic movement in north Kent and south Essex and in particular on local roads. Local evidence indicates that when there are delays on the M25 northbound traffic has a tendency to divert at junction 3 and use the A20/A225 route through Sutton-at-Hone. In such circumstances traffic using the M20 heading for the Dartford Crossing might choose to use the A227, A228 or A229. This needs to be understood to ensure that there is no adverse impact on communities along these routes.

7.9 The Update provides limited information and it is not possible to know if the traffic model makes reasonable assumptions about local roads, such as their width, nature (rural with high banks or hedges) or current traffic. This makes it hard to know if the results of the modelling are reasonable and will reflect what will happen and we have reservations about the results for local roads and the A227 as set out below:

7.9.1 Many of the local roads are rural in nature, for example Fawkham Road / Valley Road and Figure 4.10 shows that there would be a 10% to 20% increase in southbound flow in the AM peak at 2027.

7.9.2 The A227 is shown to have a 10% to 20% increase in southbound traffic during the AM peak and Inter peak. Is this due to traffic using the proposed crossing seeking to join the M20? It is not possible to understand if local roads such as this could accommodate the suggested increase in traffic at 2027.

7.9.3 The Traffic Modelling Update does not provide information of the impact on local roads such as Fawkham Road / Valley Road or the A227 at 2042. It is therefore not possible to know if this will have an even worse impact on local roads. This information is required to understand the full impact of the crossing.

7.9.4 Figures 4.1 to 4.9 graphically show change in flow between the Statutory Consultation and this Supplementary Consultation at 2017; Figures 4.10-4.12 the percentage change at 2027; and Figures 4.13 to 4.18 traffic volume as a percentage of road capacity at 2027. However, no information is provided on existing baseline traffic on local roads or their design capacity.

7.10 Table 4.1 sets out the number of vehicles per hour in the AM, Inter and PM peak hours. The paragraph following the table refers to daily traffic at the Dartford Crossing. It is not easy to understand the extent to which the new crossing will reduce traffic at the Dartford Crossing. The Table indicates that the reduction in traffic at the Dartford Crossing with the new crossing at 2042 using the Supplementary Consultation figures is in the order of 89% at the AM peak hour, 79% at the Inter peak hour and 82% at the PM peak hour. Applying these reductions to the predicted 182,400 vehicles per day on the Dartford Crossing at 2042 without the new crossing suggests figures in the order of 164,000 vehicles using the AM peak hour reduction, 144,000 vehicles using the Inter peak hour reduction and 150,000 vehicles using the PM peak hour reduction. These are similar to, or higher than, the 2016 daily figure of 147,100 vehicles. They are all significantly higher than the Dartford Crossing daily design capacity of 135,000 vehicles.

7.11 It is understood that the crossing will use smart technology. The Government announced a review of smart technology in October 2019. The outcome of the review may affect the design and cost of the proposed Lower Thames Crossing.

8. Other comments

8 We would welcome any other comments you would like to make about the Lower Thames Crossing.

We would welcome any other comments you would like to make about the Lower Thames Crossing.:

8.1 In our response to the 2016 consultation CPRE expressed the view that additional capacity at Locations A (existing Dartford Crossing) or this location was unacceptable in terms of longer-term induced traffic growth, congestion and reduction in air quality.

8.2 Since then climate change has become an important issue. On 12 June 2019 the Prime Minister announced that the UK will eradicate its net contribution to climate change by 2050. A statutory instrument was laid in Parliament which amended the net UK carbon account target from 80% to 100% (The Climate Change Act 2008 (2050 Target Amendment) Order 2019: 2.—(1) Section 1 of the Climate Change Act 2008).

8.3 The recent Court of Appeal ruling on plans for a third airport at Heathrow airport ruled that they were illegal as ministers did not adequately take into account the government's commitments to tackle the climate crisis.

8.4 In the light of this it will be important that the project complies with the legislative provisions concerning Government's policy and commitments on climate change.

Implication of scheme for other roads in Kent

8.5 We also expressed concern about the piecemeal nature of the proposals, in that they paid scant regard to the longer-term consequences on the wider roads network. The proposals do not allow for any additional mitigation measures in Kent beyond the immediate confines of the scheme that will be required. See also our comments to Question 1 at 1.10.

Cost of the scheme

8.6 There is no publicly available business case update. This is a serious shortcoming. We have serious reservations that the scheme will not be value for money when the final cost of the scheme, including mitigation measures, additional road improvements elsewhere in Kent and Essex, impact on local communities. See also our comments to Question 1 at 1.9-1.11.

A2 Watling Street

8.7 The A2 generally follows the line of the Roman Watling Street. There is the possibility of archaeological finds either side of the Roman Road, items discarded or lost by travellers. This does not appear to have been considered in the PEIR. Has KCC Archaeological Unit been consulted on potential archaeology and how this should be identified and safeguarded?

9. The consultation

9 Please let us know your views on the quality of our supplementary consultation materials, our events, the way in which we have notified people about our plans, and anything else related to this consultation.

Please let us know your views on the quality of our supplementary consultation materials, our events, the way in which we have notified people about our plans, and anything else related to this consultation. - Q9a. Was the information presented clearly and easy to understand?:

Very poor

Please let us know your views on the quality of our supplementary consultation materials, our events, the way in which we have notified people about our plans, and anything else related to this consultation. - Q9b. Were the events of good quality?:

Very poor

Please let us know your views on the quality of our supplementary consultation materials, our events, the way in which we have notified people about our plans, and anything else related to this consultation. - Q9c. Were the events suitably located?:

Poor

Please let us know your views on the quality of our supplementary consultation materials, our events, the way in which we have notified people about our plans, and anything else related to this consultation. - Q9d. Was the consultation promoted well and:

Average

Q9e Please let us know the reasons for your responses to Q9a – Q9d and any other comments you have on the delivery of this consultation.

Please let us know the reasons for your responses to Q9a – Q9d:

9.1 The consultation documents and exhibition boards do / did not provide the information necessary to support the consultation and enable CPRE Kent and its members understand not only what is being proposed but also what its impacts might be and the cost.

9.2 The Cascades consultation event was confusing as there was no explanation of how the event was being run. Whilst there were a large number of staff they did not have badges to show their expertise. You had to ask who were the experts in a particular subject and then find them. It would have been helpful if staff had been allocated to specific tables, such as traffic, environment etc. As a result it took a long time to find the right people, wait for them to be available before asking your question(s).

9.3 Significant design changes, such as the restriction of the A2 to 2 lanes, are not specifically mentioned in the January 2020 Guide to Supplementary Consultation and were only clearly evident when shown on the A1 sized maps displayed at the exhibition.

9.4 Whilst we appreciate the reason for not running the final consultation events we are concerned that people who wanted to attend and speak face to face with HE staff and consultants have not had the opportunity. Whilst two days were set aside for telephone consultation there is no knowing how many were unable to get through or were put off.

Identification questions

1 Name

Name:

Mr P Buckley

2 Address

Address:

Queen's Head House
Ashford Road
Charing
Ashford
Kent

Postcode**Postcode:**

TN27 0AD

3 Email address

(If you provide an email address we may use it to let you know about important developments in our proposals.):

paul.buckley@cprekent.org.uk

4 If you are responding on behalf of an organisation, business or campaign group, please include the name below. (This helps us to understand whether respondents can be categorised as 'prescribed consultees', as defined by the Planning Act 2008.)

Name of organisation:

CPRE Kent The Countryside Charity

Type of organisation, business or campaign group:

Campaign group, Environment, heritage, amenity or community group

Other (please state)

Other (please state):

5 Do you own land or hold any interests or rights, such as private rights of way or sporting rights, within or close to the revised red line boundary?

No

If you have ticked yes, have you received a letter to notify you of the consultation?

Not Answered

6 If you use the transport network in the area that may be affected by the Lower Thames Crossing, please tell us how you travel by ticking one or more of the following boxes:

7 Please let us know how you heard about this consultation:

Received an email from Highways England, Word of mouth

Other (please state)

Other (please state):

Equality and diversity

I consent to Highways England processing my special category data for the purposes of understanding the accessibility of the Lower Thames Crossing consultation. I have read Highways England's privacy notice and understood how it will be processing this data.

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No

1 What is your gender?

Not Answered

2 Do you consider yourself as a person with a disability?

Not Answered

3 Please describe your ethnic background:

Not Answered

4 Age

Not Answered