



**Summary  
of  
Written Representation  
of the  
Kent Downs AONB Unit**

**APPLICATION BY NATIONAL HIGHWAYS FOR AN ORDER  
GRANTING DEVELOPMENT CONSENT FOR THE  
  
LOWER THAMES CROSSING PROJECT**

**Submission Deadline 18<sup>th</sup> July 2023**

**KENT DOWNS AONB UNIT - Unique Ref 20035310**

**Enhancing landscapes and life in the Kent Downs**

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.

The Project impacts on land within the Kent Downs AONB, as a result of major proposed works to the A2 for a length of approximately 2km as it passes through the AONB and also on the setting of the AONB immediate setting, due to the proximity and scale of the new road leading to the tunnel and multi-level junction connecting the proposed link road to the A2.

National policy is clear that major development, including major road building/widening should be refused consent in AONBs, except in exceptional circumstances and where it can be demonstrated that it is in the public interest to do so. Assessment of this includes a requirement to consider alternative solutions that do not impact on the designated area. The AONB Unit considers that alternative routes at locations A, B and E that avoided AONB impacts were discounted too readily and before the impacts on the AONB were known. AONB impacts only became apparent once the route choice was finalised with the need to increase the capacity of the A2 and relocate utilities adjacent to it, requiring the widening of a 2 km section of the A2 through the AONB with associated loss of Ancient Woodland and SSSI habitat. It is also the view of the AONB Unit that alternative options for relocating utilities which would have less impact on the AONB have been too readily discounted.

Impacts to the AONB arising from the Project include:

- The proposed widening of the A2 corridor from 8 to 14 lanes for a length of approximately 2 km as it passes through the AONB, to provide 4 lanes of traffic in each direction plus hard shoulders and the creation of new, two lane connector roads provided on either side of the realigned A2, increasing the width of the highway to 21 lanes at its western end, resulting in the erosion of the landscape and visual quality of the AONB.
- The removal of extensive areas of existing vegetation along the A2, including a belt of mature trees that currently separates and screens the east and west bound carriageways from each other and loss of mature trees from both sides of the highway including removal of establishing vegetative mitigation for HS1, opening up views of the transport corridor and reducing the current wooded context within which it sits.
- Relocation of utilities adjacent to the A2 carriageways, resulting in inability to provide replacement planting along the utility corridor, further opening up the landscape and reducing the current wooded context of the highways corridor.
- Physical and visual severance of the AONB to the north of the A2, further isolating Shorne Woods from Cobham Parklands and Ashenbank Wood to the south as a result of the widened corridor.
- Direct loss of ancient woodland, and loss of habitat from the woodland within Shorne Wood SSSI.
- Reduction in tranquillity during construction and following completion of the scheme from noise and increased lighting.
- Visual intrusion on the setting of the AONB as a result of the complicated, multi-level junction with the A2 and dual three lane highway adjacent to the AONB.

- Revised access arrangements to the Harlex Haulage Depot resulting in further encroachment into a currently undeveloped part of the AONB which has high landscape character and value.
- Indirect impacts including:
  - traffic displacement impacting on roads elsewhere in the AONB, resulting in tranquillity impacts from noise and lighting and a shift in traffic heading southwards into Kent, including Dover Port and Channel Tunnel traffic, with increase in traffic using the A229 (Bluebell Hill) and choosing the M2/A2 over the M20 and subsequent likely requirement for increased capacity to be provided on major routes within the AONB that link the M2 and M20, such as the A229, Bluebell Hill and A249;
  - impacts to the biodiversity rich habitats of the AONB as a result of nitrogen deposition with a lack of equivalent compensation sites proposed in the AONB.

The Kent Downs AONB Unit considers that the impacts from the Project on the AONB are underestimated in many instances in the Environmental Statement, Chapter 7, as well as in the Planning Statement and its Appendix F. It is notable that the assessed level of impacts are downgraded, significantly in some instances, from the Environmental Statement accompanying the 2020 DCO submission and the current version, despite no significant change in the scheme and with no justification for the change provided in assessment.

In the event of the principle of the Project being found acceptable, the AONB Unit is concerned that much of the detail of the scheme is proposed to be deferred to the post consent 'detailed design stage'. While it is proposed to use Control Documents to help secure appropriate design and mitigation, we have concerns that the documents are not sufficiently robust in their requirements and leave too much discretion to the appointed contractor(s) which could have significant detrimental consequences. It is not considered appropriate to defer so much detail given the need for an exceptionally sensitive and well-designed scheme south of the river due to the site's location within and adjacent to the nationally protected Kent Downs AONB.

It is also the view of the AONB Unit that the beneficial effects of proposed mitigation are overstated in the submission and that the proposed mitigation and environmental enhancement package within the AONB fall short of what is required and do not adequately moderate the significant levels of harm identified to the Kent Downs. Should the principle of the Project be found acceptable, it is considered that additional mitigation measures at a landscape scale need to be provided within the AONB. Commitments to compensation for harm to the special qualities of the AONB also need to be secured, in line with requirements of the Kent Downs AONB Management Plan and to help ensure compliance with national policy requirements for conservation and enhancement of the AONB.



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17 July 2023