

18 July 2023

Planning Inspectorate

Dear Sir

**Higham Parish Council - Lower Thames Crossing
Written Representation – ED1 July 18th**

As a Statutory Consultee, Higham Parish Council have agreed a SoCG with NH, submitted as part of their application and to which reference should be made for our ground of objection. As requested, HPC have also produced a PADS.

Route Options – Why Option A14 not consulted on

HPC disagree with the chosen route. The first significant consultation on the Lower Thames Crossing (LTC) was in 2016. The consultation was limited to three Options: Option A, being two new tunnels/bridges parallel with the existing Dartford crossing, with no new roads or widening of the M25/A282; Option B, being a crossing from the Swanscombe Peninsular across the Thames, which was rejected because of the then current Theme Park proposals; and Option C, the subject of the current application, which had two proposed routes south of the river, with the most sensible route chosen. HPC understand that Option A was rejected as, inter alia, it did not produce the reduction in pollution and required improvement in air quality at Dartford. It is important to note that the option which would produce such benefits was not the subject of consultation, this being a 'long tunnel route' allowing M25 through traffic to bypass the existing crossing all together by leaving the M25 between junction 3 and 2 and rejoining, as per the current proposals, between junctions 30 and 29. HPC have heard this option referred to as Option A14, although it has nothing to do with the A14 road. The benefit of this route is that it achieves the objective of removing traffic congestion and pollution from Dartford and maximises the current investment in road infrastructure through Kent from the Channel Ports. As set out below, the current proposals will necessitate significant upgrading of various roads through Kent at a substantial additional cost not identified to date (or at least not made public).

https://data.parliament.uk/depositedpapers/files/dep2017-0295/long_tunnel_at_Location_A_option_a14.pdf

The above document summarising the long listing options – in this case for Option A14 quotes that:

- The cost would be £6.6bn.

- £1.4 bn less than the current proposal and £1.6 bn if including the £199m quoted by KCC for the cost of the A229 Bluebell Hill improvements.
- The capacity would be 8000 vehicles per hour – expected traffic 3700 per hour.
- Direct connection from A2 (and Jn 30 and 31) would not be provided – but connections can be achieved via M25 J3 and M25 Jn 31.
- During meeting with Graham Stevenson from NH (Applicant) on 17/07/23 indicated that Option A14 would reduce traffic impact by 18% from current Dartford Crossing. This is also shown in table shown below. The current DCO is forecast to reduce traffic by 19% having fallen from 22%.
- The table below shows that with the implementation of the Option A14 that whilst Dartford crossing impact reduces by 18% the through flow for the combined crossings increases by 27% on corresponding route of Southbound P.M. peak journey. The diagram on page 3 of the above document reflects the following information.

		Current M25		Option 14		Total		Example Differences	
		South/North	North/ South	South/North	North/ South	South/North	North/ South	North South reduction in PM	North South increase PM
Without Scheme	AM	4797	4977			4797	4977		
	PM	5020	5852			5020	5852		
With Option 14	AM	4544	4061	1948	1421	6492	5482		
	PM	4801	4770	2060	1673	6861	6443	18%	110%

Option A14

Table below taken from article on LTCA.org.uk. Note should be made in reduction in carbon emissions, reduction in accidents, reduction in land take etc.

	Option C3	Option A14
Cost	£4.1 - £5.7Bn (Southern Links)	NO Official Figure issued
Construction Period	Opening 2025-2027	Opening 2025-2027
Road Length	13.3 Miles	~7.5Miles
Installed Capacity	70% increase	Matches M25
Expected A282 Reduction	14%	40%
Blighted Homes	14 Residential, 22 Traveller Plots & 3 Agric (HE Info)	Minimal
Green Belt use (ha)*	350 to 452	Minimal
Overall Impact on Landscape	Largest Adverse Impact	Least Adverse Impact
Number of SSSI Areas	Scheduled Monument	None
Effectuated Floodplain	Tilbury Marsh	None
Neg. Impact No. AQM sites	1 (Tilbury)	None
Detour Distance Back to M25	~10Miles	None
2041 Expected Conditions on the A282 (exiting crossing)	90% of capacity - Often Queuing	75% or less very few queues
Greenhouse Gas Impact (60yr Period)	Increase 1,300,000t	693,000t reduction
No. of Accidents (60 Year Period)	Increase 60,000-62,000	Increase 26,000

*ha = Hectare = 100m² or ~ 2.47 Acres

The information provided in this chart has been extracted from the 2016 Highways England Consultation Pack. Found here <https://highwaysengland.citizenspace.com/cip/lower-thames-crossing-consultation>

Impact on A226 – Village of Higham

The LTC is predicted to cause a significant increase in traffic along the A226 in the parish both during construction and once operational; to the detriment of residents trying to leave the village via uncontrolled junctions, as well as those living along the road (some of whom have to reverse onto the road) from their driveways and a school.

The A226 is within the DCO Order Limits but there are no proposals to do any improvement works currently, in order to keep it safe.

Construction traffic using A2/A289/A226

It is currently proposed that construction traffic for plant, machinery, materials including concrete, and staff access the construction compounds and site via the A289/ A226 a one-way journey of an additional 8 miles. HPC propose that this should be banned, and construction traffic should access the site via the A2 and the proposed haul roads.

Unsuitability of A226 at Higham

The A226 is generally suitable for HGV and increased traffic levels, but not at the Forge Lane/Gads Hill School junction. The A226 at this junction for Higham Village is narrow,

dangerous for cars turning out of Forge Lane and out of Crutches Lane both onto the A226, for cyclists (as the cycle path ceases) as well as for school children crossing the A226.

Gads Hill School. Gads Hill, the former home of Charles Dickens, is a grade one listed house; as are the front wall and the path dug under the A226 by Charles Dickens. The A226 cannot be widened at this point due to Gads Hill.

It is unclear at this time whether the path and steps under the A226 would support the weight of a significant number of additional HGV's passing overhead. Gads Hill is not referenced under Built Heritage in the Community Impacts Report.

Traffic blockages in Higham

Any delay in traffic egressing and entering Higham Village via Forge Lane and Gads Hill School/Crutches Lane will cause significant disruption in Higham village. The village will become gridlocked. There are no suitable alternative exits from the village.

Proposal

HPC propose that construction traffic is banned from utilising the A289/A226 and that construction traffic access the construction compounds and south portal site area via the proposed haul roads. Currently NH have stated that the haul roads will be utilised only for earth movements and not for movements of construction plant, machinery, materials (concrete) and staff. Utilising haul roads would reduce climate impact, noise, vibration, fuel economy, nitrogen deposition and effects on ancient woodland.

Alternative Proposal

In the event, that the above proposal is not implemented, HPC request that Examination requires the layout of the Forge Lane/Gads Hill School junction to be reviewed and revised. HPC request that data is sought now, to ratify the concerns. The data then to be used to consider alternative layouts (i.e., inclusion of traffic lights or roundabouts) and that these also be trialled in advance of the LTC construction traffic commencing. HPC have requested ExA to perform an ASI in September 23.

NH/Applicant have acknowledged on a site visit in July 23 that the junction is a significant pinch point. Verbally they have indicated that traffic lights would be required to mitigate issues. This does not provide solutions for Non-Motorised Users (NMU). The cycle path ceases, the pavement closest to Gads Hill School is less than 1 metre and reduces to 0.8m and is sloped due to tree routes and is unsuitable for disabled or older person use. There is no provision for equestrian use.

The main exit from the village is Forge Lane, which has a narrow, right-angle junction with the A226 with no splays because of the constraints, necessitating larger vehicles (including pick-ups) turning left to use part of the turn right lane on the A226 for westbound traffic wanting to access the main part of the village. Vehicles also regularly drive over the

pavement for the same reason if they cannot swing wide onto the A226. NH and HPC observed this on joint site visit on 10/07/2023 with every vehicle either driving over the pavement or breaching the line of the right hand filter lane when turning left onto the A226.

6.2.8 of the Ward Impact Summary – Chapter 2 Higham. “The area of the Order Limits along the A226 Gravesend Road is required for road-widening to accommodate construction traffic using this road to access construction compounds and ULHs to the west”.

As described above, whilst this is NH’s stated plan there is insufficient width in the road to enable widening. Mitigation measures, to ensure safety of all users, motorised and non-motorised, need to be committed to. At the present time NH state that they cannot commit to measures as this may be subject of detailed design of Contractor. HPC however would like a commitment to be made to be made to implement mitigations, in the event, that construction traffic does use the A226 (haul roads direct from the A2 are the preferred option) prior to approval of the DCO such that HPC (volunteer, lay personnel) do not have to keep fighting for this with more and more NH and contractor personnel.

Ward Impact Summary Chapter 26.2.9 “A small area of Higham ward within the Order Limits in the south-west of the ward would be needed to construct the revised A289 to M2 southbound slip road that would align with the widened section of the M2 and to complete minor modifications to existing utility networks.” HPC would like clarification on this matter.

Rather than using the A226, the original construction proposals incorporated a 'haul road' from the A2 to serve all construction sites south of the Lower Higham Road. HPC want to see these proposals reinstated.

Opposite Forge Lane is Gads Hill House, formerly the home of Charles Dickens and a Grade 1 Listed Building. [The full list description on the Historic England website is "Walls of red brick with string course below parapet. Slated Mansard roof with central octagonal bell turret with ogee shaped lead roof, ball finial and weathervane. Sash windows without glazing bars. Projecting porch with columns and pilasters and round-headed entrance door with fanlight. On either side 2-storey 3-sided bays with cornices to each storey. Central first floor window with 3 lights and elliptical arch to centre light. To the south-east the dining room was extended, and a large conservatory added by Dickens. Rear much altered and built out, but an original doorcase with pilasters, pediment, and semi-circular fanlight, stone steps and wrought iron handrail. Internally Dickens' study is preserved as he left it with comical invented book titles in a sham bookcase on the door and original bookcases lining the walls. The staircase has had alternate balusters removed and fretwork panels inserted. Hans Anderson stayed at the house in 1857. Dickens built a tunnel beneath the main road to give access to an extra garden where he erected a Swiss chalet now in Rochester Museum."] Within its curtilage, and forming part of the description is a foot tunnel under the A226. This tunnel is currently closed, HPC understand, for safety reasons. This tunnel and garden form the constraint on widening the end of Forge Lane. Gads Hill Place is currently

used as part of a school. Although the school has a large car park for the use of parents off Crutches Lane, a lot of parents stop on the A226 near the school to drop off children because of the difficulties of exiting Crutches Lane, particularly when turning right, at busy times. Children who walk to school have to cross the A226 to get to school from the village. The proposals, both during construction and once operational involve a lot of additional traffic using the A226. No consideration appears to have been given to the safety of users of this road, the inadequate cycle lanes (which are only separated by a white line from other vehicles, despite the 50mph speed limit) residents accessing their properties, pedestrians crossing the road to get to/from bus stops and children going to school. As a minimum, HPC would consider physically separated cycle lanes (the tarmacaded area is wide enough having originally been built as a 4-lane road) and traffic light control at the Forge Lane/Crutches Lane crossroads, incorporating pedestrian crossing lights. Similarly, the pedestrian tunnel under the road should be investigated to ensure that it is of sufficient strength to take the additional traffic.

The traffic model shows traffic volumes changing along the A226 at the point where there is the emergency access to the tunnels which HPC are told cannot happen. This and the predicted increases on other unrelated roads e.g., the Lower Higham Road (Chalk)/Lower Road (Shorne), and Chalk Road and Lower Rochester Road (Higham), which are mainly less than 5 metres wide, causes us to question the traffic model. Increase in traffic on other narrow rural roads is also predicted.

A2 /A289

The design of the junction between the A2 and LTC needs further consideration.

Further to meeting with NH technical Lead on 17 July 23 and having reviewed engineering drawings and flythrough video, and further to HPC statement at OFH1 HPC wish to further identify the following:

Elevation and pictorial drawings for the various junctions would be helpful to increase understanding of the impact of the junction changes.

4 lanes to 2 lanes

In 2008, a section of the A2 beside Gravesend was widened to 4 lanes between Swanscombe/Ebbsfleet to Cobham. It was also rerouted away from the houses of Gravesend/Singlewell to make room for the new lanes and reduce the amount of noise and pollution from the widened roads.

M2 was widened from 2 to 4 lanes opening in 2003 between Junction 1 and 3.

The M2 jn 1 (and 2)/ A289/A2 are the major exit points for traffic from the Medway Towns (pop 280,000) and Gravesend (pop 60,000) conurbations for commuter traffic to the M25 and London. The above roads have recently been widened to achieve capacity for this traffic and there are still currently commuter traffic delays.

The A2 is the major road and major SRN into and out of London in the southeast. This traffic will not cease with the introduction of LTC.

Please explain why having expanded the M2 and A2 to 4 lanes to provide relevant capacity, that now, with additional traffic due on the road due to rerouting of M20/M25/Dartford Crossing traffic that a reduced layout is needed.

NH in meeting 17.07.23 indicated that as A289 was 2 lanes and M2 was 2 lanes that this in essence constitutes the road remaining at 4 lanes. It must be noted though that between LTC exit and Marling Cross the M2/A2 does become 2 lanes through this section.

Lengthening of A289 entrance and exit from A2.

The A289 London/westbound enters the A2 some 4.2 miles distant (and in reverse) In the event of an incident there is no ability to reroute on this length. Consideration should be given as to the impact of heavy traffic or incidents on the A2/A289 or A122 particularly in AM peak.

Whilst HPC appreciate that there is a north bound exit to the A122 from the A289 – it asks that consideration be given to whether it is better to segregate the A2 from Medway and A289 traffic onto the A2 at Marling Cross and not allow a direct entrance onto the A122. This is due to any incidents on the A122 would then impact A 289 and Medway and Gravesham residents adversely – whereas a route onto the LTC from Marling Cross and coming back Eastbound may be a more judicious solution and protect the flow for the majority of commuters.

Reference Point iii) of NH response in HPC SoCG to point 2.1.5. Can NH detail why LTAM was built specifically for the Project? How does it differ from other NH project modelling, what modelling was used to warrant widening of M2 and A2 to 4 lanes, and what has changed.

The reduction of lanes from 4 to 2 between M2 Jn1/LTC and Marling Cross both east and West will create bottlenecks for congestion and incidents at the LTC junctions. 2016 NH Consultation pack indicates an increase of more than 1000 accidents per year.

A2 Journey Times

Congestion is currently experienced from M2 Jn1/A289/Cobham to Swanscombe/Ebbsfleet in the A.M. and P.M. peak times.

A journey from Higham to Ebbsfleet International train station that should take 14 mins with no traffic, takes on average 16-35 mins, according to Google maps at 7.30 a.m., and can be significantly longer when incidents occur. Reducing the number of lanes at Cobham and the added pressure of traffic moving onto the LTC is in HPC view to make this worse.

A2 and A289 Journey Times

APP-522 Combined Modelling and Appraisal Report - Appendix C - Transport Forecasting Package TR010032-001348-7.7 Combined Modelling and Appraisal Report - Appendix C - Transport Forecasting Package.pdf (planninginspectorate.gov.uk)

In table 8.14 Journey times are shown as follows

Direction AM Peak	DM Time Mins	DS Time Mins	Reduction Mins	Reduction %
I to D M2 Jn1 to M25 Jn 2	17.5	12.7	-4.8	-27.3%

For this journey in AM peak Google reflects 14 mins to 31 mins. It is unclear to HPC whether improvements will be made on these actual average times. Also, whether the actual journey that Medway residents will make, from say, A226 roundabouts at A289 to M25 Jn2 will actually be reduced. (It is not possible to join the M2 at Jn1 from A289 or Strood A2 London Road)

Table 8.20 does not show the journey time from point 7 to point 11 (Bexley/A2 coastbound to Rochester) and therefore it is unclear whether the total commuter journey for Medway and Gravesend populations of 340,000 will be improved driving toward and from SE London/Blackwall tunnel.

Marling Cross Eastbound

Gravesend East jn Coastbound is normally backed up to the next junction at PM Peak already. This Junction will in addition become an alternative route for increased traffic going into LTC in the event that the single lane Northbound into the tunnel becomes backed up.

The complexity of the Marling Cross will be further hampered by the collector road for the A289 west bound also planned to commence significantly earlier as the A289 currently commences over the brow of Cobham Hill.

M2 Bridge to LTC – Steep Ascent

The ascent of Cobham Hill to the LTC north bound is also very steep and the junction will be just over the brow of the hill. It will be difficult for drivers to easily assess which lane to be in as the junction will be blind. This will impact not only traffic coming from M2 Jn1 but also the merging traffic from A289. When A289/A2 becomes blocked traffic diverts to A226 which becomes gridlocked. (How does A226 get into Gravesend when A122 constructed and operational).

A2 Sun

Both directions of A2 will be significantly impacted by sun, particularly in the winter months as the route is directly east/west and is blinding at commuter times. This is exacerbated by the steepness of the hill approaching the LTC exits. It is likely to create weaving and increase incidents.

This will increase congestion and incidents at A289/Cobham/A122 and Marling Cross junctions. It will make assessment of correct lane routing difficult. Signage will be difficult to read particularly when cresting the brow of the Cobham Hill London bound.

Route Monitoring

Reference Point iv) of 2.1.5 of SoCg HPC. Due to the layout of the a2/A122 at Cobham and Marling Cross there would be no opportunity to widen the road and increase lanes available for the A2 post construction as there is insufficient width to amend lane layout (particularly with no hard shoulder) and due to the complexity of the layouts and close proximity of junctions and roundabouts and ancient woodland.

Hard Shoulder

The new road, like the A2, is being built to motorway standards and, like the A2 and the A282 should have a hard shoulder and not just the 1 metre wide strips on either side of the carriageway required by an All Purpose Trunk Road.

Brewers Road

HPC request the closure of Brewers Road bridge for 19 months is reconsidered.

It needs to be remembered that the A2 is not a motorway or a restricted road and takes all types of traffic including agricultural vehicles, although cyclists tend to use either the hard shoulder or the footpath on the north side. The closure of Brewers broad Bridge for 2 years will disrupt agricultural and school bus provision.

HPC propose that the new green bridge be constructed prior to demolition of the existing Brewers Road bridge – or that access to the Park Pale bridge is given to retain connectivity over the A2 to Cobham.

Closure of this bridge will significantly restrict access to Shorne Country Park a key recreational facility for 340,000 people. The key route to access it would become Pear Tree Lane – which is not wide enough to accept more than two cars side by side (any vans side by side block the road) and is not suitable for cycle, walking and horse traffic.

WNIP – Particularly A229/M2/M20 Bluebell Hill Improvements needed.

If the ExA decide to confirm the proposed LTC route, then the necessary improvement of roads leading to the LTC need to be upgraded before the LTC opens and HPC want to see this written into a legally enforceable document; the existing primary route from Dover and

Folkestone forming part of the strategic road network being via the M20 to the M25. The A228 and A227 are two roads which are likely to suffer a significant increase in traffic as drivers try and avoid the already congested M2/A229 junction at the top of Bluebell Hill. Neither of the former roads are of sufficient capacity to take any additional traffic and pass through various villages. As well as improving the M2/A229 junction, the M20 westbound junction with the A229 does not have the capacity to take the extra traffic which is predicted to come westbound on the M2/A2 once the LTC is operational. The A2 is not even dual carriageway for its full length from the (2 lane) M2 at its eastern end (Brenley Corner) to Dover. It too will need upgrading to feed traffic to the proposed LTC, including the Brenley Corner junction, which is currently a roundabout.

HPC state that the improvements to the A229 Bluebell hill infrastructure must be implemented prior to the opening of the LTC. Otherwise, gridlock will be experienced at this junction as well as on the A249, A227, A228 connecting from the M20.

This is also raised by KCC in their 2021 consultation response.

“However, other essential wider network improvements, including the A229 connection from the M2 at Junction 3 and the M20 at Junction 6, originally part of the DfT’s Option C ‘variant’ for the LTC, have no commitment for development in RIS2 or RIS3, nor are any mitigation measures being proposed as part of the LTC scheme. This is wholly unacceptable and must be reconsidered by the DfT and National Highways. KCC is currently working up a bid for some local road improvements to the A229 to be delivered through the Major Road Network (MRN) and Large Local Major (LLM) scheme programmes, therefore it is essential that National Highways assist KCC in making the case to Government for this funding. However, 11 funding available through these local road programmes (MRN and LLM) still require an element of match funding and it is only reasonable that if the LTC is to generate a significant increase in traffic flows on the A229, which is demonstrated by the traffic modelling, then National Highways should contribute towards the cost of these improvement works.”

See also in next paragraphs re timescales and cost.

Bluebell Hill Cost and timescales M2/A229/M20 Junction improvement

Ref <https://www.kent.gov.uk/roads-and-travel/road-projects/planned-road-projects/a229-blue-bell-hill>

“This [Bluebell Hill] scheme is currently estimated to cost up to £199 million. We [KCC] have put in a bid to the Department for Transport’s (DfT) Major Road Network funding programme for ‘Large Local Major Schemes.’ If successful, this will cover 85% of the costs of the scheme. The remaining 15% will be from developer contributions and other government funding opportunities.”

HPC would ask ExA to consider Is this included junction improvement in the current costing for LTC or is this additional. How does this sway the cost benefit ratio for the LTC budget?

HPC are concerned that no timescales are planned. The A229 improvement scheme to support increased traffic due to LTC is not currently showing in the RIS 2 or 3 and RIS2 budget is already under pressure as shown below.

<https://commonslibrary.parliament.uk/research-briefings/cbp-8899/>

“RIS 2 began operating on 1 April 2020 and will run until 31 March 2025.... The RIS 2 budget is £27.4 billion. RIS 2 was published alongside the 2020 Budget, which highlighted three schemes that are part of RIS 2: dualling the A66 Trans-Pennine route, upgrading the A46 Newark bypass, and building the Lower Thames Crossing. HE has also been asked to make £2.3 billion of additional savings on operating and capital expenditure during RIS 2.”

LTC has been delayed 2 years for construction and therefore presumably will be in RIS3. If A229 improvements are not currently in RIS3 does this mean they will be budgeted in a later phase beyond 2030? This will significantly gridlock LRN such as A227 and A228 if implemented after LTC opening.

Noise, Vibration, Air quality

Whilst the DCO indicates in the main that limited impact is going to be made on noise, vibration, and air quality in Higham Ward there are no intended mitigations for the effect of noise, dust and vibration on residents and dwellings whether arising from construction works (e.g., at the Three Crutches) or the predicted increase in traffic on existing roads, e.g., the A226. Percussive piling is identified as a significant issue for three sites – but HPC have been unable to identify those.

Loss of Ancient Woodland

The proposed route results in a much larger loss of prime agricultural land than a new crossing at Dartford and also the destruction of ancient woodland. Ancient woodlands have eco systems which have evolved over centuries and cannot be readily replaced. They should be preserved and not be subject to development. On 27 May 2022, DEFRA published "Keepers of Time: ancient and native woodlands and trees policy in England", which is described as "the government's policy for ancient and native woodland and veteran trees in England". At page 18 it says "Our main priority is to protect ancient woodland and ancient and veteran trees from the threats listed in this policy document. HPC must also recognise the value of long-established woodland and consider options to provide greater protection to these habitats from development." Development is one of the main threats identified and the documents states at page 14 "Development can threaten ancient and native woodlands. Woodland can suffer loss and deterioration if houses or roads are built too close to it through damage to soils, roots and vegetation, and changes to drainage." Another threat identified in the same section is "Inappropriate recreational use".

The Parish Council are also concerned about the impact on the environment of the proposals, particularly long (centuries not decades) established eco systems and believe that other pollutants, such as PM2.5, should be considered and not just Nitrogen. The

effects on humans should be considered over a similarly wide area as for flora and fauna. The effect of the scheme on biodiversity is of concern to us, as is the guaranteeing of the retention of all environmental mitigation measures for the very long term.

Loss of agricultural land

The proposals take a large amount of Grade 1&2 agricultural land out of production in contradiction of the UK 'Government Food Strategy' policy paper published 13 June 2022. The land take south of the river is mainly Grade 1 and 2.

The DEFRA policy paper "Government food strategy" was published on 13 June 2022 and promises to improve and enhance our ability to produce food to feed our population. It states "HPC will publish a land use framework in 2023 to ensure HPC meet our net zero and biodiversity targets, and help our farmers adapt to a changing climate, whilst continuing to produce high quality, affordable produce that supports a healthier diet." The publication of this promised document during the examination period is likely to be a pertinent consideration in determining whether the proposed loss of agricultural land is appropriate. The Summary of Key Measures also says, "Our food system must not only feed our nation today but also protect it for tomorrow." At present, the land upon which it is proposed to build the south part of the LTC is mainly designated grade 1 and grade 2 agricultural land (i.e., the highest, most productive two grades) and the National Planning Policy Framework at Footnote 58 to paragraph 175 says "Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality." The LTC currently proposes to tunnel under low grade agricultural land while taking high grade land for the construction of the roads, junctions, and support facilities and also to use as a public park. The loss of prime agricultural land would be reduced if 'Chalk Park' was relocated from the Thong Lane/A226 junction to north of the Lower Higham Road.

Yours faithfully



Linda Atkinson
Clerk and Responsible Financial Officer
Higham Parish Council