

18 July 2023

Planning Inspectorate

Dear Sir

Higham Parish Council Submission

Written Representations – Lower Thames Crossing ED1 – July 18th 2023

Summary

Higham Parish Council (“HPC”) are a statutory stakeholder and have agreed SoCG and PADs with NH. HPC also presented at OFH1.

Proposed Route

Higham Parish Council (HPC) are opposed to the proposed route and believe that a long tunnel option (previously denoted as A14) from Dartford to Thurrock bypassing Junctions 1 & 2 on the south side of the river would be more appropriate.

HPC wish to ask that Option A14 now be reconsidered. The options would remove the need to upgrade M2/M20 Bluebell Hill junctions in Kent, continuing to provide a more direct route for Dover traffic. The cost at long listing of £6.6bn is £1.4 bn -£1.6bn cheaper than LTC. Traffic flow reduction at Dartford crossing is predicted at 18% which is similar to the current 19% for LTC.

Impact on Higham Village

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 Grade 1 listing and junction constraints

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.

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 Planning Inspectorate Panel (ExA) requires the layout of the Forge Lane/Gads Hill School junction to be reviewed and either revised or suitable mitigations put in place. 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.

A2 Capacity- 4 Lanes to 2 lanes

The A2 is currently 4 lanes between M2 Junction 1 and Gravesend East/Marling Junction. The LTC plans show that it will become 2 lanes. The A2 has only recently been widened to 4 lanes, in this vicinity and up to Swanscombe/Ebbsfleet junctions to cope with the capacity requirements during the commuting periods. The M2 has also recently been increased to 4 lanes in 2003.

A2/A289 Construction Phases

HPC are concerned as to how the A2 to A289 sections of road, will be affected, particularly during the construction phase – but also after opening. – significantly impacting commuter traffic both for Medway and Gravesham council residents (340,000 population).

The A2/A289 junctions are heavily used. Delays to commuter and freight traffic need to be minimised. Whilst journey times reductions are forecast for M2 Jn1 to M25 Jn 2, the reduction of 4.8 mins in 17 mins does not reflect the current average time of 17 to 30 mins published on Google Maps for a 7.30 a.m. journey. All Medway traffic must actually join via the A289 junction not M2 Jn1.

A2 Operational Phase

HPC express concern as to the layout of the A2/ LTC south portal junctions during the operational phase particularly in light of the steepness of the hill from M2 Jn 1 up to Cobham/Marling Cross; combined with the direction of the sun at commuting times – particularly during winter, mean that it is likely to be difficult to read signs and drivers to plan effective egress onto slip roads for the LTC Southern Portal and A289 and other collector roads.

This is likely to create a significant number of traffic incidents, forecast at an increase of more than 1000 increase per annum. NH have advised that new roads are not designed to take into account incidents. HPC feel that the complexity of the junction layout and the above mean that any alternations that may be needed to account for actual operation performance will not be able to be retrospectively affected and should therefore be planned for now.

Currently when the A2 and A289 becomes blocked London bound traffic from Medway, the Hoo Peninsula and Higham and Shorne traffic all utilise the A226 London/Gravesend bound to avoid the congestion, and this becomes very heavily congested.

Dover Traffic Impact – Bluebell Hill A229/ M20/M2 Junctions

HPC are concerned that the additional work needed to improve the M20/Bluebell Hill, A229/M2 Junction to accommodate the change in traffic routing to and from Dover will be significant. HPC requested that a legal constraint be written into the DCO to prevent opening of LTC until routes from Dover and the Channel Tunnel have been upgraded to increase capacity required for LTC.

In the event that this does not occur the A229 M2/M20 junctions will be further congested as well as alternative routes such as the A228 and A227 will become gridlocked from M20 to M2/A2. This junction improvement is not in RIS2 or 3. It is costed by KCC at £199m.). That the costs of the WNIP are included into the cost benefit ratio of the LTC.

That impact on A227, A228, A229 and A226 are traffic modelled in the event that this work is not completed prior to LTC opening.

Brewers Road

Removal of direct access eastbound at Brewers Road junction to A2/M2 route will lead to increased traffic on Pear Tree Lane/A226. Separately, the proposed closure of the Brewers

Road bridge for 18 months should be reduced in duration. The new green bridge should be built whilst keeping the existing bridge operational.

Noise and Vibration

HPC are concerned that the long duration of the construction period and the proposed long working hours will detrimentally affect the area and the wellbeing of the residents. Sites with significant adverse piling are stated – but definition of where is not defined.

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.

Ancient Woodland

HPC are concerned at the removal of ancient woodland and believe this should be mitigated further. Any ancient woodland compensation sites, protected species receptor sites and ecological compensation sites need to be closed off to the public in order to allow them to become established.

CONCLUSION

Long Tunnel at Dartford

That option A14 for a long tunnel option is reviewed and assessed prior to sign off the current DCO.

Construction Traffic

HPC request that construction traffic does not use the A289/A226. That it accesses the compounds and site area direct from the A2 onto the haul roads.

A226

That in the event that the A226 is utilised for construction traffic, that the Forge Lane/Gads Hill junction is redesigned to mitigate danger for pedestrians' cyclists and village traffic and ensure that Higham Village does not become gridlocked.

That segregated cycle lanes are instigated along the whole length of the A226.

A2 Layout

That the A2 retains current 4 lane capacity, and the layout be amended to take this into account. Retro fitting the LTC south layout will not be practicable or cost effective.

WNIP

That the Bluebell Hill and other WNIP junctions are improved to take into account increased traffic flow are completed prior to the opening of the LTC.

Environmental

That the impact on reduction of ancient woodland, removal of agricultural land, the affect of increased costs for moving traffic through the A229 and M2 Medway Valley routes are taken into account on the BCR and national economic impact.

Yours faithfully



Clerk and Responsible Financial Officer
Higham Parish Council