

Lower Thames Crossing

Planning Inspectorate Reference: TR010032

Deadline 4 – Post Issue Specific Hearing 6 Written Representation from CPRE Kent.

Unique Reference Number: 20035769

1.0 Introduction

- 1.1 CPRE Kent welcomed the opportunity to provide oral evidence at the Issue Specific Hearing 6 session held on the 8th of September. Our below written representation expands upon our concerns and provide context to our representations.
- 1.2 Specifically, we wish to expand upon our concerns regarding the following points...
 - BNG
 - Green Bridges
 - Dormice
 - Water Voles
 - Ancient Woodland and
 - Assessment of likely effects.

2.0 BNG

- 2.1 When evaluating the extent of habitat directly affected by the LTC, this is specifically habitat that is 0m from the Order Limits, we calculate this to be in the region of 11,719.78 Ha, (28,960 acres) which equates to approximately 45.25 miles of nationally and/or internationally protected habitat under direct threat of being lost or damaged. As the UK is often cited as the most nature depleted country in the world, CPRE Kent finds the cost outweighs the benefits by some considerable margin, having already sustained heavy losses of protected landscape with the HS1 in Kent and HS2 across the UK.
- 2.2 For example: In a recent Parliamentary report HS2 reported that *“as of 2022, approximately 20.4 hectares of ancient woodland has been felled and an additional 0.2 hectares of ancient woodland is still forecast to be felled during construction”*.
- 2.3 Furthermore, the UK ranks bottom out of 14 European Nations for nature connectivity and for having lost more wildlife than any other G7 country.
- 2.4 Therefore, to continue on this trajectory, would be a complete disaster in ecological terms for Kent’s biodiversity and the country as a whole. CPRE Kent feels the county would suffer an unacceptable loss of internationally protected landscapes.
- 2.5 When considering mitigation or compensation, the calculation for irreplaceable habitats, such as ancient woodland, would need to include both quantitative and qualitative assessments. Currently, irreplaceable habitats are excluded from the quantitative BNG calculations and as of yet, no definitive list exists of irreplaceable habitats for the purposes of BNG. Ancient woodland continues to be lost for ever from Natural England’s inventory and if not lost, severely fragmented and damaged further.

- 2.6 The Government intends to define and list irreplaceable habitats and their compensation requirements and advises that the NPPF should be followed until such time as the details are finalised. This means that these extremely rare habitats and the rare and endangered species that rely on them, do not currently have a working definitive compensation strategy in place to adequately compensate for any loss incurred.
- 2.7 Furthermore, it is highly unlikely that this habitat would be adequately compensated for or indeed, even replicated elsewhere. It is simply unfeasible to conjure up a replacement veteran tree or recreate 400-year-old ancient woodland substrate. Translocating the soil/substrate and mycelium that is ancient woodland and has laid undisturbed for hundreds of years, is akin to thrusting a spoon into a trifle and expecting the layers to remain intact and complete.
- 2.8 Whilst irreplaceable habitats are provided exclusive consideration/protection, the lack of a definitive register of irreplaceable habitat types is highly likely to cause confusion with a real danger of areas, highly complex in nature, and rare habitats slipping through the net or being irreversibly harmed in some way, and not afforded the due consideration and protection they should have. Therefore, CPRE Kent would like to reiterate just how imperative it is that thorough research, surveying, monitoring, data collection etc is carried out in order an informed decision can be made as to the best course of action for mitigation, until such time as definitive guidelines become available in law.

3.0 Green Bridges

- 3.1 Whilst CPRE Kent welcomes the use of Green Bridges (GB), we are equally disappointed to read that only seven are intended to be built for the whole of the 23km (14.29miles) crossing, with all of them being of mixed use. We do not consider, in view of the sheer scale of habitat fragmentation and destruction that is to occur - affecting some of Kents most protected and internationally ecologically sensitive areas including rare fauna, that this will be adequate. We suggest at least fourteen GBs placed strategically roughly every mile, (with the exception of the tunnel) for the exclusive use of fauna, is likely to be more effective in keeping the habitat on either side of this eight-lane carriageway connected.
- 3.2 The applicant intends all seven GBs to be of mixed use. Much of the wildlife expected to utilise these corridors actively avoid and are sensitive to, any kind of human disturbance/activity and/or are vulnerable to being runover, such as dormice, hedgehogs and badgers. It is well documented that human disturbance negatively alters a species behaviour. They may not occupy or venture into, nest or breed in any area deemed a threat or any area affected by light pollution. Therefore, any intended GBs should preferably be created exclusively for faunal use. As pedestrians, cyclists and other traffic will be provided with another 43 separate purpose-built crossings there is no need for the seven GBs to be of mixed use.

- 3.3 For example, Brewers Road GB, has been designed around a two-lane road as has Thong Lane south GB, Thong Lane North, North Road and Mucking Ford Road. This suggests to us that the main purpose of these GBs is to ferry traffic from one side of the carriageway to the other rather than as any meaningful mitigation for habitat connectivity compensation, with the greenery proposed for either side of these bridges becoming nothing more than ancillary. How long before people complain about visibility because of overgrown hedges and cite health and safety due to lack of visibility? Is there going to be streetlighting? Is the grassland planted in between the hedgerows to be kept mown? If so, then the GBs becomes more of an urban looking street rather than a functioning wildlife corridor. Furthermore, and I repeat, the very wildlife these so-called green bridges are purportedly being created for, such as Badger, Hedgehog etc are being put in direct danger from vehicle collisions utilising these proposed roads. Furthermore, at 7m width in places and other bridges width yet to be decided, we feel this is far from adequate. Natural England's Natural England Commissioned Report NECR181, literature review states that wildlife bridges should be between 40m and 50m wide with landscape bridges even wider at 80m.
- 3.4 With the GBs accommodating either a two-way road, track, footpath or cycle path, the hedges and grass verges would perform no other purpose than to green up for aesthetics rather than serve any higher purpose - that of a meaningful and safe wildlife corridor. Due to the habitat fragmentation and enormous loss of habitat, we would like to see wildlife given the priority and exclusivity on the GBs.
- 3.5 Pg 150. 8.6.166 of Ch8 Terrestrial Biodiversity cites Scotney Castel GB as an example of how dormice can successfully utilise a GB. However, it took 6 years before dormice were recorded as successfully utilising the bridge. Furthermore, Scotney Castle GB accommodates a single-track access road for the castle's use, not a two-lane carriageway for general use.

4.0 Dormice

- 4.1 CPRE Kent does not share the applicant's optimism that the impacts of the development will not be significant during and after construction. On the contrary we anticipate the population of dormice to be severely disrupted. These sensitive species are highly likely to experience significant levels of disturbance/mortality from construction traffic, noise and light pollution along with permanent habitat fragmentation and destruction, which is likely to result in the displacement and local declines in population.
- 4.2 The dormouse has declined by 72% between 1993 and 2014 and continues along this trajectory. Lost and fragmented habitat is cited as one of the main reasons dormice are in such critical decline, therefore, a speculative 10-year projected recovery constitutes a significant negative effect, and we fail to see how this can be considered 'beneficial' at any level, especially when there are no assurances.

5.0 Water Voles

- 5.1 The water vole's long-term and continued decline has seen them removed from most waterways in the UK where once they were widespread. Therefore, despite the mitigation measures proposed by the applicant, we see the threats the LTC construction poses as significant in real terms and therefore contrary to the applicant's evaluation.
- 5.2 The applicant has assessed the potential and likely direct mortality of this critically endangered and declining species as not significant, including the potential habitat degradation, disturbance and habitat loss.
- 5.3 The diverting and loss of important waterways depended on by the water vole cannot be underestimated and whilst the water voles are likely to re-colonise over time, pending suitable habitat, the initial disruption and destruction cannot be, in our opinion, dismissed and assessed as 'not significant'. Water voles have disappeared from 94% of their former sites. This decline continues today. Therefore, CPRE Kent does not agree with the applicant's assessment of likely effects.

6.0 Ancient Woodland

- 6.1 While we acknowledge the proposed mitigation and compensation plans, the project will nevertheless cause considerable harm to the landscape, wildlife (including protected species) and habitats including Green Belt, SSSIs, ancient woodland and Best and Most Versatile agricultural land. Only 2.5% of ancient woodland remains in the whole of the UK. This valuable and unique ecosystem should be cherished and protected at all costs, yet time and again, this finite and ancient habitat is destroyed to make way for roads, rail and other infrastructure. To lose another 5.35ha (13.22 acres) is a huge loss of this internationally important and irreplaceable habitat.
- 6.2 CPRE Kent would like to know if other options have been fully and carefully considered. For instance, building a bridge over the woodland, or divert around or tunnel under?
- 6.3 It may be feasible to translocate and thus save the three veteran trees earmarked to be removed. One such successful translocation of two veteran apple trees was carried out by Bea Landscape Design in 2006. CPRE Kent would like to know if this option has been considered and if scoped out, what were the reasons?

7.0 General assessments

- 7.1 CPRE Kent finds it disconcerting that the applicant should arrive at an assessment of 'not significant' mitigation aside. We consider putting up to eight lanes of carriage way through and fragmenting off, nationally and internationally significant protected habitat used by threatened species as significant.