

## **Gravesham Borough Council**

**(IP ref: 20035747)**

**Deadline 6 (D6)**

### **General comments and observation**

#### **ISH8 – ISH10 Post Hearing Statements**

These will be found in Appendix 1

- Appendix 1a ISH8 Construction and operational effects
- Appendix 1b ISH9 Environment and Operational Effects
- Appendix 1c ISH10 Traffic and Transportation

#### **ISH8-ISH10 Actions**

Gravesham response to relevant requests will be found in Appendix 2

#### **CAH3 Representations: Land at rear of Cascades Leisure Centre, Thong Lane, Gravesend**

These will be found in Appendix 3

Current position

National Highways made an offer to the Council on 12 October 2023. After due consideration Gravesham responded on 19 October stating that the offer was unsatisfactory and is not in line with the financial costings as highlighted within the KKP feasibility study work. Therefore, to be clear, the Council expects to be appropriately compensated for both the impact on our leisure/sports amenities and the wider impact the potential construction of the Lower Thames Crossing will have on our community, the borough, and the local environment.

A meeting been arranged, and a further offer is expected

#### **ASI4 HS2 accompanied site inspection**

The ASI4 visit to HS2 was very useful and informative in seeing a large construction site, and the visible processes being used to construct the Chiltern tunnel through chalk. This included movement of tunnel segments and the necessary pipe work and plant necessary to handle the chalk slurry. Also seen was the initial phases on the deposition of the chalk spoil, being covered with soil ready for seeding.

#### **Responses to ExQ2**

See Appendix 4 for Gravesham Council's response to relevant questions

#### **Comments on draft DCO v.7**

See Appendix 5 for suggested amendments to the DCO

#### **Updated SoCG's**

Agreed with National Highways they are submitting revised version but without our agreement because we have not had the time to fully digest the content and get sign off internally.

#### **Updated PADS**

An updated PADS document has been produced which takes into account most but not all the amendments to SoCG, included amending and adding to the points as necessary. This can be found as Appendix 6.

### **Section 106 agreement**

Although referred to in some of the document to clarify progress on an agreement between the Borough Council and applicant. An initial draft s.106 agreement was received, and a meeting has been held to discuss. Comment have been provided on it including additional items that could be considered and factual information. A revised document is awaited, and some matters may be dealt with by means of the REAC.

### **Comments on Applicant's submissions at D5**

These are in two appendices

- Appendix 7a Comments on document submitted at D5
- Appendix 7b Possible amendments to REAC REP5-038

### **GBC landscape comments on Applicant's responses to ExQ1**

Additional Heritage comments are attached as Appendix 8

Additional Landscape comments are set out below

### **ExQ1 Q12.2.2 Re Nitrogen Deposition sites**

**Gravesham comments on the Applicant's response:** The Nitrogen Deposition sites (and the Ancient Woodland compensation sites) appear to have been selected using the parameters of ecology and land availability within the Order Limits. While the assessment of ecology - in broad terms and in detail - of potentially suitable sites is crucial in their selection, it is our view that the site selection should be informed by a wider range of factors that take a broader view. Notably cultural heritage, landscape character and proximity.

The Applicant states that they are taking a landscape scale approach to their compensation strategy, and with an objective to position new habitat close to the affected designated habitats.<sup>[1]</sup>

However, the landscape scale strategy appears to relate to ecological factors and not to the effects on landscape character, visual amenity or cultural heritage. Further, the stated aim of developing a resilient network of ecological sites appears to be let down by the siting, in some cases, of replacement habitat at some distance from the areas suffering harm, as is the case for example in the Kent Downs AONB.

The Applicant states that the design of the Nitrogen Deposition sites has no effect on the LVIA, and it is assumed the sites will have 70% woodland cover. We would expect the landscape and visual effects of introducing these new sites to the landscape - and with such a high percentage of woodland cover - to have been separately assessed, in particular in the designated landscape of the Kent Downs AONB. Further, in our view it is not sufficient to suggest that key views to and from the proposed compensation sites will be retained when the nature of those views may be such that the introduction of woodland would no longer allow the views to be maintained.

### **ExQ1 Q12.2.4 Re Photomontage Reliability 2 Re maturity of landscaping after 15 years, and Rep viewpoint S-05a**

**Gravesham comments on the Applicant's response:** The error in the earlier version of S-05a has been rectified in terms of the likely height of vegetation at 15 years after planting. It is clear from the revised photomontage that the proposed A2 gantries will be far more prominent, and appear on the skyline from this viewpoint. Also, as previously stated, we remain sceptical regarding the impact of the new planting and its screening effects after 15 years. The effectiveness of such a thin line of vegetation between the A2 and HS1 is questioned, as the existing vegetation - much of which is to be removed - was designed as mitigation planting for HS1.

#### **ExQ1 Qu12.3.2 Re Representative Viewpoints – Regrading of Sensitivity and Effects**

**Gravesham comments on the Applicant's response:** The Applicant has not explained the nature of the stated 'refinement of the Project design' that has resulted in the down-grading of sensitivity of the viewpoints listed - as picked up in ExQ2 Q12.2.1

#### **ExQ1 Q12.3.5 Re Additional Photomontages Representative viewpoint S-03**

**Gravesham comments on the Applicant's response:** The photomontage for summer, from Representative Viewpoint S-03a (from the right of way in the KDAONB above Park Pale looking south, south-east and south-west) is based on baseline photography taken in May 2019. We have photographs taken from a similar location in May 2023. Although this cannot be deemed to be a fully accurate comparison, it is clear to us that the Harlex buildings appear far more prominent in the Applicant's baseline. Also, the growth of the hedgerow to the immediate north-east of the Harlex compound is shown as far less prominent and developed in height than our photographs would suggest. This difference in visual imagery may give the impression that the existing view is more urbanised than is the case in reality. As the photomontage is being submitted as new information, we would question why four year old baseline photography has been used.

The Applicant's photomontage for summer year 15 illustrates how the proposed planting might obliterate the long views that are currently enjoyed from this viewpoint.

In addition, the Applicant has separated the views from S-03 into separate images. This is unhelpful, as it does not capture the 180 degree view at this viewpoint. It is not clear how this key view could be maintained through proposed woodland.

[\[1\]](#) Document 6.1 Environmental Statement Chapter 8 – Terrestrial Biodiversity Volume 6 Section 8.5.16

31 October 2023