

Lower Thames Crossing DCO

Gravesham Borough Council

(IP ref: 20035747)

Appendix 1a

Gravesham Borough Council's responses to agenda items for ISH 11 on Environmental Matters – with additional post-hearing notes

3a)i. Is there agreement amongst the parties that adverse landscape effects on the AONB are localised during construction and operation of the road (inclusive of utility works), or do the parties consider that there would be an adverse effect on the character and integrity of the AONB overall?

The proposed works are only 'localised' in the very narrow sense that the construction works physically impact a relatively small percentage of the whole area of the AONB. Such a simplistic quantitative approach is not considered to be of value in the context of the character of the parts of the KDAONB that are impacted, either physically or by reason of the perceptible impacts of the project, which extend beyond its physical extent (for example visual impact and noise/loss of tranquillity). The project will have a negative effect on the integrity and the character of the KDAONB landscape during construction and operation of the road.

The KDAONB Unit has previously outlined (at ISH9) the importance of the wooded character and ancient woodland in this part of the AONB, and how the importance is elevated by the specific inclusion of the land north of the A2 within the AONB boundary when the AONB was designated.

It is our view that the existing woodland vegetation along the A2 and HS1, together with the important wooded central reservation, provides effective continuation of the woodland character of this part of the AONB. Further, the existing woodland planting helps reduce the apparent scale of the road and provides a more intimate, enclosed landscape;

The effects of the proposals will be apparent during construction and in the longer term, and not just because of the wider and continuous expanse of road surfacing and built infrastructure: -

- The current proximity of woodland planting to the road boundary will not be replicated;
- The need to maintain access to utilities, and the lack of planting in the central reservation will result in a permanent increase in the distance between woodland planting north and south of the corridor;
- There will be a loss of tranquillity;
- The change of scale will be exacerbated by larger scale, built infrastructure; tall lighting columns, higher bridges, wider gantries, and massive retaining walls (without the softening effect of vegetation)

Taken together, these changes will effectively sever the cohesive wooded landscape of the Kent Downs AONB, resulting in a loss of integrity of the landscape, and a permanent change to landscape character.

It is also our view that the works to the corridor will alter how this part of the AONB is regarded in the longer term.

The degradation of the setting of the AONB through development and infrastructure is described in the KDAONB Management Plan as a potential threat to the landscape character of the KDAONB. It is unfortunate that visuals of the proposed A2 junction were not available for the Hearing, as these would help to convey the scale of the changes proposed to the landscape, the permanent changes to landscape character, visual impact on the setting of the KDAONB, and the likely effectiveness of proposed mitigation measures.

Post-Hearing update: The photomontage image of the view from Thong Lane south Green Bridge was received on the day of ISH11, but too late to be seen and considered to provide a response at the Hearing. (REP7-189 9.179 Computer Generated Views from Thong Lane green bridge south) This image clearly shows the setting of the KDAONB will be permanently changed by the large-scale and multi-level road junction to the immediate west of the AONB, as well as from the loss of Gravel Hill Wood, close to the AONB western boundary. The multi-level junction will be readily apparent in the foreground for those approaching the AONB from the west, and will also be apparent as a backdrop for those within the AONB and travelling west.

There will be wider landscape impacts from the loss of areas of ancient woodland. The impact will be permanent in the locations where the woodland is to be lost, and in those areas where replacement planting excludes woodland. Even when including the new areas of compensation woodland, the overall impact – by the Applicant’s own estimate - will be apparent for at least 30 years (ie the time it is estimated to take for replacement planting ‘to become sufficiently established and mature to compensate for the predicted losses’ (quote from the Applicant’s response – doc 9.132 Post-event submissions for ISH9).

3a)ii. The Applicant has advised in response to both ExQ1 and ExQ2 why it has ‘adjusted’ the boundaries for the Cobham and Shorne Local Landscape Character Areas (LLCA) for the purpose of assessing landscape impacts; however, can it explain the level of sensitivity and significance of effects it would ascribe to those areas if the boundaries had not been ‘adjusted’ and instead the Kent Downs AONB LLCA boundaries (which echo the Kent County Council’s 2004 LCA) were used? Is there a difference? Having regard to the Applicant’s adjusted boundaries, can the Applicant explain what the significance of effect would be if the areas of Cobham and Shorne were not combined in the assessment but were considered and reported separately? Comments from the Kent Downs AONB Unit, Gravesham Borough Council and Kent County Council will be sought on the Applicant’s response.

The LLCA boundaries are found in landscape assessments by Kent County Council, Gravesham Borough Council and the KDAONB¹. The earliest of these documents is the Kent County Council report, which was published in 2004 and included HS1, confirming that the assessment took this development into account. The documents show the boundary between the West Kent Downs (sub-area Cobham) Local Landscape Character Area (LLCA) and WK Downs (sub-area Shorne) LLCA runs along the southern boundary of the east

¹ The Landscape Assessment of Kent (2004) by Jacobs Babbie for Kent County Council
Gravesham Landscape Character Assessment (May 2009)
and Kent Downs AONB Landscape Character Assessment Update 2020 (published 2023)

bound A2 carriageway, placing the central reservation woodland in the Cobham sub-area to the south.

The proposals would have a major impact on both LLCAs with the boundary in this location.

In the documents, the Applicant has adjusted the boundary, moving it further south to the line of HS1 (APP-198 Figure 7.2) The Applicant's LVIA has been based on this adjusted boundary.

In our view, this change in boundary position influences the landscape sensitivity and Magnitude of effect of the proposals on these areas, and this alters the findings of the landscape assessment of these LLCAs, assessed individually and in a combined assessment.

The original LLCA boundary would place the central reservation of the A2 and the planting along the northern edge of HS1 area within sub-area Cobham LLCA. These areas would be lost as a result of the project, which would have a direct - and more adverse - effect on the LLCA. In this case we believe the Magnitude and nature of effect would be assessed as greater than has been reported in the current assessment documents, during both construction and operation. The Landscape Sensitivity of the Cobham sub-area would be greater, and its Susceptibility to change (by the proposal) would also be greater.

The Shorne sub-area would be similarly affected by the proposals, with major works along the A2, a permanent reduction in tranquility, loss of woodland and a permanent increase in the prominence and scale of the A2 corridor. For these reasons we think the Magnitude and significance of effect at Design Year (at operation) would be assessed as greater than has been reported in the current assessment documents.

By way of background the LTC Team has previously proposed changes to the Local Character Areas south of the river in Gravesham Borough. The map in Figure 1.0 shows the proposed changes, submitted to Gravesham Borough Council in 2020. The map proposes the sub-dividing of the West Kent Downs LCA into a number of smaller sub-areas, and a new LCA created. The map clearly shows Cobham sub-area LLCA sub-divided into Cobham, and A2/HS1 Corridor, and part of the existing Cobham LLCA was proposed to be a new LCA called Ranscombe Farm, with a new sub-area of Ranscombe Farm (sub-area A2/HS1 Corridor). Gravesham BC rejected this proposal (see also GBC response)

In our view it is important to assess the effects of the LTC upon the landscape as it is now. The fact that the landscape is going to be radically changed is something to be considered in the current landscape setting; and this proves the point of having landscape characterisation as a tool to provide logical, robust, and defensible justifications for managing pressures for change, without diminishing the value of the landscape.

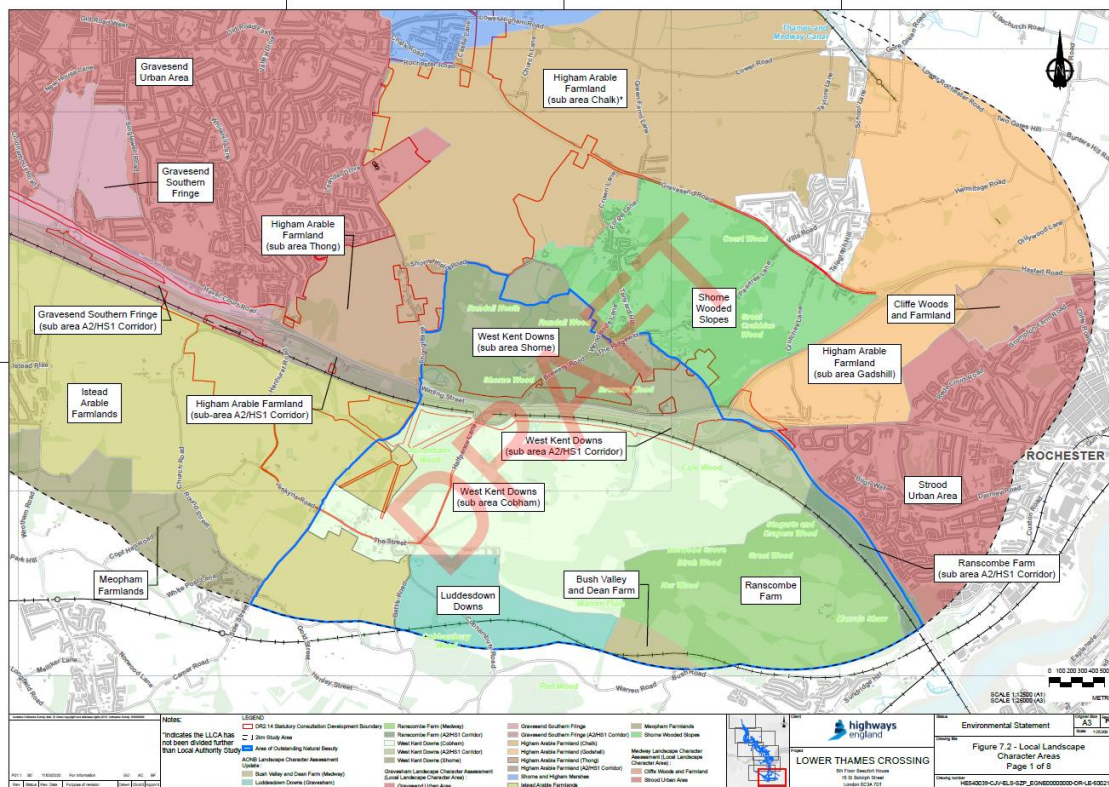


Figure 1.0 Map received from LTC Team - March 2020

(HE540039-CJV-ELS-SZP_EGNE00000000-DR-LE-50021-Local Landscape Character Areas)

The Applicant has made combined and individual assessments of the Cobham and Shorne sub-area LLCAs. This is reported in document 6.3 Environmental Statement - Appendix 7.9 - Schedule of Landscape Effects (APP-384) We have made earlier comments to the effect that, in our opinion, the overall significance of effects was underassessed.

Given their location as part of the nationally designated AONB, the LLCAs should be assumed to be of very high value. National guidance document GLVIA3 paragraph 5.47 states that 'landscapes that are nationally designated (National Parks and Areas of Outstanding Natural Beauty) ...will be accorded the highest value in the assessment'. Following this guidance, the downgrading of these LLCAs to High puts them at the same level of some LCAs not in the AONB.

Post-Hearing update: It is interesting to note that the Applicant stated (at ISH 11) that the LLCA boundary had been amended and was reflected in their earlier (2020) LVIA. The Applicant also stated that the re-evaluation of the LVIA in 2022, and changes to assessment ratings, were because of changes to the design (of the green bridges) and reductions in vegetation loss for utilities. We have previously raised our concerns at the differences between the LVIA's made in 2020 and 2022. We do not consider the changes to the design are sufficient to explain the differences in the assessment ratings. In addition, as the boundary had already been adjusted by the Applicant for the 2020 assessment, the reasons for the differences in the assessments are even more difficult to accept.

3)a)iii. Will the green bridges over the A2 at their proposed widths provide valuable landscaping connectivity to reduce the severance between the historically linked landscape of Cobham and Shorne (noting that we do not need to re-visit the discussions on Green Bridge design)?

The Council has already made comments on the effects of the widening of the A2 corridor in our response to question 3a)i. of this Hearing.

These effects will be permanent, and in our view, will impact on the landscape character of the KDAONB, which will shift to one primarily associated with motorway infrastructure; as the A2 would be dominant, and the A2 junction would change the character of the immediate setting of the AONB to the west.

The Design Principles document (APP-516 section S.104) lists the criteria for the green bridges over the A2. The list is primarily concerned with biodiversity and access but includes the role of the bridges as a gateway into the Project route and landmarks at points of entry to the KDAONB. Discussion to date in the ISHs has primarily been about the biodiversity functionality of the green bridges.

Given the scale of severance and fragmentation of landscape that will result from the Project, it is our view that a key function of the green bridges over the A2 should be to provide landscape mitigation at a (similarly large) landscape scale. In our view, the green bridges cannot achieve a landscape connection at their current restricted widths.

There is scope for the green bridges to serve multiple objectives and provide an essential component of a mitigation strategy.

This is supported by The Landscape Institute's Technical Guidance which also notes how the design of green bridges can respond to a range of drivers, one of which is the severance of landscape – be it historic landscape or its setting, or feature of importance to landscape character.

The section on design considerations in the L.I. Guidance recommends that green bridges aiming to achieve connections at a landscape level should be over 80m in width. We have commented on this issue previously. However, it is clear that the design of the green bridges should be reviewed, as they need to be much wider if they are to provide adequate mitigation.

We would request the Applicant to examine alternative designs for green bridges to achieve the mitigation required, and to state whether there are any physical or other constraints at the green bridges proposed over the A2 – including Park Pale overbridge as we have proposed this to be a green bridge, supported by the KDAONB Unit and NE – which would prevent their widening, and why any such constraints cannot be removed or relaxed.

Assuming there are no immovable constraints, we would request the Applicant to review the current designs of the green bridges over the A2. We understand it will be necessary to review a number of control documents in order to redesign wider green bridges over the A2. As an Action Point from ISH11, Gravesham Borough Council has proposed changes to the relevant Design Principles. Some alterations may be necessary to the engineering and general arrangement drawings. The relevant works plans (2.6 Works Plans Volume B Composite (sheets 1 to 20) (ref) show that the footprint of the green bridges may only be constrained by the limit of deviation for highway works. On the assumption that the redesigned green bridges can be developed within these constraints, the works plans may not require amendments. We would request the Applicant to advise accordingly.

Post-Hearing update: The specific Design Principles for Brewers Road green bridge (S1.17) and Thong Lane green bridge south (S2.12) have been updated by the Applicant (REP7-140/141). The updates comprise combining the two planting areas on the east and west sides of the bridges into one planting area for each bridge. The total width of planted area for

each bridge is the same as in earlier versions, with no additions. It is unclear what the benefits of this change will be, but it is essential, in our view, to include planting areas to both sides of the green bridges.

Post-Hearing update: At the Hearing the Applicant stated that the aim of the planting on the green bridges was to achieve a scrubby woodland character, and this should appear as woodland. The Project Design Report Part F at Section 5.1.23 (APP-513) describes proposed planting on the bridges as including small trees and shrubs. Bearing in mind the woodland character of the AONB in this area, the green bridges will not currently provide adequate mitigation for landscape or visual severance.

It is our view that woodland planting will be needed on the bridges, to provide landscape continuity and to reinforce the wooded skyline. Accordingly, the soil depth of the bridges should vary, to allow deeper areas that will accommodate woodland trees.

In addition, to maintain continuity of landscape the bridges would need to make direct links into planted or woodland areas at both the north and south ends. If possible, the landing positions of the bridges – in particular the Thong Lane south green bridge at its southern end – should be reviewed to improve connectivity. In our view this could also provide benefits to biodiversity and WCH access connectivity.

The issue of adequate visual representation of the A2 junction is still outstanding (see also ExQ2 Q12.3.1), and it is our view that the impact of the multi-levelled junction and its associated link roads and infrastructure needs to be better understood, as this could have a bearing on the design requirements of the Thong Lane south Green Bridge.

3)a)iv). Are there any landscaping mitigation measures not already proposed by the Applicant that would reduce the impact of the Proposed Development on the AONB, and/or any measures that would instead compensate for the harm (noting that we do not need to re-visit the discussions on the site selection for nitrogen deposition compensation areas)?

As the Council has consistently commented, the various compensation and mitigation planting proposals may be driven by specific impacts (e.g. ancient woodland) but given the scale of the proposals they need to be considered in totality.

Further landscape mitigation along the A2 would be constrained by the width of the corridor. Beyond the transport corridor, the needs of agriculture and the constraints of other land uses, such as the listed Cobham Park, and Jeskyns, mean there is limited scope for additional landscape mitigation. However, the provision of green bridges is one of very few additional mitigation measures that could be accommodated into the transport corridor, and which have the potential to make a significant contribution to addressing landscape impacts.

Green bridges are already proposed in the A2 corridor, for Thong Lane south and Brewers Road. However, for various reasons (as outlined by the Applicant in their response to the previous question) the design of these bridges has not provided the range of functions, or the scale needed to address the scale of landscape severance that will result from the project.

It is our view that a green bridge should be developed at Park Pale, on the site of the existing overbridge. This is supported by the KDAONB Unit and Kent County Council. The Park Pale green bridge would provide a Landmark and a gateway into the AONB at its eastern boundary and would help reduce the landscape and visual impacts of the road

corridor at this key location in the AONB. A Park Pale green bridge could provide more opportunities to develop the green elements of a green bridge and provide improved facilities for WCH/recreational users; the road on the existing overbridge leads only to a golf club to the south of the A2, so the level of vehicular traffic is low, and a public Right of Way connects the higher slopes of the Kent Downs to the north, across the A2 and under an existing tunnel beneath HS1. The bridge will also provide a connection into the wider Cobham Estate. A Park Pale green bridge may offer the potential to establish wider areas of planting, including woodland trees, and provide direct landscape connections with planted areas to the south and north into the KDAONB, in addition to the potential for enhancing user experience.

Another related issue is the loss of planting along the northern boundary of HS1. The loss of this planting due to the LTC project also means the loss of earlier mitigation for the impacts of HS1; adding to the landscape and visual impacts. It is our view that the impacts could, potentially, be lessened by making enhancements to the infrastructure associated with the project along the A2 transport corridor. This may require a review of the Design Principles

A further potential landscape mitigation measure may be to enhance the linear planting along the south side of HS1, which includes therefore the A2, west to Pepper Hill. This is outside of the AONB, but it does have the potential to improve the setting outside of the constrained transport corridor.

Within the corridor the Brewers Road/Halfpence Lane/Darnley Lodge Lane roundabout is shown as remaining following the loss of the Cobham slips on and off the A2 slips. This junction should be simply converted into a simple T junction (with Brewers Road to Darnley Lodge Lane being the straight through connection). Taking into account the constraints of sight lines, the depth of soil over HS1 tunnel and entrance to Cobham Hall School this area could be relandscaped to reflect its setting.

3b)i. The Applicant has summarised the Proposed Development's overall landscape impact in document [APP-524] at pages 68-69. It ascribes the overall impact as 'Moderate Adverse'. The ExA would like to hear from relevant parties on whether they agree with this conclusion.

Document APP-524 (Combined Modelling and Appraisal Report - Appendix D - Economic Appraisal Package: Appraisal Summary Table Report - October 2022) presents the findings of the assessments of the LLCAs impacted by the Project both north and south of the river Thames in various terms, including landscape effects.

This assessment is different to the LVIA in that the impacts of the proposal are quantified and expressed in different terms, and not as part of the Environmental Statement. The document states (section 1.1.9) that the 'appraisal of some impacts reported in this report [and the EAR] use different methodologies to those reported in the Environmental Statement'.

We would assume the LVIA has been used to inform this piece of work, although this is not clear. As we commented earlier, in our response to question 3a) ii. we consider the LVIA ratings for the West Kent Downs LLCAs within the KDAONB to be underassessed. Similarly, this document (on page 50) presents the summary assessment score for the KDAONB area to be Moderate Adverse. An overall Large Adverse effect for the LLCAs within the KDAONB would more accurately demonstrate the level of harm that would be caused to this nationally significant landscape (as we have previously commented).

Step 5 of the report (on pages 68 and 69 of the document) presents the summary assessment score for all the LLCAs affected to be Moderate adverse (negative) effect. This

is a significant effect. However, it is a summary assessment for all areas affected south and north of the river.

It is our view that the impact of the scheme as a whole should reflect the worst element of the impact; a 'worst case' approach. So we are of the view that the overall assessment rating of Large Adverse would more accurately demonstrate the level of harm that would be caused to this nationally significant landscape.

Post-Hearing update: At the Hearing, the discussion moved on to the single conclusion of the likely significant effect of the project on landscape and visual amenity in document 6.1 Environmental Statement Chapter 7 – Landscape and Visual (APP-145 section 7.9.22)

*'7.9.22 As required by DMRB LA 107, the effect of the Project on both the landscape and visual amenity has been separately assessed and the outcome combined to a single conclusion of the likely significant effect on landscape and visual amenity. Although there would be some very large and large adverse effects arising from the Project, these would be localised due to extensive mitigation proposals which would help screen views of the new road and reinstate landscape features removed to facilitate construction. For the most part, effects of the Project would be moderate or below. It is therefore concluded that the Project would result in a combined **moderate adverse** significance of overall landscape and visual effect on the existing landscape and visual amenity, **which is considered significant** in the context of the EIA Regulations.'*

The National Policy Statement for National Networks (NPSNN) requires great weight to be given to conserving the landscape in nationally designated areas such as the Kent Downs AONB. Paragraph 5.152 of the NPSNN explains the strong presumption against building new roads in the AONB, 'unless it can be shown that there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly'.

In accordance with the NPSNN, it is our view that as the landscape impact is assessed as 'significant' and there are limited options to mitigate the impact, the Applicant needs to show compelling reasons for why this project, and not some other, is needed. This, in our view, the Applicant has failed to do.

ⁱ Text of email to Lower Thames Crossing Team on 15 April 2020 (following LTS proposal received on 24 March 2020)

The Borough Council has reviewed the information the Lower Thames Crossing team sent and also consulted with our landscape consultant, the Kent Downs AoNB Unit and Natural England.

The landscape zones in this area are contained in work by KCC (2004), Gravesham (2009) and the earlier Landscape Assessment of the Kent Downs (1995), for which a draft update exists (2020).

All work since the early 2000's has taken into account the existence of HS1 (Channel Tunnel Rail Link) and the widening of the M2/A2 as far west as the Cobham Junction. The widening of the A2 between Cobham and Pepper Hill Junctions followed in 2007 so is accounted for in the 2009 work.

The guidance for Landscape and Visual Impact Assessment sets out that it is appropriate to consider when doing analysis whether any changes have occurred that might provide a justification for departing from the existing zones. There have been no changes of any significance to alter the landscape zones since the technical work was carried out in Gravesham.

In the Kent Downs AoNB the landscaping (existing and provided as part of schemes) has matured, and whether on A2 eastbound, A2 westbound, or HS1 the corridor reads as part of a wider landscape.

Due to the carriageway separation and the landscaping between the A2 and HS1 the effect of the transport infrastructure is significantly reduced. The presence of motorways and railways in an AoNB is a matter of fact and not inherently a reason for a landscape zone of their own.

In this area in particular there is an important historical component to be taken into account in that it was all part of the wider Darnley Estate, which was managed as a unit. Whilst the land ownership has fragmented over the years the area has none the less has retained its overall character.

The suggestion that your proposed scheme would have only medium impact on the corridor itself is not accepted as it is clear that Lower Thames Crossing scheme, especially as consulted upon in the Supplementary Consultation, must have a high impact on this area as it effectively destroys the current A2 and HS1 landscaping and creates a very urban corridor.

The proposed changes are not therefore acceptable and the scheme should be assessed against existing landscape zones.

It would be useful, when circumstances allow, to have a meeting on site with relevant parties to discuss the landscape assessment in more detail.