

## Technical Note

**Subject:** Summary of Local Council Responses to Lower Thames Crossing Scoping Report

### 1 Summary of key responses

This section outlines the key points commonly identified by Thurrock Council (TC), Essex County Council (ECC) and Gravesham Borough Council (GBC). Comments may be shared between all three councils or just two.

The response of Kent County Council has been reviewed but across their 8 pages the most salient points have been captured in the ‘additional detail’ box below. The comments of Essex and Kent are within the context that they are supportive of the proposed crossing.

It is notable that whilst there may be general agreement on a particular topic the scale and proportionality attached to this might vary. On reviewing the various responses some Councils – especially those in favour of the proposed crossing – are already developing thoughts on potential mitigation and benefits that should flow to their areas.

	Thurrock	Essex	Gravesham	Additional detail
Full Transport Assessment	Y	Y	Y	Traffic assessments should be undertaken on additional roads and to a finer level of detail for instance focusing upon a proposed junction with the A13 and A1089
Public Transport Improvements / Non-Motorised Users	Y	Y	Y	The absence of demand for travel other by car and Lorry has been raised. For Thurrock and Gravesham this includes questions on rail.  Kent calls for “The creation of new paths and upgrading of existing routes”.
Health Impact Assessment	Y	Y	Y	On the current scoping It is notable that Kent take a softer position - Kent “believes it to be comprehensive and inclusive of the areas we would prioritise”.  Thurrock and Gravesham call for a stand-alone HIA and Essex are supportive of this stating “ the wider determinants of health have not been included to the level that we would want to be considered” and suggest this could be by a standalone section.
Air Quality	Y		Y	Thurrock and Gravesham state the impact of changing air quality had not been fully assessed. Particular regard must be made to PM <sub>2.5</sub> .
Business Case	Y		Y	Reasonable alternatives have not been sufficiently ruled out in the opinions of these two councils. Gravesham are keen to understand what a crossing at

				Dartford has been ruled out and Thurrock wish to understand the grounds on which a crossing further East has been ruled out.
Socio – Economic	Y		Y	Whilst ECC do not call for study they do seek the scope for “economic engagement” to be extended. Including wider impacts upon socio-economic impacts must be addressed. Examples include impacts on employment and housing development.  Kent state “the scoping report does not outline what options have been examined to maximise economic benefit North Kent”
Flood & Water Management				“ECC has significant concerns about the extent of the redline boundary... it does not provide allowance for the provision of above ground attenuation”. Gravesham have also noted the risk of construction within the flood
Environmental / Habitat	Y	Y		Opportunities to deliver environmental enhancements, such as Priority Habitat and hedgerow creation, are possible however there is no explicit mention of any enhancements that have been identified.  Gravesham State the need for “all reasonable alternative options and is not limited by previous decisions”
Historic Environment	Y	Y	Y	Essex State “ The scheme will bisect a large area of very sensitive archaeological deposits and will result in the complete destruction of one Scheduled Monument.”  “Tilbury Fort and Coalhouse fort as combined monuments forming defensive structures along the Thames should be viewed as Very High Value.”
Minerals & Waste	Y	Y		ECC would expect the scope to include a materials balance (including minerals) and an understanding and assessment of the likely market areas to supply the necessary aggregates and fill materials.
Wider development	Y	Y	Y	Cumulative effects with other schemes (eg Tilbury 2) operating in the local area have been highlighted to be of importance by each authority

## 2 Summary of Essex and Gravesham submissions

### Essex County Council

The scheme is welcomed by ECC, reflecting their position that a new crossing will bring benefit to the County, albeit repeating their preference for the crossing to be in Thurrock).

It is noted with concern that there is no dedicated “Transport Section” ... A specific and full Transport Assessment is essential to fully understand the potential impacts, mitigations and benefits on both the transport network and environment. ECC requires a full transport assessment to be undertaken to assess the impact of the LTC on the immediate south Essex highway network and the wider Essex highway network. This was a key aspect of our previous responses and ECC would expect the Scope to include and understand the following:

- The changes in route assignment from origins in central and north of Essex/East Anglia;
- Key routes and junctions which may become under pressure such as A12, A127, A13; and junctions including routes involving M25 J27, 28, 29 and 30; M11 J6, 7 and 8; A127 all junctions in Essex, A13 Sadlers Farm (A13/A130), A127 Fairglen Interchange (A127/A130); A12 Howe Green junction (A12/A130); and
  - “Mitigation/proposals identified to deal with this” i.e. transport impacts
  - the cumulative impacts from other London projects such as the Silvertown Tunnel and planned growth locations (London City east), Tilbury2, as well as the range and timings of the other HE transport projects in Essex.
- Omission of a dedicated Transport section must be addressed as traffic is a major concern to ECC. A full Transport Assessment should be completed as soon as information is available.
- Greater clarification and assessment of the wider mineral waste planning implications is necessary. This should include a material balance, with minerals referenced.
- The scope of mineral and waste planning should be increased to include Thurrock and London.
- Potential for significant economic benefits due to the new crossing thus the scope of the socio-economic assessment should include; employment, skills and training needs, and early engagement with partners including South East Local Enterprise Partnership.
- Various developments on the link road should be considered such as Tilbury 2 , New power station, Wood processing plant and the Lower Thames routes.
- The scope would be expected to include provision for above ground attenuation features and these should be included within the Redline boundary.

## Gravesham Borough Council

- Scoping does not meet requirements of EIA regulation 10(3)(B) due to the following:
  - No adequate description of technical capacity of the scheme -i.e. maximum peak hour vehicle flows and max daily vehicle flows
  - Scheme description does not adequately describe what is being proposed. Particular reference to Junction A2 and consequential widening of A2 back to the M2
- Strongly of the opinion work to date is insufficient to discharge the requirement to consider reasonable alternatives when it comes to the dismissal of Route 1 due to:
  - No substantive work related to Habitats Regulation Assessment and other qualitative issues have not been monetised as WebTAG is deficient.
  - Cultural Heritage – potential for substantial harm and thus the options appraisal is not sufficient for Policy – NSPNN para 5.133
  - Scheme will comprise inappropriate development within the Green Belt.
- Major concern is that no reference to the science that underpins the biodiversity assessment methodology or the justification for the extent of surveys areas.
- A serious concern exists for the introduction of new pollution sources upon the borough and the A2 AQMA in particular.
- Air quality methodology should be updated to be in line with the latest version of the Emissions Factor Toolkit (dated November 2017).
- Clarification and update of methodology in line with NPSNN is necessary. Significance levels and substantial harm levels are different between DMRB and NPSNN which causes issues on what the deemed level of harm is. A number of court cases have been highlighted to show problems caused when the NPSNN methodology has not been correctly followed; Barnwell Manor (2014), Ordsall Chord (2016), Saddleworth School (2017).
- Collaboration with the Environment Agency's Thames Estuary 2100 (TE<sub>2100</sub>) Plan scheme, which is updating the tidal defences along the Thames, is necessary. This will be in regards to potential impacts of the relocation of the TE<sub>2100</sub> defences and how the schemes could benefit one another and the environment, through habitat creation.
- The introduction of the LTC will not address the existing severance issues upon non-motorised users (NMU) caused by the River Thames. There is potential for this to have implications under the Equalities Act 2010 so this should be covered in the EIA. Potential improvement for NMU facilities could involve increased frequency or improved timings for ferry users.