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Freepost RTTH–GRYG–SCXZ  
Lower Thames Crossing Consultation  
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Dear Sir or Madam,

**RE: Lower Thames Crossing Consultation**

Please find below Kent Wildlife Trust's response to the Lower Thames Crossing consultation.

One of the objectives for a Lower Thames Crossing is stated to be *“To support sustainable local development and regional economic growth in the medium to long term.”* While we note that an assessment of the economic benefits of the proposals has been undertaken, the assessment of the wider economic impacts is extremely limited. No assessment of the economic impact of the proposed routes with regard to the environment (with the exception of greenhouse gas emissions), communities, health, tourism, etc., has been carried out. Given the progress made in the past decade to recognise the economic cost of environmental damage and the loss of ecosystem services (for example, through the work of the Natural Capital Committee) this is disappointing. Without such an assessment, a conclusion as to the economic merits of the proposals cannot be reached.

Another objective of the scheme is *“To minimise adverse impacts on health and the environment.”* As with the economic assessment, it would appear that Highways England's work is incomplete with regard to this option. In the summary business case it is stated *“Highways England recognise that the construction of a new crossing would have impacts on local communities and the environment which would need to be considered in more detail at the next stage of the project.”*

The superficial assessment undertaken is at odds with the principles of sustainable development, where the impacts of various options should be identified and avoided in the first instance. The inadequate assessment of the wider economic impacts has skewed the analysis in favour of the options likely to have the greatest environmental impact. Given the shortcomings in Highways England's assessments, the conclusions made are unsupportable. It is recommended that the assessment is undertaken by an organisation with the relevant range of skills and expertise to examine all the relevant impacts. The limiting of the assessment to those areas Highways England has the ability to deal with, and limiting the depth of the assessments that have been undertaken, is inappropriate for a scheme of such significance.

There is another course of action that meets more of the objectives than the options proposed, and that would be measures to reduce demand. This would contribute to the UK's commitment to reduce

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greenhouse gas emissions, reduce noise and air pollution, and be a more sustainable approach in the long term. A superficial consideration of this option suggests it meets the following objectives:

#### Economic

- To be affordable to Government and users
- To achieve value for money

#### Transport

- To relieve the congested Dartford Crossing and approach roads and improve their performance by providing free flowing north-south capacity
- To improve safety

#### Community and environment

- To minimise adverse impacts on health and the environment.

We note the recent publicity surrounding the agreement reached between Highways England and Kent County Council regarding measures to reduce traffic and delays at the Dartford Crossing. While this is a step in the right direction, it highlights a lack of strategic planning, as it has rendered the transport assessments – which refer to the current crossing constraints a number of times – out-of-date. We believe that road developments should only be considered as a last resort within a sustainable transport strategy, which must be planned and fully integrated with conservation objectives and the land use planning process, as well as the health and wellbeing of communities. This strategy should:

- prioritise environmentally sensitive maintenance and improvement of the current road network over new road schemes
- reduce the need to travel, for example through: well-designed towns, cities and neighbourhoods; and improved transport technology
- promote reductions in private vehicle use in order to reduce traffic levels, fuel consumption and vehicle emissions, including fiscal measures and car share schemes
- minimise dependency on private vehicle use by increasing and improving public transport and active travel routes, which are well connected to essential services

Having established that there is still work to do to make the case for the scheme, and highlighted our concerns with regard to the analysis of the options overall and the lack of strategic planning and sustainability, we will now turn our attention to the options presented. At this point we restrict our attention to the Kent side of the crossing.

Having regard to the Options presented and the limited information provided, it would appear that Option A/Route 1 has the lowest impact on the environment. Though it is not without impacts, the limited assessment undertaken at this stage indicates a significantly lower environmental impact than Option C. Despite Option C's failure with regard to the objective to "...*minimise adverse impacts on health and the environment*", we note that it is Highways England's preferred crossing location.

We recognise that the proposed bored tunnel would avoid many of the impacts on the designated habitats on the North Kent Marshes. Unfortunately it has not been demonstrated that there has been an attempt to avoid impacts from the Southern Link Road options, highlighted by the fact that the most damaging route, the Eastern link, is Highways England's preferred option. The Eastern Southern Link goes through ancient woodland and SSSI at Great Crabbles Wood. It also goes through ancient woodland at Court Wood Local Wildlife Site. The Western Southern Link Road will result in the loss of parts of Shorne & Ashenbank Woods (ancient woodland and SSSI) and Claylane Woods, also ancient woodlands.

The National Planning Policy Framework states that "...*planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats...unless the need for, and benefits*

*of, the development in that location clearly outweigh the loss...*” and regarding development on SSSIs states “...*an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest.*” While Highways England’s superficial analysis of the case for the crossing weighs in favour of their preferred option (ignoring certain objectives), it has not demonstrated that the benefits of the particular preferred option outweigh its impacts, which remain to be assessed properly.

We object outright to the Eastern Southern Link Road, unless it can be demonstrated that it can be routed, or tunnelled, to avoid the loss of the ancient woodland and SSSI. The impacts of this route in the form presented are unacceptable, and it has not been demonstrated that these impacts are outweighed by the benefits of this option.

While the Western Southern Link Road would appear to result in the loss of a smaller area of irreplaceable habitat, we are not convinced by the information provided that enough work has been undertaken to avoid these impacts.

While it would appear that very little weight is given to any of the objectives apart from a very restricted analysis of the economic benefits, there must be a full analysis of the impacts, direct and indirect, of whichever option is chosen. In the first instance, the route should be designed to avoid these impacts as much as possible, before mitigation and compensation are considered. With regard to habitat loss, it is likely that a significantly larger area than that being lost to the scheme will be required, and this should be planned within a strategic network, managed in perpetuity.

The stated ‘preferred route’ is particularly disappointing when considered against Highways England’s biodiversity plan, which is less than a year old. Within this document are a number of Key Performance Indicators, including improving biodiversity, reducing fragmentation and increasing the number of SSSIs in favourable or recovering condition. The preferred option presented in the consultation will result in the failure of these targets. This is perhaps not surprising given the intention to consider the environmental impacts at the next stage rather than at the decision making stage. This approach is at odds with the principles of sustainable development, where impacts should be avoided in the first instance.

In conclusion, Kent Wildlife Trust calls on Highways England to:

- Undertake a proper analysis of the economic case for a Lower Thames Crossing that takes into account wider economic impacts, including environmental economic impacts
- Demonstrate that alternatives to further unsustainable road construction are not a better fit to the stated objectives of the scheme, given due regard to those objectives
- Reject the Eastern Southern Link Road, owing to an unacceptable environmental impact
- Reconsider the Western Southern Link Road, with the aim to avoid environmental impacts
- If Option C is chosen, rule out all crossing types apart from a bored tunnel
- Undertake a full analysis of the direct and indirect impacts of any chosen scheme, with an aim to have regard to the avoid-mitigate-compensate hierarchy, ensuring any mitigation or compensation is properly planned within a strategic ecological network, managed in perpetuity, properly funded.

Yours faithfully,

Greg Hitchcock

**Thames Gateway Officer**  
Kent Wildlife Trust