

Principal Areas of Disagreement Summary Statement

Lower Thames Crossing – TR010032

Higham Parish Council

Number	Principal Issue in Question	SoCG reference	The brief concern held by Higham Parish Council which will be reported on in full in WR / LIR	What needs to change, or be included, or amended so as to overcome the disagreement	Likelihood of the concern being addressed during Examination
1	Route Selection	2.1.1	Higham Parish Council is opposed to the proposed route and believe that new longer tunnels from Dartford to Thurrock bypassing Junctions 1 & 2 on the south side of the river, as suggested during the debate on this crossing in the House of Commons in March 2022 would be more effective. This maximises the use of the existing infrastructure and negates the wider network impacts of the proposals (see paragraph 13 below). It also avoids the destruction of ancient woodlands, SSSI and ecological habitats, and the loss of high grade agricultural land	Revise original Option A to build longer tunnels at Dartford starting between junctions 2 and 3 and rejoining the M25 north of junction 30, in order to provide a through route for M25 traffic and separate this from traffic using the A2 and A13 (which is what the LTC is supposed to do). A long tunnel would not only remove congestion but also improve air quality in Dartford by removing traffic. It would also remove the need to separately improve the wider network as set out in paragraph 13 below.	Unlikely
2	Design	2.1.3 2.1.30	Higham Parish Council think that the design for access from Brewers Road and Halfpenny Lane to the A2 at Marling Cross (Gravesend East) junction is unnecessarily convoluted. Also that the lack of an east bound slip onto the A2/M2 from this junction will lead to increased traffic on rural roads.	Brewers Road Shorne, which links to Halfpenny Lane Cobham, currently have direct sliproads onto the A2. The design needs to be amended to improve the proposed link between this current junction and Marling Cross (Gravesend East) in order to reduce the tendency to rat run on narrow rural roads. Provide a different solution for east bound traffic.	Possible

		2.1.5	The design of the junction between the LTC and the A2 when travelling east on the A2 is undersized and cannot be easily enhanced once the new roads are opened. The A2 is used by all types of vehicles including agricultural vehicles with trailers.	There are only 2 lanes continuing as the A2 towards the M2 instead of the current 4 lanes, lane 1 is the start of the approach to the new tunnel and lane 2 effectively becomes the start of the A289 from this direction. The A2/M2 should have a minimum of 3 lanes as a continuation and the other two roads should be 2 lanes each not 1 lane each.	Unlikely
		2.1.7 2.1.20	The A2 and the LTC and associated slip roads should have hard shoulders throughout (as currently provided on the A2 and A282)	This is a matter of safety. The government have said that currently they will not install 'smart technology' and the existing facilities (hard shoulder) on the A2 and A282 are used, demonstrating the need for them.	Possible
		2.1.21	There should be measures to stop the access of the A226 to the southern tunnel entrance becoming an informal junction as happens elsewhere	Eg: Locked gates, barrier access controlled from the nearby control room etc	
3.1	Construction Traffic A226	2.1.9 2.1.13	Routing construction traffic along A226 past junction with Gads Hill School/Forge Lane/Crutches Lane is inappropriate and dangerous to children, pedestrians and traffic. Given the historic nature of Gads Hill House (Grade 1 listed) and its grounds on the opposite side of the A226 (the 'Wilderness') and the connecting pedestrian tunnel, it is not possible to widen the A226 at this point.	Create haul roads parallel with Thong Lane from the A2 to compounds, as originally proposed, at: Gravesend Road Milton Southern Tunnel Entrance Ban Construction Traffic from A289/A226 through Higham.	Possible
		2.1.14 2.1.16	Also the general increase in traffic and particularly heavy goods vehicles is detrimental to funeral corteges and general access to the	Or as a minimum create traffic-light controlled junction or mini roundabouts in order to allow Higham residents and school parents to join the A226 from Forge Lane and	

		2.1.10 2.1.18 2.1.19	Thames View Crematorium. The effect of the increase in traffic on residents who live along the A226 (noise and pollution) needs to be mitigated	Crutches Lane Junctions, which form a staggered cross roads. Eg by the provision of insulation. Higham Parish Council also wish to be fully involved in agreeing traffic routes, timing of construction traffic etc to mitigate effects on local residents	
3.2	Construction Traffic A226	2.1.8 2.1.16	The A226 is already a busy all vehicle road prior to the imposition of the predicted construction traffic and is avoided by cyclists despite (or because of) the provision of substandard cycle lanes	For safety, cycle lanes complying with current standards for 50mph roads are needed on the full length of the A226 within the DCO boundary	Possible
3.3	Construction Traffic – Rural Roads	2.1.12 2.1.15 2.1.29	Construction related traffic should not be allowed along rural roads. Predicted increase in traffic for Lower Higham Road (Chalk)/Lower Road (Shorne)/Chalk Road (Higham)/Lower Rochester Road (Higham) etc is unacceptable.	Works should be arranged so that they do not use or cause an increase in traffic along roads which are less than 2 vehicles in width. Whether it construction traffic or traffic trying to avoid the works, nor cause an increase in traffic through Higham village	Possible
3.4	Construction spoil and material handling	2.1.40	We are concerned about the volume of material required for construction and also the amount of spoil which will need to be moved around the construction site or removed from it. The working sites south of the river are separated by two roads and a railway line as well as marshes and agricultural land from the river making river transport unfeasible.	This needs to be embedded in the DCO and not left to the whim of an appointed contractor at a later date.	Possible
4	Construction Impact				Unlikely

4.1	Brewers Road Bridge	2.1.27 2.1.28 2.1.29 2.1.31 2.1.32	<p>We now understand that this bridge will be closed for 19 months which, based on experience when this bridge was closed for the construction of the Channel Tunnel Rail Link (now HS1), will cause significant disruption to local residents, including:</p> <ul style="list-style-type: none"> - Affecting school pupils getting to Cobham, Shorne, Meopham and Higham Schools. Affects 417 and 416 bus routes. - significant impact on local traffic and rural roads particularly during the occurrence of incidents. - Adverse effect on The Inn on the Lake hotel 	<p>See also PAD 2.</p> <p>What is the reroute for Bus 416 in particular. Consider impact more fully of Brewers bridge closure.</p> <p>Minimise impact of any necessary closure by revising proposed working to shorten any closure to the absolute minimum (eg closing overnight and weekends). Potential to use the 'Golf Club' bridge as an alternative route on a short term basis.</p>	Possible
4.2	Marling Cross (Gravesend East) Bridge		<p>Works at Singlewell – Marling Cross will result in lengthy diversion in the event of incidents. Particularly with the closure of Brewers Road Bridge.</p>	<p>Eastbound, this is a congested junction with traffic queuing from the sliproad back onto lane 1 of the A2. The proposed works will make it worse. Phasing of works in this area to minimise disruption and stop rat running through Gravesend or on rural roads is an important consideration.</p>	
4.3	Noise and vibration	2.1.10	<p>As well as increasing traffic on existing roads, the construction works themselves will generate noise, vibration and dust. The effect of this on properties and the environment outside the working sites should be mitigated/removed</p>	<p>See PAD 7</p>	

5.	Environmental – Removal of ancient woodland and SSSI	2.1.31 2.1.36 2.1.37 2.1.38	We object to a) Removal of parts of Ashenbank and Shorne Woods. b) Removal of Clay Lane Wood c) Destruction of SSSI d) Removal of badger sets, bats roosts and great crested newt ponds e) Destruction of ancient woodlands. See also pollutants	Revise route to alleviate destruction of these ecosystems and important sites. This would not happen if the 'long tunnel' was built at Dartford instead.	Unlikely
6.	Environmental	2.1.36 2.1.37 2.1.38 2.1.39 2.1.43	Reduction of available prime agricultural land in contravention of Government policy and food strategy plans. Destruction of LLCA. Management and protection of replacement woods, open space etc.	Revise route. Ensure LLCA, the replacement woods and new parks are managed well and funded in perpetuity.	Unlikely Possible
7.	Construction Noise	2.1.11 2.1.41	A2/M2 junction noise at Crutches Lane/Three crutches. Noise increase stated as minimal. There has been no assessment as to the increase in noise and other pollutants arising from construction traffic on the A226 during construction	Monitor including during construction and opening. Develop plans to alleviate noise with noise cancelling fencing/ vegetation and/or improving noise attenuation measures within buildings as required	Possible
8.	Noise once operational	2.1.42	There is a predicted increase in traffic on existing roads including the A226. No measures are proposed to ameliorate the effects of this on those living along or near these roads	There should be a physical 'baseline assessment' of current noise and pollution levels along all roads which might be affected and then necessary works specified to bring any predicted increases down to current levels	Possible
9.	Pollution	2.1.32 2.1.33 2.1.34 2.1.44	It is noted that A2/M2 already exceeds pollutants levels and is an AQMA. Higham Parish Council ask that mitigation works are done in	Create and implement a pollution reduction plan to bring within human health levels.	Possible

			<p>this area to reduce current (and predicted) pollution levels.</p> <p>As there is a predicted increase in traffic along the A226, including past Gads Hill School once the scheme is operational, measures are needed which should be incorporated within the DCO scheme to kept pollution levels to current levels. The same considerations apply to other roads which are predicted to have increased traffic flows as a result of the scheme.</p> <p>All pollution needs to be considered not just Nitrogen dioxide</p>	<p>Review ability to revise route to ensure that remaining ancient woodlands are not destroyed by pollutants.</p> <p>Design measures to keep pollutants at current levels. Higham Parish Council note that some reports suggest that electric cars produce higher levels of harmful particulates than those powered by internal combustion engines.</p>	<p>Difficult</p> <p>Possible</p>
10.	Construction	2.1.8 2.1.9 2.1.10 2.1.13 2.1.14 2.1.18	<p>Temporary widening of A226 to accommodate construction and service traffic.</p> <p>Not possible at Gads Hill School (Charles Dickens Grade 1 listed Building)/Forge Lane/Crutches Lane Junction with the A226</p>	<p>Create haul roads to compound on A226/Milton/Southern Tunnel Entrance from A2</p> <p>Any widening (eg for the Crematorium) should be permanent, not temporary. The same is true for cycle lane and any other enhancements.</p> <p>See also PAD 2</p>	Possible
11	Traffic Modelling	2.1.23 2.1.25 2.1.29 2.1.30	<p>The basis for the traffic modelling has not been shared with us. Over the life of the project so far, the various iterations have produced some surprising results, and do not appear to take into account weight/width restrictions, physical attributes etc. of existing roads.</p>	<p>The models should be upgraded to take account of all matters which affect the likely traffic flows on all roads, not just main roads. The scheme can them be revised to incorporate factors designed to stop 'Rat Running'</p>	Possible
12	WCH	2.1.16 2.1.17	<p>Cycle lanes on A226 are not compliant to current standards.</p>	<p>Create fully separated cycle path along A226, particularly as this is currently the designated construction</p>	Likely

	13.3	2.1.24 2.1.25 2.1.26 2.1.27	Higham Parish Council believe that the proposed works should also include the works to the wider road network which are reasonably foreseeable, based on traffic modelling etc, and that the look back to see how the scheme and wider network is performing should only be used to mitigate unforeseen or unforeseeable problems	Without works to the wider road network, the proposals will just move congestion and pollution from one place to another (and compound the existing serious congestion at spots such as M2 junction 3 (the A229 junction)	Unlikely
14	Resident Discount/ Community Compensation	2.1.22 2.1.17 2.1.16	Resident discount on Tolls. Compensation for the Higham and Shorne residents for disruption and inconvenience. also, ensure that Cycle lanes on the A226, NCR177 and NCR1 are brought up to standard and safe.	Legally binding confirmation that residents of Gravesham and Medway will get the same discount for the LTC as is currently given to local residents for the Dartford Crossing. Community compensation for the Higham and Shorne residents. Ensure that Cycle lanes NCR177 and NCR1 are brought up to standard and safe, as well as that on A226.	Likely
15	Communication	2.1.19 2.1.24 And see comments above	Traffic Management Forum Monitoring Noise and Vibration Monitoring of impact once open. Incident Management	Ensure that Higham Parish Council and community groups are consulted and have representation on all/any groups establish by NH or anybody authorised by them (including contractors) to express and influence ongoing concerns as to traffic management, incident management, noise and vibration, pollutants, rat runs and environmental considerations both during construction and once in operational phase	Likely

16	Traffic sighting when open.	Not in currently.	<p>Higham Parish Council have previously verbally raised potential detailed items which need to be considered in the detail design. For example the angle and direction of the southern portal so that emerging traffic is not blinded by the sun at certain times of the year.</p> <p>Visibility of overhead signs, etc (eg some of the variable signs on the M25, between junctions 5 and 6 are not visible at certain times of the day in the winter).</p>	Produce detail design drawings to show that effects of the sun have been considered.	Likely