



LTC STATUTORY CONSULTATION OCTOBER 2018

KEY KENT DOWN AONB UNIT POINTS

- The NPSNN advises at paragraphs 5.151 to 5.155 that there is a strong presumption against any significant road widening or building of new roads in an AONB, unless it can be shown that there are compelling reasons for the new or enhanced capacity and any benefits must significantly outweigh the costs.
- The proposed scheme has been amended substantially since the previous consultation in 2016 to include a major widening of the M2/A2 corridor for a length of 2 km through the Kent Downs AONB south of the Shorne Woods Country Park which would result in a 14 lane wide highway through the AONB.
- In view of the fundamental presumption against road widening set out in the NPSNN and for the presumption against major developments within AONBs specified in the NPPF, a case for the need for these new works will need to be adequately addressed in the DCO application.
- The proposed changes to the scheme will result in significant increased adverse impacts to the Kent Downs AONB. Impacts would arise as a result of vegetation clearance including tree loss from the existing wide central reservation and from both sides of the highway and established mitigation for HS2, increasing the width of the highway from 8 to 14 lanes, engineering operations such as retaining walls, embankments, cuttings, provision of a new access to the haulage firm at Park Pale and the creation of balancing ponds.
- The proposals would also result in a greater physical and visual severance of the landscape to the north and south of the A2. Further impacts would arise as a result of noise both during construction and subsequently as a result of additional traffic using the route and due to additional lighting and signage.
- The widening of the A2 may also result in direct loss of ancient woodland along with habitat loss of the woodland and impacts to Shorne and Ashenbank Woods SSSIs.
- The proposal would also impact on the setting of the AONB, including as a result of the construction compound proposed just to the south of Thong, further removal of vegetation between HS1 and the A2 and a block of woodland immediately west of the AONB boundary, and as a result of the new highways infrastructure including junction connecting the crossing with the A2 being visible from the AONB, changing views from agricultural rural land to extensive highway infrastructure.

- The impacts on the AONB are recognised in the PIER with a predicted impact of Major negative change on the landscape of the Kent Downs AONB both during construction and subsequent operation and Major to Moderate negative visual impacts.
- It is advised at 6.2.4 of the 'Approach to Design, Construction and Operation' Report that the design of the Project will be influenced by five overarching considerations, including environmental constraints such as the AONB designation and that impacts will be minimised and/or mitigated wherever practicable and that the scheme seeks to deliver a positive legacy for local communities and the environment.
- The scope for mitigation in the A2/M2 transport corridor is limited because of the restricted width of the highway boundary and constraints of the HS1 line to the south and woodland to the north which is designated Ancient Woodland and SSSI. However the AONB Unit is concerned that insufficient mitigation is proposed in view of the significant residual harm that would result to the AONB. Scope for mitigation further from the current highway boundary needs to be sought, including consideration of any off site works that would help mitigate visual effects. Opportunities for advance planting also need to be established at an early stage. Green bridges need to sufficiently wide to be of true landscape and wildlife benefit. We are also keen to ensure opportunities for improving linkages for non- motorised users between the existing green infrastructure in the locality are fully embraced. It is understood that mitigation needs to be included within the red line for the DCO application and it is therefore imperative that opportunities for mitigation are established at this stage.
- In view of the limited opportunities for mitigation to moderate harm to the AONB, substantial compensation should be made, commensurate with the significant level of permanent harm. This would be in compliance with the Kent Downs AONB Management Plan policy SD12 which states that 'Transport and infrastructure schemes are expected to avoid the Kent Downs AONB as far as practicable. Essential developments will be expected to fit unobtrusively into the landscape, respect landscape character, be mitigated by sympathetic landscape and design measures and provide environmental compensation by benefits to natural beauty elsewhere in the AONB'.
- With regards to the design of the highway, the AONB Unit would expect flexibility in the highway design; full trunk road standards guidance should be relaxed to allow for a more sensitive design to respond to the protected landscape.