

## **TRO10032 LOWER THAMES CROSSING**

### **SUBMISSION BEFORE PRELIMINARY MEETING 1 (PM1) to be held on 6<sup>th</sup> June 2023**

#### **SHORNE PARISH COUNCIL (IP ref 20035603)**

1. We have previously made some contributory comments in our submission following the Programming Meeting that was held on 16<sup>th</sup> May 2023.
2. This document makes some additional comments submitted in advance of Preliminary Meeting 1 (PM1, to be held on 6<sup>th</sup> June 2023)
3. We would be very grateful to the Inspectorate for considering the points below and taking any consequent actions as they deem appropriate.

#### **List of Principal Issues:**

4. Looking at this it seems to cover all the required points although it is sometimes difficult to match up the topic headings to the points that we raised in our PADS Tracker as previously submitted (Your ref AS-079) in order to be certain that all items have been included.
5. It would be helpful if the present line listings could be expanded with a brief description of what each point is about, particularly for meeting Agendas. This would help IP's to prepare for meetings and in making written submissions through knowing better which of their issues are to be covered.
6. We would be very grateful if the intended meaning of the word "Security" could please be explained.
7. We would be very grateful if it could be considered whether direction of tunnelling (please see below) might be added to, or incorporated within, a suitable Principal Issues heading.

#### **Consultations taking place during the DCO process:**

8. National Highways (NH) have just opened an additional "Minor Refinement Consultation" which closes on 16<sup>th</sup> June. This seems curious timing as, apart from other considerations, it does not seem reasonable to be having to divert resources onto evaluating and responding to a new consultation at the same time that the DCO process is ramping up.
9. The Parish Council considers that additional NH consultations should not be taking place during the DCO process (unless requested by or agreed with the Inspectorate), and that the DCO process might appropriately be paused while any such consultation is taking place.
10. National Highways have the ability, subject to Inspectorate agreement, to submit revised documents as part of the DCO process. Provided that everyone relevant is notified, the Parish Council considers that would be a better way to manage genuinely minor changes and any necessary associated document updates.

**National Highways “Minor Refinement Consultation” content:**

11. The three topics being consulted on in the “Minor Refinement Consultation” are minor and/or reductions in the impact of the project but we are unclear why formal consultation on these is needed at all and especially at this particular time.
12. The consultation document also mentions, almost in passing, a “construction update” altering the previously stated and reiterated arrangements for boring the tunnels such that one tunnel “could” instead be bored from South to North. This appears to be a big change being proposed, hidden from clear view and avoiding properly consulting.
13. In the foreword on page 1 it states “While very limited in scope and impact we want to put forward these changes now so that we can get your feedback in order to help us determine whether to apply to the Planning Inspectorate to include them in our plans and if so, to ensure they can be given due scrutiny during the examination process.” It is not clear whether this refers only to the seemingly three items being consulted on, or additionally to the proposed change to tunnelling direction, however that should be the case regardless of whether or not it was intended by NH.
14. This new proposed tunnelling scenario would be a major change, one that has never been previously even mentioned as possible by NH. All previous documents and accompanying verbal reassurances, particularly about Environmental matters, have stated that two TBM’s will be used, both proceeding from North to South. As a result, no-one south of the Thames, whether Local Authorities down to local residents, and assorted National bodies, would have considered the new scenario in their previous reviews and responses or looked in detail at relevant documents issued for operations that were only located north of the Thames.
15. None of the documents previously published or in the DCO have evaluated this different Construction scenario in the south. It is obvious that there would in fact be very significant differences in Construction operations and impacts affecting aspects such as noise and vibration, air pollution, water supply and discharge, slurry management and transport, 24-hour working, light pollution, electricity supply, traffic and transport arrangements etc.
16. These matters cannot be dismissed by NH through high-level statements about lack of effect on the overall project when the local impacts and risks from some of the changes would be considerable. We disagree with many of the statements made. It is also unclear for how long this change has been intended. We disagree that such a significant change can just be decided by the tunnelling contractor without having been comprehensively assessed, formally reviewed and subject to a proper consultation exercise.
17. The Parish Council considers that NH will need to update a considerable number of their DCO documents to include this and all other alternative tunnel boring scenarios, including the significant additional impact on the local road network due to much greater transport of heavy construction materials.

*Shorne Parish Council,  
26<sup>th</sup> May 2023*