

TRO10032 LOWER THAMES CROSSING

SUBMISSION about ACCOMPANIED SITE INSPECTIONS (Ref PDB-001) For Deadline C (13th June 2023)

SHORNE PARISH COUNCIL (IP ref 20035603)

This document provides Shorne Parish Council's comments, as requested by Deadline C (13th June 2023), on National Highways Proposed Accompanied Site Inspection Itinerary (Ref PDB-001).

Section 1 is general comments and questions arising, Section 2 is comments on and expansions of the NH draft itinerary only relating to the Day 1 (South), and Section 3 is a Table of suggested additional routes and sites for inspection, mostly as USI's.

Section 1: General comments and questions:

1. Clarification is needed about who the ASI is intended for and who can/should attend. Our understanding from Inspectorate statements at meetings held so far is that the ASI's are intended to enable Inspectors to be able to see private land impacted by the LTC.
2. We would be grateful if it is possible for the opportunity to accompany such visits within and nearby Shorne as we do not normally have access to such land/landowners either. If attendance is permitted, can IP's join and leave the tour at mutually useful points?
3. Our understanding is also that it was said verbally that the ASI is not meant to include visiting locations that are publicly accessible anyway as footpaths can be walked and roads driven, actually and/or virtually, and some of this work has already been undertaken.
4. Note 15 asks for the Applicant to propose both USI and ASI locations however these have been mixed up together.
5. If it would be appropriate then Parish Councillors can assist the Inspectors in familiarisation tours of the area and identifying/listing many more locations of particular concern, however the latter should anyway suggest themselves from reading the NH documents and RR's/WR's. (See also Table below)
6. Note 15 refers to ".....sites and locations at which the Applicant has predicted likely significant environmental effects....." but the applicants predictions are in our opinion underestimating the likely extent of problems.
7. The NH table has a column for "discussion points", perhaps a different heading would be more appropriate, discussion would take a long time and to be meaningful and valid must include a wide range of IP's.
8. The listed itinerary items represent an awful lot of walking for one day, participants should be warned that they need to be fit and fast, wearing suitable footwear.
9. Alternatively the ASI in the south might need to be split over more days but would be do-able in one day if genuinely focused on private land.
10. The itinerary timing only shows Ebbsfleet International station and the A2, M2, A228, A229 and A289:M2J1 at off-peak times.
11. The itinerary does not include several important items which are included as comments in Section 2 and in the Table under Section 3.

Section 2: Specific comments on and expansions of the content of the draft National Highways Proposed Accompanied Site Inspection (ASI) Itinerary (Ref PDB-001), Day 1 South only:

1. 10.45 slot:
 - a. Additional traffic on the A228 starts at the M20 (or joins/leaves at the new Peter's Village bridge) however the parts of the route through Snodland and Cuxton are particularly unsuitable for additional traffic. Traffic into Strood is already often backed up to and beyond the roundabout leading to the M2/Strood.
 - b. Unclear why taking Hall Road and Rochester Road from Aylesford to Kits Coty. NOx mitigation sites might be better accessed from roads off the A229.
 - c. Given that the Burham pit site (already a wildlife area anyway) is thankfully now proposed in the ongoing Consultation to be excluded from interference in the name of NOx mitigation it might not need visiting on this tour.
2. 11.30 slot:
 - a. M2 between J1 and J3? (not J5?), Actually J3 to J1 if likely direction of travel
 - b. While on M2 look at the 4 lanes of traffic coastbound between junctions 2 and 3 that will be reduced to 50mph or less (on a motorway) due to the additional traffic volume from the LTC having joined.
 - c. While on M2 look at the houses close to the motorway in Strood west of junction 2 where there are already NO2 exceedances (depending whose figures one examines) but traffic pollution will get worse. More houses are due to be built in the fields by the A289.
 - d. Unclear about reference to Elaine Avenue and London Road (A2 Watling Street?) in Strood.
 - e. "Unknown compound south of A2" – does this mean Harlex at Park Pale Yard on the north side?
 - f. Observe current wooded and wide central reservation on A2 which is to be lost.
 - g. Observe easy and direct cycle track/footpath 177 alongside the A2 and the presence and width of hard shoulders and consider adequacy, suitability and safety of proposed replacement cycling route.
 - h. Consider the number of lanes of tarmac there will be underneath the Thong Lane/A2 supposedly green overbridge and whether anything will actually be able to grow on it.
 - i. Explain why some areas have been omitted from being used for mitigation, e.g. immediately east of Park Pale Yard.
3. 11.50 slot:
 - a. Note that Shorne Woods Country Park is the most visited Country Park in Kent hence has very large traffic access need.
 - b. Note the severance that will be caused to NS167, a very important footpath link, by the LTC with very indirect replacement.
 - c. Note similarly the loss of Fiveways/Five Fields (NG7/8/9 and connections) during construction and permanent diversion subsequently.
 - d. Note generally that all footpaths from Gravesend to its east will be severed at the same time by construction.
 - e. Omits visiting Swillers Lane fields in Shorne and Gads Hill Farm in Higham. (See Table)
4. 13.20 slot:
 - a. Unclear what is meant by Singlewell Service Station. Cobham Services southside?
 - b. Unclear point of visiting Southern Valley Golf Club, now largely destroyed so no "before" impression to be gained.
5. 13.35 slot:
 - a. Itinerary jumps about somewhat.
 - b. NS316 visiting just for views? Unclear route for getting there.
6. 14.30 slot:

- a. Clarification needed about what is meant by “River Public Pathway” here , is this the national cycle path NG2 along the northern canal bank?
 - b. Discuss grouting process and outcomes for overlying marshland
 - c. Discuss use of “Ramsar Ditch” for drainage during construction (now increased contaminated drainage and contamination risk if tunnelling direction is altered)
 - d. Discuss potential damage to Canal Bank by heavy vehicles, and to protected marsh north of the Thames and Medway Canal for grouting TBM landing works
 - e. Discuss closure of NG2 national cycle track during works
7. 14.45 slot:
- a. Clarification needed about what is meant by “River Public Pathway” here is this further along NG2 (becomes NS317) and then via Fort Road NS318? Is this needed?

Section 3: Table of suggested additional routes and sites which need inspection:

Location/Route	Reason	Look at
Brewers Road eastbound on-slip to A2, heading for M2 etc (up A289, back to M2	<ul style="list-style-type: none"> • Ease of use presently, access to A2, M2 and A289 • Proposals require all traffic to join the northern feeder road and go onto the A289, up to Higham A226, off, roundabout, over A289, roundabout, back down again to turn left onto M2 	<ul style="list-style-type: none"> • Distance of and time taken for required diversion, is about 4km • Ease and safety of journey, especially at peak times • Safety of proposed rejoining to M2 (currently lane goes round, in future requires joining stream of traffic)
Brewers Road to Higham traffic lights, turn left, turn left at Forge Lane Shorne, back through Shorne Village to Brewers Road, over bridge and take newly renamed Darnley Lodge Lane, Thong Lane down to take Right at Shorne Ifield Lane, back down Forge Lane, Across Shorne Crossroads, take Green Farm Lane to Lower Higham Road. Left to Lion Roundabout through Chalk and/or right to Higham/Lower Higham Also, Crutches Lane from Higham to Three Crutches (A2 out of Strood to join A289 sliproads back onto A2 westbound.	<ul style="list-style-type: none"> • Likely rat runs • Many local roads are also likely to suffer increased traffic through rat-running. 	<ul style="list-style-type: none"> • View likely rat-runs during construction and once operational • Suitability of roads for extra traffic and their safety • Also all approaches to/from Thong Lane for Shorne West and Riverview. • Routes drivers will take to reach the A226 and subsequent destinations by easier routes that those proposed by NH who are causing difficulties due to the LTC change to local roads layout. • Other badly affected roads will be Bush Road in Cuxton from A228 turn right then up through Cobham.
A226 Gravesend to Higham	<ul style="list-style-type: none"> • Proposed construction traffic route, ever increasing amount 	<ul style="list-style-type: none"> • Chalk Church • Shorne Crossroads, safety • Pear Tree Lane traffic lights

	<ul style="list-style-type: none"> • Proposed increased traffic post construction • Suitability for increased traffic 	<ul style="list-style-type: none"> • Proximity houses to road and below road level • Higham staggered crossroads, safety • Gads Hill House and School • Dickens' tunnel under roadway, question weight restrictions • Falstaff pub • Lack of NO2 monitoring, either current, during construction or operational.
A228 Peter's Village new bridge junction towards Strood, taking left at Bush Road and a right up to Cobham then Halfpence Lane to Brewers Road/Halfpence roundabout, then onto A2 westbound	<ul style="list-style-type: none"> • Rat running operationally • Increased difficulties of driving and future tortuous routes due to LTC 	<ul style="list-style-type: none"> • Closeness of houses to roadway, narrowness of road in Halling • Narrowness and traffic difficulties of rat run up to Cobham • Ease of access to A2 westbound for supermarkets, Ebbsfleet International and Bluewater regional shopping centre versus future position. • Also note on north side the easy, direct cycle path beside the A2 versus future proposals for long and less safe diversions.
M25, M26, M20 southbound to use A228, or off M26 at A20 then via A227 from Wrotham Hill through to A2 at Gravesend	<ul style="list-style-type: none"> • Major "strategic" rat run, already used to avoid problems on the M25 • Additional traffic will be pulled and/or pushed to use these routes due to the LTC 	<ul style="list-style-type: none"> • Routes used by drivers with route knowledge • Narrowness of A227 in places, closeness of houses to the roadway • Lack of NO2 monitoring either current or prospective in these areas.
ASI (will need consents, which NH can obtain from landowners): Gads Hill Farm, Higham then In Shorne Village: Swillers Lane large fields, Woodlands Lane pastures, Shorne Ifield Road field to south then Shorne West	<ul style="list-style-type: none"> • Productive farmland being taken for NOx mitigation and also being lost to the LTC build and mitigation 	<ul style="list-style-type: none"> • Amount of food production being lost, viability of farming on reduced acreage, severance of farmland • Additional footpaths required (as suggested to NH but not yet implemented)

- Maps/Plans of the above routes can be provided on request but are omitted at present for brevity and due to time constraints.
- The proposed routes are all USI's unless stated otherwise.
- Some of the locations mentioned in this document have already been visited as USI's but the document gives information about some of the points to be additionally considered.

Shorne Parish Council,
13th June 2023