

LTC Examination – Written Representation Deadline 1

Registration Identification number 20035375

Overview of Thurrock Scouts

Thurrock District Scout Council (TDSC) have registered as an Interest Party (IP) for the proposed Lower Thames Crossing (LTC) Development Consent Order (DCO). The southeast corner of the Condozers Scout Activity Centre (Condozers) falls within the proposed Order Limits.

TDSC provide activities to the youth of Thurrock through 19 locations from Ockendon in the West, Orsett and Chadwell in the centre and Stanford and Corringham in the East. Our recent census (Feb 2023) registered 1,116 members (4 to 18-year-old) who benefit from the activities, delivered by our 432 volunteers, on a weekly basis. As well as delivering localised activities, we arrange for pan Borough events so that all young people can experience skills, activities and competitions which are delivered from Condozers.

Condozers is approximately 3.5 acres and is located on the south side of Church Road between Cooper Shaw Road and Low Street Lane, in the ward of East Tilbury. Condozers is a peaceful rural setting 'an oasis' in a heavily populated and industrial Borough. Condozers is approximately 500 metres from the proposed route of LTC and the Station Road compound, and 1.5 km from the tunnel compound.

Condozers is used all year round by Thurrock Scout's youth and adult members. Condozers has developed and evolved over 70 years and is key to delivering the aims of scouting. During the last 13 years a major regeneration programme has been undertaken with £240K capital being invested, with many projects being delivered by volunteers. Most of the activities at Condozers take place outdoors and all people staying at the site use tents as sleeping accommodation.

TDSC is concerned about the impact on Condozers, during construction, due to extended travel time to reach the site which could result in it being unviable for evening activities. We do not have any indoor accommodation for sleeping, so our members **sleep in tents which it is impossible to insulate against an increased noise level.**

Why TDSC object to proposal

TDSC do not support the current proposals for the construction of the LTC as it will have a major impact on Condozers peaceful rural setting within a heavily industrial Borough. The environmental impact on Condozers, especially relating to potential noise, air quality, and health impacts, during the 5-year construction programme and then operational running, could be huge. This could potentially result in partial closure of the site e.g., overnight camping, and a loss of a much-needed recreation facility within the Borough. Any impact on the availability of this centre, through increased travel times and road closures during construction, plus environmental damage (noise & air pollution), has the potential to impact the development of the youth living in the Borough of Thurrock. During COVID we had to severely reduce the activities at our centre and have seen the negative impact on our members. Luckily, we have now opened fully, and members are enjoying the activity centre again.



Condovers camping field looking west with West Tilbury church in the distance. LTC route is 500 metres to the east of Condovers.



Condovers camping field looking west taken at Cub (8 to 11 years old) camp held on 7th to 9th July 2023, with over 200 people camping.

Consultations and Meetings

We have attended each of the public events during the last 6 years and raised our concerns, relating to the impact on Condovers Scout Activity Centre. Generally, we have found a high turnover of staff meeting and greeting the public on arrival, between events. During the process we have learnt to ask to see the experienced staff, who are normally located somewhere out of view. On each occasion we have been asked to document our concerns, and a response would be provided after the event, this rarely happened.

We visited the East Tilbury event, which was a late addition, for the Local Refinement Consultation held in June 2022. We managed to meet with several senior LTC project staff to discuss our concerns especially around the published documentation covering Private Recreational Facilities, which contained several incorrect statements. Because they only require access to 150 Square Metres of our land during construction and ongoing rights to access, once operational, they totally drummed down the impact on our operation, without discussion, and consequently published incorrect information. We have over 1100 members, under the age of 18 years, using this site so Safeguarding and Security of these young people is our number one priority.

We were again asked to document our discussion and concerns, which we did as part of the response, and were assured that someone would come back to us. Our first contact from LTC after the consultation was received on 2nd August, requesting a meeting. We responded that we were not prepared to meet until we had responses to the points submitted as part of the local Refinement Consultation. We finally received a response to all points raised on 24th October 2022. A meeting was held on the Condovers site, on 6th December 2022.

Being a voluntary organisation, TDSC was disappointed that LTC were allowed to hold yet another consultation after the submission and acceptance of their DCO by the planning inspectorate. As we are a voluntary organisation, we have limited resources to respond, especially as effort was being expended on the preparation of Written Representations against published timeline. Also, this consultation has been carried out during the start of our peak season (May to September). It would have been helpful if a public walk-in event could have been held within the impacted wards. TDSC requested a telephone conference, and this took over 2 weeks from request, to arrange, not satisfactory.

Reduction in Order Limit of land required.

An area of Condovers land in the southeast corner of the site falls within the order limit, ref 23-31 & 23-32. LTC require temporary possession of land and permanent acquisition rights for foul water drainage. At our 6th December 2022 meeting LTC stated “Anglian Water are unlikely to require use of any areas of site other than the fenced off pond area”.

TDSC requests the order be changed to reflect the actual area required (fenced off pond area), as the remainder of this area has been identified for future development, subject to planning permission, in the long-term development plan for the site. TDSC does not want LTC to retain permanent acquisition of rights over land which is not being used.

LTC confirmed in an email on Friday 30th June 2023:

“I am pleased to confirm that, having engaged with Anglian Water and our construction team, we have established that National Highways will be reducing the Order Limits in this area. As discussed with you on site, the pond area, beyond the fence and gate, will remain in the Order Limits and is still required to install the water pipeline. Access to this area will be taken from the neighbouring land”.

“If this change is accepted by the Examining Authority the DCO plans will be updated in due course”.

We look forward to receiving the updated DCO documentation.

Haul road north of Church Road and south of Muckingford Road.

There is a proposed haul road off Church Road, East Tilbury going north to join Low Street Lane. This haul road junction is approximately 50 metres to the east of the entrance to Condovers, on the opposite side of the road.

As discussed with LTC, any additional junctions on the narrow country lane of Church Road, leading up to the Low Street Lane railway crossing, is likely to impact road safety in this area as vehicles will be turning off Church Road to join the haul road.

LTC have previously indicated to us that this temporary haul road will be used as a secondary access route meaning that the usage of this route will be lighter. Can further information be supplied, or point us to where it can be found in the DCO submitted documents on:

- Projected daily traffic volumes.
- Type of vehicles using this haul road.
- Hours of operation of this haul road.
- Will the haul road be required for the complete period of construction, if not, how long.

Mitigation:

- Look for an alternative haul road route away from Condovers.
- Implement traffic management systems during our peak use of the site which is weekends (Easter to October), weekdays (late afternoon/evenings) May to August and full time during the school summer holidays (July/August). We would normally have 7 to 10 major events each year where there would normally be 150 to 250 people onsite. These are normally planned in October each year for the following year.

The recent LTC Minor refinement consultation included a proposal to relocate 2 Utility Logistic Hubs (ULH) towards the north end of Low Street Lane. Several years ago, Low Street Lane was restricted, mainly due to fly tipping, but remained open for Walkers, Cyclist and Horse riders (WCH). It's our understanding that this route will remain open during construction for WCH, south of the Coal Road junction, and Church Road.

- Will LTC be segregating the secondary HGV route and the footpath during construction?

Environmental Impact (air quality and noise) during construction and when operational.

Community Impact Report – Section 6.7 states:

East Tilbury ward would experience a large amount of construction activity, which would include building the two tunnels under the river Thames, construction of a new viaduct over the Tilbury Loop railway line, building a section of the A122 within a false cutting (earthworks designed to reduce the impacts on the surrounding area) and the construction of green bridges over the A122 at Muckingford Road, Hoford Road and Brentwood Road. There would also be substantial utilities works, including the diversion of OHLs, and the creation of large areas of environmental mitigation, including flood compensation and new habitats. There may be extended working hours for earthworks when days are longer (spring to autumn) and during periods of fine weather. Typically, noisier works such as piling or bridge-building would not take place outside core hours. Extended working hours would also be needed to cross the railway line, including weekend and night activities for those works on the OHLs.

Construction – Noise Impact

Table 6.16 shows predictive noise level at CN 50 (the nearest to Condovers) that there is the potential for a likely significant impact in the evening and overnight.

- Is there a maximum noise level that a young person, sleeping in a tent, should be exposed to?
- What further mitigations can be implemented if the maximum level is exceeded over an agreed period?

Following a meeting with LTC on 6th December 2022, they have installed a noise receptor on the Condovers site so that a baseline noise level can be established. Discussion have not taken place on how to review data and agreement on actions to take place, if required.

Construction – Air Quality

Community impact report states construction activities could affect nearby air quality through the release of dust and emissions from construction equipment and traffic. The area's most likely to be affected are those close to haul roads, compounds, and soil storage areas.

Properties more than 200m from the worksite, which are the majority of properties within this ward, are outside the area likely to be affected by construction dust or emissions from the worksite. In this ward, there are only a few properties within 200m of the worksite, including those along Station Road and Muckingford Road. Air quality impacts on these properties during construction would be temporary, and the Project team would put in place measures to reduce the dust impacts. The proposed measures to reduce dust and emissions have been proven to be effective when used on similar construction projects in the past. The air quality results predict change in air quality during the construction phase would be negligible, and there would be no discernible effect on health.

Condovers is within 50 metres of a proposed haul road, off Church Road, 500 metres from the Station Road compound and on a secondary access route for construction vehicles.

- Will the proposed mitigation measure stated for properties be suitable for a campsite where young people sleep in tents?
- What further mitigations can be implemented for Condovers?

At a meeting with LTC on 6th December 2022, an action was taken by LTC to investigate the installation of noise and air monitors so that a baseline can be established on the current status quo. This action would show the effectiveness of at mitigation measures., and actions that can be taken on deviations. This approach would assist any concerns raised by parents. No progress has been made on the installation of air quality monitors.

Operational – Noise Impact

Community impact report states that direct noise impacts from operational traffic would be experienced in the western section of the ward, close to the North Portal and the new A122 alignment. There would also be indirect noise impacts as a result of predicted changes in traffic flow and traffic speed on the existing road network within the ward.

Within the ward, changes in road traffic noise at identified noise sensitive receptors (such as nearby properties) are predicted to lead to significant adverse effects at receptors on Church Road (Condovers), Muckingford Road, Station Road, Low Street Lane, Meadow Close, Pipit Close, Shearwater Avenue, High House Lane, Love Lane, Lower Crescent and Pintail Close.

Noise contours are shown in Figure 6.7b. 6.7.104 The main methods of controlling noise would be, where practicable, to design the road within landscaped features such as cuttings and bunds (walls of earth). However, where noise impacts would be greatest, noise barriers would be installed (typically, wooden fences) in addition to the earthwork's features. The use of low-noise surfacing would also reduce the traffic noise once the road was in use.

- Is there a maximum noise level that a young person, sleeping in a tent, should be exposed to?
- What further mitigations can be implemented if the maximum level is exceeded over an agreed period?

Viaduct over Tilbury loop line – The viaduct is approximately 700 metres in length and located 500 metres from Condovers at its closest point. The structures general arrangement drawing for Work No 5C (sheet 30) shows parapets for the bridge deck but no provision for noise barriers to reduce noise from the LTC.

- How is it proposed to make provision for the provision of noise barriers on this structure?
- Will the structure be designed to allow the installation of noise barriers?

Operational – Air Quality

By installing an Air Quality monitor on the site, before construction, then a baseline can be established for monitoring once the road is open with all mitigations in place. If, after a period of operational running there are negative impacts then what further mitigation measures could be installed?

- What would these further mitigation measures be?

Local Public Rights of Way (PRoW) and Permissive access

The footpaths north of the river Thames and south of Muckingford Road in the Condozers area are used by TDSC's members as part of their development. These could be training walks for small groups (<6) in preparation for Scouting or Duke of Edinburgh achievement awards. They are also used as introduction to public footpath walking to our young members, normally with a maximum group size of 12.

From reading various documents presented as part of the DCO, the only extended period of footpath closure, in this area during construction will be BR58 and FP61, which will be divided without alternative routes for 2 years. We understand that there may be some short closures of footpaths or diversions, so we are looking for assurance's that:

- Temporary diversions are safe and suitable for groups of unaccompanied young people?
- Low Street Lane will be accessible, on foot, during construction as this also appears to be secondary access route for HGV's during construction?

Tilbury area Redesign of tunnel maintenance access

This is proposed access route from Station Road for maintenance and emergency vehicles, it's part of the Tunnel Area Plan. It's north of the tunnel and south of Tilbury loop line, an operational access road and bridge would be created for maintenance and emergency vehicles.

There have been previous proposals to provide a Tilbury Link Road to connect to Tilbury 2 port development to the LTC. This would run south of and parallel to the Tilbury loop railway and close to Condozers.

There have also been proposals to include a service area with associated access from the LTC at this location and although this has now been removed from the current proposals the current layout could provide the necessary access arrangements.

- What provisions are there to prevent the future provision of another junction at this location to facilitate access to either a link road to Tilbury 2 port development or a service area or both?

Tilbury Fields – Change of visual outlook from Condozers

It is mentioned in the East Tilbury Ward Community Impact document, that the Project proposes to create Tilbury Fields, using excavated materials from the construction of the tunnel and north portal to create new landforms. Tilbury Field a new park that would provide new open space in the area at Goshems Farm. The park would be over 35 hectares in size, designed with elevated areas to create vistas (above the surrounding landfill) across the Thames Estuary and guide views to features such as Tilbury Fort, Cliffe Fort and Coalhouse Fort that reflect the military history of the Thames. The new park would be publicly accessible via the Two Forts Way in the south and from FP200 in the north. It would incorporate accessible permissive routes through the landforms and allow users to reach the elevated areas.

- Why are the new public routes being proposed as “accessible permissive routes” and not Public Rights of Ways?
- LTC are keen to promote the size of this park but, why isn’t the height of the Landform mentioned?

Creation of Tilbury Field, using excavated materials from the construction of the tunnel and north portal, will result in a major change of visual outlook from Condozers.

The recent LTC Minor refinement consultation raised the option of only one Tunnel Boring Machine (TBM) being used, this is no doubt going to impact the overall timeline for the LTC project to be completed 100%, including the creation of Tilbury Fields. TDSC’s concerns relate to the number of seasons (spring/summer) required to dry and move the spoil to landscape Tilbury Fields, due to the potential environmental impact (noise and air pollution) within the East Tilbury Ward. TDSC would like to know the following:

- If 2 TBM’s are used, how many seasons will be required to create Tilbury Fields?
- If 2 TBM’s are used, what period (in months) would have elapsed, after the opening of the LTC, before Tilbury Fields is open for public use?
- If 1 TBM is used, how many seasons will be required to create Tilbury Fields?
- If 1 TBM is used, what period (in months) would have elapsed, after the opening of the LTC, before Tilbury Fields is open for public use?