

TRO10032 LOWER THAMES CROSSING

Comments on Additional Submissions submitted since the Application was accepted For Deadline 1 (18th July 2023)

SHORNE PARISH COUNCIL (IP ref 20035603)

This document discusses alterations to documents as highlighted by the Applicant through tracked changes, and review of new information of relevance identified in completely new documents within AS-001 to AS-089.

We have not reviewed all the Relevant Representations but will aim to review Written Representations once submitted.

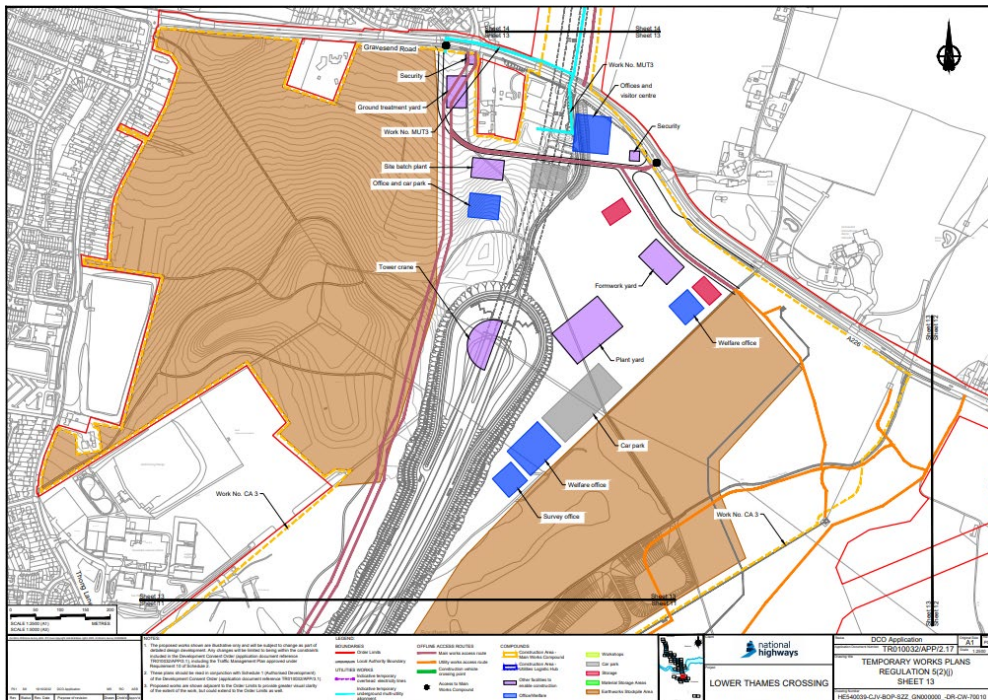
1. AS-005 - Additional Submission - 1.7 Place Name Gazetteer

Comment:

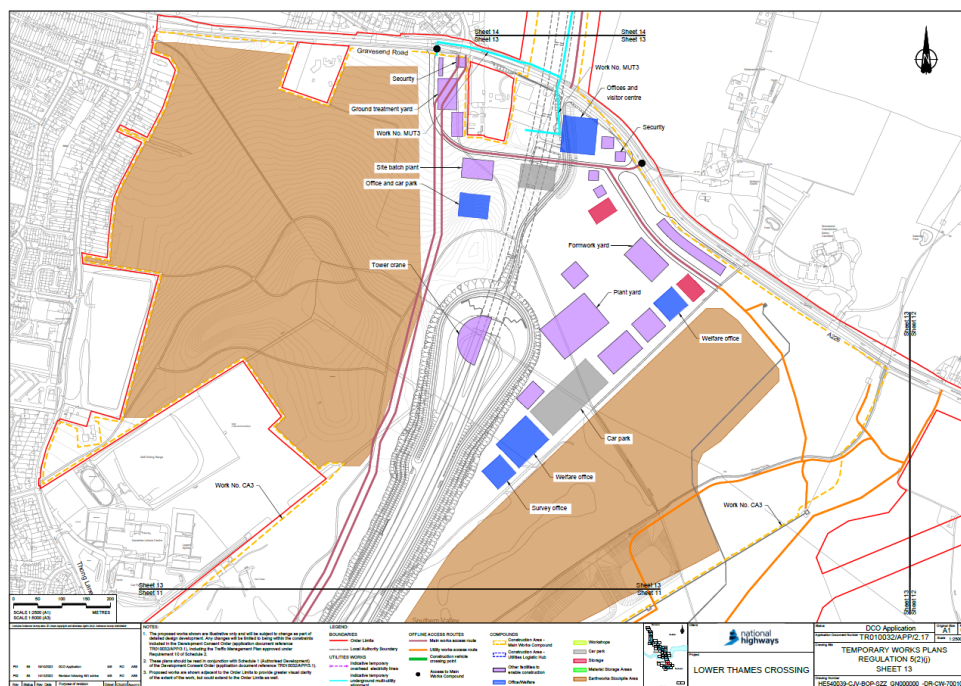
- Darnley Lodge Lane on page 2, this was formerly known as Watling Street.

2. AS-035 - 2.17 Temporary Works Plans - Volume B - (Sheets 1 to 20) (Tracked) (Version 2):

Sheet 13: Main works compound south of A226 as shown in APP-051, Oct 2022:



vs Sheet 13: Main works compound south of A226 as now shown in AS-035 (correction of reference given in our Minor Refinements Consultation response submission where this point was also raised):



Comment:

- Several existing and new lilac-coloured structures remain unlabelled, heights are unknown as are intended use and potential noise propagation.
- The land here is higher than the A226 Gravesend Road so the structures, especially where close to the A226, will be highly visible and possibly audible.
- In this document (but please see next section) there no structures shown for the part of the main works compound north of the A226 and the Milton Compound north of the Canal, or for the water discharge area north of Lower Higham Road.

2. AS-050 - Additional Submission - 6.3 Environmental Statement - Appendix 2.1 - Construction Supporting Information - (Tracked) (Version 2):

Comment:

- Two of the missing works compounds layouts referred to in the previous section are shown in plans within the new additional document AS-050 (Plates 1.4 and 1.5 respectively, pages 26 and 27) but the “Key” box for the compound north of the A226 is incomplete.
- There is still no internal structure relating to the water discharge area north of Lower Higham Road. We would be grateful if this could be added or signposted as there are box-shaped outlines here, close to houses, which suggest possible structures and/or machinery.

3. AS-058 - Response to Procedural Decision - Cover Letter

Comment:

- The Applicant stated that “Parties that produced a PADS Tracker largely did so unilaterally and only shared them with the Applicant just before the deadline.” and “To assist the

Examining Authority in understanding the position of each party and to confirm whether the Applicant had the opportunity to review and thus agree with the content of the trackers, the Applicant has produced the enclosed Principal Areas of Disagreement Position Paper [Document Reference TR010032/APP/8.2].”

- Our understanding was/is that the PADS Tracker was “our” document, to be used to flag up our issues with the Project directly to the Inspectorate, hence it was not relevant or appropriate for the Applicant to review or agree the content. NH gave us advice on format but wanted us to cut down the number of issues, so these were amalgamated as possible.
- For Shorne Parish Council, our PADS Tracker was almost entirely based on our SoCG, which was already formulated as an issues list, therefore it had little/no content not already seen by NH. Our understanding was/is that the SoCG is an NH document.
- We would be grateful if “ownership” of the respective documents could be clarified in case we have formed the wrong impression.
- No additional comments arise from AS-061 - Response to Procedural Decision - 8.2 Principal Areas of Disagreement Position Paper
- We would just say though that it is not overall practical to have two very similar but separate documents that are both requiring regular updating, particularly as we have so many issues to review. The Written Representations will effectively create a third version. We would be grateful if the Inspectorate could consider and advise whether these duplicating/overlapping documents are all necessary.

4. AS-086 - Applicant Response to Procedural Decisions of 21 March 2023:

Comments:

- The Ministerial statement of 9th March 2023 was made after the government had been able to review the DCO documents as published.
- Reading the Ministerial statement from a different angle, the SoST might be construed as implying that the application is not presently right, or an effective and deliverable plan, and that 2y further work is required. Clearly, the decision to delay construction was not just about timing of funding.
- It is perhaps unfortunate that the DCO had already been submitted and accepted for examination before this opinion was given.
- NH discuss many reasons why the examination should continue and why they do not need to change anything now (and with no actual promise of change in the future either). However, many IP’s have already expressed concern about a variety of contributory assessments being inadequate, out of date or incorrect.
- We have also expressed concern (in our comments on ISH2) about the DCO being effectively an “outline planning application with all matters reserved”. In our view, it might be preferable for the DCO to be withdrawn again while yet further work is undertaken. This would allow any resubmission of the DCO application to be in a form that would have already allayed most of the concerns that IP’s have raised.

5. AS-089 - Response to Issue Specific Hearing (ISH) 2 draft DCO

Comments:

- Under “Article 56” on page 42, Gravesham Borough Council had asked about additional structures in the proposed Chalk Park that might require Planning Permission however the same question also applies to the new parking area proposed at the southern end of Thong Lane.
- We would be grateful if the Applicant could please be requested to re-answer in connection with that area.

Shorne Parish Council
18th July 2023