

TRO10032 LOWER THAMES CROSSING

SUBMISSION after ISH1 (Issue Specific Hearing 1, 21st and 23rd June 2023) For Deadline 1 (18th July 2023)

SHORNE PARISH COUNCIL (IP ref 20035603)

A Parish Council representative attended the hearing on 21st June and viewed the continuation recording of 23rd June retrospectively. This document provides Shorne Parish Council's comments subsequent to the hearing, where relevant using same numbering as the Agenda.

We were pleased to note that a considerable number of our concerns were shared by other attendees through the very wide-ranging discussions, which also raised/revealed some new aspects.

This document details and expands upon the points that we made through participation and also comments on other points that arose, some of which will be developed further in our Written Representations.

Section 1: Representations made and expanded discussion:

Item 4b: Interface with the M20:

Representations made at the meeting:

- Impact on A2 east of Shorne/the LTC – The Applicant considers that traffic westbound on the A2 west of Shorne will reduce but we consider that there will be considerable pull of traffic heading eastbound to use the LTC, pulled in from the M25 and further west on the A2 (i.e. from south-east London). This will have other detrimental effects on traffic volume and pollution levels.
- Impact on M2 east of the river Medway – The Applicant predicts that, due to the great increase of traffic volumes on the M2, compounded by another long hill particularly heading eastbound, traffic will be greatly slowed to an extent that we consider to be incompatible with provision of and classification as a motorway.
- A289 impacts – see below in relation to comments made by Medway Council.
- Migration from M25 anticlockwise – It also needs to be factored in that, particularly when there are problems at the Dartford Crossing (as there still will be), traffic that is further back on the M25 and travelling anticlockwise will use the M26 and then the A227 and/or A228 to move across to the LTC. Trying to do so will gridlock the area. These roads are not suitable for additional traffic and are in some parts highly residential.

Item 4cii: The change to a single TBM:

Representations made at the meeting:

- Tunnelling all serviced from the north – At the hearing NH provided additional information, saying that tunnelling would be fully and only serviced from the north, which had not been made clear in the Consultation.
- Transport of “slurry” - NH state that slurry would be “transported” back through the first tunnel but the method is not known. Later they said that it would be “pumped”. We are

concerned about possibility of major spillage and that choice of slurry transport method may be another matter to be decided by the Contractor and therefore neither known at this time or under NH's control.

- Consultation responses to be copied to the Inspectorate: We asked whether it would be helpful if our Consultation response was copied to the Inspectorate so that you could see exactly what we had said and also because our previous experience is that our comments made in Consultation responses do not always find their way into the Consultation Report or get answered. We note that Thurrock Council reported the same situation.
- Direction of tunnelling to be decided by the Contractor - NH had said that the direction of tunnelling would be decided by the Contractor but we do not consider that the Contractor should be able to make significant changes without using a change control process.
- Definite commitments by NH - We are grateful that the Inspectorate have asked NH to made definite commitments but regret that we still lack confidence that changes to materials transport in particular might not arise later.

Copy of response submitted to NH:

- As discussed, please also see our response to the Minor Refinement Consultation as submitted to NH, to be found at the end of this document. The response was made based on the small amount of information provided in the Consultation document.

Other points:

- Is it a change? – We consider that NH's stance that it is not a change in legal terms is not helpful as impacted residents consider this to be a significant change and furthermore one that does have Environmental impacts. NH would have been better to say that they were Consulting when they did not strictly need to rather than trying to make out that issues over the number of TBMs were not a change.
- Environmental effects – NH say that the duration of effects and the overall construction duration remain the same. That may be true on a project-wide basis however it is also clear that tunnelling and all associated activities will take place for longer. NH's previous assurances over two TBM's moving north to south were accepted as satisfying concerns over Construction risks to the North Kent Marshes SSSI and Ramsar Site, whereas having half the total slurry instead produced very close to these introduces considerable new concerns.
- Credibility of statements – If the Contractor is likely to decide some matters later then despite what they said at the hearing, NH cannot in fact guarantee that any particular matter under discussion will happen the way they say at present.
- Assurance on supply route being from north through first tunnel bore – As we were previously assured repeatedly that there would be two TBM's, we do not place any weight on NH's statement. It would appear that at present lining segments are proposed to be manufactured in the north portal works compound however if that changed to a bought-in situation then businesses in Kent would not be excluded from bidding and if they won a contract then it would be expedient to deliver materials by the shortest possible route.
- Can it all fit? – The first tunnel bore would be extremely busy needing to accommodate the slurry heading north, water and electricity supplies, and staff and delivery vehicles heading in both directions.
- Accordance with what it said in the DCO documents - NH said that they did not state one or two TBM's in the DCO submission however we question why that was changed only at the time of submission when they had previously always stated and reassured that there would be two.

- Further detail is required - We support the suggestions made by various participants that considerably more detailed information/evidence is needed.

Section 2: Other points to mention now (remainder will be in our Written Representations)

Item 4a: Various points:

Constraint through excessive traffic levels:

- Discussion on constraint to the LTC through excessive traffic only related to the “proposed alignment” of the LTC itself.
- NH mentioned already foreseeable slowing of slip-roads to/from the LTC and wider network effects. By the latter they mean over a very wide area, which does not adequately consider effects nearby, on the A2 to its west and the M2 to its east.
- The approach taken disguises that there are significant negative impacts close to the crossing that will impact on its functioning.

Concerns raised by Medway Council over the A289 and M2J1:

- We support the concerns expressed by Medway Council over the M2J1 junction with the A289.
- We are additionally concerned about the eastbound on-slip from the A289 to the M2 being changed from a lane gain to a merge, which is less functional and less safe.
- Also about the additional traffic being put onto the A289 including the forced 4km diversion from the current Brewers Road eastbound on-slip to the A2 in order to in the future get back to the M2 eastbound.
- We have shared our concerns with Medway and Gravesham to hopefully inform their LIR's.

AADT data and design capacities:

- With NH having always previously provided and relied on AADT data it is surprising that they apparently now favour journey time and reliability theoretical calculations over hard data.
- We note that NH always refer to problems with traffic volumes exceeding design capacity at Dartford as a justification for their LTC proposals but are refusing to provide a design capacity for the LTC. This prevents direct comparison.
- NH however, as Medway Council commented, also refer to design capacity problems when expressing concern about development pressure on existing roads and junctions, for example the A289:M2J1.
- If LTC design capacity will be greater than anticipated peak traffic volume for considerably into the future then there is no reason to refuse to provide this information. Refusal creates its own suspicions. We note that the Dartford Crossing has 4 lanes and the LTC has 3 in the tunnel but only 2 for some approach roads, so speculate that LTC design capacity is only $\frac{1}{2}$ to $\frac{3}{4}$ compared to the existing Crossing.
- We would ask if the Inspectorate might request NH to supply these figures, which they must have, or explain why they either do not have them or still will not release them.

Item 4b: Modelling and outputs:

Reliability of the Transport Models:

- NH say that their Transport Model is reliable and robust in accordance with DfT guidance but that is not the same as saying that it would be judged as being reliable and robust when considered on its own or by others, that it is the same model that one would choose to use when having a completely free choice or that it adequately models local impacts of the LTC.
- Local impacts of the LTC are ignored by NH as they are thinking strategically at too high a level. By ignoring existing conditions on the ground they are not guaranteeing delivery of a functional and practical outcome.
- The statement by NH that they have modelling of junction performance but only share it when they deem appropriate was somewhat astonishing.
- They also appeared to state that Construction phase traffic modelling had not been done yet, which means that they do not know whether and how the Construction phase traffic can route and flow, and therefore whether the project can be built in constrained locations.

Age of software programs used:

- In several places in the discussion, by both NH and IP's, there was reference to software programs being "historic" (COBALT accident appraisal) and use of the out-of-date TEMPro 7.2 rather than the latest version.
- Using old programs and old versions of software when newer programs/versions are available does not convey confidence in the data manipulations and outputs. Similarly the use of old and outdated data inputs ensures low confidence in outputs.
- We find it surprising that a project as complex and costly as the proposed LTC is not being supported by recent data and the latest software.
- It might be useful if the Applicant could provide evidence backed assurances that using old data and programs is not detrimental to the BCR calculations.

Should we be "concerned"?:

- A statement was made by NH to the effect that Para 4.6 of The National Policy statement for National Networks says that the Inspectorate and the SoST "...do not need to be concerned with the national methodology and national assumptions around the key drivers of transport demand...".
- This then may not apply to IP's however there is a difference between "concerned with" and "concerned about", particularly if we believe that the predictions arising are incorrect.

Outputs within DfT acceptable range, confidence limits:

- Where outputs of calculations are said to be within the range acceptable to the DfT, there is a question arising as to where in the acceptable range the particular output falls as there can be a big difference between the lower and higher ends. Similarly, we need to know the confidence intervals of the outputs, as these tell us how certain the output is and whether the confidence intervals could take the output figure out of the acceptable range.
- It might be useful to ask NH for this or for it to be signposted in the documents.

Human behaviour can confound predictions:

- Discussion of the veracity and minutiae of transport modelling methodology is otherwise beyond our specialist expertise however we will just say that reliable prediction and

influencing of human behaviour, in this case of drivers (who can be very inventive), is a very difficult matter.

- Although aspects like journey time and reliability were quoted as major influences, we would also mention the use of satnavs and a preference to keep moving as being major influencers of route choice that can confound even the most expert predictions.

Resilience:

- This is a major scheme Objective but NH seem to consider that simply adding the LTC to the network map provides Resilience, they do not discuss how a useful quantity of Resilience will be delivered in practice. Our contention is that it cannot be (reasons to be detailed in WR's).
- We note that some charts modelling Resilience in practice (although only a least-worst scenario) were included in the documentation relating to the 2016 Lower Thames Crossing Route Consultation (Pre-Consultation Scheme Assessment Report - Volume 5: Traffic and Economics Appraisal, Section 13: Appendices, Page 9).
- That implies that operational Resilience had been modelled but no discussion has been included subsequently.
- We request that the Inspectorate might request the previous/latest full information on operational Resilience to be provided.

Item 4d:

"Smart Motorway" by stealth:

- What is proposed is a smart road - When it was recently announced centrally that the rollout of smart motorways was being paused we doubt that it was considered that changing classification to not being a motorway would be used to provide exactly the same features.
- Influence of other local roads - We do not agree that LTC has to be an A road because there are other A roads locally. However it is anyway still functionally a motorway.
- "Best-in-class" safety features etc – the Applicant stated that a maximal range of safety features is being provided, this again underlines that the road is really a smart motorway.

"Hard shoulders" and A roads:

- Hard shoulders are the norm locally - The Applicant stated that all purpose trunk roads do not usually include a hard shoulder. This may be true for recent builds if standards have been reduced but it is the norm locally and in wider Kent for hard shoulders to be provided.
- Ability to get off the running lanes - The issue actually is not the presence necessarily of a formal hard shoulder as such but having the ability to get vehicles (and occupants) fully off the running lanes so as to avoid being fatally rear-ended by an HGV. Therefore the issue is about there being an accessible (not very) soft verge to which access is not prevented by fixed barriers placed very close to the running lanes. The LTC route is designed to take large numbers of HGVs, for which soft verges and 2.3m width are inadequate.
- The decision should be informed by the likely incidence of breakdowns – The presence of long hills, which there are on the LTC route and nearby, increases the likelihood of vehicles breaking down. The LTC will have a 4km long incline from the tunnel heading south to the junction with the A2 and then a further incline heading eastbound. We consider that adequately wide hard shoulders are essential for that reason.

Other safety issues:

- Locations of proposed safety refuges - The LTC is supposed to have frequent safety refuges although broken down vehicles cannot always proceed to a refuge area before stopping.

The proposed refuges are not easy to identify on the plans. It would be helpful if NH could please be asked to provide drawings with these locations highlighted.

- Extent of safety features being provided – If a maximal range of safety features is to be provided the expenditure must be justified by there being significant safety concerns. The very fact that NH consider them justified to install is a safety concern in itself.
- Slow moving vehicles and safety – It was said by the Applicant that slow moving vehicles would be prevented from using the LTC, especially the tunnel, however there is not supposed to be any restriction on wide and heavy loads so items such as slow moving very large cranes could proceed through unchecked. Also, the 4km southbound slope after the tunnel will automatically have slow moving HGV's which will cause dangerous bunching of traffic and actions resulting from frustration to other road users.

Item 4e:

Options Appraisal:

- We consider that options further east of the LTC were not fully or properly evaluated and were disregarded too early in the processes, as also were Option A solutions.
- A choice was not really provided south of the river Thames as there was only one location for the tunnel.
- The ESL suggestion appeared to have been provided only as an “unacceptable green-field option” to divide opinion and be shot down, as evidenced that there were no proper designs produced.
- There are also matters suggesting “Pre-determination” which we will discuss further in our Written Representations.

All directions links provision:

- This was an interesting discussion in that the northern connection to the M25 is a simple merge/demerge junction in a relatively unpopulated area and only allowing traffic to go to/from the north whereas in the south the LTC lands as a T-junction with the A2 in a highly populated residential area.
- Plans have developed based on what we were offered, in a situation where a large number of residents need to access all directions for their existing routes to e.g. schools and employment and these cannot be summarily cut off. The ESL suggested junction was worse than the WSL is that regard, although the connectivity at present offered by the LTC does not replace what is being taken away, with many journeys by local residents being made longer and more difficult.
- If there were other tunnel location or road and junction design options considered by NH they were not shared with us for consideration. A fresh look at an aerial map and further discussion might be worthwhile.

Item 4f: NOx compensation land:

- This is still very confusing but our conclusion is that there is still double-counting.
- How do we know that enough area multiplied by ecological uplift is being provided? This question also applies to all the mitigation and compensation land identified.
- NH cannot count initiatives to be delivered by others, that are outside their red line boundaries, as being “their” NOx mitigation. (Otherwise this is equivalent to saying that any new tree planted privately near the LTC can also be counted).

Item 4hi: Economic benefits

- The arguments about the calculation and validity of the BCR were at high level and perhaps above us but as lay people we can make general observations.

- The BCR appraisal includes both factual and conjectural aspects, matters that are assured versus those that are only potential. Notwithstanding other matters like DfT choice to use and believe the high level and generic TAG outputs, a decision to spend over £8bn should surely be made only on good quality data inputs and assured outcomes.
- The reversion to 2010 prices and values as the basis of calculations for “Appraisal” and comparison purposes is concerning. Now that we are in 2023 one might think that at least a 2020 base should instead be used. However, the main point here is that the purpose of the DCO is a stand-alone evaluation and approval and not to compare this proposed scheme to others.

Item 4hiii: Connectivity for the Ports and Business Parks :

- Please also see our comments following OFH2.
- Connection of the Ports to and from the southern LTC seems essential and completely in accordance with the scheme local and wider economic benefits Objectives. Similarly, existing junctions need to function adequately in the face of additional pressure from the LTC. We therefore support the inputs from Thurrock Council, Tilbury and DPWorld on these matters.

Thank you very much for considering the above submitted comments.

Shorne Parish Council
18th July 2023

Shorne Parish Council: "Minor Refinements Consultation" response, 19th June 2023

SHORNE PARISH COUNCIL

RESPONSE TO THE NATIONAL HIGHWAYS "MINOR REFINEMENTS CONSULTATION" held May-June 2023

For brevity, we have omitted including our usual Introduction section which remains unchanged.

The "Minor Refinement Consultation" includes 4 topics, although we are unclear why Items 1 to 3 were sufficiently important that a Consultation was needed just when the DCO process had really got started.

We will be grateful for the points made below to be considered and taken into account in consultation response evaluations.

Please note that we consider that all points made by all responders must be evaluated and reported.

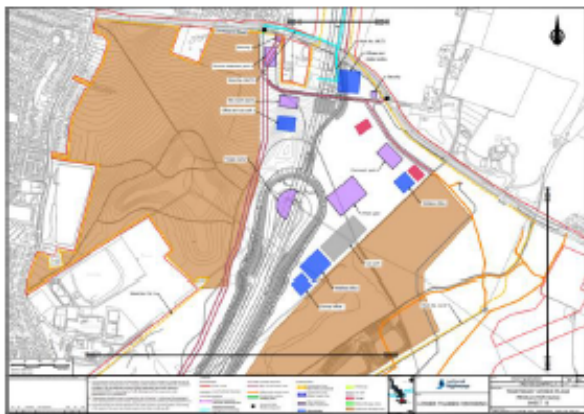
1. Consultation on Reduction of Nitrogen Deposition compensation area and Order Limits at Blue Bell Hill and Burham (MRC01)
 - The increase in land requirement for NOx deposition was only relatively recently proposed so it is rather confusing that land was included and has now been removed again.
 - Clarification is needed about whether the correct amount of land is being provided and where, and whether the degree of enhancement proposed is sufficient uplift.
 - It is surprising that NH were not fully informed about the landowners plans at Blue Bell Hill.
 - At Burham, the former chalkpit is already a locally important ecological and habitat area and its removal from interference by NH is welcomed.
2. Consultation on Increase in limits of deviation (LOD) for the northern tunnel entrance headwall (MRC02)
 - No specific comments, this does not seem to be a significant change
3. Consultation on Revised utility proposals at East Tilbury (MRC03) (three changes)
 - No specific comments, this minor change seems to be an improvement locally.
4. "Construction update" on how the tunnels beneath the River Thames could be constructed by either two tunnel boring machines, or by using a single tunnel boring machine to construct both.
 - In the Foreword, Mr Palmer refers to the changes detailed within the document as being ".....very limited in scope and impact.....", and also ".....small in extent, with only minimal change.....", however these are not the case. This is reiterated on page 30 where it says that "While there would be a small number of differences in the logistics and impacts associated with a single TBM approach, there would be no materially new or different environmental effects arising compared to those presented in the DCO Application." This is patently untrue.
 - Mr Palmer also states that feedback is requested "....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.....". The changes in construction methodology proposed are very large with significant additional impacts south of the Thames, and therefore must be set out as detailed plans considered by the Planning Inspectorate. They cannot be dismissed as being not significant in the overall project so

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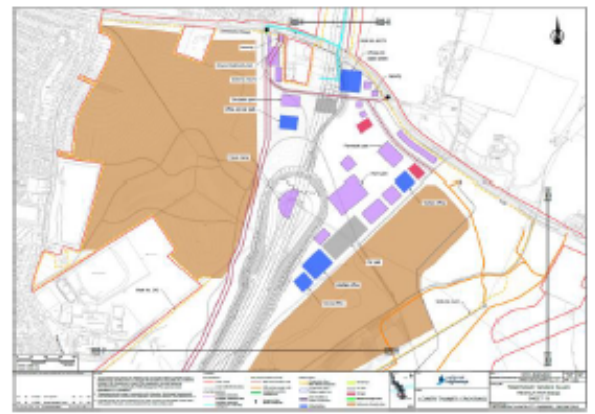
therefore waived through, and cannot just be left to the whim of unknown contractors to implement.

- Throughout the many Consultations so far, we have always been told and reassured that the tunnelling would be undertaken with two TBM's operating simultaneously from north to south, therefore we do not appreciate it being suggested at this late stage that tunnelling might be undertaken differently. E.g. in the Statutory Consultation it states that "It is proposed that the tunnel crossing will be constructed starting from the north of the River Thames and driving south."
- Because of that information and assurances, Consultation responders including the Parish Council have not looked at all into information about tunnelling that was included in documents relating only to north of the Thames so would not have made any consideration of the content in their responses.
- This presently proposed change therefore invalidates all the previous consultation responses including to the Statutory Consultation.
- We note also that in DCO Preliminary Meeting 1, the NH representative stated that it was not necessary to Consult on this proposed change as it did not require a change in "Powers". We do not accept this suggestion as in that case an explanation is needed as to why any of the non-statutory Consultations took place at all.
- Further change to the main southern works compounds is noted, with a great increase in buildings/structures, up to 25m high so resulting in significant local visual impact including near Chalk church. The suggestion that there is no significant change, as the crane is still the tallest structure, is rejected.

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



Main works compound south of A226 as now shown in AS-036/7:



- Local residents have expressed concern that the presently discussed "possible" change was, despite reassurances, actually already planned for some time to be happening.
- The Parish Council considers that NH need to update/revise a considerable number and range of DCO documents in order to take account of this proposed or even just possible change to the previously informed and reiterated twin N-S tunnel boring scenario.

Shorne Parish Council: "Minor Refinements Consultation" response, 19th June 2023

Examples of likely adverse change south of the Thames due to modification of tunnelling direction:

Change	Current effect	Proposed/Increased effect
TBM number of passes, consequent noise and vibration issues (Ref problems at Tilbury)	Two TBM's passing once, likely simultaneously	TBM's passing twice, noise and vibration issues for twice the overall time.
Construction of cross passageways	Together with TBM's passing	? - Unknown how cross passageways will be constructed
Management of TBM's	Only dismantling of the two TBM's, at end of tunnelling	Servicing and turning of TBM required in south
Water supply	All from north, additional water main constructed	Water supply needed in the south, adequacy unknown
Electricity supply	All in north	Half in south, adequacy of supply and method unknown
Treatment of slurry	All in north	? – unknown treatment in south
Wastewater discharge, groundwater treatment and dewatering facilities (24/7)	All in north	Half in south, concern over threats to the SSSI's, North Kent Marshes and Ramsar site
Removal of slurry	All to north	Half to north, half to south although then retrograde through the N-S bore
Slurry removal methodology	Unknown whether lorry, train conveyor or piped. All removed from S-N, no impact on S except possibly noise and vibration towards end of tunnelling	Unknown whether lorry, train conveyor or piped. Half removed-S, then S-N through first tunnel bore, adverse effects throughout second tunnelling
24-hour, every day (24/7) working for tunnelling and supply of materials to the TBM, also includes (Ref Statutory Consultation) "key support activities, such as site security, pumps, ventilation fans, cranes and compressors", also "major concrete pours and piling/diaphragm wall works", "sprayed concrete lining reception chambers"	Only at very end	For significant length of time
Supply of cement and tunnel lining segments, or pre-casting in compound, all vehicle movements including tunnelling and associated staff, associated noise and air pollution, light pollution changes	All in north	Half in south, greatly increases HGV movements and consequent traffic problems on the A226 through Higham and Lower Shorne as previous haul route from A2 was changed.
Tunnelling worker accommodation and rest facilities	All in north	Half in south

Shorne Parish Council, 19th June 2023