

TRO10032 LOWER THAMES CROSSING

REVIEW OF DEADLINE D1 SUBMISSIONS FROM INTERESTED PARTIES For Deadline 2 (3rd August 2023)

SHORNE PARISH COUNCIL (IP ref 20035603)

1. Introduction:

We have reviewed all the relevant documents submitted at Deadline D2 (excepting those based entirely north of the Thames).

This review added some new perspectives against the proposals as well as highlighting some items that we had previously omitted from our Written Representations.

It is apparent that many Interested Parties have significant concerns about the veracity of data and the overall viability of the proposals, and any support expressed is high-level and weak.

2. Review of selected LIR and WR submissions:

- REP1-223 Dartford BC LIR:
 - This seemed weak considering that the problems at the Dartford Crossing are supposed to be the impetus for the project.
 - The impression conveyed is that Dartford BC think only of their own needs (arguable that they should) and expect everyone else's needs and rights to be secondary and of no importance.
 - Dartford BC do not consider that other areas, Gravesham in particular, are already impacted by their own transport difficulties, already get caught up in most traffic problems at Dartford, and that the very same issues (as in their section 6.2 on page 17 onwards) will be considerably worsened by the LTC as proposed.
 - Despite the considerable extra Council Tax income that they must be receiving due to the reported 20% population growth, Dartford BC have not implemented maximal interventions to improve local traffic flows across the line of the A282, so have not done what they could to improve matters in their own Borough.
 - Furthermore, they stated at OFH3 on 5th July 2023 that they intend to continue with expanding commercial and residential growth so they will clog up the M25 orbital and Dartford Crossing approach again even faster than NH are predicting it will happen. We question if this is what the Country wants to happen.
 - Their modelling data (please see also below under "More traffic modelling...") has not been updated since 2020 and does not include a comparison of the proposed LTC with Options A1 and A14.
 - Their modelling data also lacks credibility - As commuter and other traffic on the A2 westbound increasingly joins it sequentially at the Pepper Hill, then Ebbsfleet, then Bean interchanges, it cannot be the case (please see Appendix 1, page 22) that reductions in westbound traffic putatively resulting from the LTC do not decrease sequentially as well.
 - The representations do not make a case for the LTC east of Gravesend in particular. In fact, they make a stronger case for improvement to traffic flow around the M25 (Option A14

effectively bypassing Dartford) and at the Dartford Crossing (Option A1), as otherwise none of the problems that they detail will be maximally resolved.

- REP1-225 Environment Agency WR:
 - This was only about Essex, which seemed strange given that there is a directly and potentially impacted Ramsar Site south of the Thames, which is not mentioned.
 - By following a link to their RR (no Ref No) we discovered that Natural England (NE) are taking the lead for south of the Thames.
 - While it is understandable to divide workload in this way, we would have expected the EA to have many things to say specifically about the threats to the Ramsar Site but hopefully they have fed all required information to NE.
- REP1-241 Kent County Council LIR and other documents:
 - KCC expresses support for the LTC because of putative strategic benefits but then proceeds to detail a very long list of junctions, road links and local roads that will be severely negatively impacted in various ways even from the opening year, and in fact are not pleased about the traffic fallouts.
 - They also have very long lists of other highly significant disbenefits which in our view completely undermine their stated position.
- REP1-258 Medway Council's LIR and other documents:
 - These read much the same as KCC's, they express support but then discuss lack of adequate data about developments, low benefits, and a catalogue of disbenefits, particularly on traffic congestion and air pollution.
 - The report includes their MAM traffic modelling, but we are unclear as to why there is no modelling for the A289 given that traffic levels there are a concern.
- REP1-262 Natural England WR:
 - We note that Natural England have "significant concerns" about the proposals including very strong comments made about the inadequacy, for ecological connectivity, of the proposed Green Bridges. Similar strength input on numerous other matters are also noted with gratitude.
 - Having said on page 12, (as we did in our WR's) that the DCO application is effectively an outline application with all matters reserved, so with inadequate information for decision making, on page 20 section 4.1.3 they discuss that the permitted levels for NO2 effects on saltmarsh habitat including the Ramsar Site have been decreased but that they do not require adverse impacts to be reassessed "where planning applications are at an advanced stage of determination (as in this case)". This is contradictory and, given the importance of the Thames Estuary and Marshes SPA and Ramsar site, we request that this decision should be reconsidered and possibly reversed.
- REP1-264 Networks Rail WR:
 - Objections are noted, these may link with our concerns over the "Ground Protection Tunnel" which will pass under the strategically important North Kent Railway Line and the Thames and Medway Canal.
 - The transport chaos that would result from damage to the railway line would be considerable.
- REP1-299 Tonbridge and Malling BC WR:
 - This is very similar to the WR's from KCC and GBC, it expresses support for the project and then details a very long list of highly significant adverse impacts.
- REP1-306 Woodland Trust WR:
 - We note that Woodland Trust also have strong criticism of the "Green Bridges" designs and usefulness for wildlife connectivity.

- REP1-314 BP Oil UK Limited:
 - We note the suggestion that the long derelict eyesore of the remains of the former Tollgate Motel site (vacant since the A2 widening/relocation in 2009) is suggested as suitable for “roadside services facility”.
 - However, it is on the north side of the A2 which is well supplied with (off-line) garages (Sainsburys, Morrisons and the nearby existing Shell garage), it is not on the line of the LTC so vehicles detouring to there would increase traffic on the A2 in both directions as well as the already congested Gravesend Central junction. The site is located very close to residential areas and their suggestion would further reduce the ambience of the A2 in this location.
- REP1-315 British Horse Society WR:
 - We note discussion of the same problems as we and others had raised previously over lack of information about status of paths. It is not possible for horses, cyclists and walkers, some of whom will be less able, to safely share paths. The horse routes need to be separate, for which we reference as an example the segregated layout at the Parish Council owned “Crabbles Bottom” (please see below about Impact of Air Quality deteriorations).
 - We strongly support the view that there need to be proper and continuous bridleway networks established through the project.
 - Need for a crossing point on Halfpence Lane is mentioned, we also support that request.
- REP1-327 Cycle Advocacy Network:
 - We support the comments made that cycle paths must be properly connected in a safe manner. Requirement to dismount does not seem appropriate in the modern age and could of itself be unsafe.
- REP1-338 Emergency Services and Safety Partners Sterring Group:
 - We note the statement in point 28b on page 8 that Rendezvous Points (RVP – this abbreviation is unhelpful as it duplicates with the nearby Riverview Park) should be “large enough to house a small building, lighting, power and parking facilities for approximately 30 - 40 vehicles.” In connection with which they say that the southern location appears too small. We had previously been assured by NH that the emergency control area would be part of the portal structure, i.e. underground and with no visual impact. We had also previously requested to NH that we should not be surprised with sudden appearance of additional buildings without prior discussion, yet this appears to potentially be another one. While the RVP would be in the deep pit of the tunnel entrance area, any increase in the physical size of the southern RVP will lead to even more land take and adverse impact on the local area.
 - In point 28c they go on to say that they have advised “an additional site should be provided in addition to the primary RVP close to the southern tunnel portal. One location, approximately 1-2 miles away from the southern tunnel portal, should be created for this purpose.”. This is also a complete surprise to an area that is already losing a vast amount of land to this project. It is unclear exactly where they are referring to and we request that this information should be provided.
 - However, from their other document REP1-339 it appears that they are suggesting both of two sites: the former lorry park opposite “Nell’s Café” on Valley drive and an area at ground level adjacent to the tunnel portal facilities and fronting the A226. While we understand that emergency needs are important, losing even more land to tarmac (or even grasscrete) in a location that is sensitive for many reasons, including the nearby listed Church and the ambience of the forcibly revised footpath network, is untenable. Maybe the pit needs to be enlarged as that would be less visually intrusive.

- REP1-378 AONB WR:
 - In point 3.31 on page 12, the AONB are also highly critical of the proposed A2 Green Bridges and also reference two design guidance papers which have not been followed.
 - This WR in general eloquently and loudly echoes points that we and others have made about the severe landscape impacts on the AONB including loss of the heavily wooded A2 central reservation.
- REP1-394 Owners of RK and D Shearer WR:
 - We express considerable sympathy and support the comments made regarding the amount of disruption and damage that will occur to their business due to temporary and permanent land take. There will be future severance of farmland, and serious threat to business viability.
 - We consider that it ought to be possible to incorporate suitable access tracks to and from their Barn into the design.
 - We are concerned about point 4.8 on page 9 referring to Great Clane Farm as we have seen elsewhere suggestion that the flooded area at Great Clane Marsh might be made permanent. Also, that Chalk and other chemical deposition might occur, which could alter habitat and farm productivity in the future.
- REP1-424 Swing Rite Golf Ltd c/o Smith Leisure WR:
 - We also are very unhappy about the damage that the project is causing to leisure facilities in the area. The popular Southern Valley Golf Course has already closed, the Pitch-and-Putt course will be lost and the Swing-Rite facilities (9-hole course to be lost, driving range retained) are also being adversely affected.
 - This ties in with the comments made by Gravesham Borough Council in their LIR REP1-228, page 6 point 1.11 about loss of their land at Cascades.
 - These aspects adversely affect future provision of leisure facilities in this part of the Borough and the losses go uncompensated as equivalent facilities are not being re-provided.

3. Additional comments/points prompted by content of submissions:

Loss of the A2 south side, westbound Cobham Services:

- Ref: GBC LIR REP1-228, page 99.
- This is a big loss to local residents and all A2 users as it serves traffic from the westbound M2, A289 south to westbound traffic and additional westbound traffic that has joined at the present Cobham/Shorne junction. It also relatively easily serves eastbound traffic through relatively easy circulating use of Brewers Road Bridge and Gravesend East. It is always busy, with use by many HGV's and vans as well as cars.
- Regrettably, the A2 north side Cobham Services was not reopened after the last A2 widening and an off-A2 south side garage at Gravesend Central was previously lost to the A2 widening/HS1.
- For traffic coming from the M2 westbound, the last previous service station is at "Farthing Corner" at Gillingham M2J4. Due to removal from plans of the proposed LTC rest and service station just north of the Thames it is unclear how far LTC users will have to drive to the next provision. Drivers continuing on the A2 towards London or heading either direction on the M25 also have to travel considerable distances before encountering respectively the next off-line garage or full Services. There is already locally quite an under-provision of Services accessible directly from the A and M roads.

- For local residents or those “in the know”, all the other garages in the area require detours to garages that are much harder to access, or at supermarkets.
- Please also see the comments above about REP1-314 from BP Oil UK Limited.

Upgrading of Footpath NS175A HS1 bridge:

- Ref: GBC LIR REP1-228, page 105 and Gravesham Rights of Way Committee WR REP1-239, page 4
- Reference is made in both of these documents to the problems caused by incorrect build of the bridge near Hare’s Bridge #2 carrying Footpath NS175A across HS1 such that cyclists and horse riders are required to dismount for crossing.
- We support the views expressed that if a new paths network is required due to LTC then this deficiency should be corrected as part of the project.

Traffic impact on Shorne from Country Park due to Brewers Bridge closure:

- Ref: REP1-241 Kent County Council (KCC) LIR, page 83
- KCC are understandably concerned about loss of revenue to Shorne Woods Country Park due to reduced visitor numbers during the 19-month proposed closure of Brewers Road overbridge. We are also concerned that the CP facilities, which are an asset to the locality, should remain financially viable. As a large Business impacted by the scheme compensation needs to be paid by the scheme for lost revenue.
- Of more serious concern to the Parish Council though, and a matter that we hadn’t fully taken in previously, is that KCC relatively casually mention that, during the bridge closure, all traffic to the CP will be traversing Shorne for access.
- This access would also be two way and some visitors would park short of the park, in unsuitable areas.
- The roads in Shorne (via Shorne Ridgeway and Shorne Village, also Shorne Ifield Road) are residential and simply not suitable for extra traffic, being only one carriageway wide in places and having some cottages opening directly onto the roadway. They are not built or sized for that kind of level of traffic and congestion being narrow width, having tight bends and routes through village centres.
- Having the temporary situation of traffic to Harlex, and Rochester and Cobham Golf Club using routes through Shorne for access is bad enough, but Shorne Woods CP is the most visited CP in Kent, with annual visitor numbers we believe (unverified) to be around 1 million. To have even a fraction of the current CP summer weekend/Bank Holiday traffic trying to get to and from the CP via Shorne will be completely unsupportable.
- It isn’t acceptable or tenable for such a large amount of additional traffic to be re-directed through Shorne residential areas. There will also be issues from visitors parking up for hours at locations that they find convenient for CP access, but which cause problems for local residents.
- Further thought needs to be given over this, even to the extent of fully closing the CP to visitors during the bridge closure period, with full compensation from the project – that would at least have some advantages for nature recovery.

Hills as a deterrent to HGV routeing:

- We had previously commented that poor performance of M20 J6 with the A229 Blue Bell Hill will discourage HGV drivers from taking that route and using the LTC, as also will M2 J3 and congestion on the M2 westbound.

- We note that GBC in their REP1-228 LIR, point 3.28 on page 35, also suggest that the gradient of Blue Bell Hill acts as a deterrent and that HGV's therefore prefer to stay on the M20 as the gradient of Wrotham Hill is easier.
- The above are both reasons why use of the LTC northbound, and any reduction in HGV volumes northbound at the Dartford Crossing, may both be lower than predicted by NH.
- The hills on the M2 either side of the river Medway may also have the same effect, as indeed may the 4km haul up from the Thames when heading southbound on the LTC.

Diverting tankers and oversize vehicles to use the LTC:

- Ref: KCC WR REP1-243 Page 28, point 4.40
- In this KCC state "...KCC requests that National Highways commit to diverting DGVs and oversized vehicles to use the Project in order to phase out the use of the Dartford Traffic Management Cell"
- We object strongly to this suggestion, which NH had assured previously would not happen, so we would be grateful for further written assurance on this matter.
- Doing this would cause considerable problems for flow from the M25 to the A2 eastbound, particularly for traffic first heading north on the M25, as a traffic-light controlled roundabout would need to be negotiated, and the suggestion would increase congestion and fumes on the A2 eastbound between the M25 and the LTC.
- It would also cause such vehicles to take a very long, non-sustainable detour and would cause even greater problems in the two-lane section of the LTC north of the Thames and beyond as they try to return to the M25.
- There would undoubtedly still be some oversize vehicles arriving at the Dartford Crossing that had to be stopped and turned - it is not a problem that will be absolutely going away, so the Traffic Management Cell will still be needed for as long as the existing Tunnels are deficient and not replaced.
- Instead of this proposal, KCC should be campaigning for the A1 and A14 Options to be implemented at the Dartford Crossing.
- If all these KCC supposedly more informative new analyses are using the same flawed NH data inputs then while they can be used to compare the output figures, they will be useless at establishing the real outcomes of the proposals.

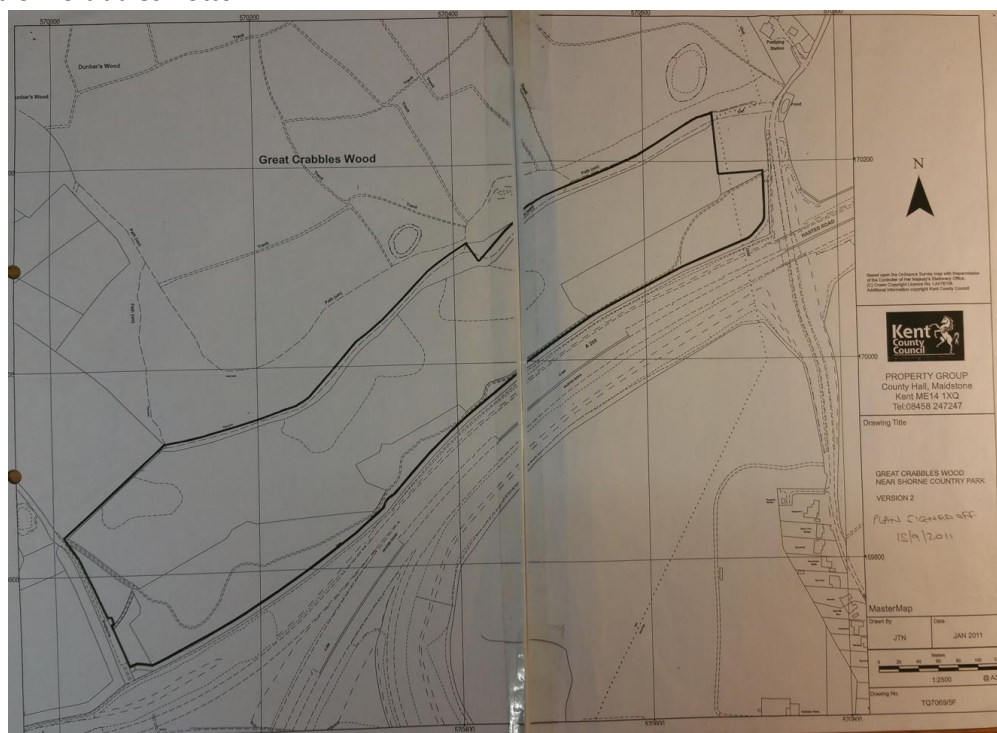
Increased traffic northbound on Brewers Road, The Ridgeway, Pear Tree Lane or through Shorne Village centre to reach A226; Thong Lane; Shorne Ifield Road:

- Both Higham PC in REP1-350 page 2 and Shorne PC believe that the proposals will increase traffic on Pear Tree Lane as vehicles cutting through Cobham from the A227 or A228 to reach the A289 will use these routes and turn right at the A226 eastbound through Higham rather than risk entering the northern connector road "blind" to conditions on the A289, or if Satnav's suggest a better route. Neither route is suitable for additional traffic.
- We are very surprised therefore that the modelling outputs presented by KCC and GBC do not show this, as increased traffic on the routes had been indicated by NH traffic figures.
- To local residents, it is the obvious route to take so this may be an example of where modelling cannot sufficiently account for human behaviour, however it is also the case that measurement of traffic volumes and turning movements inputs in the area has been deficient.
- In REP1-144, diagrams 10 and 22 show a 40% increase in traffic on Pear Tree Lane, in both 2030 and 2045.

- In REP1-162 page 30 it cites an increase of 250 PCU's (recently downplayed from 500) or 4 per minute, in both the am and pm peaks. The same increase is also stated for Thong Lane. During construction phases an increase of 250 PCU's is suggested for Shorne Ifield Road westbound (which will have been reached through Shorne Village Centre) which is it has been inspected physically anyone could tell that is not going to be possible as it is a single-track road.
- Examination of these roads shows that they are not suitable for additional traffic. We remind that in The Ridgeway there are cottages that open directly onto the roadway yet somehow these will not experience increased noise disturbance.
- For Pear Tree Lane in particular, an extra 4 vehicles per minute will compromise queuing and turning at the traffic lights on the A226 as the extra vehicles will not be able to leave Pear Tree Lane at the same rate that they enter.
- We consider that it is not acceptable for NH to alter traffic flows on residential rural roads as part of the scheme and we would therefore like to know what they propose to do, also as part of the scheme, to discourage such rat-running.

Impact of Air Quality deteriorations on "Crabbles Bottom":

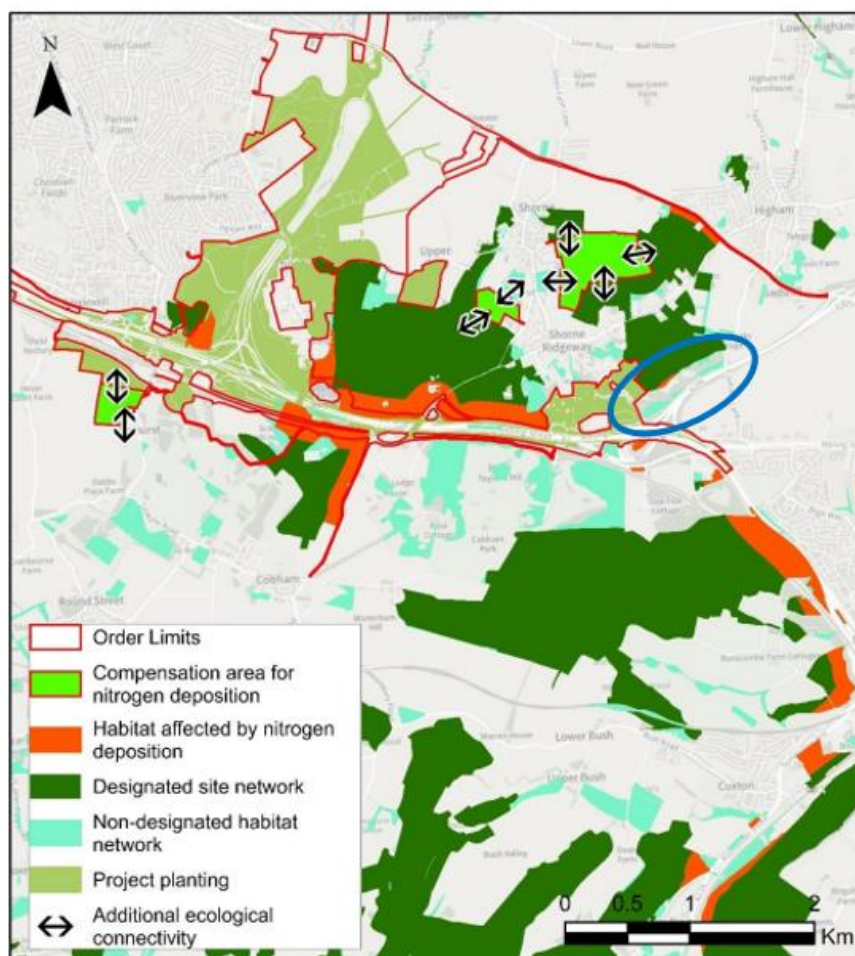
- We raised this area previously in our WR Ref: REP1-408, Page 26, "Other impacted land".
- "Crabbles Bottom" is the name given to Parish Council owned recreational and amenity land which lies north-west of the A289 and south-east of Great Crabbles Wood SSSI. The AONB is immediately to its west across the remains of Bowesden Lane, and Crutches Lane forms the eastern boundary. The site is in part physically lower than the A289/M2.
- Map of "Crabbles Bottom":



- It is the remains of farmland severed during construction of the A289 in the late 1990's and it was gifted to the Parish Council by KCC in 2011 along with perpetual maintenance funds.
- It has various habitat areas: An ancient Community apple orchard with lichen covered trees, a variety bushes and trees both natural and planted by KCC which show interesting fungi, and ecologically diverse meadow.

- As previous Darnley lands, it was recently inspected for consideration to be part of the prospective Super Regional National Park proposals and, as with an earlier previous independent expert inspection, was considered to possibly have the oldest apple trees in Kent. Brogdale Collections (National Fruit Collection) have been requested to review the trees, which we expect to happen shortly.
- GBC LIR Appendix 5 (Air Quality) Ref: REP1-231 page 12 signposted us to the diagram (please see over) in APP-350, page 84, “Crabbles Bottom” is shown circled in blue.
- It can be seen that there is a wide band of orange colouration along the north side of the A2 and for Court Wood there is a lick of orange at its south-eastern border. This infers that Crabbles Bottom would also be orange if colour was also shown there.
- Although not registered as an SSSI, “Crabbles Bottom” is ecologically equivalent. We are extremely concerned that the area will be severely damaged by increased pollution.
- Our problem is that this land is not being factored into NH consideration about the damage that will be caused to it due to Noise impacts and Nitrogen deposition - in our view it should be and preventative interventions in the form of noise and pollution barriers etc, and other mitigation should be provided.

Plate 7.19 Henhurst Hill, Fenn Wood and Court Wood compensation sites ecological network context



Park Pale bridge could be a “Green Bridge”:

- In Gravesham Borough Council (GBC) LIR REP1-228, page 68, GBC suggested that this bridge could be made into a “Green Bridge”, which would be better able to support wildlife

connectivity than can the other, so far poor (as universally regarded) attempts at providing Green Bridges.

- REP1-262 Natural England WR also suggests this on page 55.
- We agree that this suggestion would be beneficial for wildlife and would improve the ambience for users of the bridge, which is also a footpath.

More traffic modelling, more inconsistencies but less clarity and reality:

- Various LA IP representations have included or refer to their own modelling, but these unfortunately seem to be muddying the waters further rather than clearing them.
- In the KCC LIR REP1-241 they present limited results on the KTM modelling, but the data input is a Cordon of the LTAM data.
- In Medway Council's LIR REP1-258 the MAM analysis referenced uses traffic data from LTAM, a Gravesham Cordon. They have not modelled the A289 despite this being a concern.
- In the Dartford BC LIR REP1-223 they discuss the Dartford Local Plan Strategic Transport Modelling which uses a Dartford Cordon of the Lower Thames Area Model (DCLTAM)
- Gravesham BC in their LIR REP1-230 use LTAM data.
- In Tonbridge and Malling BIC WR REP1-299, their modelling data is incomplete/has not been updated, they rely on KCC and Medway data.
- We and others have previously criticised the NH data veracity due to the age and poor quality of inputs and therefore likely flawed outputs. Inputting those same likely flawed outputs into yet more modelling takes us all ever further away from reality.
- It is no wonder that nothing matches up or says quite the same, and no comparisons can be made. However, unanimous opinion is that dire transport consequences from the project are predicted (even more dire than exist locally at present that is).

4. Matters not mentioned previously:

Use of Park Pale Bridge during Brewers Bridge closure:

- We wonder whether it would be possible in some way to temporarily make use of Park Pale road and bridge, which are presently underused, while Brewers bridge is shut, this would at least cater for some directions of vehicle movement if not all.
- These could perhaps be used to provide access from Brewers Road eastbound to the A2/M2/A289 and across Park Pale bridge to the A2 westbound.

Previous Lignite mine under A2 at Inn on the Lake area:

- We recall that there was awareness of this hazard longer ago in the LTC planning processes but we haven't identified it being mentioned again recently.
- Presence of the old mineshafts could cause problems for construction.

5. Conclusion:

Reading the WR's and LIR's from other Interested Parties was very reassuring, to find that so many Interested Parties have expressed like opinions and concerns to ourselves. The same issues and objections come up time and time again, with some expressed even more vehemently than we did.

It is particularly impressive how throughout all the successive Consultations, adverse impacts as presented by NH have been reducing at the same time as observed traffic levels have been increasing (save for the Covid years). There appears to be ever-increasing self-delusion.

We can't now identify the source document but we support the opinion that has been voiced, that NH are deliberately minimising negative impacts and exaggerating positive outcomes in order to create an illusion that the project is acceptable and will work in practice.

It is clear that what the proposed scheme most needs is a big injection of reality, as the LTC will be operating in the real world.

*Shorne Parish Council,
3rd August 2023*