

TRO10032 LOWER THAMES CROSSING

REVIEW OF DEADLINE D1 SUBMISSIONS FROM THE APPLICANT For Deadline 2 (3rd August 2023)

SHORNE PARISH COUNCIL (IP ref 20035603)

1. Introduction:

We have reviewed all the relevant documents submitted by the Applicant at Deadline D2 (excepting those based entirely north of the Thames). This included the revised draft DCO and the 5 additional documents that were uploaded late for technical reasons.

Due to the very large number of documents that were uploaded at D1 we apologise that it was not possible to give all of them the in-depth attention that we would have preferred.

The review highlighted the points detailed below.

2. Review of Documents:

Use of Hoo Junction:

- Discussion triggered by REP1-004 Errata Report, Page 33 regarding APP-339 (Environmental Statement - Appendix 2.2 - Code of Construction Practice, First iteration of Environmental Management Plan Annex B - Outline Materials Handling Plan), Refers to Pages: 18, 54 and 58 and Paragraphs: 4.2.5, 8.2.3 and 8.2.38 – apologies, not yet accessed.
- This refers simply to a change of an incorrect distance “Distance to compound stated as 7km from Hoo Junction rail yard, this is incorrect, it is 4km from Hoo Junction to southern portal tunnel entrance compound and approximately 11km to the A2 compound (due to HGV bans on some roads in Shorne)” but raises concerns over possible use of Hoo Junction for materials management.
- While it might look attractive following only superficial review, in fact all routes to and from Hoo junction are problematic and more complicated than they would appear.
- Hoo Junction has two sides, in both cases the entrances are close to the Ramsar Site, in functionally linked land.
- The east side or main access is via Lower Higham Conservation Area and Canal Road. There is housing very close to the road and constrained width at a blind bend in the populated section. The agreed lorry route is via Hook Green Road (narrow with only informal passing places) to the B2000, then the A289 etc.
- The west side is accessed via Green Farm Lane, which is narrow, has only informal passing places, has a blind bend near the railway end and passes through the Queens Farm Conservation Area to join Lower Higham Road which is narrow, has blind bends and would pass the listed buildings at Filborough. The only current road transport use of the western side of Hoo Junction is a relatively low use freight depot which does not have planning permission. The main business use at the adjacent Apex Business Park has a traffic management plan in place.
- Use of Hoo Junction would provoke considerable public opposition.

New Pedestrian Crossing in Elaine Avenue, Strood:

- Discussion triggered by REP1-046/7 Consents Position Statement which refers to an s106 agreement in Medway relating to “Pedestrian crossing infrastructure due to severance (Elaine Avenue, Medway)”
- The forthcoming ASI tour will visit this area so hopefully clarification of this topic will ensue.
- We find this a little hard to understand and justify, maybe there an existing problem, and maybe this is a “sweetener” but there are much bigger problems, much closer to the LTC line and within the Order Limits e.g. a pedestrian crossing is needed on the A226 in Higham near Gads Hill School. We keep being told by NH that it is not part of the scheme to fix existing problems, yet on presently available information that seems to be the case in this instance.

Number and Direction of Tunnel Boring TBM operations:

- Discussion triggered by REP1-15y, page 85, point MW009 which states: “The tunnel boring machinery will be serviced from the North Portal. Material excavated by the tunnel boring machinery will be generated as a slurry and this will be transferred by pipeline through the tunnel to the North Portal for placement. Similarly tunnel segments and major services required to operate the tunnel boring machinery and erect the tunnel segments will be supplied from the North Portal.”
- This text makes clear that, as everyone suspected following from the casual mention in the Minor Refinements Consultation, the decision about using one TBM in two directions has in fact already been made but previously concealed by NH.

Impacts of additional traffic on the wider road network:

- Discussion triggered by REP1-183, page 56, Section B.3 being NH’s response to our comments made at/after ISH1. The answers do not really match with the points raised.
- The “considerable slowing” we referred to was routinely on the M2, in both directions between junctions 1 and 3 where a considerable increase in traffic is predicted, and at various times this increase is accompanied by slowing.
- The figures provided, that up to “...8% of the total flow on the A122 Lower Thames Crossing would come from the A2 west of the Project” were interesting as that is a lot of traffic. The connected AADT figures were not provided and are requested. The point we were making however was that we consider that the LTC will exert a considerable “pull” effect so it is likely that actual figures will be higher, particularly as a result of Dartford BC’s very large quantity of housebuilding at e.g. the Eastern Quarry/Castle Hill area.
- In B.3.4 our point was that traffic from the M25 anticlockwise would use the M26 and then the M20/A228/M2 or A20, A227, A2 to reach the LTC. NH responded that “...there would be very few trips on the M25 anticlockwise where routing via the Lower Thames Crossing would offer a shorter journey time.” We consider that this response exemplifies that there is a difference between modelling and reality as drivers are often more interested in keeping moving than in the absolute time or distance travelled and will also make route choices based on perception of the likely situation along their route (let alone Satnav information). In any case we were not referring to routine situations but that if there was an incident or just routine congestion at the Dartford Crossing and Approach Roads, as there still will be, that will cause drivers further back on the M25 anticlockwise to attempt to divert, with obvious consequences of greater widespread gridlocking being induced than happens currently.
- Under B3.5-6 NH again fail to understand that while they may be re-providing function, they are doing so in a way that is not functional – a 4km longer journey (2km on the way back) on the A289, which is prone in both directions to congestion and tailbacks at peak times, is not what

residents want to have imposed on their journey to work. We regret that we find it hard to believe that only 5 vehicles an hour (100/day) will in future be turning onto the Brewers Road north side on-slip. We would be grateful to be provided with comprehensive turning movement information for the Brewers Road north side junction as existing.

- It should be remembered that Shorne residents in many cases chose to live in Shorne due to its easy access to the A2/M2 and the wider road network. As seasoned commuters to a wide variety of work locations we are very familiar with the traffic conditions locally and further afield in all possible circumstances and are experienced at choosing the best routes to take in response.

Functionality of new Brewers Road north side junction; Vissim data in general and requests for further information:

- Discussion triggered by REP1-194 Vissim forecasting report, Page 63 for Junction 7 which confirms our fears as it shows high potential for congestion and tailing back even with traffic light controls, which require specialised installation and management.
- Sadly, it seems these calculations are also based on LTAM data, which means they are likely well underpredicted.
- We are certainly not convinced of the accuracy of the data for Thong Lane joining the new Darnley Lodge Lane. Increased traffic volumes are predicted and it is also likely to particularly suffer from rat-running.
- We have expressed concern about the twin roundabouts on the A226 either side of the A289, we would like to see similar modelling for those junctions in relation to the predicted additional A226 traffic plus the forced A289 U-turn diversion requirements as we believe traffic lights are needed there.
- Similarly, we request evaluation of the Pear Tree Lane/A226 traffic lights junction and also of Shorne Crossroads, because of the significant increase in traffic that is predicted and therefore the increased turning movements at both junctions.

Differences between the proposed A122 and a Motorway:

- Discussion triggered by REP1-196: The proposed A122 still seems to have more in common structurally with a motorway than an A road.

North Kent Marshes Internal Drainage Board concerns:

- Discussion triggered by REP1-213, the NKIDB SoCG.
- We haven't generally looked at SoCG's as they are personal between the authors and NH, but this one is of particular importance to us relating to our deep concerns over water issues and their impact on the North Kent Marshes SPA and Ramsar Site which is under the jurisdiction of the Drainage Board.
- We note and support the various concerns raised by the IDB and do not feel reassured from the NH responses that the special areas are safe in their hands and that of their Contractors.
- We note the discussion in 2.1.6 on pages 7-8 concerning the design of reinstatement that changes the layout and function of parts of the marsh. We consider that wider discussion than just with RSPB, who took over the land relatively recently, is needed concerning changing the historic layout plus any impacts on non-avian fauna and flora.
- We note the discussion in 2.1.7 on page 8 about the "Ground Protection Tunnel", this continues to be a great source of concern and considerably greater evidenced reassurance is needed.

*Shorne Parish Council,
3rd August 2023*