

## TRO10032 LOWER THAMES CROSSING

### RESPONSE TO APPLICANT'S COMMENTS ON D2 SUBMISSIONS FROM SHORNE PC AND OTHER IPs For Deadline 3 (24<sup>th</sup> August 2023)

#### SHORNE PARISH COUNCIL (IP ref 20035603)

##### **Section 1. Introduction:**

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

The points made below relate to matters identified in the documents referenced.

Thank you very much for considering our representations.

##### **Section 2. Responses to Applicant's Comments on Shorne PC submissions:**

The two most relevant documents are WR REP2-052 (9.53 Comments on WRs Appendix G – Parish Councils, Organisations and Groups, pages 142-148) and REP2-077 (9.63 Applicant's response to IP comments made on the draft DCO at Deadline 1).

The Shorne PC WR of necessity included the same topics that had already been identified in our SoCG (and PADS Tracker), most of which are "not agreed". In preparing the WR we reviewed as many of the Applicant's DCO submission documents as we could so that our submission was factually based whenever possible. Therefore, for the Applicant to mostly just refer us back to their previous answers in the SoCG Table and to the content of the very same DCO submission documents, which we had already assessed as unsatisfactory, is overall of no assistance.

The following two subsections respond to aspects of the content of the two documents from the Applicant mentioned above.

##### **Section 2a. WR REP2-052 (9.53 Comments on WRs Appendix G – Parish Councils, Organisations and Groups, pages 142-148):**

###### Section 4 – Consultation and Information issues, Page 142, second paragraph:

- Reference to additional vertical cross sections already, and still to be, submitted is noted. However what we and residents asked for, from the earliest Consultations and at Information Events was a physical (or virtual would be fine) 3D model particularly of the LTC:A2 junction.
- Many people find flat drawings difficult to understand, and the same applies to vertical cross-sections, whereas a 3D model can convey much more information.

###### Section 5 – Benefit Cost Ratio. Page 143, 1<sup>st</sup> paragraph:

- The applicant states that "The BCR reflects the value of benefits and costs at the time at which it is produced". This is not entirely true as while the calculation is being done at a particular time,

many of the inputs are historical, so the BCR calculations do not produce an output figure that is fully based at the date of production.

- We understand the point made that the BCR has fallen as costs have risen, but what is of concern is that this trend is likely to continue.

Benefit Cost Ratio, page 143, 4<sup>th</sup> paragraph:

- We disagree with what is stated in the response. All schemes have both costs and balancing benefits - these will vary with the different combinations of schemes.
- If we use Blue Bell Hill and its junctions with the M20 and M2 as an example, at present, without the LTC proposals, improvements have high cost and low benefit, so they are being discussed at present but with no promise of funding.
- If instead that scheme is included in the LTC proposals (as in Option C-variant) then that increases LTC costs more than it (if at all) increases benefits, and so reduces the BCR. This matches with what was said at the time in justifying Option C-variant being dropped and also with the general view of IPs that a variety of essential enabling schemes have been left out of the proposals simply because they would decrease the overall BCR so that would affect the likelihood of the LTC being funded.
- However, with the scheme considerable additional, directly related disbenefits are caused so although the costs of Blue Bell Hill etc improvements will be the same (ignoring inflation) the benefits will have been artificially increased. This means that the scheme could get funded, but only on the backs of residents and other users suffering considerably from years of LTC-consequent travel chaos.

Other road upgrades, pages 143-144:

- In the first paragraph, the Applicant refers to people choosing to make different journeys, but our concern is about people being forced to make different journeys.
- Overall, our concerns for local residents are dismissed as being negligible matters compared to the "greater good". However, the negatively affected populations are actually both large in number, and widespread in place of residence.
- The dismissive reference to "negative impacts on traffic flow in some locations" is unlikely to reassure KCC about the M2 and Blue Bell Hill etc, or Medway Council about M2J1 and traffic flows being constrained deeper into their territory.
- The response goes on to discuss post-scheme monitoring, which we have already judged inadequate in both timeframes and assurance of solutions being rapidly implemented.

Economic disbenefits, page 144-145:

- Hearing about how other people are perhaps going to benefit does not actually provide any pacification or consolation to those negatively affected.
- The Applicant refers to the South East Local Enterprise Partnership, which covers a very wide geographical area and is not a democratically elected body. We note that SELEP registered as an IP and submitted RRs but have not had any other participation so far in the DCO Examination.
- IPs with highway responsibilities who have expressed any support for the project, including KCC and Medway Council who send representatives to SELEP, have gone on to express considerable concerns about adverse effects on traffic flows.
- Only relatively few people will experience journey benefits. Many others, particularly making longer journeys, will have disbenefits or at best neutral outcomes overall, e.g. London bound

traffic from Gillingham and further east is first held up on the M2 east of the LTC:A2 junction, and then might possibly experience free-flow to its west, but only for a very few miles.

Community Severance, page 145:

- This section covers multiple topics that are not all about Community Severance.
- Again, repeating the Applicant's view of the whole project does not actually mitigate the losses that local residents will suffer.
- Severance is also a perception of being separated, and the presence of the LTC as a massive chasm preventing east-west access will make Shorne West residents feel that they are irrevocably divided off from the rest of Shorne.
- While WCH routes are being "reconnected", for the presently most used west-to-east routes this is only through large detours (over 1km extra distance whichever replacement route is chosen) which will be difficult and off-putting for less able WCH users.
- The document states that "The WCH strategy has also explored improving and enhancing the WCH network connectivity between surrounding communities.". Explored does not equal delivered. Suggestions that we have made in this respect have not so far been actioned.
- Journey time changes are mentioned - while there might be benefits on some journeys for some people, the overall balance on journey time changes for local residents is very negative. Whether there will be any benefit at all for anyone local depends on the exact routes travelled. As in the previous section, for more distant A2 users, e.g. travelling from Gillingham on the A2 to London and back, the outcome will be neutral at best.
- Monitoring once operational is also mentioned – the issue here is the speed at which unexpected problems (and also those which were anyway expected but ignored by the Applicant) will be resolved, in which context we have little faith in the proposed competitive funding processes. Funding needs to be guaranteed.

Road user charging and variable charging:

- On page 148, this again refers back to the previous agreement for Dartford and Thurrock residents at the Dartford Crossing and Article 46 of the draft DCO.
- In a new scenario with two tunnels, whatever was agreed previously becomes void and a new agreement is needed, particularly if the operations and charging scheme is also to be joint.
- Repeatedly harping back to the previous scenario is not helpful. Instead previous wrongs now need to be put right.
- The existing agreement is iniquitous and discriminatory, that Thurrock residents living even further from the Dartford Crossing than Gravesham residents have free use of the Dartford Crossing while equivalently located Gravesham residents do not.
- This section also refers to charges sometimes being waived, but that is actually exactly the same issue as Variable Charging. Charges should not be waived as a means of influencing which Crossing route is taken, e.g. as cited for "management of incidents or road closures".
- Please see also below under "Discount for Gravesham Residents at both crossings" in Section 3 (Applicant's comments on LIR's).

**Section 2b. REP2-077 (9.63 Applicant's response to IP comments made on the draft DCO at Deadline 1), pages 131-132:**

Shallowness of the tunnels:

- The Applicant referred us to their responses to the Port of Tilbury and the PLA, plus two clauses in the Natural England SoCG but the latter document and clauses referenced do not seem relevant to this discussion.
- Concerns have been expressed from the Ports about future-proofing Port activities through maintaining sufficient dredging depth, so we have to ask whether 12.5 m +0.5m will in fact be adequate for all future uses of the river, which must not be constrained by the LTC tunnels.
- Concerns have been expressed from ourselves and others about the shallowness under the marshes for the main tunnels and the "Ground Protection Tunnel" and consequent risk to overlying marshland.
- From reading various of the Applicant's documents it seems that tunnelling so shallowly under marshland creates many problems for construction and many consequent risks for the local environment. Tunnelling at greater depth would clearly be beneficial.
- Please can the applicant be asked to explain why the main tunnels cannot be deeper. This might mean that they could be tunnelled wholly within the chalk layer. Increased depth would lessen the risk of dewatering and unwanted water flows, plus remove the need for the "Ground Protection Tunnel" and any other injections of Grout. (Please see also below in connection with land owned by RK and D Shearer).
- Any reasons for this not being possible may also be reasons why the currently proposed location might not in fact be suitable as a location for the LTC.

"Water drainage issues" (= disapplication of Ramsar laws):

- The Applicant disregarded our comments saying that "This comment does not relate to the draft DCO."
- However, if they had read the section they would have seen that we were discussing dis-application and expressing surprise/concern that the Ramsar Site is not discussed in the draft DCO – we said "We note that Ramsar is not mentioned in AS-039. It appears once in APP-057 but that is only in the terminology for the Deemed Marine License."
- Among other content supplied as background information for readers (highlighting the Applicant's proposal to discharge potential chalk fines entrained drainage water into the functionally associated land and then the Ramsar Ditch itself) we therefore said "We would be grateful if the Applicant could be asked to provide evidence that dis-application has been applied previously to such an important ecological area."
- We would be grateful if the Applicant could please answer this question regarding relevance to the Project and precedent for dis-application of the International Laws intended to protect Ramsar Sites.

**Section 3. Responses to Applicant's Comments on submissions from other IP's:**

We are very grateful for the detailed, expert input that various IP's have made through their WR's and other submissions.

Many responses from the Applicant are standard answers that have been pasted in, so do not always provide satisfactory answers to the points that were raised.

We note that sometimes there are different answers given to the same/very similar questions.

### **Section 3a. Applicant's comments on WR's**

#### **REP2-045 to REP2-053 9.53 Comments on WRs:**

- REP2-051 9.53 Comments on WRs Appendix F – Landowners:
  - Page 51: The response to REP1-394 Owners of RK and D Shearer is noted. Earlier in the Consultations it was said that farmland required temporarily would be returned to the farmer however it now becomes apparent that re-landscaping will render much of the relevant land too steep for farming or with altered characteristics. All involved are disappointed with this development. Rationale for why it is happening does not assist the disadvantaged farmer.
  - Page 52, point 4: Giving reasons for not having factored the farm buildings properly into plans, the Applicant states that “The Ordnance Survey has recently updated their data layers which now show the landowner’s farm buildings at Plot 13-41. Consequently, the Applicant has been able to update its GIS layers which now show the farm buildings on its plans.” This comment is difficult to understand as the farm buildings had been shown on the Applicant’s plans previously (e.g. in the July 2021 Community Impacts Consultation) and are hard to miss visually in surveys, so any discrepancy was obvious.
  - Page 53, point 5: Injection of Grout north of the southern tunnel portal – Clarification is needed. The text states that plot 13-41, which is the farm buildings south of the A226 Gravesend Road, is required “...to allow for drilling operations for underground grouting.” We would be grateful for clarification about this and/or further information about the extent proposed, the works reference number etc as we could not find this in the draft DCO and were not aware that any grouting injection was being undertaken except in connection with the “Ground Protection Tunnel”. This in turn raises further questions about dewatering close to Chalk Church and alterations of general water flow to the marshes from this area.
  - Page 69: The response to REP1-424 Swing Rite Golf Ltd c/o Smith Leisure is noted. On page 70 there is a curious comment that “It is relevant to note that no Written Representation was submitted by Southern Valley Golf Course Limited, the former operator of SVGC, who have not registered as an Interested Party in relation to the Examination.” As SVGC knew that they would be selling their land to NH, that situation is to be expected. We consider that it is entirely appropriate that Swing Rite, as an operator of previously complementary golfing facilities locally, would be interested in overall public provision in the area being optimal.

#### **REP2-052 9.53 Comments on WRs Appendix G – Parish Councils, Organisations and Groups**

- Relevant original WR submissions, the Applicant’s responses and other signposted documents have been accessed and noted.
- Generally, it is for individual IP’s to assess and comment on the Applicant’s responses to their own WR’s, however there are some on which we have particular comments as follows:
  - Page 157, Response to WR from Thames Crossing Action Group REP1-425 concerning traffic migration routes to the LTC – As this topic is of significant importance, we have discussed it in detail under section 4a below.

REP2-053 9.53 Comments on WRs Appendix H - Local Residents

- Relevant original WR submissions and other signposted documents have been accessed and noted.
- We were particularly impressed by, and grateful for, the independent expert input from Mr John Elliot at REP1-364 as well as other respondents living and working south of the Thames.
- It is for individual IP's to assess and comment on the Applicant's responses to their own WRs, which we note were generally made in a cut-and-paste format.

**Section 3b Applicant's comments on LIRs:**

Local Authorities who produced LIR's will submit their own response documents but we have particularly noted the following points from reading the Applicant's responses:

REP2-058 Response to the Gravesham Borough Council (GBC) LIR, REP1-228):

- Discount for Gravesham Residents at both crossings (please see also Section 2a above, last item about Road user charging):
  - On page 6 it is stated that "The Applicant's position regarding 'free or discounted travel for Gravesham residents over both Thames crossings' is set out within the SoCG between the Applicant and Gravesham Borough Council [REP1-100] at item 2.1.48: 'The Applicant's position is that extending the discount received by Gravesham residents to use of the Dartford crossing would lead to additional traffic at Dartford, whereas the objective of the Project is to reduce traffic volumes on that crossing'."
  - We do not believe that would be the case. If both Crossings were free to use (a small benefit for having to host the Crossings) for both Dartford and Gravesham residents it follows that all residents in those areas would use whichever crossing was most convenient. This would include a balancing reduction in pressure at the Dartford Crossing from use of the LTC Crossing by Dartford residents currently proposed to be constrained to only use the Dartford Crossing (as it is free) due to otherwise being charged.
  - We consider that the Applicant's response is actually an argument in favour of broadening the discount area south of the Thames to match that in the north.
- 9-hole golf course also not open; local green space provision:
  - At the bottom of page 8, the Applicant appears to blame the owner of the 9-hole golf course for the business uncertainty that the Applicant has themselves caused.
  - Having re-read the GBC Open Space review document referenced, it may be that the Applicant has misunderstood the content. It also seems that they could be implying that they might know better than GBC about what Gravesham needs in terms of accessible green space for Shorne West and Riverview residents living within a 10-minute walk of the urban boundary.
- LTAM model versus reality:
  - At the bottom of page 21 the Applicant admits that the LTAM model, as "a Steady State Assignment model" is not based in the reality of how drivers think and behave in modern times over choosing routes in general as well as re-routing if there is an incident, especially when aided by satnav use.
  - This answer also goes some way to explain the complete lack of resilience modelling being presented or apparently undertaken, as the model is incapable of producing such predictions.

- Closely spaced junctions:
  - On page 22 the Applicant states that “The Project’s design reduces the risk of incidents occurring” and “the Project has been designed as a free flow addition to the road network and does not have closely spaced junctions”, inferring greater resilience to traffic incidents.
  - However, the gateways to the LTC are the A2 and M2, which do have closely spaced junctions (as mentioned earlier by GBC, please see page 12). Especially with greater traffic and congestion levels, incidents on the A2 and M2 will therefore cause the whole LTC to fail.
  
- Refusal to undertake additional air quality monitoring:
  - We note on page 45 that the Applicant refuses GBC’s suggestion of just 5 additional air quality monitoring locations (we have previously suggested other sites in addition).
  - The reason given is that the Applicant does not predict any deteriorations that would be significant effects on human health receptors, or therefore provide any mitigations. However it is obvious even despite NH’s poor input data that, and as shown by the contour mapping predictions, that air quality will be worse over a wide area.
  - The best way not to have a problem (in this case any adverse effects detected) is of course not to take any measurements but we would ask the Inspectorate whether they consider this approach to be satisfactory.
  
- Proposed landscaping of Nitrogen Deposition Sites:
  - On page 75 the Applicant refers readers to the oLEMP APP-173 however the information in that document for these sites is sketchy and a bit garbled, e.g. referring to screening telecommunication masts and electricity wires where none are present and mentioning views from Blue Bell Hill when the sites cannot be seen from there.
  - Under “Fenn Wood” the Applicant states “Potential additional benefits such as community benefits e.g. enhanced access such as improved surfacing, increased connectivity with the surrounding PRow network, artwork and benches, visitor/ public Information/ education boards and signage in relation to biodiversity, the benefits of natural regeneration and the Kent Downs AONB”.
  - The areas under discussion are part of our existing footpath network and fully rural in character. They are not part of the AONB and do not require urbanising interference of this type, which is likely to be unacceptable to local residents.
  - The Applicant’s response about the design process does not provide confidence.
  - There has not been any contact to date with the Parish Council about design of the 3 relevant areas of land within Shorne.
  
- Noise monitoring:
  - The Applicant discusses this on page 89, saying “....any monitoring would need to be over a very long period to gain average levels”.
  - In our WR, on page 27, we commented “Duration of noise surveys – the survey durations were too short to be able to form an opinion or provide a basis for any conclusions, see (APP-150, page 34).”
  - The Applicant’s response to GBC quoted here confirms that our opinion is correct, and that “Sampling Error” pervades the Applicant’s noise (and other) measurements and predictions, for both the Construction and Operational phases.
  - The Applicant also states regarding noise modelling that “the comparison of a measured noise level with that predicted in a model space scenario is considered to provide an unreliable indication of scheme performance and cannot therefore be reasonably relied upon”, and goes

on to say that "Section 4.2 of the Design Manual for Roads and Bridges (DMRB) LA 111, as referenced in Section 12.8 of the ES, states that routine operational noise monitoring 'cannot provide a reliable gauge for whether the predicted magnitude and extent of operational adverse impacts are greater or less than those predicted in the assessment'".

- The results of appropriately undertaken and properly validated monitoring of any parameter, whether to establish baseline conditions or measure actual outcomes, are undisputable facts.
- We consider that the Applicant needs to provide further explanation and information on these points so we would be grateful for these matters to be taken up further with the Applicant.
  
- Access to schools during construction:
  - On page 109 there is some discussion about this as regards impact on "active travel" (i.e. unhindered and safe walking and cycling routes) however we are not aware of the Applicant having undertaken any studies looking at the catchment areas of primary and secondary schools in the area and also the reverse question about where children in the area go to school.
  - Such a study would reveal that the bulk of school access is by presently by vehicles, particularly for secondary schools, and that there are both public and private school bus routes in operation as well as access by private cars.
  - Many children in the area attend rural primary schools away from their urban residence locations, and children from both rural and urban locations go to a wide variety of, some quite distant, secondary schools, both State and Private. So, as well as schools within Gravesend and Strood, local children will also be going to locations such as Cobham Hall, Gads Hill, central and south Rochester and others, and some even further afield.
  - All these transport links will be disrupted during construction and also during operation so the question is about how children are going to be able to travel to the school locations that they need to attend.
  - Table 2.3 on page 21 of the oTMPfC (REP1-175) is referenced but it only refers to local schools not local schoolchildren.
  
- Road Drainage and the Water Environment (yet again):
  - The response on page 123 regarding potential Ramsar contamination during adverse weather events does not inspire confidence.
  - The project must be designed such that compound water runoff cannot under any circumstances contaminate the North Kent marshes SPA and Ramsar site.
  
- Chalk Park and mound – reasons and need; relocation:
  - On page 151 among other references, GBC, say "It is understood that the wooded hilltop will be 13m to 17m above the existing ground level. The purpose of this feature is not clear. The hilltop would appear alien in this gently undulating landscape, and would interrupt long views across the open landscape."
  - The driving force to have such a mound is to reduce the Applicant's need for and cost of removal of excess excavated chalk, and not primarily to provide a park, especially as GBC have said there is not any especial need for an extra one (please see point about green space provision above).
  - Chalk Park is something that is being imposed rather than being something that local residents actively sought. All that was wanted was for as much land as possible to be returned to its previous use, which is what we had been assured would happen.



- We agree with GBC's assessment and increasingly question the need for and appropriateness of the park as a whole, and its elevations, as opposed to restoring the land to its historical farming use (please see comments about the Applicant's response REP2-051 referenced above) or locating any mounds that must remain where they will provide greater community protection from the noise and air pollution to be caused by the project, particularly the elevated LTC:A2 interchange.
- We consider that the location of mounds, and provision of planted bunding along the borders of the LTC (an earlier design that was changed without consultation), should be revisited.

REP2-059 Response to Kent County Council LIR:

- Transport Impacts:
  - Pages 4-14 discuss the transport impacts detailed by KCC in their LIR based on their Kent Transport Model modelling. These are pretty damning so we hope they are not "conservative" as KCC suggest.
  - The juxtaposition with the previous pages hailing the strategic positivity of the scheme seems peculiar as the usefulness of the LTC to Kent depends on the LTC functioning, and the approach roads and routes not holding traffic up yet KCC's own predictions show that will happen.
  - Within their responses (bottom of page 8, and repeated on page 13), the Applicant states that "While the Applicant does not consider that there any transport impacts requiring mitigation by the Project, nor any subsequent intervention options needed, it notes that: The Applicant is considering the need for enhancements along the A2/M2 corridor which are within the RIS3 pipeline.". This is contradictory as the Applicant wouldn't be seeking (or expecting to get) funding unless there was a significant problem predicted, so seems to validate KCC's highly adverse predictions.
  - The phrase "The Applicant maintains a route strategy for the M25 south of the proposed connection with the Lower Thames Crossing, the M20, A2 west of the junction with the Lower Thames Crossing, and to the M2 east of junction 1." does not make sense so needs explaining or correcting.
  - On page 7, among KCC's predictions it says that "Tollgate and Gravesend East are also forecast to experience queue lengths blocking back through upstream junctions in the with-LTC scenario, with associated delays and road safety risks. Journey time increases of up to 6% on roads north of the SRN junctions to/from Gravesend are forecast with LTC, resulting in congestion and delays." In our view, these outcomes demonstrate that the proposed scheme is inadequately planned and incorrectly located, as the consequences, including for the southern two-way connector road, will be crippling for the local area.
  - The Applicant also refers (top pf page 9) to joint working with KCC saying "The outputs of this study will allow Kent County Council to develop more advanced business cases over the course of the next 10 years through existing processes." This implies an up to 10 year timeframe before the problems caused by the LTC will get solved (always assuming that they can be). That is a completely inadequate timeframe for resolution, especially as some of these adverse consequences have already been predicted for more than ten years before opening.
- Closure of PRoW's during construction:
  - The applicant states on pages 32-33 that "There are four PRoWs for which no diversion route has been provided and which would be closed for long periods of time. These are sections of NS164 and NS165, plus Footpaths NG7 and NG8 which are located near the South Portal and for which new routes would not be available until towards the end of the construction phase. PRoW user surveys established the nature of PRoWs and their usage by WCH; the surveys

- indicated that the majority of PRoWs crossed by the Project route (which included NS165 and Footpath NG7 as representative routes within this area) have a low level of usage.”
- The footpath surveys undertaken were on limited days and for limited hours, therefore little conclusion about usage can be drawn.
  - Leaving aside that the farmer is very good about ensuring that the paths are well marked, the paths would not be as clear and wide as they are seen on aerial views if they were not well used. The “Strava Global Heatmap” is also a useful source of information showing these paths as “hot”.
  - The “five-fields/five-ways” paths (NG7, NG8 and NS164) are particularly popular, as is the “Runway” path NS169 to the Country Park via NS 167 – we note that severance of the latter is not mentioned by the Applicant.
  - The impact of the loss of all the routes simultaneously, for a very long time during construction, is going to be very severe. We are surprised that the Applicant can classify this degree of community severance as only “moderate adverse impacts”, which is explained as “250m–500m increase (adverse) or decrease (beneficial) in WCH journey length”, in Table 13.4 of APP-151. In Table 13.64 we consider that the degree of the adverse effects are understated. The Applicant tries to say that the adverse effects are unimportant as having to walk further has health benefits but it should be personal choice how much time and distance someone wants to walk and where to. A route that is too long, and unpleasant, will have the reverse effect of discouragement.
  - The Applicant refers to [APP-539] which “considers the impacts of the Project in relation to active travel. Table 7.18 concludes the assessment of health outcomes for active travel during construction as neutral, and notes that in instances where no diversions are proposed, alternative routes remain available for the local community to use, such that impacts on existing leisure and recreational use are not considered to be significant”. This statement is patently untrue south of the river Thames.
- Green bridges and habitat connectivity:
    - On page 62, the Applicant says “All three green bridges within Kent are maintaining road connections that already exist in those locations to avoid severance impacts as a result of the Project”.
    - This is not true as Thong Lane south connected directly into woodland whereas in future it will connect to a two-way road (three lanes wide at that point) so connectivity of the proposed green bridge will in future be fully severed.
  - Archaeological investigation of the Nitrogen Deposition mitigation areas:
    - Archaeological investigation and possibility of presently unknown important below-ground sites is discussed on page 69, and also page 78.
    - For the newly proposed Nitrogen Deposition mitigation areas, no archaeological investigations have so far been undertaken and this omission will need to be corrected.
  - Impact on Conservation Areas:
    - On page 61, the Applicant states regarding the impact on Thong Conservation Area that “Thong Village (ES CA10) is assessed as likely to have a temporary negative (moderate) construction impact and a permanent negative (minor) impact, following mitigation by screening of construction compounds. The operational impact to the Thong Village Conservation Area is recognised as likely to be negative (moderate adverse) even after mitigation by use of earthworks and woodland planting.

- We consider that Thong is likely to suffer major adverse effects during both construction and operation.
- We note that KCC's point about impact on Shorne Village Conservation Area has not been answered by the Applicant. Additional tall planting close to the LTC line and southern portal would be beneficial to a wide area.
- Chestnut Green Conservation Area has been omitted by both KCC and the Applicant but is likely to suffer adverse impact from additional traffic and pollution consequences, during both construction and in operation – it needs to be added to the Tables and assessments.

REP2-061 Response to the Medway Council LIR:

- Negative impacts on air quality:
  - Discussion on page 2 has a strange justification from the Applicant that because exceedances and need for an AQMA on the A228 are predicted to be needed presently without the project, therefore the project doesn't cause problems because it itself doesn't cause a new need for an AQMA. That is not the same as saying that the project does not cause significant deterioration in air quality above what would have resulted from just background traffic increases.
  - Given the topography of the A228 through Cuxton, the increased HGV movements (77 in the 2045 a.m. peak hour as stated on page 7 of the response to Tonbridge and Malling REP2-067) will cause a considerable decrease in air quality, particularly as travelling up inclines, when HGV's emit most pollution, are not factored in to the air quality calculations.
  - There is widespread scepticism about the traffic volume predictions on which the air quality calculations depend, so it seems likely that the actual air pollution caused by the project will be greater than predicted.
  - The A228, from Halling northwards, is a residential route with housing close to the roadway, and in some cases below roadway level which also further adversely impacts negative air quality experienced.
  - It is also very unclear as to what improvements could be implemented on this road to reduce/mitigate the adverse effects.
- Planning Applications resulting in additional traffic:
  - On page 4, the Applicant discusses 11 Planning Applications, some very large, which all have traffic implications for the A289 and M2J1. Logically, these should all be included in traffic modelling.
  - However, the Applicant discusses them individually and then dismisses them individually from being included, yet together they amount to a significant increase in forecasted traffic on the relevant routes and junctions.
  - To be successful, the project needs to be based in reality.
- Traffic related severance (Elaine Avenue versus Higham):
  - On page 8 this discusses about severance for pedestrians caused by project related traffic increases.
  - We discussed this matter previously on page 2 of our Deadline 2 submission (REP2-116).
  - The charts in REP1-145 show that while traffic volume increases on the A226 are similar to those at Elaine Avenue, there are many more periods of the day that are negatively impacted.
  - We remain unclear as to why Elaine Avenue will suffer particularly high traffic increases due to the project, and find it surprising that worse increases on the A226 at Higham do not merit inclusion in Table 7.9 of APP-539.

- Supplies sourced from the Hoo Peninsula; delivery times in general:
  - On pages 10 and 19 there are references to the Hoo Peninsula being a “significant supplier location”.
  - We can see this is possible (but not yet decided) but that leads to concerns about the route such supplies would take to reach the LTC works compounds and therefore the impact on the road network locally and nearby residents.
  - This concern has only been increased by the discussion about only having one TBM. Although the Applicant has said that the south-to-north drive would still be serviced and supplied from the north tunnel compound, we see it as being likely that more materials than presently predicted would actually end up being supplied directly to the south portal compound.
  - The Applicant refers readers to Chapter 8 of APP-529 where it says in point 8.6.19 on page 270 that “The peak period for deliveries to compounds is forecast to be between 08:00 and 09:00”. Such timing will conflict badly with local commuter and school traffic using the A226 and A2 as the peak traffic times locally are respectively later and broader.

REP2-067 Response to the Tonbridge and Malling Borough Council LIR:

- No additional comments arise from the content, much of which is in common with other responses.

**Section 4. Other matters of particular significance highlighted here; Additional points:**

We would be very grateful for the Inspectorate's consideration of the following particular points arising from previous and current submitted documents.

**Section 4a. Traffic migration routes between the M25 anticlockwise and the A122**

This issue has been raised repeatedly by us to the Applicant, from the very beginning of Consultations, that when there are incidents at the Dartford Crossing, as there still will be in future, considerable additional traffic will migrate from the M25 anticlockwise to travel:

- M25 J5, M26 eastbound, M26 J2a to A20 northbound, A227
- M25 J5, M26 eastbound, M20 eastbound, A228
- M25 J3, M20 eastbound, M20 J2 to A20 eastbound, A227
- M25 J3, M20 eastbound, A228 northbound
- M25 J2 to M2 eastbound

Which together will gridlock the entire Gravesham and Medway areas and beyond, particularly with the obvious additional rat-running through unsuitable residential routes.

The first four routes above are well known to Gravesham and Medway residents who use them routinely in preference to the M25. In a major incident, some drivers are even likely to travel down the M20 to the A229 Blue Bell Hill and even the A249 Detling Hill to cross over to the M2 westbound.

Responses from the Applicant to date have been dismissive of the concerns raised.

In their response (although unfortunately they did not wait to see our written post-meeting representations so as to fully understand the point that we were actually making) to Shorne PC in REP1-183 (9.10 Post-event submissions, including written submission of oral comments, for ISH1) on

page 57, point B.3.4, NH stated that "there would be very few trips on the M25 anticlockwise where routing via the Lower Thames Crossing would offer a shorter journey time". This is one of those responses where the statement might be true in itself, in isolation, but the wording does not answer the actual point raised or relate to the reality of what drivers actually do in practice – our experience as local (meaning actually over quite a wide area) residents and routine users of the migration routes is that the migration route is generally preferred even though physically slightly longer and slower as it avoids risk of/actual A2 and M25 routine congestion.

However, the response given to the Thames Crossing Action Group (TCAG) on page 156-157 of REP2-052 regarding their similar comments in REP1-425 concerning traffic migration routes to the LTC is not only completely different but the Applicant actually admits, for the first time that we are aware of, that what we and others have been saying all along is in fact true.

The Applicant now states, as copied below:

The majority of incidents would be managed at a day-to-day operational level and would likely have a relatively minor effect on road users diverting between the Crossings.  
More complex incidents would be escalated to a Regional Response to enable strategic involvement for the planning of resources and resolution, press coverage and wider strategic signing.  
In most incident cases, even at Regional Response level, Dartford would continue to operate at ~50% capacity, meaning the remaining ~50% would need to be managed:

- Traffic in the immediate vicinity of the Dartford Crossing would likely continue to use the Dartford Crossing.
- Traffic on strategic routes towards the Crossing would be warned of the delays through (all currently existing):
  - Variable message signs (including journey time information and differential route information at strategic points)
  - Sat Nav/in-car systems
  - Traffic England website (incident descriptions, delay information and resolution estimates)
  - Press, radio, etc.
  - Social media
- This will provide road users with journeys already underway to make early and informed decisions around the best choice of route for example:
  - Remain enroute to the Dartford Crossing
  - Divert to Lower Thames Crossing through an appropriate route (as early as possible)
  - Use alternative sections of the SRN if appropriate (e.g. M25)

The use of media streams to alert people to the potential delays would also likely have the effect of temporarily reducing the number of people attempting to make a crossing, therefore temporarily reducing the overall demand (as demonstrated by the protests on the QEII Bridge in 2022).

So, as well as the traffic that was always going to routinely use a migration route, a further 50% of the M25 anticlockwise traffic will attempt the same, and in fact such traffic will be encourage to leave the M25 early to use migration routes.

And that of course assumes in the above scenario that the Dartford Crossing is only partly closed, whereas there have been many incidents where the A282 northbound has been 100% closed between M25J2 and the Crossing itself.

We would be grateful if the Applicant could please be asked the following:

- To expand on what they mean by "Divert to Lower Thames Crossing through an appropriate route", particularly as to what route(s) they consider appropriate in the above circumstances and how they will ensure that only this/these are used.
- To explain why there has never been a proposal for a motorway link from the M26 to the LTC despite this being the obvious design counterpart to the proposals north of the Thames – this omission raises concerns that this "missing link" may be yet another road scheme that is being

left out of the proposals to reduce apparent costs but will rapidly become obviously needed yet without funding being assured.

**Section 4b. U-turns at the A289:A226 junction:**

In their response (although as said already, unfortunately the Applicant did not wait to see our written post-meeting representations so as to fully understand the point that we were making) to Shorne PC in REP1-183 (9.10 Post-event submissions, including written submission of oral comments, for ISH1) on page 57, point B.3.6, NH stated that "The Applicant's transport model forecasts that at most five trips in any modelled hour would u-turn at the A289/A226 junction."

We do not consider this to be credible, especially as, as far as we are aware, no proper studies of turning movements at this junction have been undertaken.

The question here is about how much traffic driving on the eastbound north side distributor road actually wants the M2 eastbound, while being forced on a pointless 4km detour, rather than to continue further on the A289.

We consider that present/future users of this route will arise from:

- Shorne and Cobham etc residents
- Businesses such as the Nook Pet Hotel, and Harlex etc (for whom HGV restrictions prevent other routeing).
- Rochester and Cobham Golf Club users (including special events)
- Traffic from south-east Strood (including Strood Academy) which currently travels westbound through Three Crutches roundabout to head westwards on the A2 before U-turning at Shorne (although these may in future instead ratrun to M2J2 using Elaine Avenue or Bligh Way)
- Users of the Inn on the Lake Hotel (including special events)
- Cobham Hall day pupils, and special events
- Shorne Woods Country Park, including special events

However, at the same time, it is obvious that many users will instead ratrun through Shorne to reach the A226 so as to avoid getting caught up in congestion/jams on the A289.

The point is that we consider that the above current/additional traffic volumes will be considerably greater than just 5 vehicles per hour, and that the severity of the impact on M2J1 and the A289 will also depend on the timing of peaks of such usage.

**Section 4c Chalk stockpiles duration:**

A matter that was discussed earlier on in the project is of there being a large chalk stockpile to the east of the south portal that would only be removed over a period of several years extending after the end of the project.

That would cause noise, air and dust pollution and increased HGV movements for a very long period of time after the LTC had been opened, and delay completion of landscaping. There would also be prolonged risks around run-off and drainage of contaminated water, and presumably implications for the land on Great Clane marsh and on nearby residents if drainage needs are prolonged.

If this long-term stockpiling is still proposed we would be grateful for further clarification/signposting on this point including HGV movement numbers, routes and duration of the associated nuisance.

*Shorne Parish Council,  
24<sup>th</sup> August 2023.*