

TRO10032 LOWER THAMES CROSSING
COMMENTS ON APPLICANT’S D2 SUBMISSIONS
For Deadline 3 (24th August 2023)

SHORNE PARISH COUNCIL (IP ref 20035603)

Introduction:

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

Thank you very much for considering our representations.

Comments on relevant submissions by the Applicant:


REP2-001 Covering letter:

- We note in 1.7.8 on page 5 that “The Applicant has no comments to make on the following Deadline 1 submissions by others:”, this includes under item (d) the three detailed submissions from Shorne Parish Council (REP1-405, REP1-407 and REP1-409)

REP2-005 Draft DCO (tracked changes):

- It would be helpful if the tracked changes could be indicated in a bright colour.
- REP2-042 is also noted as some help in this regard but was physically separate from the first document so only found subsequently.

REP2-014 6.2 Environmental Statement Figure 2.4 - Environmental Masterplan Section 1 & 1A:

- NOx mitigation land:
 - Apologies that we have only just realised that a large area of land for NOx mitigation at Gads Hill Farm, as was proposed in the Local Refinement Consultation in May 2022, does not in fact feature in the plans submitted for the DCO in November 2022, so we apologise for our confusion on this matter.
 - Some of the land at Burham pit and Wouldham, previously consulted on in the Minor Refinements Consultation as not being needed, does however still feature.
 - However, the total amount of NOx land required, where it is to be provided and how the area required is calculated does still need clarification.
- Question about a symbol:
 - We were unable to ascertain the meaning of this roadside symbol  so would be grateful for it to be explained.
- Sheet 2:
 - West of the road drainage pond on Park Pale, we continue to question why an area of farmland purchased by NH as part of a much larger plot has been left out of the mitigation etc plans and the red line boundary. Planting here would be beneficial in hiding the new access road and the drainage pond from some views.

- West of Park Pale bridge we have previously suggested that there needs to be a fence that blocks headlights as drivers on the northern connector road could have a problem with headlights of vehicles leaving the bridge approach and on Park Pale heading westwards.
- Sheet 3:
 - The entrance to The Nook is not shown in the correct location (this has been pointed out to NH previously), it opens from Brewers Road but is not shown crossing the verge.
 - North side of Brewers Road bridge, as raised previously to NH, there needs to be a new WCH crossing point (Pegasus?) across Brewers Road so as to enter the Country Park. Additionally, there may need to be a footpath extension on the eastern side verge along to the new traffic lights at the slip-roads junction.
- Sheet 6 and 8:
 - Existing north-south footpath NS156 is not shown.
 - Unclear what the dashed blue/pink lines on boundaries mean (also Sheet 5).
 - A routinely used path crosses from Swillers Lane to the east, this needs to be a WCH route. (Please see also REP2-072)
 - Swillers Lane stream is not shown, Southern Water require an uncultivated margin to this.
 - Planting of trees will need to take account of above ground electricity supply lines that cross the Swillers Lane fields area.

REP2-016 6.2 Environmental Statement Figures Figure 2.4 - Environmental Masterplan Section 2

- Sheet 1: As said elsewhere, we support the need for an additional WCH crossing point (Pegasus?) at the northern end of Halfpence Lane.
- Sheet 21: There is an informally used path from Shorne Ifield Road heading south into the Country Park, on the east border of the mitigation land (west side of the Ifield Farm stream), this needs to be made a full WCH route, including bridleway. (Please see also REP2-072)

REP2-033 7.16 Community Impact Report (Tracked changes version):

- Page 37, 6.1.102 – “Istead” was correct.
- Page 51, 6.2.56 – unclear what is meant as “ealth” is wrong, and also the last sentence.

REP2-041 9.8 Environmental Statement Addendum (Tracked changes version):

- Note this states in 1.2.6 that it contains “new information issued for the first time”.
- Table 2.2, Point 6.1 – Note improvement to description of Gads Hill Place. The Dickens’ Tunnel under the A226 needs to be examined and if required strengthened and protected before work starts, an undertaking to repair any damage after it has been caused is inadequate.
- Appendix C:
 - This contains discussion about using a single TBM, as per the Minor Refinements Consultation.
 - We note that under point C.3.10 it refers to an assessment connected with only having one TBM being undertaken in January 2023, confirming that this change was being considered well before the date of the Minor Refinements Consultation. This must have been decided before or just after the DCO documents had been submitted as instructions to make connected assessments had already been given by January.
 - We consider that, regardless of the information contained, at the southern portal there will be additional impacts of noise, dust, light and other pollution, 24 hour working/extended working hours (not mentioned) as well as differences in various forms of risk.

- Appendix D:
 - This considers effects of the two-year delay in construction.
 - We consider that the design work detailed in D.3.3 should be undertaken prior to DCO approval and not afterwards.
 - The delay further decreases the validity of the traffic modelling, and all co-dependent calculations, which should always be based on the latest available figures and latest/best available programs.
 - Similarly for measurements and surveys contributing environmental information, these will also be further out of date so require updating.

REP2-068 9.57 Without prejudice assessment of the air quality effects on European sites following Natural England advice:

- This is for Natural England and other experts to evaluate.
- However, we note that for the Ramsar Site this does not factor in that there is “functionally linked land” which is also important.

REP2-069 to REP2-061 9.58 Engineering Cross Sections:

- These show that there will be considerable, unmitigated visual and noise impact on local residents from the multi-level LTC:A2 junction.
- There need to be considerably more bunds and visual/acoustic screening of the LTC junction, and beside all roadside WCH routes.
- We ask whether it would be beneficial to also create a chalk mound in this area so as to achieve noise and visual screening of the LTC junction from Shorne West and Riverview Park.

REP2-072 9.60 Supplementary Walking, Cycling and Horse Riding (WCH) Maps (Volume A):

- These are helpful, however do not yet show additional links that have been requested. These are:
 - East from the end of Swillers Lane, the junction of NS156 and NS159 (NOx mitigation land), this is an informal, but well used, WCH route that the farmer leaves unseeded and mown. It should perhaps also circle the NOx mitigation area.
 - On the east side of the compensation land south of Shorne Ifield Road, heading north-south, also used informally but should be added as a WCH route.
 - An off-road connection parallel to the north side of Shorne Ifield Road, to if desired connect NS170 to new paths without having to use the roadway.
- As before, please note the severance caused by the loss of the link of NS 169 and NS174 west of the LTC line to NS167 east of the LTC line, and the very long detour routes that result.
- Please also consider the low ambience (please compare with air quality and noise propagation maps) of many of the new/replacement WCH routes, particularly the paths on both sides of the LTC heading north from the Thong Lane overbridge and curving round the north side of the tunnel portal, and the replacement route of NC177.