

TRO10032 LOWER THAMES CROSSING

COMMENTS ON APPLICANT’S SUBMISSIONS SINCE D3 For Deadline 4 (19th September 2023)

SHORNE PARISH COUNCIL (IP ref 20035603)

Introduction:

We have reviewed all relevant documents submitted by the Applicant at D3: REP3-001 to REP3-146 (excepting those based entirely north of the Thames), and AS-094, AS-098 and AS-099. (CR2-001 to CR2-019 were not relevant).

Several documents were assessed that it would not be useful to try to make comments in response, particularly where based on the outdated LTAM data, but please also see matters identified below.

Thank you very much for considering our representations.

Comments on relevant submissions by the Applicant:

REP3-110 7.5 Design Principles v2.0:

- Pulverised Fuel Ash introduction: Page 32, section LSP.22 discusses formation of open mosaic habitat using large amounts, up to 20%, of Pulverised Fuel Ash – this raises concerns about the possibility of water run-off resulting in contamination to the North Kent marshes SPA and Ramsar Site.
- Land loss for Emergency Services use: On Page 50, sections S3.20 to S3.22, physical arrangements for emergency services (helicopter landing area, Rendezvous Point and emergency muster points) are noted. If these are taking additional land out of mitigation/compensation use and availability then the same land area will need to be added to the land being overall provided.

REP3-112 7.9 Transport Assessment (Part 1 of 3) v2.0

- Railway usage figures, Page 88, Table 6.2:
 - We note that Railway usage figures do not appear to include Freight use, which locally involves the North Kent line and its nearby branch to Hoo (Hundred of Hoo line).
 - We are aware that Network Rail are proposing to route many more trains via the North Kent Line, these future plans also need consideration.
- Volume and Capacity figures for Local Roads: Pages 119, 139 and 150, respectively for Plates 7.3, 7.15 and 7.24:
 - This gives volume to capacity increases in the pm peak 2045 of “over 40%” to both Thong Lane and Pear Tree Lane northbound.
 - We are no longer clear what base figure the Applicant is using for this prediction but would anyway like to know how the “capacity” of these narrow and winding roads has been assessed and how accommodating this suggested increased volume (50 to 250 vehicles in peak hour) can possibly be the case in practice.

- As this level of increase cannot in fact be accommodated, there will instead be an increase in traffic taking alternative routes, e.g. a route through Shorne Village to the A226 as regards an alternative to Pear Tree Lane.
- Links over 85% capacity: On Page 118, section 7.3.20 it states that “.....in the 2045 PM peak there are a number of links at the M2/A2/A122 Lower Thames Crossing junction that are forecast to operate above 85%, including: a. A2 eastbound distributor (98%), b. A2 eastbound distributor approaching Brewers Road (95%)”
 - This is the route from the LTC to the A289 and Hoo Peninsula so we have to question, given the proposed housing and business developments to be forthcoming on the Hoo Peninsula but which are not at present adequately factored in to traffic predictions, as to how this link is going to be functional.
 - The Brewers Road off-slip from the A2 eastbound distributor is also shown as being at 75-85% capacity, and the Vissim figures (REP1-194 9.15 Localised Traffic Modelling Appendix H - Traffic Operational Appraisal - VISSIM Forecasting Report, Page 63, Table 5.18) show predicted queues of up to 90m at the 2045 pm peak - at non-average times there could be impact back onto the northern eastbound connector road even with traffic sensitive signals.
- “Gravesend” Bus routes, Page 92, Plate 6.29:
 - We note this is titled Gravesend and not Gravesham (unlike the other chart for Thurrock), it also includes Dartford routes.
 - This does not show bus routes through rural areas, which are used by schoolchildren getting to and from schools, particularly those of secondary and college ages, and elderly rural residents without cars.
 - In Shorne we additionally have routes 311, 416 and 417 passing through the Village.
 - It is unclear why rural bus routes, which will be severely impacted during construction and by altered access routes in operation, have been omitted from the diagram for the south of the Thames.

REP3-114 7.9 Transport Assessment (Part 2 of 3): Construction traffic increases (Page 270 onwards):

- Various Plates in the document together show large increases in traffic, sometimes in both directions simultaneously, and increased journey times.
- When increases are predicted on Lower Higham Road it is sometimes unclear how the traffic reached there.
- When increases are predicted northbound through Shorne Village, that traffic needs traffic light facilitation at Shorne Crossroads.
- Some of these roads have restrictions against HGV’s so the pcu count approximates to the number of vehicles.
- Increased traffic at Brewers Road overbridge will block further movements.
- Peak hours of 7-8 modelled are earlier than the expected peaks on these roads, which is 8-9.
- Overall, this very long period of traffic disruption is going to be a very long nightmare for local residents.
- The point is that, even if the predictions are underestimated due to the age of the input data into LTAM, large increases are predicted on roads that are inherently unsuitable for increased traffic. This will in turn cause increased accidents during the Construction period.

REP3-116 7.9 Transport Assessment (Part 3 of 3): Accidents:

- Accident figures, Page 416, Plate 9.3 (Spatial distribution of accidents by value over 60 years):
 - This shows fewer accidents on the A226 westbound through Shorne and Higham even though the traffic levels are predicted to increase and there will be increased hazardous right turns across 50mph traffic at Shorne Crossroads. This prediction therefore lacks credibility.
- Collisions, Page 420, Plate 9.5 (Collisions A2/M2 junction, 2015 – 2019)
 - This shows that several roads that are predicted to have large increases in traffic during construction, and afterwards, already have poor accident rates which increased traffic is likely to worsen, both in frequency and severity.

REP3-124 9.8 ES Addendum v3.0:

- Claylane Wood: Page 25, Section 6.1. While it is true that Claylane Wood is privately owned and not Public Open Space, it is also the case that local residents access it frequently, do not perceive it as being private land, and that it will be adversely affected by the project.
- Shorne Woods Country Park car traffic: Under A.2.7 on Page 76 it is stated that there is parking for 300 cars. This is true but there are regularly over 100 vehicles also parking (illegally) in Park Pale, particularly in the school and Bank holidays and when there are special events, which are increasing in number. The playgrounds were recently doubled in size so further attracting in visitors.
- Shorne Woods Country Park visitor numbers: This is quite an elusive topic, which must make planning for the Park very difficult. A.2.12 on Page 77 gives the latest available figure as 353,066 visitors in 2013/2014, but we consider that numbers must be considerably higher now, probably at least 500,000 if not more. These visitors will put considerable pressure on the Connector roads and Gravesend East, which they do not at present.
- Jeskyns visitor numbers: Under A.2.19 on Page 79 said that according to The Annual Survey of Visits to Visitor Attractions there were a total of 878,626 visitors to Jeskyns in 2021. This is further pressure on the southern two-way connector road.
- Pedestrian use of Thong Lane: A.2.21a on Page 80 cites that 3 pedestrians were identified walking on Thong Lane. As that would be a very hazardous undertaking in the southern part, we are surprised that anyone was identified although the exact location surveyed is not stated.
- Thong Lane Car Park: This is discussed from A.3.2 on Page 82. We are unclear what the impetus was for this being proposed, perhaps so that the Applicant did not need to reinstate the land. It will introduce an Urban appearance and facilities in a way that could be overall undesirable. We have noted and share KCC’s concerns about this facility in the WR Ref... and elsewhere. The suggested vehicle numbers will impact on the Tong Lane junction with “Darnley Lodge Lane”, and will also be making turning movement into and out of the Car Park in quite a hazardous location.
- Change in 24 hour working in single TBM scenario: The Appendix C (Review of a single TBM tunnelling) starts on Page 100. It makes no comment about the fact that the single TBM scenario involves many months of 24-hour working at the southern tunnel entrance compound which was not previously the case. We have this raised in several places including at ISH5 but did not receive an answer from the Applicant.

REP3-141 9.67 AQQHIA:

- This document lacks data validity and uses modelling designed for Urban areas. It’s purpose seems to be to whitewash over justified concerns about health impacts close to the A122.

- With the predominant wind direction being to the south-west, we question that a discussion limited to 200m is valid. Re-provided WCH routes are within 200m as well as residential addresses.
- The LTC has some very wide roads and large junctions. It is not stated in the document as to where the beginning of the 200m margin is measured from. Is it the edge of the outermost running carriageways? Is it only for straight sections or junctions as well?
- It is unclear how there can be 148,000 people living within 200m of the line of the LTC, which latter should be the only people considered.
- An additional matter is that, whether or not it is actually toxic, smell from emissions from the LTC (which may contain NO₂ and particulates) will be discernible, will affect a large population area and will give residents the impression of being polluted.
- On Page 2, Section 1.1.11 the methodology as regards increased mortality incorrectly divides the effect over all the population living within 200m of a roadway in the “AQQHIA study area” but some of those are supposedly getting improved air quality. The denominator should be people who will be suffering adverse air quality. Increased mortality due to increased NO₂ exposure in the opening year is an unlikely, high-level and long generation time impact which would be impossible to prove, especially compared to e.g. the more likely development of or worsening of asthma.
- Likewise, in 1.1.14 on Page 3, in both examples the denominator is again wrong. For example a) it should be only those people who already have asthma severe enough to at times require hospital admission. Dividing by people who have never had and never will have asthma is inappropriate. This methodology will also not be captured numerically through only looking at (the anyway notoriously unreliable) hospital admission data as it would be needed to additionally include GP and Practice Nurse consultations. For example b), the resident population will include children who are not going to have cardiovascular incidents for decades if at all.
- Annex A on Page 20 reveals that the “AQQHIA study area” includes locations such as Canterbury and Tandridge, a very considerable distance from anywhere directly and adversely affected by the LTC.

REP3-143 9.69 SoCG between (1) National Highways and (2) Harlex Haulage and (3) J & B Martin (Crayford & Fawkham) Limited:

- In point 2.1.2 on Page 4 we note that the position of the balancing pond at Park Pale was moved east by the Applicant in response to a request from Harlex.
- The effect of this arrangement was for Harlex to enclose a section of Farmland that they did not previously own, so enlarging their territory.
- This raises concerns for the Parish Council, as expressed previously in various documents, about the future proposed use of this enclosed land, when the Applicant could otherwise have increased the mitigation planting along the A2.
- We do not consider that the Applicant should have been facilitating this kind of manoeuvre at all and certainly not for land that is situated within the AONB.
- Otherwise we support all the points raised by Harlex.

REP3-145 9.72 NTEM 8 and Common Analytical Scenarios:

- This refers on Page 2 to quite large differences in the output values obtained. The Applicant concludes in point 1.1.10 that “Overall therefore, it is considered that the need for the Project (as set out in Need for the Project [APP-494]) remains valid as the Project would provide relief to the Dartford Crossing in every scenario”. For the Cost Benefit Ratio, it is the degree/percentage of any

such relief that is important, so where figures are lower than previously presented, benefits will be lower as less relief is both needed and provided.

- On page 6, one of the factors being applied is for “high take-up of connected autonomous vehicles (CAVs)”. Given some of the problems that have been identified with these worldwide, we are not convinced that this will come to pass.
- Page 7 revisits the Written Ministerial Statement of 9th March 2023 which we discussed previously. The key point is that the 2y delay arises from concerns about the ability of the Applicant to at present, without further Consultation, “ensure there is an effective and deliverable plan”, an opinion which we strongly support.
- We will otherwise leave the interpretation of this new data to experts in the field.

REP3-146 9.73 Tunnel Depth Report:

- Despite its title implying greater breadth of discussion, this document is only about PLA concerns and does not include information about main tunnelling depth south of the Thames, including the Ground Protection tunnel which is shallower.
- The geological plan Annex A on page 29/30 does not extend far enough south to capture the relevant area but a companion drawing is indicated and has been requested from the Applicant.
- This matter is also discussed further in our submission after ISH 4, in connection with the inadequate response by the Applicant to a question that we had raised about tunnelling shallowly under marshland.
- Ask: We suggest that a similar report focusing on south of the Thames and including the Ground Protection Tunnel would be helpful and we would be grateful if the Applicant could be requested to provide this if considered helpful.

AS-094 10.4 Change Application (August 2023) Appendix B - Minor Refinement Consultation Report:

- Overall content of the document is noted.
- We note that the Applicant has not commented on submissions including our own which raised that the change to a single TBM would introduce 24-hour working at the Southern Portal and that therefore there would be increased noise impacts on local residents.

AS-098 and AS-099 10.4 Change Application (August 2023) Appendix B - Minor Refinement Consultation Report, Annex D - Responses to consultation Parts 1 and 2:

- It was good to be able to see the original representations, this is the first time that has happened throughout all the years of Consultations.
- We note that many representations reproduced in these documents are similar to our own, especially that from Gravesham Borough Council.