

TRO10032 LOWER THAMES CROSSING

RESPONSE TO WRITTEN QURESTION AT ExQ1 (15th August 2023) For Deadline 4 (19th September 2023)

SHORNE PARISH COUNCIL (IP ref 20035603)

Introduction:

We have reviewed all the written questions at ExQ1 and hereby submit answers as much as we are able to, and at this time.

There are several questions in which we have a great interest, particularly noise and water issues, but we will need to review the responses from expert IP's and the Applicant before making any comments, at a future Deadline.

Thank you very much for considering our representations.

Section 1: Questions directed specifically to Shorne Parish Council:

- None identified from ExQ1 itself.

Section 2: Questions directed generally to “All IPs” and “concerned” IPs:

Question:	Response from Shorne Parish Council:
ExQ(1) 2.3.1	Carbon and Climate Considerations: R (oao) Boswell v Secretary of State for Transport: We have not responded to this question as we do not consider that we have sufficient knowledge and expertise, however we are hopeful that other IP's are in that position.
ExQ(1) 3.1.1	EIA Regulations 2017: Consideration of Reasonable Alternatives: We are unable to answer concerning assessment of discharging of duty.

<p>ExQ(1) 3.2.1</p>	<p>Consideration of Alternatives: Other Modes/ Solutions:</p> <p>We have made inputs on this matter previously therefore have not responded in full to this question again but add the following:</p> <ul style="list-style-type: none"> • This is not necessarily about an alternative mode being instead of the entire A122 proposals, but we consider that an opportunity should have been taken to provide a two-way rail link along with any additional road crossing of the Thames. • This would have facilitated International heavy goods trains being able to cross the Thames, and use the Channel Tunnel, without having to go into central London. • The same would apply to long-distance rail passenger services. • This ability would remove pressure from the High Speed 1 line which has only one track in each direction so gets progressively busier as it gets closer to central London, and is also under pressure to take more services into St Pancras. • We reference for example an article published in the Sunday Telegraph on 2nd July 2023 titled “Unblock the Chunnel and get freight back on track” by Nicholas Hellen.
<p>ExQ(1) 3.2.2</p>	<p>Consideration of Alternatives: Other Routes:</p> <p>We discussed this previously for example in our Written Representation, REP1-408, Page 4, section 3.1. We are not expert Transport Planners but that does not mean that our opinions lack validity. We consider that overall the proposals need to go back to basics/the drawing board for a major rethink.</p> <p>Deficiencies identified fall into the following categories:</p> <p>1) <u>Routes and route combinations not considered at all:</u></p> <ul style="list-style-type: none"> • Hybrid D+E Option: On Pages 4-6 of our WR we discussed the possible hybrid Route D+E Option – this would connect together the A249 north from M2J5 (currently being massively upgraded at significant cost) and the A289 north from M2J1 (both currently needing upgrades) by means of a new outer Medway road tunnel between the northern parts of the Isle of Sheppey and the Isle of Grain. These are both deprived areas which would derive great economic benefit, and Medway Council are considering such a tunnel as being needed anyway. From a junction on either Sheppey or Grain (there is a large amount of brownfield land at Grain) a Lower Thames Crossing tunnel could then connect this area into Thurrock/Essex, although it is not for us to suggest where such a crossing would best connect to the road network north of the river. This route has the advantage that Dover traffic would use the A249 Detling Hill from the M20 to the M2, and it would remove large volumes of HGV’s from both the M2/A2 and M20 west of the A249 and as a result would have greater beneficial effect at the Dartford Crossing. • Connecting to the M20 (and M26): This was suggested early on by another Parish Council in the area, to have a (tunnelled) link that would bypass the A227. At the time the concept was considered to be a non-starter however given the now more obvious deficiency (compared to the north of the Thames) of there not being a proper connection between the M26 and the LTC (please see page 13 of our REP3-201 submission commenting on others WR’s) this should perhaps have been considered. With escalation costs as proposed, the marginal cost of tunnelling further is starting to look relatively cheap compared to the overall likely cost of the project.

	<ul style="list-style-type: none"> • Completing the M25: This is Option A14 (long tunnel from between M25 J3 and J2 to a suitable point on the M25 north of Dartford Crossing) in combination with Option A1 (improvements/extra tunnel or bridge at Dartford Crossing), and would give considerable relief to Dartford. As far as we are aware, the two Options in combination were not considered. <p>2) <u>Options that were otherwise incorrectly rejected or not taken forward:</u></p> <ul style="list-style-type: none"> • Options D and E routes were rejected as being too far from Dartford (although the meaning was unclear) however as can be seen for the D+E hybrid Option above, M2J1 is only about 1Km from the presently proposed LTC junction with the A2, and use of the A249 for access would we believe be more attractive to HGV's coming from the Channel Ports. • Option C variant has been discussed at great length by IP's so we will not discuss it again here, but we support the Blue Bell Hill improvements, and their costs, as being essential to Option C. • Option A solutions: The outcome of the 2013 Consultation was advice from the DfT that both Option A (chosen by 20% of all respondents but second to the 26% in favour of locations further east of Gravesend) and C solutions (only 17% of respondents were in favour of C or C variant) should be taken forward for further evaluation. The Ministerial Statement on 15 July 2014 said "We will now develop and appraise route options at both locations (options A and C) in order to identify a proposed solution. We will observe the actual effects of Dart Charge once it is introduced and work with local government, the South East Local Enterprise Partnership, businesses and other key parties to better understand aspirations for growth and implications for the road network. By undertaking more detailed work on route options at both locations, we will identify solutions that best meet the aspirations of government and stakeholders, whilst demonstrating value for money." Note the reference to "two locations", and that the evaluation report referred to solutions "At Option A". The January 2016 Technical Appraisal Report longlist appraisal undertaken by Halcrow was relatively comprehensive and included Option A14 (long tunnel). Subsequently however the Applicant has demonstrated bias and pre-determination by excluding Option A14, and later in fact all location A Options, from further consideration during Consultations (including in combination with other solutions located at the Dartford Crossing itself), and by only considering in effect one solution south of the Thames, at Option C. <p>3) <u>Other designs for Option C:</u> We discussed this previously in our ISH1 response, REP1-409, Page 6 and WR REP1-408, Pages 15-16. Since the time that both the WSL and the unviable ESL variant of Option C were suggested, the overall opinion locally was that connectivity was inadequate, which is why in response the LTC:A2/M2 junction has been ever growing in size and complexity. However as said previously, using Gravesend Central and M2J2 as ways to achieve all directions connectivity (to simpler LTC connections with the A2 as first proposed) was never offered at that time or subsequently but could do with being reconsidered now and for various locations not only immediately east of Gravesend.</p>
ExQ(1) 4.1.14	<p>Modelled Traffic Effects: Lower Thames Area Model: TAG Compliance</p> <p>There are expert IP's who will input in detail on this question. We have been able to read the TAG guidance documents using basic evaluation methods and as a result it does seem to us that the guidance is not being properly followed.</p>

ExQ(1) 9.4.5	Mitigation We are unable to answer this question which requires expert input.
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Shorne Parish Council
19th September 2023