

Gravesham Borough Council

Issue Specific Hearing 3 (5 September 2023) – (ISH3) on Project Design

Examining Authority's Agenda Item / Question	Gravesham Borough Council's Response	References
1. Welcome, introductions, arrangements for the Hearing		
2. Purpose of the Issue Specific Hearing		
3. A2/ M2/ LTC Intersection		
The ExA will ask questions of the Applicant relating to		
a) Review of Function and Traffic Movements		
<p>i. The ExA will ask the Applicant to explain the function of the proposed junction and the route paths through it that can be taken by traffic.</p>	<p>The problem for NH is how to handle the intersection between A2, A122, Marling Cross junction, and the feeder roads to A289/A2 (local road). In effect they are creating one complex junction to replace what are currently 3 separate junctions. The result will be very complicated to use. Originally Marling Cross eastbound slip (which now feeds the A2) connected to A122 and the feeder road but was then amended following consultation to connect to the A2/M2. The A2/M2 coastbound reduces to 2 lanes for 1.5km and the briefly London bound. A289/A2 (local road) access from MX is via Darnley Lodge Lane, Brewers Road and on slips at Shorne which remain.</p>	<p>https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010032/TR010032-003260-National%20Highways%20-%20Other-%203.1%20Draft%20Development%20Consent%20Order v4.0_clean.pdf</p> <p>Requirement 3</p> <p>3.—(1) The authorised development must be designed in detail and carried out in accordance with the design principles document and the preliminary scheme design shown on the engineering drawings and sections, and the general arrangement drawings, unless otherwise agreed in writing by the Secretary of State following consultation by the undertaker with the relevant planning authority and, in respect of</p>

	<p>GBC confirmed to the ExA that, notwithstanding the complexity of the junction, and so the potential for confusion for drivers, GBC would not wish to see any reduction in the nature of the movements catered for by the junction because to do so would have negative impacts on local access and connectivity (noting the importance of the A2 for local access), and the potential that any reduced connectivity could cause traffic to 'overspill' onto the local road network.</p> <p>GBC agreed with the comments made by KCC on the importance of the arrangements for monitoring and managing the operation of the junction and that these arrangements needed to be adequately secured by the control documents, including a role for input by the local authorities.</p> <p>GBC asks:</p> <ul style="list-style-type: none">• Involvement in the detailed design to ensure no unforeseen knock-on effects on the local highway networking impacting on local resident and businesses. <p>Requirement 3 does not recognise any role for the relevant planning authority where the detailed design is in accordance with the certified design principles document and that document in its current form [REP3-110] does not include engagement with the relevant planning authorities in the application of its design</p>	<p>the authorised development comprising highways other than a special road or a trunk road, the relevant local highway authority on matters related to their functions, provided that the Secretary of State is satisfied that any amendments to those documents showing departures from the preliminary scheme design would not give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement.</p>
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	<p>principle to the detailed design. The relevant planning authorities would only been involved in the evolution of the design from the current preliminary design to the detailed design if they were consulted by the Secretary of State in relation to a proposal by the Applicant to <u>depart</u> from the design principles and the preliminary scheme design. GBC does not regard this as an acceptable level of oversight, given the preliminary nature of the design and the potential for material effects on the receiving environment as the design progresses, as well as its concerns about the 'useability' or coherence of the junction in terms of the potential for driver confusion. The safeguard in Requirement 3(1) for materially new or materially different effects (a) only applies to departures from the preliminary scheme design and (b) in any event the environmental statement only addresses 'significant environmental effects'.</p> <ul style="list-style-type: none">• Evidence that the junction actually works (may be for ISH4) given concerns raised by WSP report commissioned by KCC• GBC noted that a concern about usability not being included as a design principle was a matter it would want to raise under Agenda Item 7	
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	<p>(but in the event Agenda Item 7 was deferred).</p> <ul style="list-style-type: none"> GBC maintains its request for the Applicant to provide further information showing the 3D implications of the design for this junction. Whilst GBC notes the Applicant's comments on why it considers it cannot provide access to it interactive modelling, GBC considers that there must be simpler approach that provides an ability to understand the junction ins more detail. 	
<p>ii. The ExA will ask the Applicant to explain the function and design of the proposed frontage roads and proposed treatments of intersections and traffic movements including the accommodation of traffic using the current intersection at:</p> <ul style="list-style-type: none"> M2 junction 2 M2 junction 1/ A289/ A2 Brewers Road Darnley Lodge Lane/ Thong Lane Henhurst Road/ Valley Drive Wrotham Road 	<ul style="list-style-type: none"> M2 J2 is the A228 junction for which no alterations are proposed (in Medway). The A228 provides another, relatively level, route from M20 to M2 avoiding Blue Bell Hill A229. Traffic pressure could spill on very local roads via Cuxton to Cobham or via A227. M2 J1 is largely abolished in that the M2/A2 goes through as 4 lanes (now 3) and the A289/A2 (local road) form the 2 lane parallel slip roads to LTC junction. Only the eastbound connections from/to A289 to M2 remain and are a matter of concern to Medway now due to development at Hoo and Isle of Grain. They are both single lane and are currently lane gain/loss related to J2. They will become ordinary merges under the scheme. Technical work being 	

	<p>commissioned by Medway may show action is needed now (which could then react back on what is shown under the DCO).</p> <ul style="list-style-type: none">• Brewers Road slips (Shorne) remain and join/leave the feeder road eastbound. If a vehicle wants the M2 it would need to go up A289 to Higham junction and come back south. South of the A2 the roundabout remains minus the Cobham slips on/off A2. Gravesham have suggested that this could become a simple T junction and allow the area to be relandscaped (partly over HS1 which imposes constraints).• Darnley Lodge Lane/ Thong Lane a simple T but with walking/cycling provision. Destroys what's left of Ashenbank Wood between HS1 & A2• Henhurst Road/Valley Drive (Marling Cross) becomes much more complicated with traffic signals – unclear about provision for walking and cycling through this junction. WSP work for KCC raises the issue of whether it actually works as a junction.• A227 Wrotham Road (Tollgate) has no changes, but WSP work commissioned by KCC implies issues as a result of LTC there could be congestion issues. Junction was a	
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	<p>major issue at 2014 Local Plan Inquiry despite at that point only being 5 years old from A2 widening.</p> <p>GBC asks:</p> <ul style="list-style-type: none"> • That the various junctions ‘work’ in transport terms • That the A2 can continue to fulfill its local traffic role and that vehicles do not reroute through the urban area or along the A226 – 2 lane sections of A2 being of particular concern • Local Plan growth can be accommodated (with any necessary junction improvements) • NH undertake to monitor traffic flows and take corrective action of LTC causes issues 	
b) Siting and Land Take		
<p>i. The Applicant is asked to explain the rationale for the siting and land take for this intersection.</p>	<p>Originally for LTC there was a western (as now proposed) and an eastern option that fed into M2 J1. The western option at route choice had simple slip roads onto A2. Only when Scoping/Stat Con did the current overall layout emerge with the rebuilding A2 through the AoNB. In discussing this it is important to remember that the A2 is an integral part of the local road network due to the frequency of junctions along it as well as a strategic link.</p> <p>GBC asks:</p> <ul style="list-style-type: none"> • Historically GBC have asked the Applicant to consider whether lower speeds would result in a more compact junction 	

	<ul style="list-style-type: none"> As noted above in Item 3(a)(i), GBC would not wish to see any reduction in the nature of the movements catered for by the junction because to do so would have negative impacts on local access and connectivity (noting the importance of the A2 for local access), and the potential that any reduced connectivity could cause traffic to 'overspill' onto the local road network. A reduction in the scale and land-take of the junction would be likely to have negative effects on its ability to cater for movements. 	
<p>ii. How did the relationship between this intersection and the settlements of Thong, Riverview Park and Shorne come about?</p>	<p>Put simply, if you wish to avoid Shorne & Ashenbank Woods SSSI, Cobham Park and HS1 you have to use the gap between Riverview Park and Thong, as two high pressure gas mains and 400Kv line do. The problem is the number of junctions along the A2 as a result of its history of being upgraded from a country lane since the 1920's. Removal of Marling Cross junction as access to east Gravesend would produce unacceptable impacts as traffic rerouted inside the urban area to reach Tollgate (A227) or A226 to go east. South of the A2 the extension of Darnley Lodge Lane to Marling Cross to replace the Cobham slips creates yet further intrusion. Modelling work shows some traffic attracted to use the route through Sole Street from A227 (Meopham) to reach A2/LTC.</p>	<p>See REP1-232 Appendix 6 Cultural Heritage Assessment of the Gravesham LIR for historical information on the development of the A2</p>
<p>c) Design mitigations</p>		

<p>i. Have sufficient measures been taken to “meet the principal objectives of the scheme by eliminating or substantially mitigating the identified problems by improving operational conditions and simultaneously minimising adverse impacts” in this location? (NNNPS paragraph 4.31)</p>	<p>The project has not produced sufficient evidence that it ‘works’ will realistic levels of development. Major concern remains that failure to upgrade A229 Blue Bell Hill will result in traffic diverting to A228 or A227 to avoid congestion.</p> <p>Also concerned about the rat running that occurs now and from the modeling seems to transfer east i.e. via Cuxton)</p> <p>With reference to route from M2 to southern portal, and therefore including the section of the A2 in the AoNB and the Green Belt. Landscape, cultural heritage, and biodiversity impacts on the A2 section east of Thong Lane are not mitigatable (that is loss of ancient woodland and landscape impact on AoNB). GBC also considers that there is an inadequate assessment of Green Belt impacts. Answer is therefore no, GBC is not persuaded that the design takes a holistic approach across the different environmental disciplines and consequently does not consider that it constitutes the ‘good design’ sought by para 4.31 of NNNPS. GBC does not consider that the design shows sufficient consideration of the adverse impacts or proper amelioration or mitigation of them.</p> <p>GBC also draws attention to the absence of any bespoke mitigation from construction impacts for the two private traveller sites on the A226 Gravesend Road (Horse Shoe Meadow and Viewpoint) in the vicinity of the</p>	
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	<p>south portal (as referenced at para 13.46-13.48 of the LIR) and that is also an example of the proposal failing to achieve 'good design' by not minimising its adverse impacts.</p> <p>GBC ask:</p> <ul style="list-style-type: none"> • major mitigation and compensation package for route in Gravesham beyond that which is already proposed. • Increased widths for the A2 Green Bridges at Thong Lane (south) and Brewers Lane. <p>GBC asks:</p> <ul style="list-style-type: none"> • Monitoring and remedial action if required 	
4. A13/ A1089/ LTC Intersection		
The ExA will ask questions of the Applicant relating to		
a) Review of Function and Traffic Movements		
i. The ExA will ask the Applicant to explain the function of the proposed junction and the route paths through it that can be taken by traffic		
ii. The ExA will ask the Applicant to explain the function and design of the intersection in relation to the local road network.		
iii. The ExA will ask the Applicant and the Ports for observations on the function and design of		

<p>the intersection in terms of providing access to the Port of Tilbury, Tilbury 2 and London Gateway Port.</p>		
<p>b) Siting and Land Take</p>		
<p>i. The Applicant is asked to explain the rationale for the siting and land take for this intersection.</p>		
<p>ii. How did the relationship between this intersection and the settlements of Orsett and Baker Street come about?</p>		
<p>iii. Are there any measures that could be taken to limit the effect of the proposed siting and design on the settlement of Baker Street, paying particular regard to the proposed loss of residential property and the proposed proximity of alignments and structures to residential and care home properties that are proposed to remain in situ?</p>		
<p>c) Structures and Design Mitigations</p>		
<p>i. Have sufficient measures been taken to “meet the principal objectives of the scheme by eliminating or substantially mitigating the identified problems by improving operational conditions and simultaneously minimising adverse impacts” in this</p>		

	location? (NNNPS paragraph 4.31)		
ii.	Is there sufficient design resolution for the structures proposed in this location?		
5. M25/ LTC Intersection			
The ExA will ask questions of the Applicant relating to the siting, design and proposed performance of the M25/ LTC intersection.			
a) Review of Function and Traffic Movements			
i.	The ExA will ask the Applicant to explain the function of the proposed junction and the route paths through it that can be taken by traffic.		
b) Siting and Land Take			
i.	The Applicant is asked to explain the rationale for the siting and land take for this intersection.		
ii.	How did the relationship between this intersection and the village of North Ockendon come about?		
iii.	How did the relationship between this intersection and the Thames Chase Forest Park come about?		
iv.	Are there any measures that could be taken to limit the effect of the proposed siting and design on the Forest Park and on the settlement of North Ockendon, paying particular		

<p>regard to the use of the Forest Park and the proposed relationship of alignments and structures to residential property?</p>		
<p>c) Structures and Design Mitigations</p>		
<p>i. Have sufficient measures been taken to “meet the principal objectives of the scheme by eliminating or substantially mitigating the identified problems by improving operational conditions and simultaneously minimising adverse impacts” in this location? (NNNPS paragraph 4.31)</p>		
<p>ii. Is there sufficient design resolution for the structures proposed in this location?</p>		
<p>6. Alignment Choices</p>		
<p>The ExA will ask questions of the Applicant relating to</p>		
<p>a) For each of the routes between:</p> <ul style="list-style-type: none"> • the A2 / M2 and the southern tunnel portal at Thong • the northern portal at Tilbury and Baker Street / the A13 • the A13 via Stifford, the Mardyke Valley, South and North Ockenden to the M25? 		
<p>i. Have sufficient measures been taken to “meet the principal objectives of the scheme by eliminating or substantially mitigating the identified problems by improving operational conditions and</p>	<p>GBC does not suggest that a different alignment of the A2/M2 and southern portal would have been possible but it repeats its concerns (as above) that the alignment creates adverse impacts and that the proposals make insufficient efforts to minimise those adverse impacts and so fails</p>	

	simultaneously minimising adverse impacts” in this location? (NNNPS paragraph 4.31)	to constitute ‘good design’ in line with para 4.31 of NNNPS.	
ii.	Is there sufficient design resolution for the structures proposed in these locations?	No, with particular reference to the treatment of the Green Bridges at Thong Lane (south) and Brewers Lane.	
b) The proposed M25 improvements			
i.	Have sufficient measures been taken to “meet the principal objectives of the scheme by eliminating or substantially mitigating the identified problems by improving operational conditions and simultaneously minimising adverse impacts” in this location? (NNNPS paragraph 4.31)		
ii.	Is there sufficient design resolution for the structures proposed in these locations?		
7. Design Resolution and Discharge			
	The ExA will ask questions of the Applicant relating to	GBC notes that Agenda Item 7 was deferred.	
a) The role of the Design Principles Document			
i.	Do the references to the Design Principles Document [APP-516] in Requirements 3 (Detailed design), 5 (Landscaping & ecology), 13 (Travellers’ site in Thurrock) provide sufficient security		

<p>for the delivery of good design?</p>		
<p>ii. Is there a case for the securing a design review process to assist the assessment of design outcomes during the discharge of requirements? If so, how should that be provided for? Or is it sufficient to reference the design review process in the certified Design Principles Document.</p>		
<p>8. Next Steps</p>		
<p>9. Closing</p>		