

TRO10032 LOWER THAMES CROSSING

COMMENTS ON APPLICANT’S SUBMISSIONS SINCE D5 For Deadline 6 (31st October 2023)

SHORNE PARISH COUNCIL (IP ref 20035603)

Introduction:

We have reviewed all relevant documents submitted by the Applicant at D5 and since, numbered REP5-001 to REP5-094 (excepting those based entirely north of the Thames).

The representations below only cover selected points that we consider to be of particular importance as in many cases they have already been covered in our previous submissions. Omission of mention of a particular topic does not indicate agreement with the Applicant’s responses. In some instances, we consider that expert IP’s will be able to provide better replies than we can.

Thank you very much for considering our representations.

Comments on relevant submissions by the Applicant:

REP5-046 6.2 ES Fig 7.19 - Photomontages - Winter Year 1 and Summer Year 15 (1 of 4) v3.0:

- Viewpoint S12 (Brewers Road overbridge):
 - The bollards shown in the current views will still be needed, here and elsewhere, to prevent visitors to the Country Park from parking on verges, including planted areas and on WCH routes.

REP5-048 National Highways Code of Construction Practice, First iteration of Environmental Management Plan v5.0:

- Emergency access, helicopter landing area if one TBM:
 - Page 60, Section 6.9.5 – The need for a secondary helicopter landing area at the south portal during construction is noted but seemingly only in the single TBM scenario. We consider it is likely to be required regardless of specific need for transport to hyperbaric facilities at the north portal.
 - Our experience of the air ambulance service is that they sometimes expend time establishing where to land, which may not in the end be the closest point to the incident. Therefore an identified location is required throughout construction.
- Ground level storage of tunnel segments:
 - Page 87, Table 7.1 REAC, point MW017 refers to there not being any storage of tunnel segments on the ground surface at the southern portal, however this does not exclude them being stored in the pit at the entrance to the tunnelling workings.
 - Note that there would anyway be tunnel segment storage at ground level at the part of the compound north of the A226 relating to construction of the ground preparation tunnel.

REP5-056 7.14 Outline Traffic Management Plan for Construction v5.0 (Clean):

- Membership of the Traffic Management Forum (TMF):
 - Page 123, Section E.1 refers to the purpose of the Forum as being “...safeguarding the interests of impacted stakeholders.....”. More consideration needs to be given to how impacted residents can input into the discussions and decisions.
 - Page 124, Section E.3.1 states that routine membership is as listed in Table 2.1 (page 9) however there are no Community representatives listed.
 - Page 124, Section E.3.2 states that “...other relevant stakeholders will be invited by the Traffic Manager when their participation is pertinent and relevant to the topics under discussion.”. That is a subjective pre-judgement which could lead to Community frustration.
 - It would be better if appropriate Community representatives were full members, to at least receive agendas and Minutes of meetings so that they can input when they consider it relevant and before decisions are made. This would improve the quality of decision making by the TMF rather than the Community being perhaps inappropriately excluded from the discussions and therefore unaware of these and arising decisions that will have adverse local impact.
 - The same applies to anything else where membership is being defined by the same Table 2.1, including operational phase monitoring.

REP5-079 9.108 Diagrammatic Sections - Construction Compounds:

- Page 5, Housing on east side of Thong Lane:
 - A “2-3m high temporary screen bund” is proposed, but it does not appear to provide any useful protection, whether visual or acoustic.

REP5-082 9.111 Actions from the Accompanied Site Inspections:

- Page 2, Point 1A, Drainage pond at Park Pale:
 - There is apparently a, not a very pronounced, fall in level to the drainage pond, of only 4.7m. We have to leave it to the ExA and expert IP’s to assess whether the design as proposed is likely to be satisfactory.
- Page 2, Point 1B, A122:A2/M2 visuals:
 - Height data provided is noted.
 - As commented previously, the cross-sections in REP2-069 show that there will be considerable adverse visual impact for residents in Shorne West, Riverview and Thong.
 - Page 16 of APP-245 shows that the effect on the WCH routes will also be particularly severe, for very many years until screening vegetation is sufficiently mature.
- Page 4-5, Point 1D, Traffic figures at severance locations:
 - Valley Drive is already busy and difficult to cross, and will become busier. We consider that a predicted increase of only 15% is likely to be an underestimate. Given the obvious difficulties of queuing up such a steep hill southbound, such increase will also promote rat-running to/via Thong Lane and other routes.
 - For Elaine Avenue, it would be helpful to have information provided as to why traffic there in particular (there are other routes available) is considered likely to increase and by such a large amount.

REP5-083 9.112 Joint Position statement: Blue Bell Hill:

- Lack of any progress:
 - This document shows that there continues to be a regrettable impasse between NH and KCC over agreement to fund, and therefore implement, upgrading of the A229 and its junctions with the M20 and M2.
- Performance of the A229 Blue Bell Hill:
 - The Applicant references two Tables from APP-158, Tables 7.12 and 7.13 but omits to reference Table 7.11 which shows changes of up to 31.6% northbound in the AM peak.
 - Table 7.12 shows increase of up to 9.9% northbound in the interpeak, and Table 7.12 PM peak shows increases of up to 37.5% northbound and up to 31.4% southbound (strangely, the increase is greater in the low growth scenario than for high growth).
 - We are unclear how these figures have come to be assessed by NH as “acceptable” and that “these relative increases are not significant” as these sound like subjective value judgements. We would be grateful if detail of the assessment method and statistical analysis could be provided or signposted.
 - We do not regard such increases in journey time as not being significant. Clearly there will be significant deterioration in journey times to and from Maidstone.
 - We are also unclear whether the data presented encompasses performance of the motorway junctions or of just the A229 link itself.
 - (Please note this section was written independently prior to the discussion at ISH 10).
- Quantity of relief at Dartford:
 - The whole point of the LTC is supposedly to reduce traffic volumes at the Dartford Crossing, so as discussed previously by ourselves and other IP’s, the A229 needs to function properly or risks discouraging traffic from migrating from the M20 to the A2 to take the A122, and promoting unsuitable alternative routes such as the A228 and A227.
- Timing:
 - It is patently obvious that upgrading the A229 and the motorway junctions needs to happen before the LTC is opened, and therefore that funding needs to be assured.

REP5-086 9.115 Applicant's Responses to IP's post-event submissions at Deadline 4:

- No response to Shorne PC’s submission ref REP4-398:
 - We note that there are no responses from the Applicant to the content of the Shorne PC post-event submissions.
 - Perhaps like other documents below there will be some comments forthcoming regarding ISH 3-7 and OFH1 at a later deadline.

REP5-087 9.116 Applicant's Comments on IP submissions at Deadline 4:

- Responses to Shorne PC comments in submission REP4-396 (Comments on Applicant’s submissions):
 - The Applicant has responded on Pages 4-5 to a few of the points that we had raised.
- 24-hour working at the southern portal in the one TBM scenario:
 - We note the acknowledgement that there will be change leading to 24-hour working occurring.
 - The Applicant states “...would require a minor alteration to the timing of and duration of 24hr working.”, however we had not been aware that much, if any, 24hr working was proposed at the southern portal so actually there is a considerable change. There needs to be a proper and locally based assessment of the new impacts.

- This is particularly the case as local experience is that noise travels widely in the area, particularly at night when it is usually quiet.
- Volume to capacity figures for local roads:
 - The point under discussion was as to how a capacity has been defined for rural roads of narrow width such as Thong Lane and particularly Pear Tree Lane, when there is no standard guidance on this matter that we can find.
 - This point has not been answered and neither has the question about the base figures used.
 - It is impossible to evaluate the Applicant’s statement that “...the increase in flows in the 2045 PM peak is between 50 and 250 vehicles an hour,a flow increase of greater than 40%.”
 - Is 50 vehicles an hour >40% or is 250 vehicles per hour >40%? The range quoted is very wide.
 - Also, how much greater than 40% is the predicted % increase?
- Performance of Brewers Road junction:
 - We continue to be concerned that peak usage of the junction, e.g. for Country Park access at summer weekends and special events, also at the Rochester and Cobham golf course etc, may cause much longer queues.
- Bus routes:
 - This was covered again in our more recent submission REP5-124.
 - The diagram has not been provided by “the” provider, but “a” provider – Routes 416 and 417 are a different provider, and route 311 (not included in the Table) is a different provider again.
 - Therefore, both the diagram and the Table are incorrect.
- Accident rates:
 - We apologise for our error, we were confused by the curious language used in the presentation method whereby increased accidents are described as negative benefits rather than being called disbenefits.
 - Our assessment of the situation as there being an increased number of accidents occurring was however correct.

REP5-088 9.117 Applicant's Comments on IP submissions at Deadline 1 to 3:

- Response to Shorne PC Comments on Applicant’s submissions at D2 [REP3-199]:
 - This document includes on Pages 75-77 the Applicant’s responses to some of the points that we had previously raised.
 - Further commenting was evaluated as unnecessary except for the next point.
- REP2-014 6.2 Environmental Statement Figure 2.4 - Environmental Masterplan Section 1 & 1A Sheet 2
 - The response tells us what has happened (which we knew) but does not tell us how and why this land was excluded. The land we are referring to is part of a single parcel of land that the Applicant should have been purchasing as a whole along with the rest (has in fact already been purchased). The land under discussion has been separated off due to the Applicant’s intervention.
 - The response about a headlight blocking fence at Park Pale is noted however if it is going to be needed, which we believe it will be, then it should feature in the drawings now so that landscape impact can be fully assessed at the present time.