

TRO10032 LOWER THAMES CROSSING

COMMENTS ON APPLICANT’S SUBMISSIONS AT D6 For Deadline 7 (17th November 2023)

SHORNE PARISH COUNCIL (IP ref 20035603)

Introduction:

We have reviewed all relevant documents submitted by the Applicant at D6, numbered REP6-001 to REP6-123 (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 content of the Applicant’s submissions. 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 at D6:

REP6-006 2.9 Engineering Drawings and Sections Volume B (A122 LTC cross sections) v4.0

- New Sheet 19:
 - This new sheet displays ground contour levels at the Southern Portal area and shows that the “Chalk Park” mound will have a maximum height of 66m above sea level, having been built up by approximately 16m above existing ground levels.
 - This document does not include sectional views.
 - Persons on the mound will have a view of the proposed electricity substation (which subtracts land from the recreational site and overall landscaping), although this may be partially screened by another area to the north-east that reaches 60m above sea level.
 - The mounds give some protection to residents on the west side of the portal but, unlike north of the river, there is nothing on the east side.

REP6-036 6.2 Environmental Statement Figure 7.19 - Photomontages Winter Year 1 and Summer Year 15 (1 of 4) v4.0

- Photomontages:
 - The Artist’s Impressions/Photomontages are in general not very accurate, often being positioned at vantage points and camera heights which maximise a favourable impression of the suggested outcome.
 - The “before” photographs were taken at various dates in 2019, since when there has been considerable vegetation growth. The loss of this will expose structures to view that cannot presently be seen at all.
 - We are unclear why the photographs were not updated for the DCO application.
 - The contrast between now and the possible opening year is very severe in most locations.

- The project involves removing previous mitigation plantings that have only just reached a decent size so their loss will be very keenly felt by residents.

REP6-038 6.3 Environmental Statement Appendices Appendix 2.2 – Code of Construction Practice, First Iteration of Environmental Management Plan v6.0:

- Lack of Community Representation:
 - We note again that Table 2.1 on Page 12 does not include local community representation or membership.
 - Community representatives should at the very least receive all agendas and minutes and all papers for review so that any required input can be timely and effect influence over decisions before they are made.
 - We discussed this omission on page 2 of our REP6-200 submission.
 - This point also cross-references to all other groups with memberships based on the same Table e.g. the Traffic Management Forum

REP6-046 7.5 Design Principles v4.0:

- Mammal culverts added/not:
 - S1.23, page 39 – Noted with thanks that a mammal culvert has been added on the north side of Brewers Road bridge,
 - S2.15, Page 44 – Similarly noted with thanks the same south-west of Thong Lane south Green Bridge.
 - The exact designs of these need to be provided for expert consideration of suitability and how they would work in practice.
 - However, discussion at ASI1 was about the south side of Brewers Road bridge. It was unclear whether or not there were any biodiversity connectivity tunnels already in existence in connection with the previous HS1 works, we would be very grateful for this to be clarified (please see also page 6 of our previous submission REP5-124).
- South Portal building design:
 - S3.10 to S3.14, Pages 47-48, discuss design of the portal building, which is supposed to be integrated into the surrounding landscape and be designed to sit within the cutting and to blend into the surrounding landscape topography.
 - Some of the photomontages and other Artist’s Impressions drawings suggest that the reality could be different.

REP6-048 7.14 Outline Traffic Management Plan for Construction v6.0:

- Access route to Shorne Woods Country Park:
 - Table 4.2 3rd point, Page 49 should also mention Shorne Woods Country Park
 - Due to the large volume of traffic impacted, it would be helpful if the diversion routes to access and leave Shorne Woods Country Park during construction (and during operation) could be set out clearly now.
 - These are:
 - From the west, A2 eastbound traffic uses existing Brewers Road off-slip

- From the east, A2 westbound traffic needs to overshoot and use Gravesend East to turn back onto the A2 heading eastbound and then take the existing Brewers Road off-slip.
- Leaving to the west, traffic needs to use the Brewers Road eastbound on-slip and go eastbound to the Crutches Lane roundabout to turn back (or similarly use M2J1 if accessible) onto the A2 westbound
- Leaving to the east, traffic needs to use the Brewers Road eastbound on-slip and either directly onto A2/M2 if accessible or otherwise via the 4km A289 diversion turning back at A226 Higham roundabouts.
- These are similar in part to Plates 4.9 and 4.10 on page 65.
- There also need to be at the least signs on the A226, certainly at Forge Lane (Shorne) and Pear Tree Lane saying “No access to Shorne Woods Country Park”. Signs may also be needed at the A226/A289 junction and various other locations with the aim of directing SWCP visitors to only use the authorised access routes.
- There could also perhaps be means of traffic monitoring by ANPR cameras to detect and sanction visitors using incorrect access routes.

REP6-089 9.131 Post-event submissions, including written submission of oral comments, for ISH8:

- Thong Lane Car Park (compound CA2) legalities:
 - In 3.2.5, page 15 the Applicant states that “...although the undertaker must remove all temporary works to restore the land to the reasonable satisfaction of the owners of the land, the undertaker is not required to remove any temporary works where agreed to with the owners of the land.”
 - The point is that, as far as we are aware, the previous owner of the land in question was the Darnley Estate and not KCC. Therefore KCC’s opinion about “restoration” or otherwise of the land may not be of relevance.
 - We question whether the DCO permits the Applicant to gift land that has been compulsorily/voluntarily acquired for the construction of the LTC to a third party (KCC in this instance).
 - Under 3.2.6, page 15 the Applicant goes on to discuss “.....whether the car park forms mitigation or compensation, AT noted that the Applicant is in agreement with KCC that it would form enhancement at the request of KCC.”
 - If the land is supposed to be part of the area count for LTC associated mitigation/compensation, as such post-works it should be restored to woodland and pasture (or equivalent).
 - We do not consider that a car park, plus connected urban paraphernalia as desired by KCC, is mitigation or compensation for the loss of woodland and pasture that has occurred. It cannot be regarded as “restoration”, and it is certainly not an enhancement compared to what currently exists.

REP6-090 9.132 Post-event submissions, including written submission of oral comments, for ISH9:

- Thong Lane Car Park (again):
 - Under 5.1.4, page 18 the Applicant states that they “...reference the car park as part of the assessment of potential impacts on community land during operation, noting that the new car park provides additional means of access to the Country Park and wider countryside.”

- The additional visitors that the Applicant and KCC are inviting into the area will actually have a negative impact on community land by making the recreational areas which exist for Gravesham residents much busier than they were intended/created to be.
 - As an additional example of the problems that can be caused, harking back to Covid, mixing of populations (human, canines, equines) is actually a means for increasing the spread of infectious diseases into areas where they do not currently exist – local residents had to avoid SWCP during the Covid epidemic for that reason. The point is that additional out-of-area visitors can be detrimental to local populations.
 - As we have said previously at length in our representations at the meeting and subsequently (please see Pages 7-11 of REP6-201), we do not accept the assessment that increasing visitor numbers in general, and specifically in a section of the Country Park that is not presently much visited, does not cause damage to the SSSI.
 - Under 5.1.7, page 19 the Applicant discusses data it has shared with NE about visitor numbers and associated activities. As far as we are aware based on personal communication, SWCP does not have any up-to date information about visitor numbers or characteristics, so we will be interested to see this hard data in the other submission referenced.
 - Under 5.1.8, we have to disagree that the proposals are in any way “appropriate”.
 - The Applicant goes on to quote from the Shorne Woods Country Park Management Plan 2021- 26 (KCC, 2022) however that document would be discussing the existing visitor centre and other attractions, which are located in a section of the park that is not classified as SSSI.
 - Opinions differ between local residents and the income-focused KCC, and SWCP management, as regards the damage that the greatly increased visitor numbers and their vehicles are wreaking on the overall fauna and flora of the park.
 - If KCC wish to attract more visitors to SWCP rather than develop their other sites similarly, then as with any business they should do that focused on their existing Visitor Centre but only up to its on-site capacity.
- Thong Lane Car Park – additional notes:
 - In Annex C.3, page 52 we note again the discrepancy between the Applicant’s evidence and that of KCC as stated at the ISH8 as to whether or not the Car Park is intended primarily for SWCP visitors.
 - Under C.3.2 we do not believe that the proposed additional Car Park will have any impact on reducing parking fee avoidance parking in Park Pale but are concerned that it risks creating similar problems in Thong Lane, on the Thong Lane south overbridge and on the southern connector road.
 - On Page 3 of their REP6-129 submission GBC stated “KCC has had no pre-application discussions with GBC in connection with the establishment of any such facilities at the proposed car park.” The situation about discussion with Shorne Parish Council is the same.
 - For information, this topic was discussed at the Shorne Parish Council’s Planning and Highways Committee meeting on 9th November 2023, and there were no expressions of support for the proposal from attending members.

REP6-092 9.134 Wider Network Impacts Position Paper:

- A122 impact on SRN junctions:
 - In Table 3.1, page 22 the impact on A2 Gravesend East junction and Valley Drive is said to be “Minor Adverse”.
 - We find this surprising given the high usage and problems presently and the amount of additional traffic that will in future be using the junction and the convoluted southern two-way connector road.
- Blue Bell Hill corridor Volume Over Capacity figures
 - Appendix A1, page 42 gives supposed volume/capacity figures.
 - Given knowledge of the reality of how poorly the A229 and junctions perform already, we find it very hard to believe, from the predicted figures of additional traffic due to the LTC, that the drawings reflect the actual likely situation.
- A2 west and east, Volume Over Capacity figures:
 - Likewise, a lack of belief given that the A122 will pull in so much extra traffic to the area.
 - Lack of suitability of Pear Tree Lane for additional traffic has been discussed several times previously.

REP6-099 9.144 Applicants Response to Comments Made by Kent County Council at D5:

- Volume/Capacity data for northern connector/frontage road
 - Table 2.1, point 3 on page 3 states that “The Applicant has provided KCC with additional information on vehicle speeds and flows on the corridor, as requested.”
 - This information needs to be made publicly available to all concerned IP’s.
 - There does not seem to be any good reason why such data was not anyway included in this document.

REP6-113 9.152 Responses to the Examining Authority’s ExQ2 Appendix G – 11 Biodiversity (Part 1 of 2):

- Thong Lane Car Park (CA2) – yet again
 - Please see all our previous comments, particularly Pages 7-11 of REP6-201.
 - This section relates to the Applicant’s response to ExQ(2) 11.4.1 and ExQ(2) 11.4.2, on pages 27-39.
 - The first part of the discussion does not really add anything that has not been covered before except we note that the significant adverse impact on the nearby property of “Thong Mead” has been acknowledged.
 - While there will be visual screening grown up by the “design year”, by inference that inherently means that there will be very many years prior with little/no useful screening. This will be exacerbated because existing screening vegetation is threatened by proposed roadway vertical alignment changes.
 - As stated above, we do not consider that provision of a car park at Thong Lane will have useful (if any) impact in reducing the parking that is taking place in Park Pale as that appears principally intended to avoid paying parking charges when accessing the main visitor centre, so a distant accessory car park, which is also charged for, will not be what those visitors want.

- There is again a discrepancy with KCC who are wanting to encourage new visitors, from unknown residence locations, to come into the area to enjoy land that is not in KCC’s ownership, so that KCC can generate income from such visits.
- We note that a visitor number figure is provided for Jeskyns of 878,626 visitors with 200 car parking spaces (plus overflow on local roads), which would be an average of 2,400 visitors per day. It is not known how that figure was obtained but it seems unlikely to be correct.
- SWCP however, as we had reported previously, does not have any actual visitor number figures.
- We are not convinced that the pedestrian entrance to SWCP at the southern end of Thong Lane is currently “well-used”, such a term requires numerical definition.
- We note that all the data provided in this section is based on “evidence-based assumptions” (seemingly meaning imagination with little/no factual support) rather than the hard data that it would perhaps be reasonable to expect. However regardless it is suggested in Table 3 on page 38 that an additional 62,520 visitors per annum (range 1120 to 14880 per calendar month), in 31,260 vehicles (range 560 to 7440 per calendar month), would result from the proposal. This number of visitors, especially at the times of the highest figures, would put considerable additional pressure on local paths and the amenity of the area, particularly the western part of SWCP. It would also impact on road safety (pedestrian, animal and vehicular) in this part of Thong Lane and both the safety and congestion of the junction with the southern two-way connector road.
- Any needs identified in the KCC Country Parks survey relate to need in all of KCC’s parks, some of which may be suffering from underinvestment, so the conclusions may not relate at all to SWCP which already has a high level of provision.
- Just because a Kent-wide need may have been identified, that does not mean that it has to be provided in Shorne. Some of KCC’s other Country Parks further into Kent might be more suitable destination locations for out-of-area visitors.

REP6-122 9.157 Kent Downs AONB and Utilities Works:

- Error noted:
 - The chart in this document shows Shorne Common Rough, the triangle of land between Woodlands Lane and Brewers Road, edged in purple indicating that it is part of Shorne Woods Country Park land.
 - This is not correct as the land mentioned belongs to Shorne Parish Council.
 - This chart and any similar should be corrected by the Applicant.
 - We also note that the AONB boundary appears to be generally incorrect in the Shorne Ridgeway and “Fenn Wood” areas, please see <https://kentdowns.org.uk/boundary-map/> for the correct boundaries.

*Shorne Parish Council,
17th November 2023*