

TRO10032 LOWER THAMES CROSSING

**SUBMISSION AFTER HEARINGS: CAH5, OFH5, ISH 11-14
held between 21st and 28th November 2023
For Deadline D8 (5th December 2023)**

SHORNE PARISH COUNCIL (IP ref 20035603)

A Parish Council representative attended the hearings (or listened to the recordings/viewed the transcripts) of the hearings held between 21st and 28th November 2023. This document provides details of Shorne Parish Council's verbal representations plus a range of comments on the discussions that took place. Excepting OFH5 which is out of sequence, hearings are discussed in date order and individual items are presented in the order of the discussion at the hearings.

Thank you very much for considering our submitted comments.

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*Shorne Parish Council
5th December 2023*

CAH 5 (21st November 2023):

Mr Daniel Smyth, for St John's College:

Calculation of land area affected by Nitrogen deposition:

- Interesting points were raised about the inclusion of the area occupied by railway tracks and road surfaces in calculation of land affected by nitrogen deposition. This could be a flaw in the methodology, as is the fact that parts of the SSSI's have already been destroyed by HS1 and previous A2 road widening does not result in any adjustment, or application of weighting factors.
- However, it is difficult for us to judge in which direction the data should be adjusted as opinions are bound to differ, so we leave the discussion to IP's with greater expertise.
- The question as to why the pink shaded affected land extends down Halfpence Lane was not answered in the hearing. Similar pink shading extends north from the A2 on Thong Lane and also needs explanation.
- We have the reverse concern about land such as the Parish Council owned "Crabbles Bottom" not being included in assessments, as expressed previously in for example REP2-118, page 7. The same concern applies to Cobham Hall Park. Both of these land areas are valued for their ecological habitat and biodiversity yet adverse impacts on them do not seem to be regarded sufficiently as a concern, and also without any mitigation or compensation being proposed.
- This may be because they are not presently registered as SSSI's but that does not alter their nature (in the broadest sense).
- We would contend that all land within the 200m arbitrary cut-off should be evaluated and have Nitrogen deposition damage mitigated and/or compensated.
- We also raise a question about potential impact on the project should these large land areas become registered as SSSI's in the relevant future.

Impacts of nitrogen deposition on SWCP:

- There was discussion that according to the Applicant SWCP does not show any signs presently of adverse effects from nitrogen deposition however we had been told directly by SWCP that it does – the height above ground where lichens grow on trees was mentioned as showing impact.

Mr Graves, for HS1 Ltd:

- Content noted.
- We would be concerned if there should be adverse impacts on Railway operational land and Railway operational functions, especially if the number of tracks should need to be increased or another station/parkway built locally.

OFH5 (23rd November 2023):

Mr Brace, Riverview resident:

- We empathise with Mr Brace over the matters that he raised.
- His opinions are shared by many who have not participated in the ongoing DCO discussions.

ISH 11 (22nd November 2023):

Item 3: Kent Downs Area of Outstanding Natural Beauty (AONB) and Wider Landscape Matters:

- Impact of the A122:A2 multilevel junction and other aspects on the AONB (representation made):
 - We absolutely support the comments made by the AONB Unit and Gravesham Borough Council about (among many other aspects in general) the severe visual impact of the multi-level junction on the area, and particularly the nearby residents of Marling Cross, Shorne West, and Riverview Park. Noise impact will also be severe as no mitigation will be possible due to the height.
 - We also second the regret expressed over the loss of the remainder of Gravel Hill Wood (small but very valuable habitat and visual screening), which we cannot recall otherwise having been specifically mentioned during the DCO hearings. Being mature habitat, as much of it as possible should be preserved rather than being bulldozed.
 - The artist's impressions now available in REP7-189 convey some of the horror of the changed appearance.
 - Our verbal representation was that what had already been said by others more than amply, and more eloquently, covered what we otherwise wanted to say.
- The project results in enhancement of the WCH network?:
 - We disagree with the Applicant's contention that the WCH network is subject to enhanced linking.
 - Links in busy areas have greater importance numerically than those in lower use areas.
 - The existing and popular link between Shorne West and Thong/Shorne Woods Country Park (Footpath NS167) is being severed and the severed link is not being re-provided. What is being offered instead involves lengthy detours, so is adverse for the less able.
 - The severance could easily be solved, with great positive impacts for all WCH users, by means of a "Thames Chase" style bridge.
 - We previously discussed this on page 6 of our REP6-201.
- Landscape Character Area Boundaries:
 - As an additional aspect supporting the discussion, we would just point out that the Parish and Ward Boundaries also run along the centre of the A2/A2 wooded central reservation.
 - (By Ward we mean the new "Higham and Shorne" Ward introduced in May 2023.)
- Green Bridges design over the A2 line and functional landscape severance/connectivity:
 - We support the comments made by various participants such as the AONB Unit, GBC and Natural England, that the green bridges as proposed fail to provide landscape (and biodiversity) connectivity.
 - This is due to inadequate width and density, and therefore quality of greening, combined with interruptions to continuity by roadways, and significant disturbance through other functions (carrying busy roads, and WCH routes).
 - We support GBC's suggestion that the green bridges do not need to have straight sides although we disagree that the "landing points" are as constrained as the Applicant has made out. (Please see our previous representation REP4-398, page 18 onwards).
 - If re-provision of the Brewers Road and Thong Lane south road bridges as green bridges cannot be made suitable for wildlife connectivity then we suggest a potential solution could be another separate Green Bridge, perhaps with a WCH route) should be installed connecting SWCP and Shorne-Ashenbank Woods. As this would create a major gain of biodiversity connectivity, we consider that the gain would greatly outweigh the small amount of possible damage that might occur to the SSSI's either side.

- We support calls to also make Park Pale bridge a Green Bridge, as we have expressed in previous representations.
- Scoring methodology for environmental impact assessment:
 - We note and support the comments from Natural England, GBC etc about the scoring being incorrect.
 - Averaging is incorrectly used for this, and for many other assessments made by the Applicant together with including data for massively large “study areas” with low/no impact which skew the assessments such as of near-LTC air quality impacts.
 - We look forward to seeing the detailed submissions from expert IP's.

Item 5: Mitigation Proposals:

- Location of Nitrogen compensation land:
 - We support the comments made by the AONB.
 - We also are having trouble understanding whether the NOx compensation land to be provided south of the river is the correct quantity for the amount of damage being done.
 - Damage to all impacted land should be considered, not just confined to presently registered SSSI's.
 - We also consider that compensation land should be provided as close as possible to the harm and be proportionate in size.
 - We note the AONB's assessment that 89% of the identified impacts are south of the Thames, but only 21% of the compensatory land area is south of the Thames.
 - The Applicant said that NOx deposition has been assessed in clusters. It would be helpful to have more detail or signposting about this, and to know the result of the calculations in terms of the land area needed to provide sufficient compensation area within each cluster.

ISH 12 (23rd November 2023):

Item 3a: Replacement Open Spaces:

- Status of Southern Valley Golf Club (SVGC, representation made):
 - There were disappointingly disparaging comments made about the status of SVGC.
 - SVGC was indeed privately owned but it was an easily accessible, pay-and-play course which operated almost as if it were a public facility.
 - Anyone could arrange to play, and there were none of the somewhat archaic restrictive membership and playing rules as are found at other local private clubs.
 - To describe it as “behind a paywall” or “ringfenced” is incorrect and unfair. Golf courses in general are expensive to run and maintain. While happy to be corrected, we are not aware of any golf courses at least in the south-east UK that are state owned (and therefore state funded) and also completely free to use (but then paid for through Council Tax, so not free at all). We cannot access the full previous information now but believe that the green fee at SVGC was only £20 as a one-off payment by ordinary players.
 - SVGC was an asset to the community in a variety of ways. Individual and family lessons could be booked, with some being introductions to golf as a recreational sport. The clubhouse could be hired as a social venue and we understand was doing well for wedding receptions and other kinds of parties.
 - Many Shorne West/Riverview residents used, and still use at present, the footpath NG8 that runs across the course as it is part of the popular fiveways/5-fields circuits through open

aspect farmland. There was no fee to cross the golf course on the footpath while enjoying its landscaping, or to cross the nearby fields, so in that context there is also no gain from Chalk Park.

- SVG closed because of the LTC project and resulting uncertainties/opportunity. Although the owners may well have claimed to the Applicant that the site could be used for building, that was probably not a realistic suggestion (and would have been opposed by the Parish Council) but rather aimed at increasing the purchase price paid. The premise was not tested through a planning application.
- Should the LTC not happen there is no reason why SVG could not reopen as a golf course but it is not presently operable due to the criminal damage and antisocial behaviour that occurred while it was closed during negotiations. Alternatively, in our opinion it otherwise could and should revert to farmland.
- Losing SVG is a significant reduction in sports provision in the area, for which Chalk Park does not provide a like-for-like substitute.
- Local residents like to see the yearly farming cycle/seasons in practical operation, so loss of that is also a disbenefit both close to the LTC line and also regarding other land being taken by the project.

- **Parkruns:**

- For information as it was discussed in connection with potential uses of Chalk Park, there are already Park and other runs in the area.
- Parkruns operate at Shorne Woods Country Park every Saturday at 9.00am, a 5km run circuit within the park close to the Visitor Centre. 481 events have been held, with up to 314 runners participating (hence some of the parking problems caused on Park Pale as a result).
- There is also a 3km run at the Cyclopark, also every Saturday at 9.00am. 157 have been held with up to 208 runners participating.
- There is an annual (for 40 years) North Downs Run, 30k, routes vary, 396 participants this year.
- The above will be disrupted during LTC Construction.
- We would also comment however that the ages and abilities of people who can do a Parkrun are self-restricted so it is not actually an inclusive sport.

ISH 13 (27th November 2023):

Item 3b: Local Traffic Modelling: Progress and Final Positions (Bluebell Hill):

No additional comments except to support KCC that major improvement works (rather than drawn out repeated tinkering) are needed at Blue Bell Hill and to its motorway connections at either end.

ISH14 (28th November 2023):

- **Long-term online access to documents:**

- We support Gravesham's request that documents should be available long-term so that they can if necessary be consulted into the future.
- While physical deposit locations are important, it is really electronic access that needs to be available as that is the easiest and most convenient mode nowadays for most people.
- It has been a problem that some documents from previous relevant studies and consultations are no longer available.

- We would further suggest that all the DCO documents could be made available on a memory stick (who would be best to supply these, and at what cost/charge needs thought) or as suitable easily bulk downloadable files such as Zip files or similar.
- Workers Accommodation undersupply and consequences:
 - If there is a problem then it may become necessary to add temporary workers accommodation to the main works compound south of the Thames.
 - However, the Applicant is amassing a large housing stock locally through voluntary acquisition and we assume this will be made available to the workforce.
- Adequacy or otherwise of decommissioning and restoration provisions for land including works compounds:
 - We agree with the comments made by Mr Smith about potentially urbanising structures not being allowed to endure.
 - We covered the topic in part previously in REP6-201, Section 2 page 7 onwards.
 - We support the comments made by Thurrock about transparency being needed for landowners (and LA's) over having advance knowledge and agreement about the physical condition of land that will be handed back.
 - It could be that what is intended to be handed back might normally require planning permission. In that case a planning application for retention should be required and determined by the LA. This should be a full planning application so that conditions can be attached rather than being by means of a lawful development certificate, and done prior to handing back as, if permission was refused, the Applicant would need to remove the refused structures/remediate the land.
 - Regarding persistence of compounds, we already potentially have a situation with the Valley Drive/Marling Cross National Highways Compound. This was a lorry park, land already in the ownership of the Applicant. Permission was given for "temporary" portacabin offices, car park and perimeter fence originally in 2019, and renewed in 2021. The offices were used by the Applicant during survey and investigation works but are now vacant.
 - Perhaps all utilities/works compounds and other temporary work locations connected with the project (even if subcontracted) should require full planning applications. This would prevent the situation that has happened over the past few years during ground investigations, with it being found by chance that hardstanding and portacabins had been placed on farmland (by agreement with the landowner but no-one else) or over-height structures erected on restricted business units).
- Dropbox for early access to "home straight" documents:
 - The document early access system for the last gallop to December 20th needs to work for all IP's and not just "the list of parties that we went through last week" (Transcript page 109) otherwise some IP's could be prevented by time constraints from participating in the last stages of the Inquiry.
 - We are pleased to report that we raised this with the Applicant today and they have kindly agreed to our request so hopefully we will be able to get the link to work even with rural quality (meaning poor) broadband.
 - We will also be sending them our three D8 submissions for their early sight.