

TRO10032 LOWER THAMES CROSSING
COMMENTS ON APPLICANT’S SUBMISSIONS AT D9
For Deadline 9A (15th December 2023)

SHORNE PARISH COUNCIL (IP ref 20035603)

Introduction:

We have reviewed all relevant documents submitted by the Applicant at D9, numbered REP9-001 to REP9-279 (excepting those based entirely north of the Thames).

Due to time constraints (as previously communicated) in many instances we had to rely on skim-reviewing the documents which had “tracked changes”.

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 D9:

REP9-118 6.1 Environmental Statement Chapter 7 - Landscape and Visual v2.0 clean:

- AONB and other land as Proposed UNESCO Global Geopark etc:
 - On page 40, under section 7.4.38 is detailed the proposal from the Kent Downs AONB Unit to obtain “Cross-Channel UNESCO Global Geopark status”, with a decision anticipated in 2025. This may/may not be the same as the North Kent Partnership National Nature Reserve (NNR) proposal that has already been under discussion locally.
 - Regardless of how high a status is obtained, we had previously questioned on page 2 of REP8-186 about what might happen if an additional SSSI area were to be subsequently created either inside or bordering the order limits, in a location where it would be adversely affected by the project.
 - There are two points arising:
 - The NNR proposal involves land currently outside the AONB (and order limits) such as the Parish owned “Crabbles Bottom” near to M2J1:A289.
 - Global Geopark/NNR/SSSI status will impact on the Applicant’s overall proposals as it will increase the amount of compensation/Mitigation land required.

REP9-136 6.2 Environmental Statement Figure 2.4 - Environmental Masterplan Section 4 (4 of 10) v2.0 clean:

- Plan of proposed remediation of Milton Compound
 - Sheet 4 of this document provides a plan as we requested previously on page 1 of our REP9-307.
 - A plan was also requested by RSPB themselves in point 3.3 on page 5 of REP9-298.
 - As said previously, existing and historic ditches and ditch patterns need to be maintained, having been preserved during works then reinstated afterwards.
 - Some existing access routes onto the firing range are not shown as being re-provided post works and we would like to see confirmation that is acceptable to users of the range.

REP9-246 9.8 ES Addendum v9.0 tracked changes:

- This document has been subjected to a very significant amount of change at D9, which makes it extremely difficult to review.

REP9-275 9.213 Applicant’s Responses to Interested Parties’ comments on the Draft Development Consent Order at Deadline 8:

- Responses to suggestions from Gravesham Borough Council:
 - In Section 4, pages 10-15, the lack of positive responses from the Applicant is noted.

REP9-276 9.214 Applicant's comments on Interested Parties' submissions at Deadline 8:

- Lack of response at D9 to previous points raised by Shorne Parish Council:
 - Further to our earlier comments that matters raised at D6 had not received a response, there have not since then been any responses to those and later matters that we also raised.
 - The points we raise are prompted by the Applicants submissions.

Additional points/matters:

- Deadline 9A submissions:
 - The Applicant has said that they will share documents that they submit at D9A however there will not officially be an opportunity to respond.
 - Similarly, other IP’s may submit documents with content of note.
 - It is not presently clear how/whether a later response can be made if considered warranted, hence we have made a “Final” comment below.

Final Comment:

In our evidence, analysis and comments submitted to the Examination, Shorne Parish Council has pointed out considerable (too many to summarise) disadvantages and outright flaws in the Applicant’s proposals. These result in overall lack of confidence in the scheme as presently proposed for just east of Gravesend, and, at least in our view, cast great doubt on the entire concept of a Lower Thames Crossing at all without first attempting to improve the existing Dartford Crossing.

We and others have highlighted that much of the detailed information on which such proposals should be based seem to be inadequate if not sometimes inexplicably completely lacking, and certainly not robust and standing up to close examination for veracity. This all seems contra to what the public should have a right to expect, and an extraordinary situation given the high levels of expenditure under discussion.

Participating in the Inquiry has been an “interesting” experience. If we do not have a chance to say this later, we would just like to thank all involved at the Inspectorate (and on the Applicant’s side and all the other IP’s and their representatives) for their forbearance in assisting us to participate, and in listening to, reading and considering our representations.

*Shorne Parish Council,
15th December 2023*