

Gravesham Borough Council

Lower Thames Crossing

Deadline 9a submission

(IP Ref: 20035747)

This note covers D9 submissions and some outstanding matters for clarity and is in addition to our Final Statement.

Section 106 agreement

This has now been signed and was submitted by National Highways at D9 as [REP9-266](#)

Cascades

Covered in part by the Statement of Common Ground to be submitted by National Highways and briefly in our Principal Areas of Disagreement Summary submitted with this document.

Broad agreement has been reached with National Highways for an area of land from the Southern Valley Golf Course and a capital sum in compensation for the loss of the Par-3 course from the rear of the current site. Draft Heads of Terms were received on the evening of 12 December and are now under discussion. This is complicated by the existing lease with Swing Rite Ltd, so it is necessary to establish a way forward for all parties on the site.

The Council has proposed an amendment to the SACR relating to responsibility for contamination, but the draft version of the Statement of Common Ground makes it clear that National Highways is responsible for the cost of clearing up any contamination that may be found.

D9 submissions

Framework Construction traffic Travel Plan [\[REP9-233\]](#) – note that no changes have been made to this document so the previous points on housing accommodation remain

Stakeholder Actions and Commitments Register [\[REP9-241\]](#) – new commitment (SACR-25) about land contamination on which is not quite clear enough as to National Highways being responsibly for any remediation costs

There is a new commitment to hand over air quality monitoring equipment (SACR-027) which is in theory welcome but without any revenue to support maintenance, analysis and other costs is not a very practical as the Council does not have the resources to support it.

Gravesham BC response to doc 9.187 Post-event submissions, including written submissions of oral comments, for ISH11 – by the Applicant (REP8-110)

Re A.3 Hearing Action Point: Local Character Area boundaries.

It is our view that the Applicant's response does not support the changes they made to the boundary between the Shorne sub-area and Cobham sub-area LLCAs in their 2020 and 2022 assessments.

The Applicant changed the boundary between the LLCAs for their 2020 LVIA, and it is clear that the change in boundary position influenced the landscape Sensitivity and Magnitude of effect of the proposals on these areas, and thus altered the findings of the landscape assessment of these two LLCAs.

In their post-event submission for ISH11 (REP8-110) the Applicant now states the reasons for the change in the 2020 LVIA are not known. This being the case, then by inference the Applicant cannot support their own position, and the original boundary should be reinstated, and the assessment reviewed.

The Applicant's response then goes on to explain a further change in the boundary made between the assessment of 2020 and 2022. The Applicant's explanation includes the prominence of the HS1 corridor and A2 corridor from the southern fringes of Shorne Woods Country Park as one of the reasons for moving the LLCA boundary. Document 6.2 Environmental Statement – Representative Viewpoints – Winter and Summer Views (1 of 8) at Figure 7.17 Viewpoint S-13 Sheet 3 of 3 clearly shows the significant effect of the wooded central reservation on this area, and its role in forming a strong boundary. It is therefore our view that the LLCA boundary should be reinstated.

NB Gravesham have previously responded to the effect that the 2020 LVIA was underassessed.