

Shorne Parish Council

————— Borough of Gravesham —————

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TRO10032 LOWER THAMES CROSSING SHORNE PARISH COUNCIL (IP ref 20035603)

Response to DfT letter dated 28th November 2024 requesting comments on the Applicant's response dated 26th November 2024 plus other responses from other interested parties (Consultation 8).

Introduction:

Shorne Parish is located immediately north of the A2 and west of Gravesend. It will be very severely impacted by the A122 Lower Thames Crossing (LTC) proposals.

Our full introduction can be found in our Written Representations submitted at the beginning of the Development Consent Order (DCO) process, please see pages 1-2 of Ref REP1-408: [TRO10032-002949-Shorne Parish Council - Written Representation \(WR\).pdf \(planninginspectorate.gov.uk\)](#)

We have covered some of the topics presently under discussion in several of our previous responses as part of the DCO Consultation.

Section 1 - Matters raised by the Applicant:

The applicant (National Highways, NH) has discussed various aspects of their proposals and also submitted some updated documents.

We will address these in the order in which they have been included by the Applicant.

The situation generally is that the Applicant expresses their own satisfaction with their own proposals and actions taken, but that does not mean that interested parties and local residents are also satisfied – in many instances they are decidedly not.

Active Travel issues:

While NH correctly state (see their point 2.17 on page 4, first paragraph) that there has been consultation and engagement, and input obtained, that is not the same as saying that the input led to the modifications that consultees requested/advised.

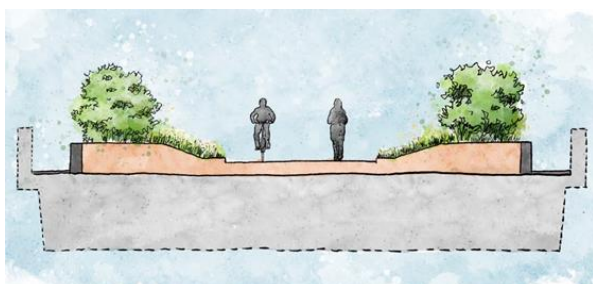
Green bridges:

The Applicant states that there are seven new green bridges but this is not really correct. South of the Thames there are three existing busy road bridges that need to be demolished and replaced during construction: Thong Lane north (across the line of the LTC), and Thong Lane south and Brewers Road (both across the existing A2). So these are more correctly replacement bridges that the Applicant wishes to redefine as “Green Bridges”.

The design proposals for these have however been eloquently discredited by expert IP’s during the DCO process, as the green elements are far too narrow to be effective. It was advised that they need to have at least 85m width of just the uninterrupted and undisturbed greenery whereas they will instead still carry two lane roads with increased traffic volumes as well as footpaths, cycle tracks and bridleways.

Thong Lane north is the widest of the three but is only 84m wide in total. The comment that this is “one of the widest green bridges in Europe” just raises concerns about the quality of provision at these unknown other locations. We believe that the Thong Lane north green bridge could and should be made much wider by means of cut-and-cover methodology.

The two bridges across the A2/M2 line will both require relevant wildlife to cross two or three lanes of tarmac at one end of the green strip before also encountering the barrier created by HS1. The following images are taken from DCO document 7.4 Project Design Report Part F last revised in October 2022, pages 15 and 17. The example is more typical of green bridge installations and does not include a very busy two-lane road over a massive motorway.



Illustrated example



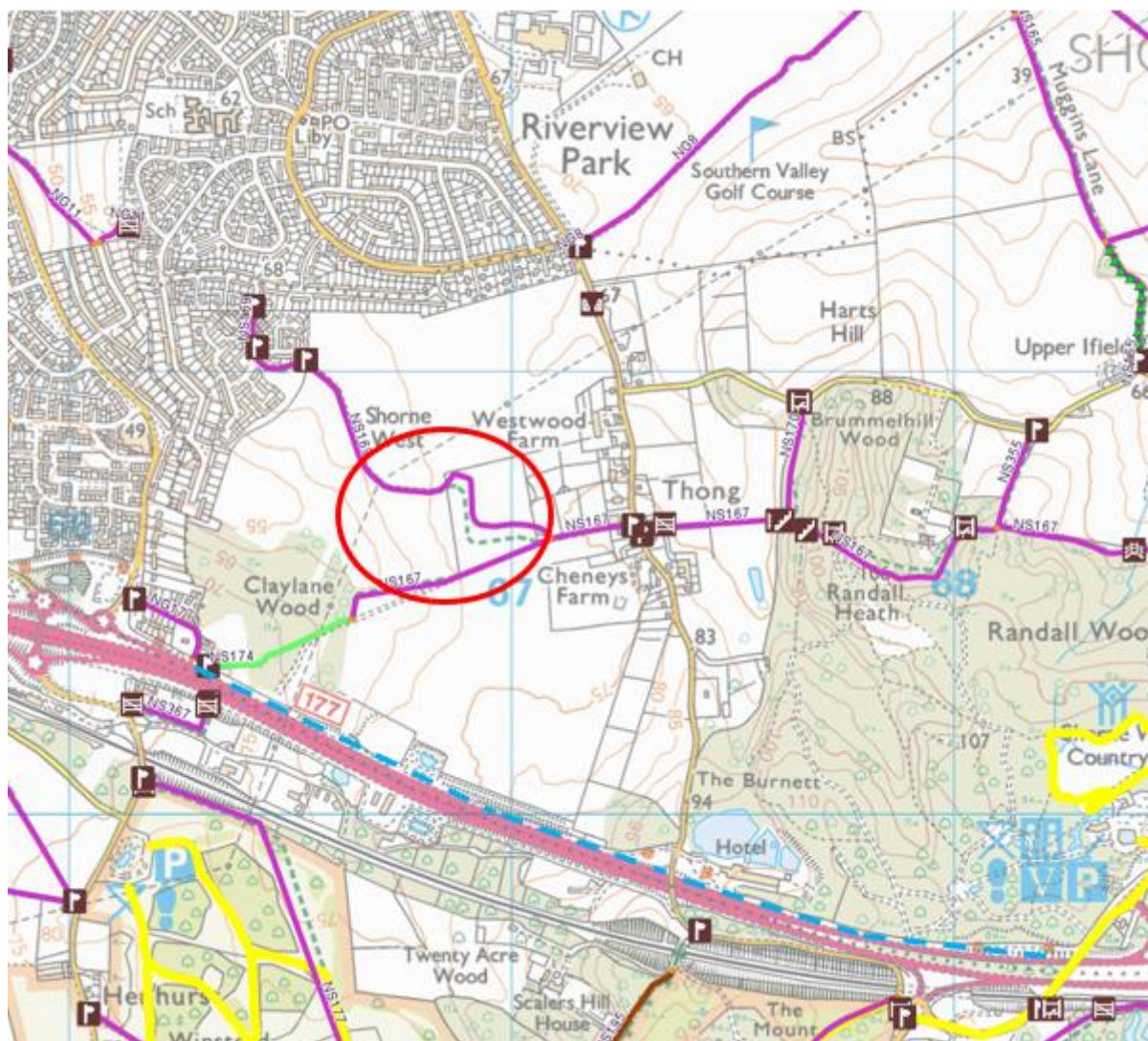
Thong Lane south as proposed

We have previously questioned whether any plants/trees will be able to grow located over so many lanes of traffic and pollution and are yet to be reassured on that point. It might be preferable to drop the pretence that these really are green bridges and look at improving/restoring habitat connectivity in other, perhaps better ways.

Footpaths severance and replacement with new footbridges:

The National Highways response does not mention that, as well as the long-distance cycle route NS177, the line of the LTC also severs a very important footpath route NS167 (joined by NS 169 and NS174), and which is not being reconnected in the proposals. If the stated aim is “to create safe, easy crossing points” then it should definitely be reconnected although perhaps that is being saved for another project to supply funding subsequently at some future point “to restore links severed by historic road building”.

What currently exists is direct, short and popular, being the main and historic “runway” route between Shorne West/Riverview Park and Shorne Woods Country Park. NCR177 cycle track (and footpath) runs, efficiently short and direct, along the entire north side of the A2.



Existing WCH map, from Kent County Council – footpath purple, bridle path green.

(Added red oval, paths being lost; blue dashed, existing NCR177)

What is proposed instead means either (from NCR177) a 2km total diversion up the line of the LTC, to cross at Thong Lane north overbridge, and then back down again or else what will be a convoluted, and polluted route with multiple road crossings (6 roundabouts and 2 other junctions) to negotiate, having been forced to the south of the A2/M2 via Gravesend East junction and eventually re-crossing back again at Brewers Road (2.17 point e, page 5).

When we raised the unsuitability of their proposals with NH their response was that having to walk an extra 2km was good as promoting health. That may be so, but if residents have mobility problems or need to wheel prams or carry shopping (there are no shops in Thong), the prospect is likely to act as a significant deterrent to ambulatory physical activity and instead encourage car journeys.



Proposed WCH map (from page 23 of 7.4 Project Design Report part E)

(Potential bridge replacement for lost direct footpath link of NS167 and easier/safer diversion of NCR177 added in red)

We find it hard to understand why the currently proposed replacement routes is considered satisfactory (NH describes “improved connections” in 2.17 point d on page 5) in comparison with the existing, and why there is not provision of a bridge such as shown below from page 18 of Document 7.4 Project Design Report Part F. This could as shown above carry both NS167 and NS177 across the line of the LTC while avoiding the long and hazardous diversions (light blue above) that are instead being created.

Please also consider the quotation in the Applicant's point 2.19, page 5, which we do not consider to have been satisfied.



Illustrative view of Thames Chase bridge, north of the Thames

A similar bridge from Shorne Woods Country Park right across the A2/M2 and HS1 into Ashenbank Wood could also be considered, as this would have the potential to be a true Green Bridge connecting up protected habitats currently divided by the very wide (and proposed double the width) A2/M2/HS1 infrastructure corridor.

Temporary replacement route for NCR177:

We accept that there would be a need for a replacement for cycle route NCR177 during the works however NH intend to sever all the footpaths located between the A226 in the north and the A2 in the south at the same time at the beginning of construction and for them to remain closed throughout the full duration of the works over the following 7 years.

Involvement of Active Travel England (ATE):

We are pleased that this was recommended and has already been actioned (point 2.20 and Appendix A), however, other IP's have had many years of familiarisation with the plans, since 2013 and before, so perhaps 10 days was a rather optimistic timescale in which to read and digest all the relevant documents, understand how existing routes are used and how the proposed replacement routes are in fact less satisfactory.

NCN177 and having to dismount (Point 3.2 of the ATE response):

We note that Active Travel England picked up on this point, which has been raised repeatedly by many IP's and still requires resolution through the auspices of the project. The situation is unsatisfactory and already a community annoyance but must be solved before NH can claim the diversion route as being adequate to bring into use.

"Temporary" means 7 or more years of diversion and NH's response on page 22 of Annex B is inappropriately dismissive of a problem that they will be making numerically worse.

It is true that the dismounting problem hasn't been caused by NH however they can and should ensure resolution in partnership with Network Rail before work commences. Perhaps the DfT are best placed to command this to happen.

“Structured Engagement with Stakeholders”:

We are concerned that Parish Councils, where they exist within the project area, are not listed as Stakeholders to be consulted and directly involved in meetings and multi-disciplinary workshops (see point 2.21a and revised document 7.5 Design Principles, Appendix D). As Councillors are local residents directly impacted by the proposals, having themselves been elected by all local residents, Parish Councils are in the best position (perhaps better than some of the stakeholders who are listed) to advocate and represent the opinions of the local community, and fully understand impacts, hence they should not be shut out from participating in such important discussions.

We have already seen examples from the overall landscaping whereby major and sweeping changes have been made that took the design away from what local residents had agreed as satisfactory, for example, change from wooded bunds along the line of the LTC to open (so noise and fumes transmitting) vistas along with removal of acoustic protection fencing.

Minimising disruption to local people (section 2.28):

For local residents, disruption from the project will be maximal throughout, and will not recover afterwards as some changes to traffic routes and volumes are permanent. There is probably nothing much that can be done to reduce impacts save for optimal traffic light systems at every road junction (both temporarily and in some cases, permanently, such as along the A226), particularly those that serve bus stops such as at Shorne Crossroads.

Similarly to as expressed above, it is essential that local representatives are part of the stakeholder discussions.

The role of the Community Liaison Officer (point 2.30) must be to solve problems that are identified not just to be informing residents about new problems the project is going to cause for them.

All the policies discussed are good in theory but it is how successfully they get implemented that will be critical to good relationships with the Community.

A226 Gravesend Road and cycling provision (point 3.3 of the ATE response):

We have concerns about a potential change to an urbanised appearance, which would not be welcomed by residents as it would be effectively being implemented largely to serve persons who are merely passing through Shorne.

Section 2 - Matters raised by other interested parties and additional points:

2.1 The Gravesend:Tilbury Ferry (currently closed):

Financial support of the Gravesend:Tilbury Ferry:

This was raised by Gravesham Borough Council and we agree with their comments. We request that one way or another adequate funding should be provided in order to allow reinstatement of the Ferry as its closure is a significant and damaging blow to Gravesend and also Tilbury.

Use of the Gravesend:Tilbury Ferry by LTC workers:

The Applicant was intending to make use of the Ferry to transport workers across the river Thames during construction, to get from/between accommodation/work bases on opposite sides, this will not now be available so the plans need modifying and/or a very long road journey would be needed instead.

Cyclists having facilitated transport through the Lower Thames Crossing:

The existence of and therefore availability to use the Ferry was cited by the Applicant in earlier discussions about reasons why they were not providing or otherwise enabling a shuttle system for cyclists to traverse the proposed Lower Thames Crossing.

This is unlike the Dartford Crossing where <https://www.gov.uk/dartford-crossing-bike> states:

“Get across the Dartford crossing by bike: Ask for a special pick-up vehicle to take you and your bike through the Dartford crossing at Essex Point or Kent Point. You cannot cycle over the bridge or through the tunnel. The service is free.”

While this is an operational phase matter, we consider that there should be a binding undertaking that such a system will be in place as soon as the LTC is operational.

2.2 Location for Rest and Relaxation Areas:

There was a proposal submitted on 9th September 2024 by the owners of a plot of woodland south of the M2 at Strood.

Local residents consider that their suggestion may not be practical for a variety of reasons:

- Albeit on the other side of the motorway, the land is opposite a quite dense residential area
- The land is currently woodland and within the boundary of the North Kent Downs Special Landscape Area (formerly called Area of Outstanding National Beauty)
- The requirement for slip roads would take up a significant amount of the land with more likely needing to be purchased.
- The land is on a curve in the road which affects forward visibility of the putative entrance and exit slips, and where there is an uphill merge from M2 Junction 2 on-slip with crossover of traffic demerging from the M2 to take the A289 so is very close to the overall M2 junction 1.
- It would only serve the westbound carriageway as there is no room for flyovers, which would also adversely affect local residents.
- The area would not provide services for traffic joining the A2:M2 from the A289 out of Medway or travelling in the reverse direction.
- There is public right of way that crosses under the M2 and over HS1.

Former Tollgate Motel: For information, we also note that proposals for reconfiguration of the Tollgate Motel site have been resubmitted recently (see Gravesham Borough Council planning application Ref 20240856) but there are problems with the traffic data/assessment and the safety of the road access on and off a very busy roundabout.

Thank you very much for considering these representations. We will be happy to answer any further questions or provide any additional information that might be requested.