

This statement will set out why the Lower Thames Crossing is not required and that the submission does not provide sufficient information to assess the impact of this development in Thurrock. Clearly this application is contrary to the NPPF in that it is development in the Green Belt which would cause demonstrable harm and it is not agreed that there is sufficient weight to overcome this fact.

The following document Lower Thames Crossing 7.2 Planning Statement Appendix E Green Belt sets out the justification for the proposed road being acceptable to be built in the Green Belt, indicating similar schemes built in the Green Belt, benefits to the economy, tree planting etcetera as reasons for overcoming the overriding fact the development is contrary to the NPPF. This document sets out in words what is considered will be acceptable, however it is clear that no amount of tree planting or screening will prevent the potential noise and pollution that this will create. I would urge the inspectors to visit the A13 widening to observe the potential impact of this proposal. The noise and pollution around Stanford le Hope has significantly increased and the Lower Thames Crossing will additionally add to that and form a massive scar across the Green Belt impacting not only on Stanford le Hope but villages and urban conurbations in and around its route. This proposal will significantly and severely impact on the landscape and the proposed mitigation is insufficient to mitigate the harm. This will severely impact on the outlook and green belt surrounding the conurbations and villages in Thurrock and the reasons put forward in the documentation clearly do not outweigh the harm to the Green Belt or provide justification for developing on the Green Belt.

It would seem that the submission does not fully provide information regarding the impact of the development particularly in regards junction around Stanford le Hope and that operation of the junction clearly shows it will impact. Having contacted the Inspectorate it is apparent that I need to contact National Highways to obtain any relevant information surely this should be available as part of the submission and there is therefore insufficient information to make sound judgement on the necessity of the Lower Thames Crossing. It is important that detailed information available in order to assess and understand how this proposal will impact on junction in Thurrock.

Looking at the Statements of Common Ground many remain with points not agreed thus showing that this proposal has not fully accepted by a number of authorities and interested parties.

The base data seems to be from 2016 and considering that travel patterns have changed since then and there are more people working from home so car journeys have become more local, it seems that it would have been appropriate to update the base for a comparison flows that are more representative of traffic flows at present.

There does not seem to be documentation of traffic generation calculations and trip generations along with junction analysis within the submission thus it has not been possible to understand the full impact of this development. Looking at the following document Lower Thames Crossing 7.7 Combined Modelling and Appraisal Report - Appendix C - Transport Forecasting Pack there seems to be no inclusion of the potential impact of the road on other junctions in and around Thurrock. Thus the documentation fails to fully set out the impact of the Lower Thames Crossing and does not comply with Local Thurrock Policy or National Policy.

Similarly the Lower Thames Crossing 7.9 Transport Assessment fails to fully set out the impact of the Lower Thames Crossing and does not comply with Local Thurrock Policy or National Policy. This document mainly concentrates on the strategic routes and impacts and fails to set out the impact on local roads particularly those in the east of the Borough.

It is clear that what has been provided is inappropriate and will not properly serve the Borough forcing traffic to use inappropriate routes to access the Lower Thames Crossing. Thus, impacting on local junctions around Stanford le Hope and villages surrounding it. The junctions are already taking a significant level of traffic and DP World is not at full capacity and the Thames Enterprise Park is yet to be built and add traffic to the network but it has shown from these developments that they will struggle with the DP world and TEP traffic to the extent mitigation measures are required. The addition of the LTC traffic will only exacerbate this further.

The main reason for the LTC seems to be the relief of the Dartford Crossing but the layout and access to the M25 in the location of the Dartford Crossing is in itself the cause of the issue not the traffic. In fact most of the problems occur because of the poor management of the crossing and the ability for traffic to short circuit the approaches to the crossing creating congestion. It would have been more appropriate to look at limiting access to the crossing by taking out a number of junctions thus limiting the ability to try and short circuit queues when they occur on the M25.

Looking at the traffic data on the M25 in 2017 and it is clear that the majority of the traffic that joins the M25 in Kent is to the west of the proposed Lower Thames Crossing and it is unlikely that this traffic will go back on itself to join the road. In addition the other locations that vehicles access the Dartford Crossing are from Outer London and circulating on the M25. This traffic additionally will not join the LTC. There is clear evidence that the Lower Thames Crossing in its current format is unnecessary and that its current design will severely impact on Thurrock particularly those areas to the east of the proposed route. The documentation provided by National Highways also clearly evidences that the Lower Thames Crossing will have very limited impact on removing traffic from the M25 and surrounding. That in itself is contradictory for the strategic need of this road. Its limited access points make this impracticable and it does not fully serve access into Thurrock. It forms more of a by-pass with limited links and those links provided will only severely impact on other junctions within Thurrock particularly in the east of the Borough.

This scheme very much reminds me of the M25 around Sevenoaks where the links were not fully implemented and that traffic has to take inappropriate routes to access parts of the network. The provision of insufficient links, not matter whether the scheme is necessary or not is a indication of poor design and trying to cut costs to the disbenefit of the scheme. This scheme will not provide the appropriate access for Thurrock.

The M25 when it was initially in concept form looked at linking major motorway links in and around London but unfortunately this has not been the case and on both sides of the crossing we have links close to the crossing point that serve local routes in Kent and Thurrock which create issues as traffic tries to short circuit the main routes. Again it is unlikely with the Lower Thames Crossing that this will alleviate this issue. What is required is additional crossing points close to the existing Dartford Crossing. The LTC will not alleviate the issues around the Dartford Crossing as indicated in the submission.

In conclusion it is evident that the DCO application falls short on information provided and does not clearly set out the impact outside the extents of junctions on the route of the crossing clearly only considering the strategic routes linking to it and not setting out its full impact on roads in Thurrock particularly those to the west. It would seem that baseline data is somewhat outdated and does not reflect current traffic movements. It is clearly contrary to the NPPF and the benefits do not outweigh the harm to the Green Belt. It will clearly impact on noise and air quality in a Borough that already suffers from significant air quality issues. It is not justified in traffic terms as it will not provide significant relief to the Dartford Crossing as the majority of the traffic using the Dartford Crossing are on journeys west of the proposed route and thus are unlikely to use the facility. Thus the documentation fails to fully set out the impact of the Lower Thames Crossing and does not comply with Local Thurrock Policy or National Policy and should be refused.

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