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Lower Thames Crossing
Received 10 January 2023
From Robert Rudge

Representation Summary

"My representation will include why I am against this planned development. In my opinion it is a costly, environmentally disastrous, civil engineering project that is in the wrong place. There were many better options that have been discounted and yet Highways England / National Highways has resolutely stuck to 'Plan C' throughout the last few years. The costs of the project have dramatically increased, environmental issues seem to have been blurred. If an M25 / A282 relief road project was started today it would not be in this location. The Lower Thames Crossing is too little too late, it will be close to capacity by the time it opens. The budget seems to be wasteful and expensive for an infrastructure project that will not achieve sufficient traffic headroom and could become over capacity within in a relatively short period. Highways England has chosen a construction site that is the worst of several options. The original option B was probably the best option but that was cancelled for a theme park that has now been cancelled. The consultation period has been long and drawn out whilst any normal member of the public who took has been expected to understand engineering jargon to a higher level. The Jargon has put many objectors off, which was probably the point. Environmentally it is of poor quality during and after completion, the local area will be impacted and the relative health of the area will be damaged. The level of 'Green washing' Highways England has used is just biased manipulation of the green issues. This project needs to be sent back to the drawing board."

Why Here?

It seems (to me) that the Department of Transport made the decision to proceed with this project with little or no regard for Highways England's recommendations or the feedback received from the public during several consultation exercises. Some would suggest, that the decision to build a new crossing east of Gravesend was made long before the project brief was given to Highways England to develop.

Option C cuts right through the Green Belt and prime agricultural land. Option C' routes cut through:

- The Kent Downs Area of Outstanding Natural Beauty (AONB),
- Great Crabbles Wood Site of Special Scientific Interest (SSSI),
- Shorne and Ashenbank Woods SSSI

All of which is cherished greenbelt land and would destroy beautiful and precious countryside forever! Residents across Singlewell, Riverview, Chalk, Thong Lane, Shorne, Higham and Strood will be directly affected by increased noise pollution and poorer air quality.

Insufficient Capacity for the new tunnel and insufficient capacity on local roads to cope

Highways England figures state that the capacity at the existing Dartford Crossing is only 135,000 vehicles a day and traffic is forecast to increase by 7% per year. The Lower Thames Crossing doesn't solve the problem (it actually would make the situation worse). The LTC is designed to take 20% of the Dartford crossing traffic however, the Dartford crossing is regularly over 25% over capacity. Traffic at the Dartford Crossing was given as 140,000 vehicles a day on average during the 2016 consultation, which includes 25,000 HGVs a day. It is forecast to increase to 159,300 vehicles a day by 2025. Which would be 18% above capacity by 2025 and the LTC may only just be starting construction.

I understand that certain sections of the A2 are operating at 10% over capacity so adding more traffic onto the road can only increase the certainty that traffic jams along this route will increase. The A2 highway between the Pepperhill and Cobham junctions in Kent, UK, was partially relocated (some years ago) and widened from three to four lanes in both directions as part of a strategy to provide a consistent standard of highway from the M25 to the M2 in Kent. This section of highway is 7km long and carries over 110,000 vehicles per day. The previous former stretch of highway was consistently severely congested especially during peak hours and suffered frequent accidents. It also ran close to the town of Gravesend, significantly disrupting local residents. Congestion was forecast to worsen as traffic volumes continue to increase. As I understand it, the LTC now proposes to narrow this 7km section back down to two lanes which if true is illogical.

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During peak times at the Dartford Crossing, there can be typically 30-45 minute delays northbound causing queues back to junction 3 and sometimes as far as junction 4. It has been forecast that these hold-ups will be reduced by only 14% or 6 minutes with the new tunnel barely any change when you are sitting in a queue. It will however encourage use of "rat-run" routes throughout North Kent involving the M26, A227, A228, A229, and numerous country lanes. Much of the traffic that would normally use the Dartford Crossing will try to access the new Lower Thames Crossing. Has Highways England adequately modelled the potential impact on other routes in the event of minor or major incidents at the Dartford crossings?

Insufficient Local Planning

If the purpose of Lower Thames Crossing is to attract Channel port traffic away from the current designated freight route (M20/M25/Dartford Crossing) the alternative routes would be via the A2/M2, A249, A229, A228 and A227. **No proposal currently exist to upgrade these routes. Therefore it is highly questionable whether these have the capacity to deal with the additional demand.** These routes climb the North Downs, steep hills that HGV's can struggle to cope with, especially in winter conditions. Instead the design Highways England has come up with has serious consequences for the existing trunk and local road network. The most significant issue for north Kent is that that the design reduces the A2/M2 from 4 lanes to just 2 in each direction at a pinch point between the Shorne and Gravesend East junctions. Added to this is the fact that they propose on a single lane linking the proposed Lower Thames Crossing to the A2 in each direction. It is clear that **all the Feeder route will get congestion this tunnel does not help congestion it makes it worse.**
It is my considered view that the Option A routes must be reconsidered.

Discarding of Options during the consultation period.

Highways England discounted at the earliest stage of their investigations routes in the Option A corridor which would have provided better address the traffic congestion problem. Has Highways England given too much bias towards their assumptions on "*economic benefit*" (which I believe means the development of housing and business parks) frankly, if true it is clear to me that Gravesham does not want these economic benefits . Furthermore, If it does then why is there no mention of this in the Gravesham Borough Council Local Plan.. From this I surmise that the these claimed economic benefits are unfounded, and have created a falsely weighted argument for their case for Option C. There is also a claim that an estimated 400,000 extra jobs will be created how could this be calculated? I have no doubt by using some economic modelling program which only return predictions based on the inputs. What were the inputs and were they the correct ones...who knows? But history shows economic modelling is generally wrong.

The Dartford Expressway option was dismissed out of hand

The Dartford Expressway is a pair of motorway-grade tunnels, three lanes in each direction plus a hard shoulder, carrying the M25 below ground from south of junction 2 to north of junction 30, completely and invisibly bypassing Dartford.

According to Highways England's figures, only 30% of traffic using the Dartford Crossing is local, the remainder in regional or national with no interest in destinations or local roads within the Dartford area. 70% of traffic needs to be able to pass through Kent without touching the sides. London's Orbital Motorway has never been completed to motorway standard at Dartford and that there are no published proposals to do so.

Location 'A' at Dartford. Highways England considered but summarily discounted early in their route selection process. Highways England claimed that Option A14 has "**limited attraction of traffic**" this is beyond understanding given that is has been stated the Dartford Crossing is operating well over its designed capacity.

Aggravating the situation at Dartford

Since the 'pay booths' were removed the Dartford Tunnels are now interrupted on average 800 to 900 times a week to allow petrol tankers and other hazardous loads to be escorted through the tunnels. Each stoppage can last 2 minutes, but full closures of up to 10 minutes are sometimes required. Which has just exasperated the situation. I can't recall if this was reported on when the pay booths were removed, but it certainly wasn't made clear as we were told that the lanes would be 'free flowing' once the pay booths were removed, which never happened for north bound traffic.

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Archaeology

As an amateur archaeogeography, I am able to see variations in landscape where the natural landscape has been altered by humans in some shape or form. It is clear to me that there are a significant amount of ancient earthworks across the fields where the proposed Lower Thames Crossing is to be built. Whilst there has been archaeological digs in some places, it has been clear to me that many areas of interest have been missed, this is clear by the cropmarks visible every year. One crop circle is very evident where HE proposes to store their vehicles during construction why wasn't it visited by the archaeological team? Some might suggest that it is easy to look the wrong way when you don't want to find something. Furthermore there is plenty of aerial evidence of historical earthworks in the fields that don't seem to have been explored.

Environment

Highways England have admitted that unless they can resolve the huge 6.6 million tonnes of carbon emissions issue the project will not go ahead. There (as far as I am aware) HE have not been able to provide info of how they plan to resolve that issue.

The cost has risen from £4.1bn up to £10.1bn+++ The adjusted Benefit Cost Ratio had dropped from 3.1 right down to just 1.22.

There are no guarantees the proposed LTC will go ahead.

Pollution

It seems questionable that Pollution levels around the Dartford Crossing have been excluded from government air quality assessments because **it was classed as a "rural" road**, Department for Transport (DfT), which is responsible for road classification, confirmed the rural status "was incorrect" but hasn't yet produced the pollution levels. However, for the last 15 years the local council has carried out its own air quality measurements, and each year the area around the crossing has been above the EU's target for nitrogen dioxide. Public Health England has estimated Dartford has one of the highest percentage of deaths that can be attributed to long-term exposure to particulate air pollution in Kent. The Co2 emissions that come with the new carriageway, directly conflict with the government's goal to achieve net zero by 2050 how can that be resolved?

Green Belt

Wildlife Trust

Parts of the Shorne and Ashenbank ancient woodland, a site of Special Scientific Interest. Is the home to a number of rare species including woodpeckers, great crested newts and dormice.

"Whilst planting new trees is valuable, it will never compensate for the loss of ancient woodland." Once it has gone it is gone forever.

Ineffective consultations

There were no Public Information Events held in Chalk or Higham, two of the worst-affected areas, although there were two events in Maidstone. Emails were also sent to c.250,000 Dart Charge account holders. It is clear that the majority of people in these groups will not be personally affected by the proposals and that their views have been sought to sway the outcome of the consultation in favour of Option C. It is not reasonable to expect members of the public to trawl through the 30 volumes plus appendices online or in pamphlets to seek vital information, such as route maps. Much of the material is written in some bizarre form of '*Engineering English*' that even for an engineer like me is difficult to understand. This smacks of consolation hand tying designed to put off many objectors. Most notably there has even been a '**Like poll**' (Support map) on the Lower Thames Crossing Website. But there isn't any 'Dislike poll' to offer a fair perspective. It would have been a simple way to gauge public opinion.

The cost of building the tunnel - Questions to be asked.

The public are not being given a clear picture of the costs either.

Costs have been blurred and misleading - £8.3bn is the lower end - 2years ago it 10.1bn. What is the true cost?

Can the subcontractors fulfil their contracts without going bust because of the rising costs of materials?

Is it not better to concenter a different system for example opening up more viable ports further up the coast. To container traffic and then distributing from further north.

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In the past Government Ministers have said Option A at Dartford was still on the table, but there were no questions about Option A in the consultation such that we were unable to express support or opposition to Option A.

Final point

Mark Harper - 09-03-2023

To date we have spent over £800m on planning the Lower Thames Crossing. It is one of the largest planning applications ever, and it is important we get this right. We remain committed to the Lower Thames Crossing, and the Development Consent Order process will be an important opportunity to consult further to ensure there is an effective and deliverable plan. In order to allow time for this process, and given wider pressures on RIS, we will look to rephase construction by 2 years.

If this project is so important how come it can be delayed by 2 years??

Robert Rudge
14th July 2023