



Written representation **strongly opposing** the application for development consent by National Highways for Lower Thames Crossing

C. Richardson
Registration ID No. 20033736

This written representation will refer to impacts, issues and features south of the river.

In the Community Impacts Consultation 2021, Lower Thames Crossing Executive Director, Matt Palmer, stated:

“Our ambition is to leave communities and the environment better off than when we arrived.”

I feel this ambition, along with the notion that the LTC will be the ‘greenest road ever built’ cannot be compared to, nor will it surpass the community identities and landscapes that already exist.

It is hard to imagine how the construction and operation of ‘the third largest tunnel in the world’ with associated roads and infrastructure will induce benefits for local people and the environment in Gravesham and Thurrock.

There is serious concern that the project cannot and will not meet its objectives and ambitions but may carry on regardless.

I am strongly opposed to the proposals of the Lower Thames Crossing east of Gravesend, as they ultimately do not provide the significant relief required for the ongoing issues at Dartford, while causing large adverse impacts on new locations.



Project Objectives

1. To relieve the congested Dartford Crossing and approach roads, and improve their performance by providing free-flowing, north-south capacity.
2. To improve the resilience of the Thames crossings and the major road network.
3. To minimise adverse impacts on health and the environment.
4. To improve safety.
5. To achieve value for money.
6. To be affordable to government and users.
7. To support sustainable local development and regional economic growth in the medium to long term.

Dartford Crossing

The original purpose of this project was to solve the congestion issue at Dartford Crossing. Although the proposed Lower Thames Crossing, east of Gravesend, will transfer a proportion of this traffic, Dartford will be at (or in years following, above) its design capacity and those issues which exist for road-users currently, will still exist even if the LTC is built at Gravesend. There are no proposals within this scheme to address problems at the immediate location of Dartford.

What will National Highways do to resolve the following points:

- The M25 not being a complete orbital motorway at the location of Dartford A282.
- The proximity of local junctions to the Dartford Crossing with joining traffic.
- Traffic weaving to get in the correct lane.
- Height restrictions on tunnels.
- Halting traffic to escort large and hazardous vehicles.
- The effective capacity in the northbound tunnels being lower than the southbound bridge.

A proposal for a scheme in this location, A, may have been more effective to provide substantial relief, as is suggested in an AECOM Final Review Report conducted in 2013, which deemed options B and C as less resilient, especially when incidents occur at the existing crossing. At Dartford, there may have also been the opportunity to separate national, regional and local traffic.



A2/M2 Existing View



Proposed LTC junction



Network Resilience

Even if you are an advocate of the LTC, a major flaw of the project is the rejection of National Highways of updating the junctions at M20/A229/Blue Bell Hill, which was previously presented as Option C Variant. This was likely removed as a result of cost, but really should factor into the current proposals as the route will be a significant connection for traffic heading towards the LTC.

Kent County Council have taken responsibility for seeking funding for an upgrade to Blue Bell Hill as a direct result of the Lower Thames Crossing being proposed in the Gravesham area. National Highways have since acknowledged the impacts the LTC will have on Blue Bell Hill with their recent proposals to mitigate nitrogen deposition, but this will mean further land acquisition.

In National Highways' Views from the Road Assessment (6.3 Environmental Statement – Appendix 7.13) the magnitude of change describes the substantial alteration from a linear road to complex junction where the A2/M2 will meet the LTC. In this section of the road, the M2 is reduced from 4 lanes to 2 and the LTC has a single joining lane. This reduction, I feel, will result in a serious constraint of capacity and will lead to increased accidents. (Images, left, from 6.2 Environmental Statement - Figure 7.19 – Photomontages)

The single joining lane for the LTC may prove to be a significant issue when Dartford experiences a major incident or closure, when that traffic seeks the alternative crossing, creating congestion all along the A2, while other local routes will become rat-runs. Overall, it is not clear from National Highways' findings, what the impacts on the network would be in worst-case scenarios.

Questions

- How will commuter traffic be impacted between Maidstone, Medway Towns and Gravesham? And in turn, what will be the impact on jobs and local business?
- How will HGVs manage the gradient on Blue Bell Hill?
- What will be the outcome if funding is not granted for the upgrade to Blue Bell Hill – or if the upgrade is not delivered before the LTC is open?
- What will be the effects on the strategic network if the Blue Bell Hill upgrade and the LTC junction on the A2 are constructed simultaneously?
- What will be the effects of an incident at any point between the M20 and the proposed A122 Lower Thames Crossing junction on the A2?
- What will be the effects of a major incident or closure at either Dartford Crossing or the LTC? How will traffic migrate between the two options?



Health & Environment

It seems that one of the most negative aspects of the LTC is the lately investigated effects of nitrogen deposition and how this will be mitigated. In document 6.3 Environmental Statement - Appendix 5.6 - Project Air Quality Action Plan, it describes,

“Thirty-six sites that have been assessed as likely to experience a significant effect as a result of the change in N deposition. These sites predominantly consist of woodland and semi-natural grassland habitats, and the changes in N deposition are considered likely to adversely affect the sites’ structure, function and composition to a degree which would compromise their integrity either temporarily or permanently.”

The risk of degradation to habitat quality is acknowledged, with most changes in nitrogen deposition owing to increased traffic flow and road alignment and therefore a multitude of mitigation measures will be required. How effective this mitigation will be, seems very uncertain. National Highways also reflect on the point of Avoidance through Design,

“The Project has been developed to avoid or minimise significant effects on the environment through design and mitigation measures. Avoidance through design (including location and route options) has been the primary approach to mitigating adverse impacts of the Project...the Project route and design have been selected after extensive development, engagement, and consultation.”

I do not agree with National Highways that this has been their primary approach, especially regarding route selection. In the 2013 consultation the highest percentage of preference was for a new crossing at location A, Dartford.

When the 2016 consultation took place, the location of Dartford did not feature much at all, as this option had been discounted by the opinion of National Highways. There was confusion for consultees if Option A was even still a possibility to choose.

Option C was heavily promoted and although 3 designs were presented, the point was that they all crossed the river in the same one location – east of Gravesend. The 2016 consultation has set the tone for all subsequent consultations.

In considering the overall effects of construction and operation of this project, simply for the fact that this road infrastructure has to be built to accommodate an AADT flow of approximately 86,400 vehicles through the A122 tunnels - it will be introducing, or increasing, detrimental outcomes to Gravesham residents in relation to noise, visual aspect, air quality and environment that could otherwise have been avoided.

Safety

The Lower Thames Crossing is set to be built as an all-purpose trunk road, which uses smart technology. Smart technology does not account for human behaviour. Often, when gantry signs indicate incidents on the existing road network, some people make the choice not to follow signals, for example, when there is a lane closure. In using detection cameras, especially in bad weather, incidents may not be responded to quickly enough (all it would take is for the person in the vehicle behind to not be paying attention). I feel these types of 'smart' roads will not be as safe as having a hard shoulder.

Value for money & Affordability

At every stage of consultation, the cost of the Lower Thames Crossing has risen (now up to 10 billion) and it is still not clear how this would be value for money in terms of the benefits it would provide, while not alleviating issues that will still exist for Dartford Crossing users in the future. Also now factoring into the expense, will be the new areas of compensatory land required to offset nitrogen deposition, as well as potential avenues into greener methods of construction. Costs seem to be ever-increasing particularly to cover the extent of mitigation and compensation required, and the proposed benefits of the project weaken in comparison.

Local development

For this section I will refer to points raised by Gravesham Borough Council in their Principal Areas of Disagreement Summary. Their concerns include:

- Funding demands – Gravesham BC, Kent CC, health authorities and the emergency services are examples of agencies that will incur additional expenditure as a result of the LTC scheme.
- Local community suffers significant negative impacts from construction and operation but without major economic gains that would justify it.
- Impact on housing - the council does not believe that there is sufficient capacity in the local housing market to accommodate additional demand from the construction workforce in a very constrained supply situation.
- Business disruption during construction and operation.

The impacts of the scheme will place a very great strain on local authorities, services, businesses and residents in the immediate environs of the LTC, with little gain.

Proposed site of Southern Portal



The Purposes of Green Belt



To check the unrestricted sprawl of large built-up areas.



To prevent neighbouring towns merging into one another.



To preserve the setting and special character of historic towns.



To assist in safeguarding the countryside from encroachment.



To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.



The proposal of constructing the Lower Thames Crossing in the selected location, I feel, wholly defeats the purposes of green belt and other categories of land which are a means of preservation and form a strategic gap; of all original options, Option C has the worst impact environmentally.

In order to build this project, contractors will need to destroy and remove those areas of ancient woodland and high-grade agricultural land that fall within the order limits, and then attempt to compensate and mitigate the impacts of the crossing they are building, which may ultimately be a futile endeavour; there are no guarantees that the level of mitigation will be of comparable quality to what exists now, plus the results of this mitigation will take several years to be realised as is shown in the document photomontages Year 1 vs Year 15 and perhaps longer if the project suffers any setbacks. It also means that local people will be denied access to parts of the countryside for a very long time, for example, the public footpath between Thong Lane and the village of Shorne, which will be the site of the proposed Southern Tunnel Compound.

I feel that National Highways should have developed further proposals for the alternative routes which would avoid designated areas and functional agricultural sites. It would have also meant a fair comparison would have been presented to the public at the Consultation in 2016, which may likely have led to a different outcome on location.

The LTC has long been promoted by National Highways as a key to 'unlocking economic growth' rather than providing a stout resolution to the problems at Dartford Crossing. In this location, it will be the key to unlocking urban encroachment and adverse, irreversible impacts on both Gravesham and Thurrock.



Large numbers of people may agree with and support the need for another Thames Crossing, but would they necessarily have concern about the details of its location, if it was felt that *any* option for a crossing would resolve the problems at Dartford as soon as possible?

It is important to ask if east of Gravesend *really* is the right and best location, will it solve the problems at Dartford or create new ones in another location?

The benefits of the Lower Thames Crossing are not clear, but the adverse impacts are obvious; this route will come at a terrible cost to local people and the environment. I feel that Gravesham and Thurrock will be lost in a runaway vision of an expanding Thames Gateway area.