

Mr Robert Lane

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The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

18th July 2023

Dear Sir

Lower Thames Crossing (Reference Number TR010032)

Written Representation

I have previously submitted a Relevant Representation summary regarding this project. I now submit further details of my representation which I request to be taken into consideration during the Examination process.

1. National Highways has failed to properly examine alternative options as required under the environmental impact assessment.

National Highways quickly dropped the alternative solutions at the Dartford Crossing, even though they would have far less impact on the environment than the Lower Thames Crossing.

They failed to give proper consideration to a simple 4-lane bridge at Dartford which would have replicated the existing southbound bridge, thus freeing up the existing tunnels for non-motorway traffic. This could have been built by now, at a fraction of the cost of the Lower Thames Crossing.

They failed to give proper consideration to Option A14 and its derivatives, a tunnel linking the M25 south of junction 2 to the M25 north of junction 30, thereby completely bypassing the existing Dartford Crossing, putting all motorway traffic underground, and finally completing the M25.

National Highways appears to have lost sight of the original purpose of the new Thames Crossing, which was to relieve congestion at Dartford, and is now focussed on “unlocking economic growth, and supporting the development of new homes and jobs in the region”.

The application should not be given consent until this has been addressed.

2. National Highways has failed to consult on the alternatives.

Despite the largest proportion of consultees being in favour of a new crossing at Dartford in the 2013 options consultation, National Highways unilaterally omitted the option of a new crossing at Dartford from their Route Consultation carried out in 2016.

There was not a single question about Dartford in 2016; it was not even mentioned other than to reject it. They had already decided where they wanted to construct the crossing and they were determined not to let the public have their say in case they did not agree with them.

National Highways therefore only consulted on variations of the Lower Thames Crossing east of Gravesend. There were no proper alternatives. Despite this, the majority of consultees still chose to oppose the Lower Thames Crossing east of Gravesend.

3. National Highways manipulated the results of the 2016 Route Consultation to give a false outcome.

In April 2017, National Highways announced that the majority of consultees supported their proposals for the Lower Thames Crossing east of Gravesend, and that a total of 19,729 either agreed or strongly agreed with their proposals, against a total of 11,988 who disagreed or strongly disagreed.

However, on further examination it became clear that National Highways had deliberately and unilaterally discounted over 13,000 responses from members of the public who opposed the crossing. They had been grouped together into just 10 "campaign" responses.

This was a deliberate deception to tilt the response in their favour. If all the responses had been counted as they should have been, the results would have shown that the majority of consultees opposed their proposals. In fact, over 25,000 consultees disagreed or strongly disagreed with the proposal to locate the Lower Thames Crossing east of Gravesend, against 19,770 who agreed with it.

We can only speculate whether the Secretary of State would have made the decision to go ahead with the crossing east of Gravesend if he had known the true level of opposition.

4. The Lower Thames Crossing fails to address the traffic and incidents at the Dartford Crossing.

National Highways own forecasts indicate that even if the Lower Thames Crossing is built, the Dartford Crossing will still be operating over its design capacity.

The northbound tunnels at Dartford will still be undersized. Hazardous loads will still need escorting through the tunnels. There will still be traffic weaving and frequent incidents on the approaches to the tunnels, resulting in continuing and frequent stoppages. The Lower Thames Crossing does nothing to address these problems.

The application should not be given consent until this has been addressed.

5. The Lower Thames Crossing fails to provide resilience in the event of an incident at Dartford.

Despite the fact that the Dartford Crossing will continue to operate over its capacity, National Highways has failed to model traffic scenarios in the event of the continuing traffic incidents on the northbound approaches to the Dartford tunnels.

There is insufficient capacity to accommodate traffic exiting the northbound M25 at junction 2, and there is insufficient capacity to accommodate traffic exiting the A2 westbound on to the Lower Thames Crossing – just one lane is provided.

In the event of an incident on the northbound approaches to the Dartford tunnels, congestion on the M25 will quickly build up, the A2 westbound will become gridlocked, Gravesend will become gridlocked, and traffic will exit the M25 at junctions 3 and 5 and use unsuitable roads through towns and villages to reach the Lower Thames Crossing.

The application should not be given consent until this has been addressed.

6. The project fails to provide sufficient capacity on the A2/M2 link.

At the proposed location of the LTC junction with the A2 east of Gravesend, the A2 currently has 4 lanes in each direction connecting to the M2, having been widened to accommodate increasing traffic volumes in 2009.

In the 2018 Statutory Consultation, it was proposed that the through link between the A2 and the M2 would be reduced to 3 lanes in each direction through the LTC junction.

However, at the 2020 Supplementary Consultation, this had been reduced to just 2 lanes in each direction. There was no mention of this in the changes outlined in the consultation documents; it could only be discerned by close-up examination of the GA drawings.

Notwithstanding the surreptitious manner in which this change was introduced, it raises serious concerns on whether 2 lanes will be sufficient to accommodate the heavy volumes of traffic that travel between the A2 and M2, particularly at peak times.

Traffic on the existing 4 lane A2 is already at capacity at peak hours. The majority of this peak traffic is east-west in the morning and west-east in the afternoon. It is not cross-river traffic, it is traffic between the M2 and the London area. It is unlikely that 2 lanes will be able to accommodate these volumes of traffic.

The application should not be given consent until this has been addressed.

7. Loss of connection between Brewers Road to the M2

Residents in Shorne have had direct access from Brewers Road to the M2 since it was built 60 years ago. At Statutory Consultation, this was still the case. The A2 eastbound retained a slip road to join the M2 at junction 1.

However, in the 2020 non-statutory refinement consultation, this slip road was removed, thereby removing direct access from Brewers Road Shorne to the M2. Its removal will require traffic from Brewers Road to embark on a 4km diversion along the A289 to the A226, negotiate 2 roundabouts, and return along the A289 in order to

access the M2. Not only will this add over 1,000km to a regular commuter's journey each year, it introduces additional accident risk as drivers have to negotiate the merges and roundabouts. It is inevitable that many drivers will not bother with this circuitous route but will instead use Pear Tree Lane and the A226 through Gads Hill to access the A289 to the M2, thus putting motorway-bound traffic through unsuitable rural village roads.

The reasons given by National Highways for this change are spurious. They claim that this is to reduce traffic weaving on the approaches to junction 1. This is simply not true, because traffic heading towards the M2 will no longer be able to weave across to the left to join the A289 or A2 at junction 1 – it will be segregated. The weaving will take place 4.5km further west, where National Highways propose to restrict motorway-bound traffic to the outer 2 lanes of the A2 eastbound, whilst traffic bound for the A2, A289, and Lower Thames Crossing will have to move across to the inner 2 lanes of the A2. This will result in far more weaving, incidents and accidents than currently occurs.

The application should not be given consent until this has been addressed.

8. The project application fails to address or mitigate against traffic rat-running on the local road network.

National Highways has consistently failed to properly consider the impact of changed and increased traffic flows on the local road network in the vicinity of the Lower Thames Crossing, and the project fails to include any measures to mitigate against this. South of the River Thames, this will particularly impact communities such as Thong, Shorne, Cobham, and Sole Street.

As examples, they forecast that traffic volumes in Thong Lane (Thong), Pear Tree Lane (Shorne), Henhurst Road (Cobham), and Warren Road (Luddesdown) will increase by over 40% at times. Further investigations show that this may be in excess of 100%. There is no mitigation.

The application should not be given consent until this has been addressed.

9. The project application seeks to circumvent the 5-year moratorium on all-lane-running smart motorways, introduced by the Government in January 2022.

At the Statutory Consultation in 2018, National Highways clearly stated that *“the route will be a motorway with three lanes in each direction, along the whole route from the M25 to the A2. It will have no hard shoulders in common with smart motorways”*.

However, with the approach of the moratorium in 2022, National Highways changed the description to: *“The Lower Thames Crossing route would be defined as an all-purpose trunk road. This means the road would use green signage instead of the blue signage that is seen on conventional motorways. Whereas an all-purpose trunk road is usually accessible for all vehicles, there would be restrictions so only vehicles allowed on motorways would be able to use the Lower Thames Crossing”*.

This is a change in name and signage colour only, a ploy purely to circumvent the moratorium. It is still all-lane-running, and all motorway restrictions shall continue to

apply. For all intents and purposes, it is a motorway. All the inherent risks and dangers associated with smart motorways remain unchanged (and ignored).

The application should not be given consent until this has been addressed.

10. The cost and environmental impact of the project is unacceptable.

When the route was selected in 2017, it was estimated that it would cost £3.7 billion. It has now risen to over £8 billion. Although the route between the A2/M2 and the M25 is just 23 km long, 4.25 km of which is in tunnels, the land take required amounts to a massive 24.35 km², equating to 9.3% of the total combined area of Gravesham and Thurrock. This is a land grab of epic proportions.

Would National Highways have seriously considered locating the crossing east of Gravesend, in preference to other simpler, less expensive alternatives, if they had realised the massive escalation in costs and the enormous adverse impact this would have on the environment and the ecology of Kent Downs AONB?

The whole project has spiralled out of control. The project does not meet its objectives and the application needs to be refused.

11. Restrictions to the Local Residents' Discount Scheme encourage longer journeys

Currently, residents in Dartford and Thurrock are entitled to reduced crossing charges at Dartford. Under the proposed Lower Thames Crossing, the Local Residents' Discount scheme for Thurrock residents will apply to both crossings, whereas for Dartford residents it will only apply to the Dartford Crossing and for Gravesham residents it will only apply to the Lower Thames Crossing.

This is fundamentally flawed, and will lead to unnecessarily longer journeys, using more fuel, creating more CO2 and pollution. For example, a resident of Southfleet or Swanscombe wishing to travel to Southend or Basildon will need to take a longer route via the Dartford Crossing to take advantage of the discount. A resident of Northfleet wishing to travel to Dagenham or Romford for example will need to take a longer route via the Lower Thames Crossing to take advantage of the discount. Residents of Dartford and Gravesham should be entitled to the Local Residents' Discount Scheme for both crossings, just as residents of Thurrock are entitled to. This is particularly the case when one of the crossings or its approaches is closed or blocked. Local residents should not be penalised in these circumstances.

12. Late change to tunnelling methodology

In 2023, National Highways announced, almost as an aside, that they may use a single tunnel boring machine to bore both tunnels instead of two as previously consulted on.

This is a fundamental change. At every single previous consultation, including the Statutory Consultation, they had stated that there would be two tunnel boring machines, boring from north to south. All tunnelling operations, logistics, and staff accommodation, would be carried out from the northern side of the crossing. All slurry and excavated material would emerge on the northern side of the crossing. All tunnel segments would be transported to the northern side of the crossing.

Understandably, consultees and authorities on the Kent side have not had to consider the environmental impact and traffic impacts of the tunnelling operations. This has now changed.

How will the tunnel boring machine (the largest in the world) be turned round to go back north? How much extra land will be needed to facilitate this? How many extra vehicle movements? Where will the staff and logistics be accommodated?

And how will the slurry and excavated material be removed when the tunnel is being bored from Kent to Essex? What is the impact on noise, air quality, vehicle movements?

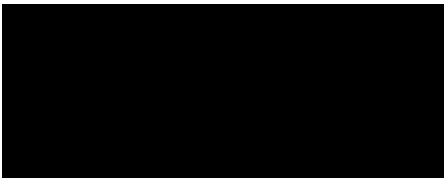
And how will the tunnel segments find their way to the southern side if the first tunnel is being used to transport slurry back to Essex?

These are fundamental changes. National Highways' assertion that there would be little change in impact overall is an insult to the residents on the southern side of the crossing, where the impact will be significant.

There has been no proper consultation or consideration of this. It was not part of the Statutory Consultation or any consultation until the last consultation which received very little publicity.

The application should not be given consent until this has been addressed.

I trust these representations will be given due consideration. If you require any further information, please do not hesitate to contact me.



Bob Lane

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