

1. **National Highways has failed to properly examine alternative options as required under the environmental impact assessment.** They failed to give proper consideration to a simple 4-lane bridge at Dartford, thus freeing up the tunnels for non-motorway traffic. 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, bypassing the existing crossing, putting all motorway traffic underground, and finally completing the M25.
2. **National Highways has failed to consult on alternative routes.** National Highways failed to consult on any options at Dartford in their Route Consultation in 2016. They only consulted on options east of Gravesend.
3. **National Highways manipulated the 2016 Route Consultation responses to give a false outcome.** In 2017, they announced that the majority supported their proposals. This was only achieved by discounting over 13,000 consultees who opposed the crossing. They were condensed into just 10 “campaign” responses. In reality, over 25,000 consultees opposed the LTC against 19,770 who supported it.
4. **LTC fails to address traffic volumes and incidents at Dartford Crossing.** National Highways forecasts that Dartford Crossing will still operate over capacity after LTC opens. The northbound tunnels will remain undersized. Hazardous loads will still need escorting. Traffic weaving and frequent incidents will continue to occur. LTC does nothing to address these problems.
5. **LTC fails to provide resilience.** National Highways has failed to model traffic scenarios when incidents occur on the northbound approaches to the Dartford tunnels. There is insufficient capacity for traffic exiting the northbound M25 at junction 2, or exiting the A2 eastbound towards the LTC – just one lane is provided.
6. **The project fails to provide sufficient capacity on the A2/M2 link.** At Statutory Consultation, the A2 and the M2 were linked by 3 lanes in each direction through the LTC junction. This has since been reduced to 2 lanes in each direction. This will not be sufficient for peak-time traffic volumes between the A2 and M2.
7. **Loss of connection between Brewers Road to the M2.** The removal of direct access from Brewers Road and the M2 results in unacceptably long local diversions, additional accident risk, and encourages motorway traffic onto unsuitable rural village highways. This change was introduced after the Statutory Consultation.
8. **The project fails to consider rat-running on the local road network.** National Highways has consistently failed to consider the impact of changed and increased traffic on the local road network near the LTC, and the project fails to include any mitigation measures.
9. **The project seeks to circumvent the 5-year moratorium on smart motorways introduced in January 2022.** At Statutory Consultation, National Highways stated that the route would be a smart motorway with no hard shoulders. The description has been changed to an all-purpose trunk road with motorway restrictions. A change in name only, to circumvent the moratorium.
10. **The cost and environmental impact is unacceptable.** Since the route announcement in 2017, the cost has increased from £3.7 million to £8+ billion. Although the route is just 23 km long, the land take is 24.35 km<sup>2</sup>, equating to 9.3% of the combined area of Gravesham and

Thurrock, with massive impact on the environment and Kent Downs AONB. This route would not have been chosen had the true costs and environmental impact been declared.

- 11. Restrictions to the Local Residents' Discount Scheme encourage longer journeys.** Thurrock residents will be entitled to discounts on both crossings, whereas Dartford and Gravesham residents will be restricted to either the Dartford Crossing or the Lower Thames Crossing. This will encourage longer journeys, more fuel, CO<sub>2</sub>, pollution. Dartford and Gravesham residents should have the same entitlement as Thurrock residents.
- 12. Late change to tunnelling methodology.** The late proposal to use one tunnel boring machine instead of two will have a serious impact on the south side of the river – more noise, pollution, traffic movements. How will excavated material be transported back to Essex at the same time as tunnel segments are transported to the Kent side?