

Unique Reference: 20035470

National Highways responses to my written submission were not at all forthcoming, and are in keeping with their previous record of not giving adequate information, and does nothing to allay my worries and concerns. Therefore, I have some questions I would like National Highways to answer please.

### **MY FURTHER COMMENTS ON MY CRITICISM OF THE APPLICANT'S ASSESSMENT OF UNEXPLODED ORDNANCE (UXO). Including PUBLIC HEALTH IMPACTS**

In APP 433 - UXO DESK STUDY & RISK ASSESSMENT

Page 4 - "UXO Hazard Assessment – The following potential sources of UXO hazard have been identified on the Site:

"WWII Bombing , River Thames , Milton Range, Pipe Mines at RAF Gravesend, Bomber aircraft crashes".

The "Desk Study" is 191 pages long and it very soon becomes evident and is confirmed on Page 5 of those 191 pages, **that the entire route is a "potential source of UXO hazard"**.

Page 5 of APP433 -"Remainder of the Site-

Large parts of the Site comprised marshland during WWII and it possible that bomb and shell impacts **may have been missed and gone unrecorded in uninhabited areas.**

**As such, the potential for encountering a UXB or UXAA shell anywhere on the Site cannot be discounted"**.

The only reference to UXO in -

APP 539 - Health and Equalities Impact Assessment (HEqIA)

"Page 250 - 13.7.8 – **Five** potentially significant sources of Unexploded Ordnance (UXO) hazard have been identified along the Project route and these areas have been assigned a moderate UXO hazard level".

**Question to National Highways –**

**Why is there no mention in APP539 Health and Equalities Impact Assessment of Page 5 in APP433 Unexploded Ordnance -**

**"As such, the potential for encountering a UXB or UXAA shell anywhere on the Site cannot be discounted"**.

**Why is there no mention of "ways in which these impacts would be reduced or contingency plans put in place for any such occurrence."?**

Then in "Public Health Impacts" I am referred to APP151 Population and Human Health – which contains 2 paragraphs that just repeat themselves -

“ES Chapter 13: Population and Human Health [APP-151] describes how local communities could be affected by the construction and operation of the Project and explains the ways in which these impacts would be reduced.”

“As well as the assessments documented in the HEqIA, ES Chapter 13: Population and Human Health [APP-151] describes how local communities could be affected by the construction and operation of the Project and explains the ways in which these impacts would be reduced.”

Repeated information right next to each other - National Highways trying to look like they are giving out lots of information.

APP151 Page 249 - 13.7.1 - Cumulative effects

e. Geology and soils – interrelationships relate to effects associated with soil quality which have been taken into account in the assessment of effects on agricultural landholdings. A further area of overlap relates to the assessment of potential sources of pollution (land and water) and **unexploded ordnance and the potential impact these may have in relation to human health.**

**Questions to National Highways -**

**Why, again, nowhere does it explain any way in which “these impacts would be reduced” and definitely no indication of safety measures that will be put in place in such occurrences.**

**In the meantime there is a definite negative impact that it is having in relation to human health, since this project began and will continue to have until this is resolved, because residents are having to live with, and are very aware of the latent dangers, that they could well be put in a situation of extreme danger of losing their homes and worse”.**

Another important factor relevant to this whole subject is

**Question to National Highways**

**How can residents have any confidence in National Highways in respect of their health and wellbeing, when not only are they being given misleading information, National Highways have no apparent contingency plans in place for any UXO incidents. Is it because in the first paragraph of their response to me they state -**

**“The Applicant has and will continue to act on its findings and recommendations, with responsibilities passed on to its appointed contractors as appropriate.”?**

**That sounds like they will pass on responsibility to contractors during construction, then if during that construction UXO are made more susceptible to explosion for any reason, if/when the road is operational, an explosion occurs, National Highways will take NO responsibility for the worst happening and consequences.**

## MY FURTHER COMMENTS ON MY CRITICISM OF THE APPLICANT'S ASSESSMENT OF GROUND BORNE NOISE AND VIBRATION AND UNDERWATER NOISE FROM THE TUNNEL BORING MACHINE AT MARINE RECEPTORS

AP433 P 97

5.4 Marine Mines

**“No records have been found indicating that marine mines were laid on the Site.”**

**“Records indicate that marine mines were laid in the River Thames** during at least 25No. Luftwaffe raids between November 1939 and November 1941. These were effective in sinking vessels in the Thames Estuary on a number of occasions.

**Marine mines are not considered to provide a source of UXO hazard to the Site with the possible, albeit very unlikely, exception of buoyant marine mines migrating onto the Site.”**

Like a vast amount of the information provided by National Highways, it appears to be assumption, presumption and guesswork that is completely contradictory, and gives no confidence at all.

In APP-420 National Highways 6.3. - Environmental Statement –

Appendix 9.1 Pages 6-13 - Assessment of Ground Borne Noise and Vibration, and Underwater Noise from the Tunnel Boring Machine at Marine Receptors - it states -

Page 10 – 6.1 - Significance criteria – Fish and Page 13 6.2 – Mammals

Potential UXO Hazard - P 91

**“There were a number of strategic targets along the River Thames in the vicinity of the Site that were bombed, and UXB falling in the river were less likely to have been accurately recorded or retrieved. Several ARP records simply state that bombs fell ‘in the river’ without specifying exactly where.”**

**“Therefore it is considered that there is an elevated probability that a UXB fell unnoticed on the Site within the River Thames and remained in situ.”**

### Questions to National Highways –

**If that report is supposed to “conform to industry best practice and all relevant guidance”, why has an assessment – 5 pages – NOT been done specifically for UXO in Appendix 9.1 in relation to “Potential Hazard” to construction personnel, as only Fish and Mammals are included?**

In APP420 –Page 10 - 6.1.1 it states

“ Furthermore, the characteristic impedance of water is much greater than that of air, resulting in underwater sound levels being numerically much higher than would be the case if the water were replaced by air.”

“It is still important to note that explosives rarely lose effectiveness with age. In some instances, mechanisms such as fuzes and gaines can become more sensitive and more prone to detonation, regardless of whether the device has been submersed in water or embedded in silt, clay or similar materials.”

### Questions to National Highways

After reading the paragraphs above, although it may not be “located on the Site” residents in Kent and Essex are very aware of the possible danger that could happen by underwater noise and vibration from the TBMs on the SS Richard Montgomery, that could trigger other UXOs to explode anywhere in the river or Thames estuary environs.

### Why has the SS Richard Montgomery been ignored in the report?

### Why is the following so confusing/misleading?

APP433 – Appendix 10.10 P98

#### 5.6 Wrecks Containing UXO

**“NO records have been found indicating that any live wrecks likely to contain a source of UXO hazard are located on the Site.**

**The nearest wreck to the Site known to have contained explosives is detailed below.**

Wreck No. 12908

The wreck of a powder hulk is recorded off Mucking Flats, approximately 2.2km northeast of the central part of the Site.

Figure 18 is an extract from the Admiralty chart **showing the wrecks and obstructions in the vicinity of the Site**. HMS Cornwall is circled in red and the live wrecks (lighter barges) on the Site are circled in purple.”

P 99 - 5.8 UXO Migration in the Marine and Estuarine Environment

There are **several identified potential sources of UXO hazard in the marine and estuarine environment in the vicinity of the Site.**

### Question to National Highways

**All the way through APP420 it refers to “the TBM” singular - so will risk assessments and analysis of using both 1 and 2 Tunnel Boring Machines be undertaken before a decision is made, bearing in mind the two paragraphs above, as obviously 2 TBMs would produce double the noise and vibrations?**

Contained in - Lower Thames Crossing – Minor refinement consultation- Page 30 – Construction Update

“If we are granted permission to build LTC then our contractors would determine whether to use one or two TBMs.”

**As National Highways have stated that the decision regarding 1 or 2 TBMs will be left to the contractors, will the contractors actually take the UXB information into consideration, not just the cost involved of using 1 or 2 TBMs?**

APP433 - ES Appendix 10.10: Unexplored Ordnance (UXO) Desk Study & Risk Assessment

P 120 – Table 7 - This does not make it clear which category “tunnelling” comes under.

**Question to National Highways**

**Which category includes “tunnelling”?**

APP 433 - Page 117 - 9 RISK MITIGATION ASSESSMENT

“When the construction design is finalised, it is recommended that a detailed UXO risk mitigation strategy is commissioned.”

**Question to National Highways**

**Will the design be finalised before permission is considered for the entire project, meaning that a detailed UXO risk mitigation assessment will have been done and taken into consideration?**

**MY FURTHER COMMENTS ON THE PROJECT’S ABILITY TO SOLVE CONGESTION AT DARTFORD?**

The brief given was to solve congestion at the Dartford Crossing but it would still be over capacity according to National Highways own figures for the predicted reduction in traffic.

APP 495 - 4.3.31 With greater certainty of journey times and commuting costs in the Lower Thames area, firms and workers would both be more willing to look further afield for business and employment opportunities across the river.

Although asked on several occasions National Highways have never answered.

**Questions to National Highways**

**What is the proposed design capacity of the LTC?**

**Does it include induced HGV’s ? Tilbury Port expanding along with DP/London Gateway port, Thurrock Enterprise Park, and other local businesses have already voiced their intention to expand their businesses including HGV fleets.?**

## MY FURTHER COMMENTS ON THE COST OF THE PROJECT

### Question for National Highways

Highways England – Route Consultation 2016

P 4 - Estimated costs are between £4.3 and £5.9 billion (including allowances for inflation). !!!!!

How would it be considered good value for money if the congestion situation is exactly the same as 2016 figures showing Dartford Crossing was already over capacity, and figures you are now predicting for the opening and following years, if the Lower Thames Crossing was built at a cost of taxpayers money of £10bn+++?

## MY FURTHER COMMENTS ON AIR POLLUTION

National Highways response includes –

“An increase in pollutant levels is predicted at receptors adjacent to the A122 Lower Thames Crossing route, but pollutants are predicted to be well below air quality objectives at receptors along this route, with the Project in operation”.

### Question to National Highways

Does it include induced HGV's as not only is Tilbury Port expanding extensively, along with DP/London Gateway Port, Thurrock Enterprise Park, and other local businesses that have already voiced their intention to expand their HGV fleets, if the proposed LTC goes ahead?

### Question to National Highways

Surely, with the current initiative to get people to buy electric cars and being told that they will be less polluting, (which is not technically correct as PM2.5 will be just as bad, if not worse for electric vehicles,) that will mean that induced traffic will build and build, putting the public at more risk of air pollution and bad health?

The Mayor of London and TFL are doing all they can to stop motorists using the roads in London because of the harm to its residents from air pollution. We deserve the same consideration and that will only be done if the LTC is not built.

Taken from -

<https://democracy.thurrock.gov.uk/mgAi.aspx?ID=13963>

- [Meeting of Lower Thames Crossing Task Force, Monday, 16th August, 2021 7.00 pm \(Item 20.\)](#)

The HE Head of Consents moved onto question two: “since HE have stated there won't be ventilation chimneys for the tunnel, can they please explain in detail how the tunnel would be ventilated? This is obviously a major concern especially for residents closest to the portals, both visually and in regard to air pollution.” He responded that there would be fan ventilation

along the length of the tunnel, but these would only be switched on if traffic became stationary, slowed or there was an incident. He explained that in normal circumstances vehicle movement would create airflow and disperse emissions out of the tunnel portals. He stated that the nearest home to the tunnel portal was along Station Road and was approximately 800m away. He stated that the air quality impact would only be felt approximately 50m from the tunnel portal, **and all emissions would be dispersed at around 200m from the tunnel portal.**

“The Chair questioned air quality surrounding Coalhouse Fort, which would be close to the north portal tunnel entrance. The HE Head of Consents stated that any air quality impacts would have been dispersed before reaching Coalhouse Fort, and was far enough away from the area of concern, which was 50m from the tunnel entrance. He explained that within 200m away from the portal, air quality returned to its normal levels. The Chair questioned if wind could impact on these areas of concern. The HE Technical Lead responded that wind would help to disperse particulates.”

**This is the kind of worryingly misleading information Highways England/National Highways have been telling us and is totally unacceptable as proved below.**

Taken from-

<https://www.gov.uk/government/statistics/emissions-of-air-pollutants/emissions-of-air-pollutants-in-the-uk-particulate-matter-pm10-and-pm25>

“Both PM and precursor pollutants that can form it can travel large distances in the atmosphere.

However, around half of UK concentrations of PM comes from anthropogenic sources in the UK such as wood burning, and tyre and brake wear from vehicles.”

**That means that visitors to Coalhouse Fort and the so called “park” next to the north portal would have to take gas masks to protect themselves.**

<https://democracy.thurrock.gov.uk/mgAi.aspx?ID=13963>

“Councillor Piccolo questioned if the fans would also be used when traffic was slowly crawling. He asked if monitors would be in place along the tunnel to ensure fans came on when necessary, even if traffic was not stationary. The HE Technical Lead stated that he would come back with a written response.”

**[Question to National Highways – Has that now been done, if so what was the response?](#)**

“Councillor Muldowney questioned why different ventilation systems would be used in the LTC compared to the Dartford Crossing. The HE Technical Lead responded that the LTC would be a more modern tunnel and would be much bigger than the Dartford Crossing. He stated that the team were currently working to assess airflows, but as the traffic travelled in

the same direction, this should ensure necessary ventilation naturally. He explained that the ventilation fans would only be used if stationary traffic occurred. The Senior Consultant Stantec queried if there was a minimum length for a tunnel before ventilation had to be introduced. His understanding was that the LTC would be too short to introduce ventilation columns. The HE Technical Lead replied that the tunnel length as well as the gradient determined what type of ventilation was needed, **but ventilation columns were not needed for the LTC.**”

“The Chair questioned how air quality and noise would be monitored during construction and operation. The HE Head of Consents stated that air quality and noise would be monitored during construction to provide a baseline level of data, but would not be monitored during operation. The Chair questioned how air quality and noise would be compared pre-LTC and after route opening. The HE Head of Consents replied that HE would monitor traffic levels rather than specifically noise or air quality. The Chair requested that air quality and noise monitoring after route opening be included as part of the scheme. Councillor Piccolo echoed the Chair’s comments and felt that air quality and noise needed to be monitored after route opening to show if HE’s predictions were correct or not. He felt that monitoring would be the only way Thurrock would know if there was a problem with local air quality levels. The HE Head of Consents mentioned that there were a number of complexities involved in air quality and noise monitoring, but would take this back to the team for their consideration.”

### Question to National Highways

**Has that now been considered and will air quality be monitored after construction, during operation?**

### MY FURTHER COMMENTS ON PUBLIC HEALTH IMPACTS

The whole LTC project has, and is still having, such a detrimental impact on residents’ health all along the proposed route.

Consultations have been inadequate and frustrating, questions have not been answered sufficiently, residents some elderly, have received letters informing them that their homes would be at risk and then the next week advising them that mistakes were made and that was not actually correct, people I know have suffered nervous breakdowns, and been extremely worried to the extent of mentioning suicide., Homeowners, land owners and businesses, have moved rather than suffer the consequences of the road actually being built near their premises or definitely having a CPO being served, meaning they have moved away from family and friends of long-standing.

### MY FURTHER COMMENTS ON ENVIRONMENTAL IMPACTS, INCLUDING WOODLANDS

Taken from -

<https://democracy.thurrock.gov.uk/mqAi.aspx?ID=13963>



[Meeting of Lower Thames Crossing Task Force, Monday, 16th August, 2021 7.00 pm \(Item 20.\)](#)

“The HE Head of Consents moved onto question three: *“have HE looked into The Wilderness in South Ockendon as an ancient woodland as we previously requested, if so what update is there?”* The HE Head of Consents stated that there was specific criteria for a woodland to be designated as ancient, as the woodland had to be in continuous existence since 1600. He stated that the team had studied historical maps of The Wilderness and records of its existence only went back as far as 1840.”

Taken from -

<https://www.gov.uk/government/news/government-launches-new-scheme-to-boost-tree-planting>

Published – 4 November 2019 – The government today (Monday 4 November) launched a £50 million scheme to help boost tree-planting rates in the fight against climate change.

Woodland creation is an excellent way to help combat the effects of climate change.

The role trees play in combating climate change cannot be underestimated and by applying to the Guarantee you will also play a crucial role in helping with the UK’s efforts to hit Net Zero carbon emissions by 2050.

### **Question to National Highways**

**Are National Highways not aware of the Government Scheme?**

**If so, surely it is worth preserving a woodland that has been proved to have been there since 1840 rather than chopping down “almost” ancient trees?**

**If so also, why was the decision taken not to go through the landfill site nearby that was originally earmarked for the proposed route, and not The Wilderness?**

### **MY FURTHER COMMENTS ON THE LACK OF PROVISION FOR CROSS-RIVER ACTIVE TRAVEL/MODAL ALTERNATIVES**

National Highways comments in their response – “Latent demand for walking and cycling across the River Thames at the Project crossing point is low and therefore unlikely to unlock enough trips to make the required infrastructure for a dedicated shuttle service economically viable.”

### **Questions to National Highways**

**How did you come to the conclusion that “latent demand is low” especially for cycling across the Thames when there has never been an opportunity for us to do so at this location?**

**I am sure that if the shuttle service at the Dartford Crossing was better advertised many more cyclists would take advantage of it.**

**With regard to cycling, when this proposed project is currently £10bn+++ and rising, why is the deciding factor – “to make the required infrastructure for a dedicated shuttle service economically viable” as the Government are strongly encouraging modal shift patterns?**

### **MY FURTHER COMMENTS ON IMPACTS ON AGRICULTURE**

**No response to the main point of my comment regarding agriculture, namely the current food emergency.**

Taking farmland that is currently providing us with necessary food supplies and putting established farmers out of business, is extremely short sighted, especially as we already have a current food emergency on our hands, including obtaining food we now rely on from outside of the UK for different reasons, such as war, drastic change in weather patterns happening all over the world. If we concentrated on at least keeping what agricultural land we have now, and possibly increasing it instead of building roads like the proposed LTC on so much of it, we would be more food self-sufficient. That is called common sense.

#### **Question to National Highways**

**How will having a new road and new solar farms that are also taking a vast amount of agricultural land locally, but no agricultural land or farmers providing us with food, help anyone or anything?**

#### **Questions to National Highways**

**Where does it state exactly how much food production will be lost from agricultural land take for the project and how many farmers will go out of business as a result?**

**Instead of building this new road to ease congestion at the Dartford Crossing mainly for HGVs transport food from abroad through Dover, surely we should be prioritising growing our own food and supporting British farmers?**

### **MY FURTHER COMMENTS ON IMPACTS ON A SOLAR FARM**

**National Highways have completely ignored my reference to an “operational solar farm”, being Cranham Solar Farm and referred me to AS040 which only refers to Ockendon/Bulphan solar farms, with no reference to Cranham Solar Farm at all.**

#### **My question to National Highways –**

**Why did you not mention Cranham Solar Farm in your response, as it is the only one that is, and has been “operational” since December 2016?**

**Community Impacts Consultation – 2021** - 91 mentions of Cranham – **no inclusion of Cranham Solar Farm at all.**

Yet in Map Book 2 – Land Use Plans – Page 45 - sheet 42 – **“Solar Farm to be demolished” which was the only way we realised it would be demolished.**

**Ward Impact Summaries - 2021**

**Page 199 - Map 200 –Solar Farm - Receptor Site for Protected Species. No mention of it being demolished.**

**Why would Cranham Solar Farm subject to demolition when the need for electricity is, and will be even more important, especially as although you made no mention of it I found in -**

APP 151 - P 175 1.3.6.112 - Businesses

13.6.112 The Cranham solar farm would be subject to demolition. The site would also be impacted by utility diversions and forms part of environmental mitigation proposals. The site has been attributed a high sensitivity, by virtue of it covering an area of between 1ha and 5ha. Due to the nature of the business, loss of employment associated with demolition of the solar farm would be low. **Loss of the Cranham solar farm is assessed as having an impact of major adverse magnitude, resulting in a large adverse effect, which is significant.**

P 257 - Impact description – Businesses – loss of business as a result of property demolition

**Significant effects relating to Cranham Solar Farm –**

Sensitivity – High

Impact magnitude – Major

Effect - Large adverse

**Question to National Highways –**

**In view of the your previous statements regarding the importance of Cranham Solar Farm, how can you now justify your response to me below, when it refers to the Ockendon/Bulphan solar farms and not Cranham solar farm which has been operational since 2016, which you have ignored completely?**

NH Response to me - “In light of the minimal interface between the Project and the solar farm, and the fact that the solar farm will be built and operating by the time the Project receives consent, the potential for the Project to prejudice the operation of the solar farm is minimal.”

As I was definitely not happy with National Highways response to me, I then looked at National Highways response to -

REP1-309 Cranham Golf Course and found the information below which I find extremely confusing.

### “3. Ecological mitigation – great crested newts

As with all the Project, this area has been subject to extensive and comprehensive ecological surveys to gather the empirical data necessary for effective mitigation strategy for protected species, including great crested newts.

The Project is required to provide essential mitigation for the loss of great crested newt terrestrial habitat around Thames Chase Community Woodland. This mitigation needs to take the form of new replacement habitat to offset that which would be lost rather than identifying existing good quality great crested newt habitat which is already likely to be colonised by the existing newt population.

The grassland habitat on which the solar farm is situated provides very limited opportunity for shelter or foraging for great crested newts.

The habitat creation proposed for this area by the Applicant is open mosaic habitat which would offer a diverse range of habitats (scrub, rougher grassland, ecological ponds, hibernacula and refuges) that would offer new shelter, foraging and breeding opportunities for the newt population to offset that which would be lost in Thames Chase Community Woodland.”.

So it would appear that not only is the solar farm being demolished but that Thames Chase Community Woodland is losing part of their land which is inhabited by great crested newts.

### “Cranham Golf Course Written Representation Rep 1 -309

Of the 4 alternative sites discussed in the report the main Cranham Golf Course site was dismissed from potentially being a suitable location. The justification is twofold and of significance to this representation. The explanation is set out in full below:-

“This is a viable commercial business that intends to continue and, if the Project were to use this land, it would potentially instigate a significant business extinguishment claim. Furthermore, this land isn't ideally located for environmental mitigation of the Project particularly in relation to the mitigation requirements for Great Crested Newts. Surveys showed that this site already contains areas of suitable terrestrial habitat for Great Crested Newts (such as rough grass and scrub) and the golf course is well-linked to Thames Chase and lies within the buffer zone associated with the newt ponds to be impacted. Given its proximity, suitability and accessibility, it therefore is not appropriate to consider this site as 'replacement' habitat as it is likely to form part of the existing terrestrial habitat used by the newts. Therefore, the Project will not pursue use of this land.”

The two key reasons for not pursuing the golf course land are equally applicable to the solar park, namely:-

“1. Cranham Solar Park is also a viable commercial business which has planning permission to generate electricity until 16th December 2056. The site has been generating electricity for only 6 years and qualifies for generation payment under the feed-in-tariff. Proceeding with

the compulsory purchase of this land will also therefore result in a significant business extinguishment claim.”

### Question to National Highways

**If that is so why is the solar farm being demolished, as it is obviously not suitable for great crested newts, but solar energy is so vitally crucial now and for the future, and the golf course would appear to be exactly the open mosaic, scrub, rougher grassland, ecological ponds etc and could form a much larger part of the existing terrestrial habitat used by the newts?**

**Is it honestly National Highway’s opinion that the Ockendon and Bulphan solar farms are being built and considered as replacement for the already “operational” Cranham Solar Farm as that output of electricity will be gone?**

**The need for the supply of electricity is going to be even more crucial with the enforced move to electric vehicles along with global problems , why hasn’t that been taken into consideration too?**

With regard to the Ockendon/Bulphan solar farms that are being built now, and are already visible from Green Lane in Orsett because of the height of the panels and the fact that the proposed LTC will go right through the middle of them -

### Questions to National Highways

#### Has any of the following been taken into account?

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1015236/en-3-draft-for-consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1015236/en-3-draft-for-consultation.pdf)

#### **Draft National Policy Statement for Renewable Energy Infrastructure (EN-3)**

P 89 2.52 Solar photovoltaic generation impacts: glint and glare

2.51.7 The Secretary of State will consider visual impact of any proposed solar PV farm, taking account of any sensitive visual receptors, and the effect of the development on landscape character, together with the possible cumulative effect with any existing or **proposed development.**

#### **Has the fact that the proposed LTC will be right in the middle of the solar farms that are already being built been taken into account?**

#### **Has the following been considered or agreed with the solar farm developers?**

Mitigation 2.52.3 Applicants should consider using, and in some cases the Secretary of State may require, solar panels to be of a non-glare/ non-reflective type and the front face of the panels to comprise of (or be covered) with a non-reflective coating for the lifetime of the permission.

## MY FURTHER COMMENTS ON IMPACTS ON EMERGENCY SERVICES

As a resident of Thurrock I am extremely concerned about the impact on our emergency services, and whilst appreciate that there is engagement with the emergency services, it does not change the fact that we are extremely short of emergency services.

It really does not reassure me to know that -

“additional direct access points have been provided so that emergency vehicles could access the Project more quickly from the local road network”,

as that just confirms to me and is confirmed in -

“AP 529 - 9.3.13

“Over the study area as a whole there is predicted to be an overall increase of 2,672 casualties in the first 60 years after opening as shown in Table 9.4. on the proposed LTC”,

which would divert the emergency services away from any accidents/incidents that occur locally, away from the proposed LTC, in our everyday lives.

I really do not understand the relevance of -

Table 9.4 Change in the number of casualties over the appraisal period.

Without the Project –	Fatal 1,441	Serious 14,559	Slight 146,987
With the Project	- Fatal 1,467	Serious 14,741	Slight 149,451
Change	- Fatal 26	Serious 182	Slight 2464

**Where do the Fatal, Serious and Slight casualties come from in the “Without the Project” as “Without the Project” there is no LTC?????**

## MY FURTHER COMMENTS ON MODAL ALTERNATIVES TO THE PROJECT

“The Project would create opportunities for public transport operators to develop new local and regional bus services, by providing new connectivity between Kent, Thurrock and Essex. Identification and **development of these routes is the responsibility of the relevant operators**. Local buses will not have to pay the user charge for the Lower Thames Crossing, reducing operating costs for operators”

**The project would NOT** “create opportunities for public transport operators to develop new local and regional bus services, by providing new connectivity between Kent, Thurrock and Essex.” Because it would be impossible for residents to actually access public transport along the route.

### **Question to National Highways**

**How can there be any public transport, as if people cannot access it along the route, obviously no company is going to develop a route when the public cannot access it?**

**Therefore your comment about “local buses not having to pay the user charge reducing operating costs” is totally irrelevant.**

I did not say anything about having a railway connection for passengers or freight across the River Thames as an alternative to the Lower Thames Crossing .

What I did say, and National Highways have completely avoided my comment regarding, was rail alternatives for HGV's, is the fact that Dover Port has no direct rail connection and that should be considered as a possible alternative to the LTC as it would take a huge amount of traffic off of the Dartford Crossing.

National Highways are only interested in building new roads, so would obviously not support the money that would be spent on the LTC being used for Dover to have a rail link instead, even if it is a better option, especially for the residents of Kent and Thurrock who will suffer greatly from the highly toxic triangle, a result of the proposed LTC if it is goes ahead.

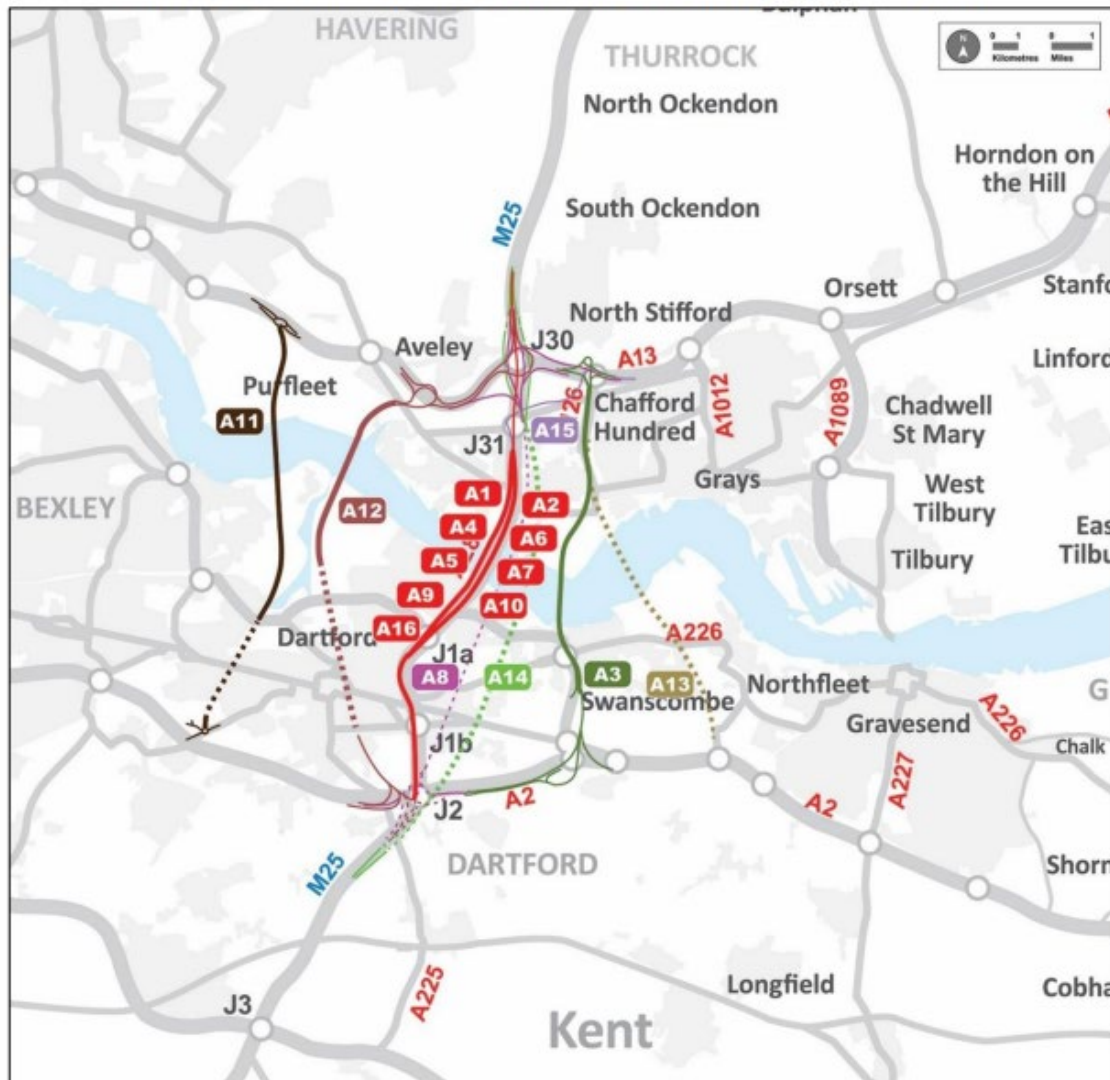
### **MY FURTHER COMMENTS ON ALTERNATIVE ROUTE OPTIONS AND UPGRADES AT THE DARTFORD CROSSING**

#### **Question for National Highways**

**National Highways -In APP 495 –**

**P 72 - Plate 5.3 All route options within the Location Option A corridor**

**Plate 5.3 All route options within the Location Option A corridor**



**Question to National Highways**

**Why was it considered necessary for Route A14 to start south of the A2 Junction 2 with the M25, as in the map rather than at Junction A2/M25?**

That would take national traffic away from the existing Dartford Crossing, in both directions, bypassing the current tunnels and coming up past Junction 30/31, to rejoin the M25, north of J30/31 as shown in the map, making the M25 a complete motorway, and would definitely alleviate the congestion at the current crossing. The tunnels would obviously be much longer, but looking at tunnels in various parts of the world, would not be unattainable, but there would be less land-take and devastation.

**Taken from 2016 Consultation**



	<b>Option C3</b>	<b>Option A14</b>
Cost	£4.1 - £5.7Bn (Southern Links)	NO Official Figure issued
Construction Period	Opening 2025-2027	Opening 2025-2027
Road Length	13.3 Miles	~7.5Miles
Installed Capacity	70% increase	Matches M25
Expected A282 Reduction	14%	40%
Blighted Homes	14 Residential, 22 Traveller Plots & 3 Agric (HE Info)	Minimal
Green Belt use (ha)*	350 to 452	Minimal
Overall Impact on Landscape	Largest Adverse Impact	Least Adverse Impact
Number of SSSI Areas	Scheduled Monument	None
Effected Floodplain	Tilbury Marsh	None
Neg. Impact No. AQM sites	1 (Tilbury)	None
Detour Distance Back to M25	~10Miles	None
2041 Expected Conditions on the A282 (exiting crossing)	90% of capacity - Often Queuing	75% or less very few queues
Greenhouse Gas Impact (60yr Period)	Increase 1,300,000t	693,000t reduction
No. of Accidents (60 Year Period)	Increase 60,000-62,000	Increase 26,000

\*ha = Hectare = 100m<sup>2</sup> or ~ 2.47 Acres

The information provided in this chart has been extracted from the 2016 Highways England Consultation Pack. Found here <https://highwaysengland.citizenspace.com/cip/lower-thames-crossing-consultation>

### Question to National Highways

**Taking the above chart into consideration, how do National Highways justify the comments made to me below, that the correct decision was made in view of the following?**

a. Route 1 could not be developed as a free-flowing 70mph solution, as the crossings and approaches would be restricted to 50mph.

If A14 started at or just north of M25/A2 Junction through to a tunnel under the Thames which emerges around or just north of Junction 30/31 to rejoin the M25, It does not go anywhere near the approaches of the current crossing, so the speed limit would be 70 mph right through?

b. As traffic would still be funnelled through the existing M25/A282 corridor between junction 2 and junction 30, it would not provide resilience on the network.

It does not get funnelled through the existing M25/A282 corridor. Northbound hazardous vehicles would not need to be escorted, meaning the existing tunnels would not have to be

closed every #15 minutes, which is one of the main causes of congestion at the current crossing., It would be higher in construction than the existing tunnel, so tall lorries would not have to be diverted to an appropriate tunnel as is the case now, again necessitating the traffic lights to be used, causing congestion.

c. Despite lower costs than the preferred route, it delivered lower value for money as the economic benefits were substantially smaller.

### Highways England – Route Consultation 2016

**P 4 –Route C3 – proposed LTC -Estimated costs are between £4.3 and £5.9 billion (including allowances for inflation). !!!!! Currently £10bn+++ and rising.**

d. The additional traffic through the existing corridor would exacerbate existing air quality problems and lead to an overall noise disbenefit.

It would not affect the air pollution anywhere along the route, as it would not go through the existing corridor and the air would be cleaned before leaving the tunnels.

**That invalidates all of the reasons stated in the response to me by National Highways and confirms that they should look again at the route options.**

Published - 29 October 2021

<https://www.gov.uk/government/news/the-queen-elizabeth-ii-bridge-at-dartford-celebrates-30-years-of-connecting-essex-and-kent>

“Built at a cost of £120m and officially **opened** by Her Majesty Queen Elizabeth II in **October 1991** it was the first bridge to be built at an entirely new location along the river Thames for more than 50 years. For a short time it was also the longest single span bridge in Europe measuring over 2,872 metres long.

Nicola Bell, National Highways Operations Director (South East), said:

The Queen Elizabeth II bridge together with the whole Dartford Crossing has proved to be a vital link on the M25 and a great investment in the economy, helping nearly 1.5 billion vehicles cross the river Thames over the past 50 years.

It continues to bring huge benefits to the economy and with these benefits comes demand. The government is committed to doing all they can to **ease traffic flow** and **improve journeys for the future.**”

### Question to National Highways

**Well that didn't work, did it? Sound familiar regarding the need for the proposed LTC?**

## **CONCLUSION**

Now, again Highways England/National Highways have been commissioned to alleviate the congestion for traffic and air pollution to nearby residents, at the Dartford Crossing. Absolutely nothing I have heard from them has persuaded or convinced me that the proposed Lower Thames Crossing would rectify anything, it would be just another white elephant at a cost of £10bn+++ of taxpayers money.

In fact from their own traffic modelling (guestimates), all that would happen is that the Dartford Crossing would still be over capacity, and the proposed LTC would create exactly the same situation currently at the Dartford Crossing, but also for residents all along the proposed route by creating a toxic triangle.

The QE2 Bridge was built without wind proofing, no doubt to save money at that time, which is now a definite problem in regard to closure numerous times a year for southbound traffic, in the same way as saving money is the prime consideration that the Tilbury Link Road, Rest and Service Area, (which we were told originally was a legal requirement), were scrapped from the proposed LTC, but both will have to be done at a later date, or it not being considered “economically viable” for cyclists to cross the river.

National Highways are doing all they can to make the current proposal look like better “value for money”/” benefit cost ratio”. If wind proofing had been done on the QE2 Bridge at construction, and it had been made a north and southbound bridge instead of just southbound, then hazardous vehicles would not have had to be escorted through the tunnels, which is a massive reason why there is congestion at the current crossing northbound.

Also, in their wisdom, National Highways built the A2 Junction with no forethought, and is now contributing to being one of the main reasons for the current congestion, as it is much too close to the existing crossing.

## **Question to National Highways**

### **Why is this project even being considered with history like that?**

After taking part in every consultation, attending numerous events, speaking to National Highways staff and not actually being given answers to questions asked, not ever being able to see exactly what the proposed LTC would look like, other than the cloud cuckoo land “Fly through video”, which bears no resemblance to the areas which would be blighted, it didn’t even show the Orsett Windmill in the first attempt, continually being told that we would have to wait for the DCO to find out answers to our questions in more detail, only to now being told to look at thousands and thousands of pages of even more inadequate information, which brings up more questions than answers,

Look at how dangerous so called smart motorways have proved to and continue to be, and the proposed LTC will be a “smart motorway by stealth”, which is a massive worry. The disgraceful state of all SRN roads for which National Highways are responsible, with potholes, dead trees supposedly planted as noise barriers and/or nitrogen deposition, litter, road works that are being undertaken because they didn’t get it right in the first place.

I definitely have no confidence in National Highways and sincerely feel that they are not fit for purpose and should be decommissioned, and an across-the-board transport group should be put in its place to consider all of the possibilities for future road, rail, canal, river, sea, transport decisions.

It has taken me days to wade through all of the information that we have always been told would be in the DCO, when it should have been made available at every stage, it has taken so long to find anything, if at all, to try locate the answers to my questions, but as is obvious by this, has not been very helpful at all.

I do feel so very strongly that the proposed Lower Thames Crossing and National Highways are not fit for purpose. The whole project has been without any adequate/feasible consideration to the fact that there are other suitable alternatives that do not include a new road and that would be much more conducive to residents living healthier lives.

National Highways are obviously just trying to justify their position and jobs.

The proposed Lower Thames Crossing would definitely not solve congestion at the existing Dartford Crossing, but would definitely cause completely irresponsible, unhealthy, unnecessary devastation to the whole area in which it is being proposed to be built, and be a complete and utter waste of £10bn+++ of taxpayers' money.