

Lower Thames Crossing TR010032

Responses to ExQ1 submission

Thames Crossing Action Group

Unique Reference: 20035660

DEADLINE 4 (19th September 2023) / Submitted 19th September

Introduction

1. Thames Crossing Action Group represent those who are opposed to the proposed LTC.
2. Please accept this as our submission in response to the ExAs first written questions [[PD-029](#)].

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Responses to ExQ1

Response to Q3.2.1 - EIA Regulations 2017: Consideration of Reasonable Alternatives

3. Please also see our responses to both Q3.2.1 and Q3.2.2. We hope these responses will highlight why we do not believe that full and adequate consideration has been given in regard to alternatives, and definitely has not adequately taken into account the effects of the development on the environment. There are better and more sustainable alternatives than the proposed LTC.

Response to Q3.2.1 – Consideration of Alternatives: Other Modes/Solutions

4. We do not believe that adequate consideration has been given in regard to alternatives of other modes and solutions.
5. We will try not to duplicate the info we have shared previously by signposting you to the section of our Written Representation [[REP1-425](#)] from paragraph 207, but may make reference to some aspects again here in the interest of an easier read and to try and avoid major need for cross referencing where possible.

In regard to consideration of rail alternatives

6. NH state in the 2013 Strategic alternatives section of ES Chapter 3 [[APP-141](#)] that:

“...the provision of rail freight as part of any new Lower Thames crossing would not address the rail freight capacity issues that are forecast for the area.”

“Passenger flow volumes on a cross-river rail route east of London would be likely to be limited, meaning the inclusion of passenger rail services would be unlikely to represent value for money”

7. And 3.6.3 *“The 2009 DfT study also assessed modal options, considering a rail crossing of the River Thames. It concluded that there was no reasonable business case for the inclusion of rail passenger services as part of any future Lower Thames crossing facility. It further concluded that the provision of rail freight facilities as part of a new crossing in the Lower Thames area would be unlikely to assist in addressing any shortage of freight paths on key rail routes. As a result of this study, provision of rail capacity crossing the Lower Thames was not considered further.”*
8. Our understanding is that NH only ever considered rail alternatives as a crossing for rail in the vicinity of the current crossing. This limits options and viability, due to existing rail, connectivity, and rail in London already being so busy and at or near capacity.

9. However, rail improvements between Ashford and Reading would bypass London, and also serve Gatwick and other areas.



10. This is a rail improvement option that has appeared in official Kent County Council rail strategy reports. It is our understanding that the current estimated cost for these rail improvements is less than £5bn, so half the price of what we believe the proposed LTC would cost, particularly taking into account the current LTC estimate is as at Aug 2020 and so outdated and not a true reflection of current costings.
11. As we have mentioned previously, in this day and age it is shocking that the Port of Dover, for example, is not connected by rail.
12. Considering that 70% of goods in and out of the Port of Dover alone use the Dartford Crossing, and that around 42% of traffic using the current crossing is goods vehicles, we have to question why the Port of Dover is not connected by rail. Surely an option like this should be given due consideration, especially at a time of climate emergency.
13. When you additionally consider on top of that the fact that , as per paragraphs 56 and 57 of our Deadline 3 submission [[REP3-205](#)], the amount of HGVs in the area is much higher than observed on other parts of the SRN, surely adequate consideration needs to be given as to how to get more freight off of

roads and onto more sustainable rail?

14. We have seen no evidence that such an alternative has been adequately considered.

15. Why have alternatives such as rail improvements between Ashford and Reading, and connecting the Port of Dover by rail not been considered as an alternative/solution?

16. Additionally, in regard to cross river passenger rail options. Where is the evidence to say who would or wouldn't use a cross river train service? People who wish to travel from Kent to Essex or vice versa by train currently have to go into London and back out again.

17. Many avoid using rail due to it being expensive, unreliable and not offering the route we need, such as the time it would take to go into London and back out again to make what could be a simple river crossing.

18. In the 2016 Route options section of the same document [APP-141] it also states that:

“Respondents to the 2016 non-statutory consultation raised concerns that there was a lack of consideration for public transport. Following the public consultation, as part of the process of selecting the preferred route, an assessment was undertaken to consider modal alternatives, including rail, ferry, road-based public transport and non-motorised modes. This assessment found that alternative modes would not provide a replacement for a new crossing.”

19. This most definitely shows a public interest in public transport options and alternatives.

20. Since these decisions were made it has been better identified and acknowledged that modal shift to more sustainable travel is needed and should be supported and encouraged.

21. How can people be expected to make a modal shift if there is not option to do so?

22. We also believe it is important to note that various options seem to have only ever been considered in isolation rather than what could be achieved through various solutions equating to a better and more sustainable solution as a whole.
23. Also, that the focus has remained on a new crossing prioritising road, rather than considering other alternatives. We believe this is part of the problem by having Highways England/National Highways, as the focus is on highways, as their name says.
24. In this rail section we would also like to mention tram alternatives, such as Kenex Tram.
25. This tram project is estimated would take around 10% of cars away from the Dartford Crossing, which is not an insignificant amount compared to the proposed LTC.
26. Whilst in its own right as a project Kenex Tram would not solve all the problems associated with the Dartford Crossing, it could be part of a variety of options that implemented together would be better and more sustainable, for a lower cost than the proposed LTC. We do not believe NH have ever given such possibilities adequate, if any, consideration.
27. If for instance you considered the rail option and tram option as a joint solution, the associated benefits would see a reduction in traffic on roads, and not just in the project area, but much further afield as the freight could travel on rail right through closer to destinations in The Midlands and beyond, thus improving traffic flow on a far greater number of routes than the proposed LTC.
28. With the rail improvements bypassing London it could also help ease congestion within London, where rail is already struggling, and improve passenger rail on an alternative route bypassing London, and covering again a far wider area with benefits from the scheme.
29. The suggested Ashford to Reading rail improvements pass through Gatwick too, so could also bring more sustainable connectivity to another international port for both freight and passengers.

30. Ultimately, rail/tram options would be better, cheaper, and benefit far more, as well as the economy, and of course be far more sustainable than what is being proposed with the LTC.
31. Instead the proposed LTC would not solve the problems at the Dartford Crossing, would add to congestion, pollution and chaos (especially when there are incidents at either crossing), would be hugely destructive and harmful, would not be viable for public transport, and offers no provision for cross river active travel, so no support or encouragement of modal shift, at a time of climate emergency.

Other solutions

32. There are a number of things that contribute to the issues at the Dartford Crossing, and we question whether adequate consideration has been given to them, particularly during re-assessment of whether the proposed LTC is the best solution, and whether all options have been adequately considered.
33. A downfall of the QE2 bridge at the Dartford Crossing is the fact that due to a decision over cost, wind proofing barriers were never built into the bridge. This means that since it opened in 1991 there have been many occasions that the bridge has been closed due to high winds.
34. When closures of the bridge occur, either due to high winds or other incidents, one of the two Dartford Tunnels is closed and traffic is diverted through the tunnel instead. This of course results in severe congestion and issues.
35. We question whether any up to date assessment has been done on retrofitting wind barriers now that there have been developments in potentially lighter weight wind proofing options?
36. Whilst we acknowledge that this alone would not solve all the problems, as we have previously stated we do not see that the solution should have to be considered in isolation and that multiple options could provide a better and more sustainable over all solution.

37. Another considerable issue at the current crossing, particular travelling south to north is the fact that the lights are turned red every 15-20 minutes to allow hazardous vehicles to be accompanied through the tunnel.
38. NH are very quick to declare how many Electric Vehicles (EVs) would be on the road in the future. If we for one moment go with their predictions and overlook the serious issue of deadly PM2.5.
39. If there were a serious reduction in the amount of fossil fuel vehicles on the roads, then it would follow that the amount of fuel tankers on the road would also drop. Considering a large percentage of the hazardous vehicles using the Dartford Crossing and forcing the lights red every 15-20 minutes are likely fuel tankers, we question whether a change to non-fossil fuel vehicles would also improve traffic flow at the Dartford Crossing through the associated drop in fuel tankers, and therefore there be a much greatly reduced need to turn the lights red for escorts.
40. Again, we are not aware that this aspect has been thought of let alone considered adequately.
41. 3.7.7 g. *“Option A, if constructed as a bridge or immersed tunnel, would impact on the potential development of some commercial sites adjacent to the existing crossing, but these impacts might be avoided to some extent by constructing a bored tunnel instead.”*
42. Whilst this refers to a particular location/route, which we will comment on further in Q.3.2.2, we do also feel it relevant to this question.
43. After all, who is to say that impacting potential development should always be considered a negative?
44. Generally new development creates new traffic, and new traffic adds to congestion on the roads.
45. As has been touched on in hearings, when Dartford Borough Council were asked what consideration has been given to the impact development would have in regard to traffic flow/congestion, in regard to development, which they felt was a benefit of LTC.

46. We would argue that giving more consideration and potentially limiting development is actually another alternative to improving traffic flow.
47. Moving on from that aspect, we would also suggest that promoting more localised production reduces miles travelled and again is another potential solution to improving congestion and traffic flow.
48. Even looking just at the impacts of the proposed LTC on food security it clearly shows that the loss and impacts to agricultural land would result in the need for greater food miles travelled. With food security being such an issue, it could not only result in increased miles travelled within the country but internationally, and also impact health and wellbeing through lack of adequate and sustainable food supplies in our country.
49. Things have changed drastically since options were considered, and we do not believe there has been evidence provided to show that things have been properly assessed since. Net Zero, climate change, need for modal shift, supposed government support of public transport and active travel. Need for air quality improvement. Acknowledgement of benefits of nature on health and wellbeing. Food security. Need to improve biodiversity, the UK one of most nature depleted in world.
50. Not only do we believe that there has not been adequate consideration and consultation on alternatives, but we also believe that there are better and more sustainable alternatives that would be better value for money, and more fit for purpose than the proposed LTC.

Response to Q3.2.2 – Consideration of Alternatives: Other Routes

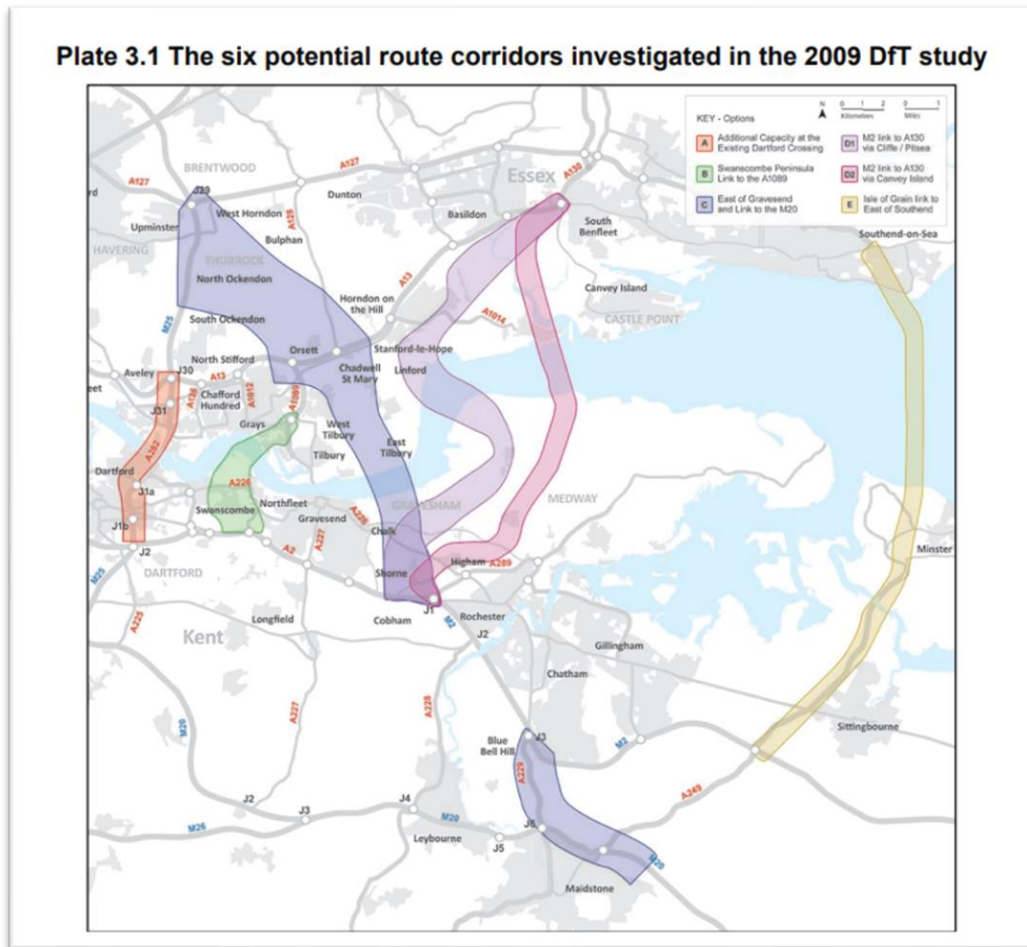
51. We do not believe that adequate consideration has been given in regard to alternatives routes/locations.

52. We will try not to duplicate the info we have shared previously by signposting you to the section of our Written Representation [[REP1-425](#)] from paragraph 207, but may make reference to some aspects again here in the interest of an easier read and to try and avoid major need for cross referencing where possible.

2009

53. From ES Chapter 3 [[APP-141](#)]

54. 3.7.2 “The crossing locations included a link between the M2 and M20 at Blue Bell Hill, which was considered as a variation of Location C with the potential to enhance benefits from the Project. This was therefore referred to as Location C variant but is shown as part of route corridor C in Plate 3.1.”



55. Notice how at this stage Option C includes a link to the M20 via Blue Bell Hill (A229), shown in blue on the map above. This was known as the C variant.

56. This link was not deemed by National Highways to be necessary for the LTC project and was ruled out, along with many other options. The reason given for not progressing C Variant was because it was not deemed essential for a new crossing and due to the cost both financially and to the environment. However, Kent County Council are now progressing Blue Bell Hill improvements, in part as a direct result of the proposed LTC.

57. In addition, 7.7 Combined Modelling and Appraisal Report – Appendix D [APP-526].

58. Paragraph 3.4.4 states:

“A detailed option identification and route selection process was then carried out by the Highways Agency (as it then was) at the two crossing locations taken forward. Several route options were considered at location A and location C. **A potential**

modification was considered to location C, which included changes to the roads connecting the M20 and M2, known as C variant.”

59. And paragraph 3.4.5 of the same document states:

“Four route options were short-listed for consideration as part of this process: one at location A (route 1) and three at location C. The three route options at location C were identified as routes 2, 3 and 4 north of the Thames, and western southern/eastern southern links south of the Thames. The assessment also considered different options for crossing the river. **Assessment of the C variant options determined that they did not help to transfer traffic from the Dartford Crossing on to the new route at location C. It also had substantial impacts on the Kent Downs Area of Outstanding Natural Beauty (AONB). As a result, the C variant options were not considered further.”**

60. We consider the removal of C Variant to be a false economy, as it has been made clear by many that improvements at Blue Bell Hill/A229 would be essential for traffic to travel from the M20 to the M2/A2 to reach the LTC, if it goes ahead. Considering that the proposed LTC is to provide an alternative route for the ports in the South East through to the Midlands and beyond, it is quite apparent that this is definitely an integral part of journeys that would be made.

61. This shows that adequate consideration has not been given in the route choice selection, and that any reassessment has clearly not been adequate in this regard.

2013

62. In December 2013 an LTC Consultation Response Summary¹ was released. In that Summary there are some very interesting points to bear in mind.

63. Most interesting to us is the fact that on Page 31 it clearly states in point 9.3

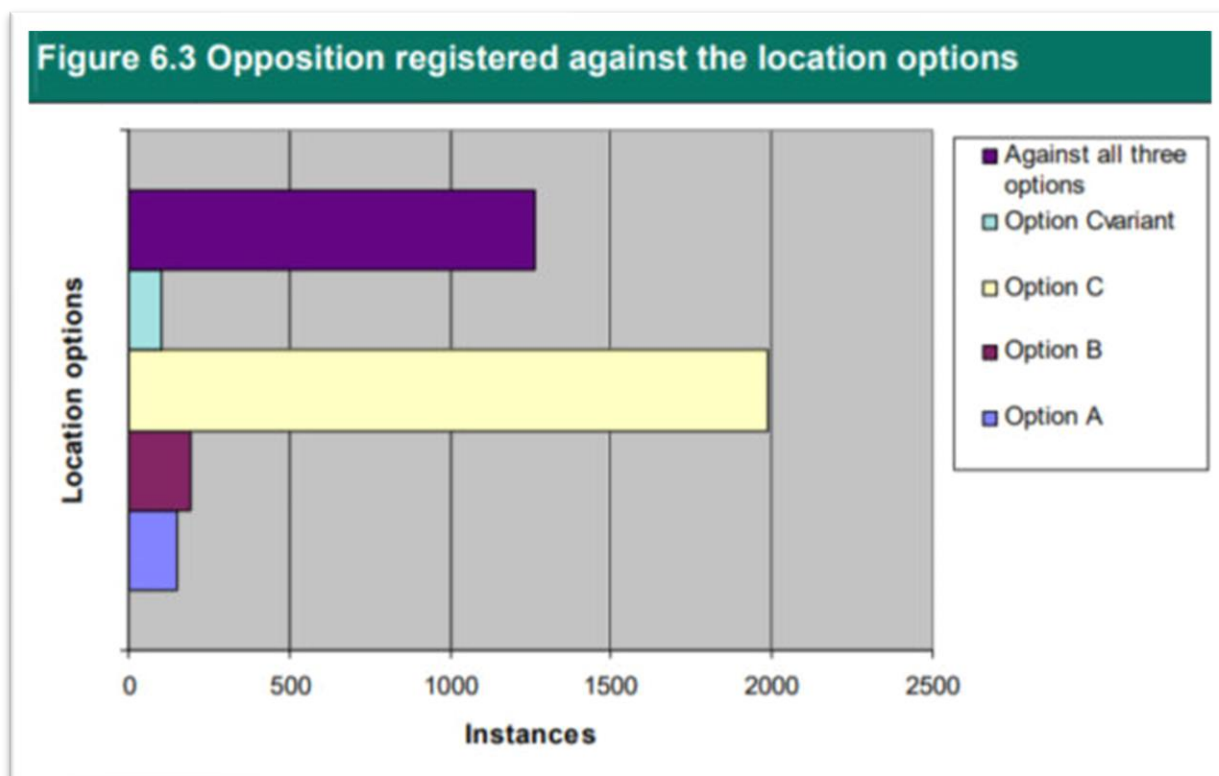
1

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/321116/consultation-response-summary.pdf

“Again, we received a mixed reaction regarding the location options, with 20% of all respondents expressing a preference for a new crossing at location Option A, 5% preferring Option B, 17% preferring either Option C or C variant, and 26% expressing a preference for another location. Option A was preferred by most individual respondents and Options C and C variant were most popular with those responding on behalf of organisations.”

64. Remember, location Option A covered many variants around a similar location to the current Dartford Crossing, location Option C had many variants all in a similar location to what is now the proposed LTC then known as Option C3. They clearly state that *“Option A was preferred by most individual respondents and Options C and C variant were most popular with those responding on behalf of organisations”*(most likely businesses).

65. So, this tells us that as far back as 2013 the most favoured location option overall was the residents choice of location Option A, and one of the least favoured was location Option C.



Fast forward to the consultation in 2016

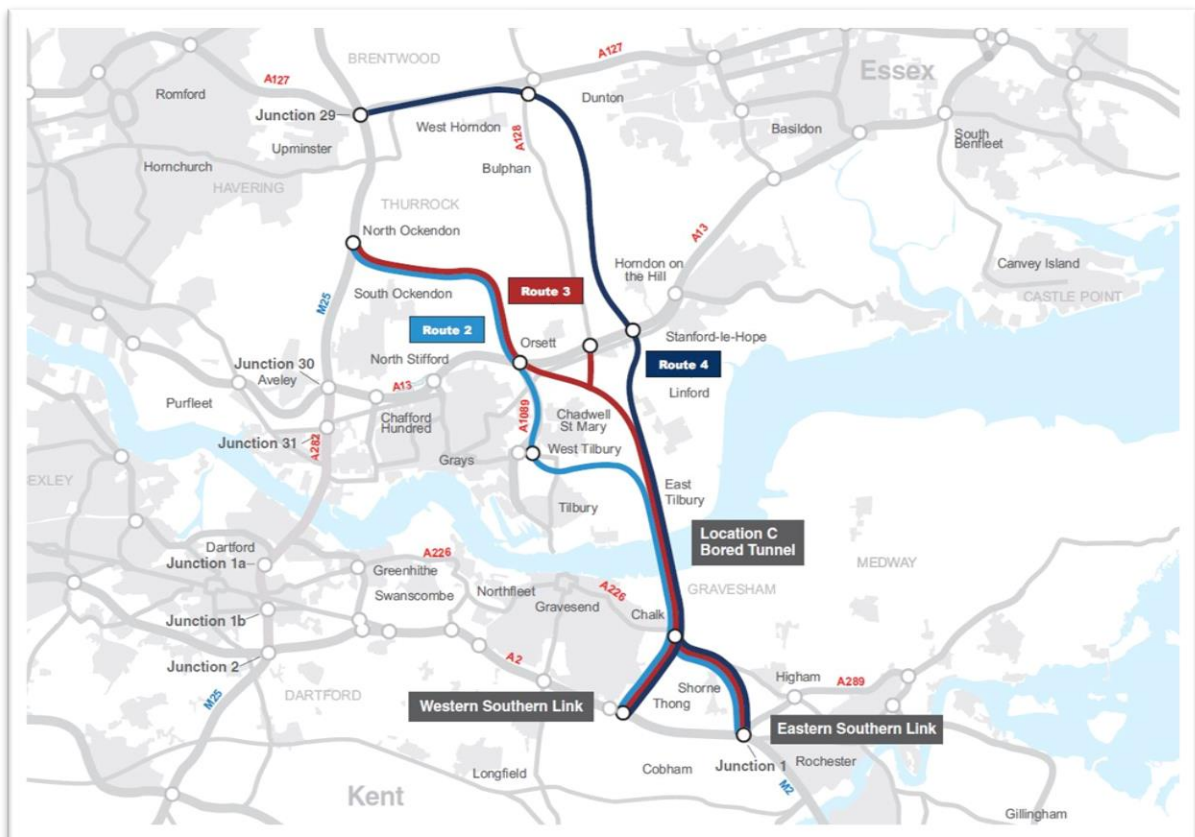
66. Remember the results of the 2013 clearly show that the most preferred location was Option A, and one of the least favoured was location Option C.

67. What did National Highways (or Highways England as they were known then) ask us next? Would we prefer route option C2, C3, or C4! You really couldn't make it up.

68. We always say it's like someone telling you that they don't like cheese, and then you asking them if they would like a Cheese & Tomato, Cheese & Onion, or Cheese & Pickle sandwich. They don't want Cheese!

69. Not only that, they presented this consultation in a completely biased way in favour of these route C options and hid away info and options to truly be able to respond on anything other than one of the Option C routes, unless you dug deep enough and did enough of your own research to be able to comment on a different route option.

70. This is very apparent on the 2016 consultation website², which is where the image and quote below is taken from:



“Following a series of studies and a public consultation in 2013, the Government commissioned Highways England, the operator of the country’s motorways and

² <https://highwaysengland.citizenspace.com/ltc/lower-thames-crossing-consultation/>

major roads, to consider options at two locations. These are shown on the map overleaf, at the site of the current crossing, known as Location A, or a new crossing location further east, known as Location C.

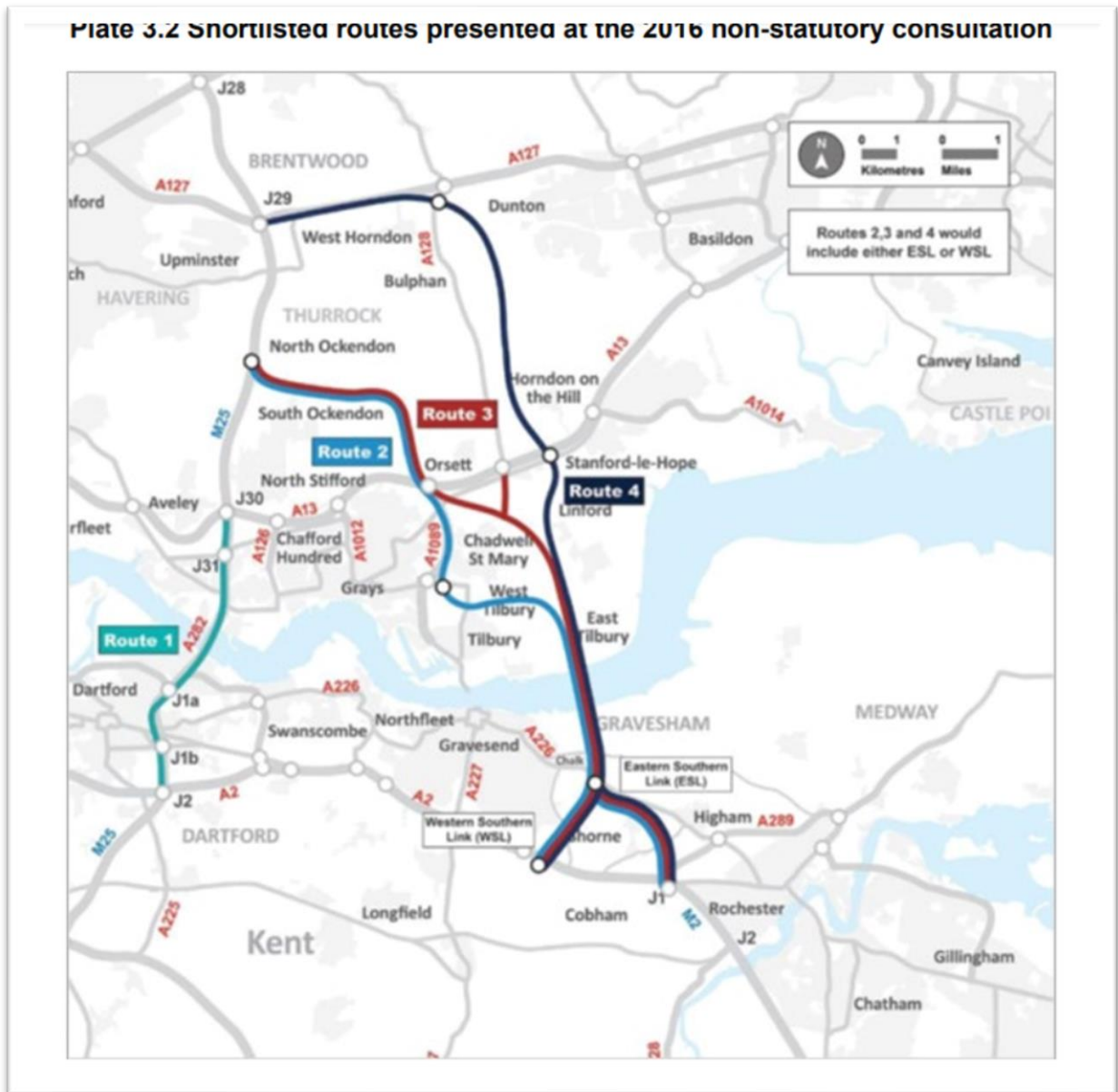
At both locations we have developed engineering solutions and assessed them in terms of their economic, traffic, environmental and community impacts. The assessment has also taken into account the significant growth and development plans for the region. At Location C, three potential route options have been identified north of the river in Essex and two south of the river in Kent.”

71. In ES Chapter 3 [\[APP-141\]](#) NH detail the following under the 2016 Route options section:

“Following an assessment of long-listed route options at locations A and C against the Scheme Objectives, consultations reviewed a shortlist of options considered to be viable:

- *Route 1 and Location A (with either bridge or bored tunnel river crossing)*
- *Routes 2, 3 and 4 at Location C (with either bridge, bored tunnel or immersed tube river crossing)*

These route options are shown in Plate 3.2 in Section 3.8 of this chapter.”



72. We draw attention to the fact that the map they present includes Route 1, yet please note the image we shared above it taken from the 2016 consultation that does not include Route 1.

73. Please also note similarly that the 2016 consultation questionnaire also featured a map on the front that didn't include Route 1, as can be seen in the capture below (and in the additionally submitted 2016 LTC Consultation Questionnaire document)

highways
england

2 HE failure to consult
Received too late in the consultation period to distribute

Lower Thames Crossing
Consultation questionnaire

Highways England is consulting on proposals for a Lower Thames Crossing – a new road crossing of the River Thames connecting Kent and Essex.

A new crossing is needed to reduce congestion at the existing Dartford crossing and to provide free-flowing north-south capacity. Unlocking economic growth and supporting the development of new homes and jobs in the region is also a priority.

Following a series of studies and a public consultation in 2013, the Government commissioned Highways England to carry out a more detailed assessment of two location options. These are shown on the map, at the site of the current crossing, known as Location A, or a new crossing further east, known as Location C.

We have completed our assessment and are seeking your views on our proposals. Route options are shown on the map to the right.

74. This can be seen highlighted within the circle marked 1. Additionally, we note that Highways England (as they were known then) did not send enough consultation booklets to the borough, and Thurrock council made multiple formal complaints during the consultation and requested more booklets. Most arrived after the consultation finished.

75. HE (as they were then known) began the consultation informing residents and council that Location A was not on the table or being taken forward, causing a huge amount of confusion. At the consultation events held across the borough and with local businesses, HE only had large scale maps of the routes at Location C, none at Location A. Again, showing the bias towards Location C and manipulating the process to get people to favour this route.

76. In addition, it took Andrew Jones MP, the Parliamentary Under-Secretary (Department for Transport) to confirm that Location A was still being consulted on, halfway through the consultation. He said, "I can confirm that Option A is included within the consultation and remains an option for consideration."

77. Highways England's Consultation Toolkit stated: "Location A will not be taken forward and therefore this option is not included in the public consultation."

78.6 13 In the HE Consultation Publicity Toolkit, which was issued to all Highways England staff and agency personnel involved with advising the public at the Consultation Publicity Events, it included the following in the FAQ section:

Q2: Why are you not consulting on a route option at Location A?

A: In summary, Highways England's assessment has shown that a crossing at location A would not solve the traffic problems at Dartford and would do little for the economy. Location C, by contrast, provides double the wide economic benefits of Option A, and provides a clear alternative route to the Dartford Crossing, reducing congestion there and improving the resilience of the road network as a whole. In light of these findings Highways England have concluded that a route option at Location A will not be taken forward and therefore this option is not included in the public consultation.

79. The Government later confirmed that Location A at Dartford was in fact included in the consultation. However, this was several weeks into the consultation period, and this important change of tack was not conveyed to the 1.2 million individuals and organisations who had been invited to respond to the consultation. In any event, it was too late for those individuals who had already responded. It also does not change the fact that there were no questions about Location A.

80. In addition, whilst in [APP-141] Plate 3.2 in Section 3.8 states that Route 1 was presented in the 2016 consultation, appearing to suggest it was consulted upon, Paragraph 3.4.6 in 7.7 Combined Modelling and Appraisal Report – Appendix D [[APP-526](#)] states: "A non-statutory public consultation on route options was held in 2016 (Highways England, 2016). **It explained that location A (route 1) had been assessed as not meeting the Scheme Objectives** and therefore proposed a crossing at location C. Of the three potential route options at location C, the consultation included a proposed configuration involving route 3, the eastern southern link and a bored tunnel crossing of the River Thames."

81. In view of this irreconcilable conflict of important information, and the clearly incorrect guidance given to consultees by HE, we consider that the consultation was fundamentally flawed.

82. We did comment on all this and more in our Inadequacies of Consultation submission, which we are also submitting at Deadline 4, as we have been unable to locate it in the Examination Library, despite submitting it previously at the start of the DCO process.

Preferred Route Announcement

83. Prior to the preferred route announcement, the Port of Tilbury had publicly voiced that their support of Option C3 was subject to it including a junction/connection for the port³.

84. Maps started being published of Option C3 showing what is known as the Tilbury Link Road. National Highways then went on to remove this junction/connection.

85. However, Tilbury Link Rd has featured as a Road Investment Strategy (RIS3) pipeline project, meaning it is being considered to be progressed as a separate stand-alone project in its own right.

86. Again, we consider this to be a false economy, and also highlight that the Tilbury Link Road is by name a link road because it would link to the proposed LTC, if both go ahead. At the end of the day the Tilbury Link Road cannot go ahead without the LTC, as what would it link to?!

87. This shows that the route and design choice has not been adequately considered, and that reassessment has not been adequate yet again.

88. Ultimately the route selection stage led to the then Secretary of State for Transport, Chris Grayling MP, announcing the preferred route, a tunnel under the River Thames east of Gravesend and Tilbury (Location C, route three with the western southern link), which became known as Option C3, and then of course as the proposed LTC.

89. The image below taken from ES Chapter 3 [APP-141] shows the preferred route announced in April 2017.

³ <https://www.forthports.co.uk/wp-content/uploads/2018/03/3661.pdf>

Plate 3.3 The preferred route announced in April 2017



90. We have to question whether the same decision would be made now in light of how much has changed both in regard to the proposed route, and what the world looks like now.

91. We do not feel that there has been adequate consideration or consultation, and definitely do not believe that an adequate reassessment on the route selection has been carried out. We believe that if the decision was made again now, knowing what we now know and with the project as it is being proposed, the LTC would not have been chosen.

Additionally

92. NH state in the 2013 Strategic alternative section of the ES Chapter 3 [[APP-141](#)]:

“Location B removed from further consideration due to limited public support, the potential impact on local development plans and limited transport benefits”

“Locations A and C taken forward for further work with no preference yet identified.”

93. Moving on in ES Chapter 3 [APP-141]

94. 3.7.7 b. *“Options B and C require provision of new roads to link a new Thames structure to the strategic road network. The environmental risks would all be substantially greater for these options than for a new structure provided at Option A.”*

95. This highlights that Option A would have less impact, so more positive and beneficial than Option C.

96. 3.7.7 d. *“Environmental constraints of particular note for Option C include ancient woodland in Shorne and Ashenbank woods which are near the location proposed for a junction providing access to the M2/A2; the Thames Estuary and Marshes Ramsar site where proposed development would be subject to a test of over-riding public interest; and landscape and visual impacts on the Kent Downs AONB”*

97. 3.7.7. h. *“Option C would traverse land largely designated as Green Belt, which is a designation that generally constrains development, so it is less likely that a route at Option C would conflict with planned development.”*

98. We do not believe that options at Location A would destroy and impact greenbelt as much as Option C which is predominantly routed through the greenbelt.

99. 3.7.7 e. *“Options B and C would be expected to improve air quality in Thurrock and Dartford Air Quality Management Areas (AQMAS) but could impact on*

other AQMAs due to the expected increase in traffic passing adjacent to these areas if Options B or C were built. Option B could have an adverse impact on AQMAs declared for the A226 leading to the river crossing and at the Bean Interchange between the A2 and A296 by Dartford Borough Council. Option C could have an adverse impact on an AQMA declared for the A2 leading to the river crossing by Gravesham Borough Council, and for the whole of London Borough of Havering.”

100. Location A including Option A14, a long tunnel from around junction 2 on the M25 through to between junctions 30 and 29. As a long tunnel this could filter air pollution thus improving air quality considerably. The proposed LTC doesn't even bother to filter air pollution in the tunnels.
101. 3.7.7 f. *“The noise assessments indicated that while Option A could have slight impacts in terms of noise through traffic changes on the existing transport links, Options B and C would both establish new network links and thus be expected to increase exposure to properties and people that would otherwise be relatively unaffected by noise.”*
102. Again, Location A14 or variant could reduce noise pollution in the long tunnel, whereas Option C would increase exposure to noise pollution.
103. 3.7.7 g. *“Option A, if constructed as a bridge or immersed tunnel, would impact on the potential development of some commercial sites adjacent to the existing crossing, but these impacts might be avoided to some extent by constructing a bored tunnel instead.”*
104. As mentioned in our response to Q3.2.1 of ExA1 - Should potentially reducing development and growth in an area that is already suffering from congestion be considered an adverse impact? We would argue that this is actually another alternative to improving traffic flow.
105. 3.7.7 j.” All of the options would deliver economic benefits due to congestion relief for users as a whole and improvements to the transport connections used by businesses, which would be expected to result in benefits to the national economy. Within the economic performance, **Option A is likely to deliver greater congestion relief at the existing crossing, although additional capacity at this location is likely to worsen capacity issues at other**

points on the surrounding parts of the strategic road network. If new capacity is provided by Options B and C, it is likely that the existing crossing will remain close to capacity, and although delays would be reduced, incidents could still lead to long delays as they do at present.”

106. This highlights that Option A would be better at solving the problems at the Dartford Crossing. Why is it considered ok to state that additional capacity at Location A is likely to worsen capacity issues at other points on the surrounding parts of the SRN, yet the same issue and concern is ignored when it comes to Location C, including the proposed LTC? Clearly many have voiced concerns over the LTC's impact to the existing road network, if it goes ahead. It seems to us that NH manipulate and present info to suit their own wants and needs.
107. Again, everything appears to have been considered in isolation, with a predominant focus on roads alone, with no genuine consideration or provision for multi modal options, or support/encouragement for modal shift.
108. Aspects such as the removal of C Variant and the Tilbury Link Road which we consider to be a false economy, is not just a financial false economy, but also in regard to environmental impacts. If these aspects were included in the LTC project, rather than being progressed as separate stand-alone projects the LTC cost would rise, the BCR would drop even further, and environmental impacts would be even worse, which is saying something considering how destructive and harmful the proposed LTC is.
109. We do not believe that proper and adequate consultation and consideration has taken place in regard to route/location options. Nor do we believe that environmental impacts and other aspects been properly considered and reassessed against what has been progressed to DCO stage, ie the proposed LTC. We believe that the project has been presented in an inadequate and misleading way since early on, leading to a flawed project being progressed and now being presented for DCO examination.
110. We believe evidence shows that there are better and more sustainable options that have not been adequately considered.

Response to Q4.1.1 – Modelled Traffic Effects: Dartford Crossing

111. A.2.7 in Annex A of 9.10 Post-event submissions, including written submission of oral comments, for ISH1 [REP1-183] which states that the proposed LTC would bring the Dartford Crossing traffic back to 2016 levels. *(Captured and pasted below for ease of reference)*

A.2.7 There are two aspects to the impact of the Project on trips using the Dartford Crossing:

- a. First, for a considerable time into the future, the forecast journey times for longer distance trips using the Dartford Crossing, going from junction 2 to 29, are similar to the to 2016 journey times, and are significantly lower than the forecast journey times would be were the Project not provided (the Do Minimum scenario). There are few other, if any, busy sections of the Strategic Road Network that would see similar journey time improvements in 2045 when measured against 2016.
- b. Second, more local trips are able to use the Dartford Crossing to make short distance trips across the river, using the capacity released as some longer distance traffic from Kent uses the Project. This is a benefit for local residents who wish to travel to the other side of the river, for example to take advantage of a job opportunity.

112. We draw attention to paragraph 1.15 of Chapter 1 – Executive Summary – Dartford River Crossing Study⁴ into capacity requirements published by the DfT in April 2009, which states ‘The Dartford Crossing experiences high levels of flow and congestion on a daily basis, with typical traffic flows in the order of 145,000 to 150,000 vehicles per day.’

113. This clearly confirms that in 2009 the Dartford Crossing was 10-15 thousand vehicles per day over the design capacity of 135,000 vehicles per day.

114. We then draw attention to paragraph 2.2.6 of the Summary Business Case from the 2016 Highways England LTC Public Consultation⁵ which states, ‘At present the crossing handles an average daily traffic flow of about 141,000

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https://webarchive.nationalarchives.gov.uk/ukgwa/20100513192540mp_/http://www.dft.gov.uk/about/strategy/capacityrequirements/dartfordrivercrossing/chap1execsummary.pdf

⁵ https://highwaysengland.citizenspace.com/ltc/lower-thames-crossing-consultation/user_uploads/lower-thames-crossing-consultation-summary-business-case.pdf

vehicles (2014) which is greater than the design capacity of 135,000 vehicles’.

115. As a final reference on this, we draw your attention to paragraph 3.1.1 of the Case for the Project⁶ from the 2018 Statutory Consultation, which states, ‘Even though it was designed for 135,000 vehicles per day, it carried over 180,000 vehicles on some days in the year to September 2017.’
116. The above clearly shows that as early as 2009 reports were showing the Dartford Crossing was considerably over design capacity, and that things were even worse by 2016.
117. If National Highways are stating that the proposed LTC would bring the Dartford Crossing back to 2016 figures, it is admitting that the Dartford Crossing would still be over design capacity.
118. It is our understanding that design capacity is an estimate of when a road/crossing will be free flowing. This therefore means that the Dartford Crossing would not be free flowing, if the proposed LTC goes ahead, and thus fails on the first scheme objective.

Response to Q4.3.5 – Diversion Routes

119. NH have consistently told us over the years that it is not within industry standards and guidelines for them to plan for how traffic would migrate between the two crossings when there are incidents.

120. Since evidence shows that the Dartford Crossing would still be over design capacity, and that congestion has a large part to play in the high number of incidents, it is highly likely that the number of incidents would remain high.

121. Paragraph 7.9.3 of 7.9 Transport Assessment [[APP-529](#)] states:

7.9.3 While the Dartford Crossing infrastructure remains available for many years of future service, National Highways has in the past, had to implement longer-term closures of critical infrastructure on the SRN. By providing an additional crossing of the River Thames, the Project would improve the resilience of the road network in the event of a longer-term closure of part of the Dartford Crossing or approach roads. In addition, the provision of an alternative crossing of the River Thames would provide increased flexibility for undertaking maintenance works while continuing to maintain connectivity across the SRN. This would result in shorter and less complex diversion routes for certain closures, particularly for larger vehicles.

122. As the Dartford Crossing is known to be a piece of infrastructure that is and will continue to need maintenance due to its age, and as NH admit they propose to use the LTC as a diversion route, why are they not giving more consideration to how that traffic would migrate?

123. The Dartford Tunnels are the oldest part of the Dartford Crossing, and if the LTC is used as a diversion/alternative route when they are closed traffic would come off the M25 onto the A2 coastbound, where there would be just one single lane from the A2 onto the LTC. This is not an adequate connection, and would not offer reliable resilience on the road network.

Response to Q4.3.6 – Dangerous Goods Vehicles at Dartford

124. The traffic lights at the Dartford Tunnels are turned red around every 15-20 minutes to escort hazardous vehicles. If you put traffic lights anywhere else on the strategic road network and turned them red so frequently there would be similar congestion issues.

125. We believe a large percentage of hazardous vehicles are fuel tankers. What consideration has been given to the fact that with fossil fuel vehicles being phased out, the need for fuel tankers would also be phased out as demand drops?

126. With NH stating that this move away from fossil fuel vehicles will happen quickly enough when it suits their needs re pollution levels during operation of the LTC, if it goes ahead, what assessment has been included into traffic modelling in regard to the reduction in needing to stop the traffic at the Dartford Tunnels so often?

(We note that as we have stated previously ‘zero emissions vehicles’ still emit deadly PM2.5 from brake, tyre and road wear, so pollution levels are still a concern with growing levels of traffic.)

127. With regard to provision for hazardous vehicles still using the Dartford Crossing, we highlight that there are a number of fuel storage and refineries in the Dartford Crossing area, certainly to the north of the river. If hazardous vehicles from this area were required or encouraged to use the LTC instead of the Dartford Crossing, there would not be adequate connections to the LTC, as there is no direct access to the LTC from the A13 eastbound. Such traffic would have to take the Stanford Detour.

Response to Q5.1.3 - Methodology: Open Spaces for Human Users

128. We would also suggest and request that any assessment of such public amenity areas should include the impacts to human receptors using the proposed new 'parks' to fully assess the impacts.
129. Additionally, we would highlight that whilst some areas that are used as public amenity areas would be closed during construction, if the proposed LTC goes ahead, leaving people to find alternatives. We question what assessment has been done, if any, in regard to the impacts this has? For example, some may spend time in an area for leisure that they would no longer be able to during construction, which could expose them to increased adverse impacts.

Response to Q10.6.2 - Operational Surface Water Drainage Pollution Risk Assessment

130. We note that this question mentions that:

Paragraph 4.4.3 states “The results confirm that following treatment, with one exception, cumulative discharges do not result in pollution of the receiving water environment” and describes the location and issue in paragraph 4.4.4.

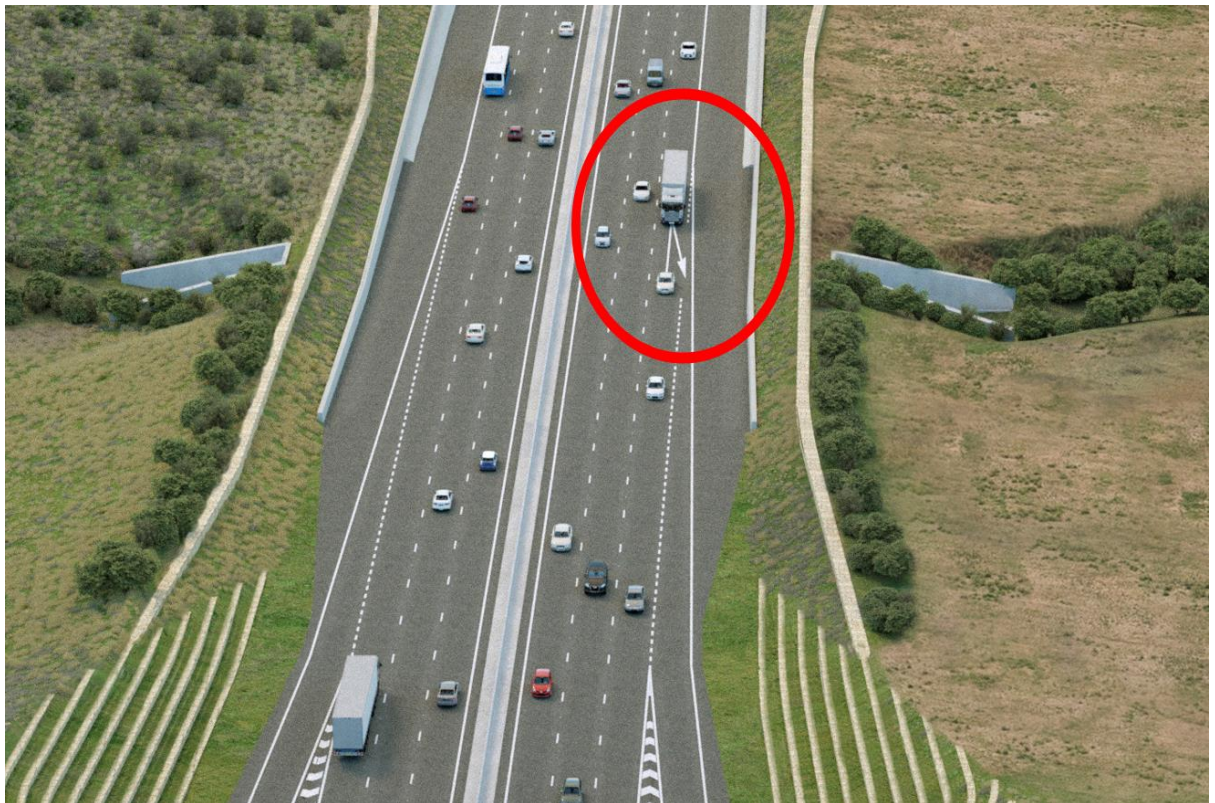
131. We ask if we are really supposed to believe that there would be no PM2.5 pollution to watercourses if the proposed LTC goes ahead?

Response to Q10.6.5 – Mammal Ledges

132. Whilst we acknowledge that these questions relate to mammal ledges in regard to culverts, we would like to take this opportunity to make comment on another aspect in regard to the culverts that may also be relevant to wildlife commuting or foraging routes, as well as potential anti-social behaviour/risks.

133. As you can see, this culvert near the northern portal runs underneath the proposed LTC.

(Please excuse the red circle in this instance, this screen capture was used in our consultation response to highlight the fact that the image shows a lane arrow directing traffic off the LTC onto the Operations and Emergency Access, which is not supposed to be open to the public)



134. We have previously asked NH about this culvert, since the opening to the east of the LTC is within the Tilbury Fields boundary, and the other end is within the security fenced area for operations and emergencies. As the area to the west would be security fenced in, we asked what was to stop access via

the culvert. We asked if there would be any kind of grate to stop access and were told 'no'.

135. You can see the security fencing marked on Sheet 20 of 2.5 General Arrangement Plans (Volume B) (Sheets 1 to 20) [[APP-016](#)]. A zoomed in capture of said map below



136. Whilst we are all for ensuring passages for wildlife, it does lead to questions on the aspect of security and risks, including antisocial behaviour etc.
137. What is to stop antisocial behaviour?
138. What is to stop access to the Operations and Emergency access via the culvert?

139. What is to stop security threats to the LTC and tunnels, as well as traffic using the LTC?

140. If these aspects are addressed in any way, what potential impact would that have on culvert access for wildlife whether there are ledges or not?

141. As an aside, since mentioned briefly above, we also question what would be done to stop general traffic on the LTC accessing the Operations and Emergency Access/junction?