



CPRE Essex  
RCCE House,  
Threshelfords Park  
Inworth Road, Feering  
Colchester, CO5 9SE  
Tel: 01376 572023  
Email: [office@cpre-essex.org.uk](mailto:office@cpre-essex.org.uk)  
Website: [cpre-essex.org.uk](http://cpre-essex.org.uk)

## **CPRE Essex response to HE Lower Thames Crossing Statutory Consultation**

Preamble: CPRE Essex is an independent charity which works alongside the 43 other independent county branches of CPRE as well as the national CPRE organisation. As an Essex-based organisation our comments focus on the northern portals of the crossing, the network connections north of the crossing, and the impacts on the wider roads network linking the proposed tunnel to the M25 to the north of the Dartford Crossing. However, our comments are in part informed by national CPRE's research and we support and endorse all the comments on this consultation made by our colleagues in CPRE Kent.

We have also seen, and fully endorse and support, the very comprehensive consultation response on detailed junction layouts for NMUs submitted by the Dartford & Gravesham Cycle Forum. In addition we note that at their full council meeting of Thurrock District Council held on 12 December 2018 there was a unanimous vote to oppose this proposal.

### **Q1 CPRE Essex strongly disagrees that there is a need for the Lower Thames Crossing**

The congestion, delays and air pollution currently suffered at the existing Dartford crossings are well known and urgent action must be taken to address them. However, we emphatically do not agree that a new LTC beneath the Thames linking Tilbury and Gravesend or in any other location is the appropriate solution.

HE's own projections for traffic growth suggest that if the LTC is opened in 2026 as suggested, the amount of traffic using the existing Dartford crossings will be scarcely lower than the levels experienced today. HE's own projections for traffic growth suggest that if the LTC is opened in 2026 as suggested, the amount of traffic using the existing Dartford crossings will be scarcely lower than the levels experienced today. Meanwhile, entirely new detrimental effects of traffic growth, built infrastructure, noise and air and light pollution will be suffered by communities, habitats, designated landscapes and ancient woodlands along and around the new route.

What is needed is a national transport strategy that does not foster and indeed encourage the ceaseless growth of road-based traffic but focuses on genuinely resilient and sustainable policies for the movement of people and goods.

These proposals for this project appear to represent the outcome of planning for a 'business as usual' scenario that flies in the face of government commitment to both climate change and air-quality obligations. They will also increase national reliance on the English Channel crossings, which are already under stress; the current level of contingency planning for a 'no-

deal Brexit’ and the potential delays caused by Customs checks demonstrate the fragility of the UK’s over-reliance on these ports of entry and exit.

With regard to need, it is of particular concern to us that during the evolution of this project its objectives have shifted. The Lower Thames Crossing has evolved from the 2009 proposals featuring the alternative location Options A, A14, B and C – all of which were evaluated for their benefits in reducing congestion at the Dartford crossings – to the current proposals, which are focused on ‘unlocking potential’ and promoting growth.

With regard to need, it is of particular concern to CPRE Essex and CPRE Kent that during the evolution of this project its objectives have shifted. The Lower Thames Crossing has evolved from the 2009 proposals featuring the alternative location Options A, A14; B and C – all of which were evaluated for their benefits in reducing congestion at the Dartford Crossings – to these 2018 proposals which are focused on ‘unlocking potential’ and promoting growth. We do, of course, support a stable and growing economy, but not at the expense of the social and environmental damage on such an unprecedented scale, and in a part of the UK that is already over-stressed.

We are therefore particularly concerned that the only questions under consideration in this consultation, and in HE’s previous consultations, on a new LTC have been ‘where/how should a new road crossing be built?’ rather than ‘whether’ a new road crossing ought to be built. We consider it perverse that the only mode of transport considered for this crossing has been road-vehicle based<sup>1</sup>; this is even more perverse in the light of the recent UN IPCC report (‘Special Report 1.5°C’)<sup>2</sup> which highlighted the urgent and dramatic actions that will be needed internationally to prevent global temperatures – already 1° above the pre-industrial range – from rising above 1.5°C, beyond which the level of climate change impacts are agreed to be catastrophic. These concerns have been further endorsed by the agreements reached at the end of the Climate Summit on December 15 2018.

In 2017 CPRE published a meta-analysis of Post-Opening Project Evaluation (POPE) studies from over 80 official evaluations of road schemes carried out over the past two decades to establish whether they delivered the outcomes promised before their construction<sup>3</sup>. Specifically, the POPEs were analysed to examine if road building:

- Delivered the promised congestion relief;
- Damaged the landscape as much as feared;
- Boosted local economies as hoped

With the benefit of hindsight stretching back over 20 years, this meta-analysis of road scheme POPEs overwhelmingly showed that new road schemes:

---

<sup>1</sup> Other than brief consideration of the inclusion of some rail capacity, an option dismissed in 2009 and to our knowledge not revisited since (‘Dartford River Crossing Study prepared by Parsons Brinckerhoff Ltd for DfT January 2009’, accessed in December 2018 here:

<https://webarchive.nationalarchives.gov.uk/+http://www.dft.gov.uk/about/strategy/capacityrequirements/dartfordrivercrossing/chap1execsummary.pdf>)

<sup>2</sup> <https://www.ipcc.ch/sr15/>

<sup>3</sup> Available at this link on the CPRE website: [The end of the road: Challenging the Road Building Consensus](#)

- Generated traffic far in excess of that predicted for the scheme, and even farther and faster in excess of traffic growth in comparable areas: long-term averages over six studies (8-20 years) showed a 47% increase above background levels of growth;
- Led to permanent and significant environmental and landscape damage;
- Showed little specific evidence of economic benefit to local economies.

## **Q2 dis/agree route, changes since 2017**

We strongly oppose the proposed route: see our answer to Q1. However, if it were to go ahead, we note that the proposed new tunnel exit on the Essex bank of the Thames is in an area which is scarcely above the current sea level and thus will be more vulnerable to flood risk as sea levels rise. This will impact on all the proposed new infrastructure which will require adequate protection from salt water incursions.

The operation of any natural or designed drainage systems must allow for the significant future changes in water levels, higher sea levels change the rate of flow upstream. It is important to note that riverside fogs occur in such landscapes. They cause poor visibility which leads to hazardous driving conditions.

Any major project such as this proposal has a massive environmental impact on the locality. During a construction phase there is an increase in poor air quality, transport fumes and dust, noise and vibration pollution from heavy vehicles and round the clock additional lighting.

There are a number of residential communities across the area which will be impacted in various ways by this proposed. During any proposed construction phases there will be significant disruption to daily life, the loss of some dwellings, the inconvenience of massive road works, dust, increased noise levels as well as poor air quality.

The proposals make significant inroads into the greenbelt with the loss of productive agricultural land and will encroach on existing long-established woodlands and other valuable wildlife habitats.

## **Q3 support/oppose southern route, crossing, northern route**

We strongly opposed the proposed project: see our answer to Q1.

## **Q4 support/oppose M2/A2 junction, (tilbury junction, A13, M25)**

We strongly opposed the proposed project: see our answer to Q1.

In the event that it does go ahead, CPRE Essex notes and endorses the comments and suggestions made to improve safety of NMUs at the proposed junctions made by the Dartford & Gravesham Cycle Forum for the southern junctions and would support similar suggestions for the roads north of the River Thames. CPRE Essex has major concerns that the suggested layout of roads linking the northern exit to existing roads contain some very exaggerated detours for traffic joining/exiting from the proposed tunnel and that these will lead to the unintended consequence of rat running in other areas as drivers seek to avoid these detours. Traffic congestion is a regular feature on the road network round M25/M11/A12/A13 which has economic implications. Many of these roads become gridlocked at busy times or when there are multiple accidents.

There is insufficient detail in the proposals to give reassurances that adequate thought has been given to allow access by emergency vehicles and escape routes for trapped vehicles within this network of roads and the proposed new tunnel.

### **Q5 support/oppose proposals for prows**

As before: please see our response to Question 4. The plans at the current stage of consultation do not detail precisely how disruption to the ROWs used by walkers, cyclists and riders within both counties will be kept to a minimum so more detailed comment is precluded. However, we once again endorse the approach of the D&GCF to the importance of adequate, dedicated and integrated NMU provision to support active travel. This is also contrary to any proposals by Thurrock Council to improve cycle ways and encourage more walking in the area.

### **Q6 dis/agree with measures to reduce environmental**

Again, our comments in response to Q1 refer.

This project, as it stands, will be an expensive intervention which will do next to nothing to improve the air quality problems caused by the existing Dartford/Thurrock crossings. We note with concern that the PEIR (summary document, section 4) asserts that the AQMA at the existing Dartford Crossing (along with designated AQMAs in Essex) do not exceed UK Air Quality Strategy Thresholds; this is clearly disingenuous as Dartford Borough Council's latest LAQM Annual Status Report (2017)<sup>4</sup> Currently there are 16 air quality management areas (AQMA) in Thurrock<sup>5</sup>.

### **Q7 support/oppose proposed area of land**

CPRE Essex notes that there will be direct loss and indirect damage to the Metropolitan Green Belt.

### **Q8 service area at tilbury jct**

The location of the proposed site of the Service Station is very close to the current sea level and substantial measures would be required to ensure that this will be protected from flooding as sea levels rise. It is also close to the scheduled Ancient Monument of Coal House Fort which is an artillery fort built in the 1860s to guard the lower Thames from seaborne attack. It stands at Coalhouse Point on the north bank of the river close to East Tilbury and noted for its historical features. The area around the fort is has SSSI status and supports many red data insects and other forms of wildlife.

### **Q9 dis/agree ltc will improve traffic conditions on surrounding network**

Please see our response to Q1: we do not accept that the negative effects of 'rat running' on the north-south routes has been adequately predicted or modelled,

We note the concerns of CPRE Kent in regard to the impact of increased traffic on the A225, A227, A228, A229 and A249 which are already problematic and also subject to extensive

---

<sup>4</sup> [https://www.dartford.gov.uk/data/assets/pdf\\_file/0005/571136/Dartford-ASR-2017.pdf](https://www.dartford.gov.uk/data/assets/pdf_file/0005/571136/Dartford-ASR-2017.pdf)

<sup>5</sup> <https://www.thurrock.gov.uk>

housing growth identified in local plans. In Essex roads which are likely to suffer are A1089, A1013 A13, B188

Weight restrictions; pinch points and heritage/listed buildings and ancient bridges are common features of these routes. It is already the case that disruption on any one of these north-south routes leads to knock-on congestion on the others.

In Essex, the proposed new road network will have implications on all the roads in the vicinity of the new tunnel as well as further afield with drivers seeking alternative routes when the main roads are gridlocked.

It is proposed that the Lower Thames Crossing will add resilience to the national roads network in the event of one or more of the existing Dartford crossing being unavailable at any time. However, it is unclear to us how traffic expecting to divert between the Lower and existing Thames Crossings, at least on either side of the Thames will be able to achieve this in a timely manner given the existing weight of traffic using roads feeding into existing Dartford crossing.

#### **Q10 views on charges**

No comment.

#### **Q11 support/oppose plans for how to build**

No comment

#### **Q12 views on utilities and pylons**

The area for the proposed development on the north bank of the Thames is crossed by many pylons and high-pressure pipelines.

#### **Q13 Other comments**

CPRE Essex is in agreement with CPRE Kent and we would welcome clarity over the source of funding, since statements made in the consultation guide about the split of public/private funding appear to be at odds with responses to queries at local consultation events that have been fed back to us. This is particularly relevant in the light of the announcement made in the 2018 Budget withdrawing Government support for PFI and PF2.