

Planning Inspectorate

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Representation form**

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Date: 13th February 2023

Lower Thames Crossing Pre Examination Representation

Thank you for notifying Sevenoaks District Council on the formal notification of acceptance for the Lower Thames Crossing (LTC) Development Consent Order application.

Background

Sevenoaks District is a predominantly rural district situated in West Kent. Sevenoaks District Council (SDC) has followed the LTC application as it has been progressing and responded to consultations when necessary.

The Sevenoaks District has a number of major routes which are frequently used by residents, commuters, freight and LGV traffic especially during peak times. Routes within the District include the M25, the M20 and M26, the A20, A21, A25 the A225 and A228. The M20 is a significant route for freight and tourism as it provides access to the coastal ports of Folkestone and Dover, and the main connection to mainland Europe. The M20 also provides links to the M25, both directly to Junction 3 and an indirect link with Junction 5 via the M26. Junction 3 of the M25 (Swanley) has significant pressure from traffic from either direction i.e. those wishing to continue to the existing Dartford Crossing and traffic wishing to join the M20 from the existing crossing. The A25 runs parallel to the M25 and M26 through the width of the district, where there are problems on the M25, M26 and even on the M20, A2 and at the Dartford crossing, the A25 becomes quickly congested by vehicles, looking for an alternative route from east to west and vice versa. This congestion is further exacerbated by the lack of access onto and off the M26 at junction 5 of the M25.

SDC are progressing with a new Local Plan which concluded its Regulation 18 consultation in January 2023. This version of the Local Plan focuses on making best and efficient use of land in towns and settlements across the District, reflecting the

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strategy for meeting development needs. A second Regulation 18 will be taking place in Autumn 2023 with an anticipated Regulation 22 submission date of Summer 2024.

Consultation Response

Sevenoaks District Council (SDC) is supportive of a new Lower Thames Crossing as it allows road users greater choice to cross the Thames, improve travel journey times and improve the flow of traffic across the north section of the Kent strategic road network. There is potential for greater economic benefits to be realised with a new crossing at the chosen location. The new crossing would allow greater opportunities for more employment and housing land to be realised, which would create greater opportunities for businesses to locate near high quality infrastructure, as well as greater connections with mainland Europe. Pressure would be relieved from the existing Dartford Crossing, as the new location would redistribute traffic flows. Whilst the Council is broadly supportive of the LTC, we have some concerns to outline in this pre examination stage.

The Council's Initial Baseline Transport Assessment 2022 reiterates that the M25 Junction 3 near Swanley is a congestion hotspot. This identifies the junction is at between 85% and 100% capacity depending on AM or PM peak according to 2019 data. The Council's Air Quality Action Plan 2022 identifies the Junction of Birchwood Road and London Road, Swanley as an Air Quality Management Area (AQMA). This is closely located to the A20 leading towards the junction. The AQMA has been declared for exceedances of the NO₂ annual mean objective.

It is recognised the transport model overall shows that traffic and congestion, in particular approaching the Dartford Crossing, and number of incidents would increase if the LTC is not built. National Highways note that the Dartford Crossing has a capacity of 130,000 vehicles per day but in actuality is frequently over capacity and used by more than 185,000 vehicles per day. It is acknowledged that the benefits of the LTC must be taken as a whole. The wider Network Impacts Management and Monitoring Plan indicates that the overall level of traffic using the Dartford Crossing would fall on average by 19% in 2030 and 12% by 2045 compared to the Do Minimum scenario.

However, SDC wish to express some concerns. The LTC Traffic Forecasts Non-Technical Summary summarises the key findings on the performance of the road network in the future comparing with and without the Lower Thames Crossing. It is noted looking at the traffic volumes as a percentage of road capacity maps, there is not a continuous improvement for this junction across the different LTC forecasts with some scenarios showing increased strain. SDC have concerns regarding the change in volume/capacity outlined in plate 5.10 - Traffic volumes as percentage of road capacity, Do Minimum: AM peak, 2030 compared to Plate 5.11 Traffic volumes as percentage of road capacity, Do Something: AM peak, 2030. This shows an increase of capacity in Swanley with the Crossing. The Do Nothing scenario shows a 75.1 to 85.0% and Do Something scenario shows 85.1 to 95.0% more volume over capacity. Furthermore, it is noted that an increase of traffic will occur during the construction phase. There is concern that this will lead to further congestion on the strategic road network which will impact the local roads resulting in additional congestion and impact on the air quality. Increased traffic movements around the

crossing will create increased disturbance, noise and air quality issues to surrounding communities, not just after completion but during the construction phase as well. In our previous consultation response in 2016, SDC raised concerns regarding the impact on immediate and surrounding communities during the construction and operation of the Crossing being considered. The Community Impact Report thoroughly considers and addresses this. SDC wish to defer detailed comments on these to the relevant local authorities. We also take the opportunity to reiterate that we acknowledge the sensitivity of the site including ancient woodlands, Listed Buildings, Conservation Areas, historic landscapes, and Registered Parks and Gardens. The impacts during construction and operation of the Crossing is considered in the Environmental Statement Non-Technical Summary and other supporting documents. It is noted that further surveys before the start of works are required to consider potential environment and ecological impacts. SDC reiterate the importance of future surveys being conducted in close partnership with the relevant authorities and public bodies to determine the impact on important sites.

In conclusion, SDC is broadly supportive of the Lower Thames Crossing proposal, as it will create a new connection between Kent and Essex, alleviate traffic on the Dartford Crossing, improve the flow of traffic across the north section of the Kent strategic road network and provide an economic boost to the South East. It will clearly have benefits to our residents, commuters, freight and LGV traffic. However, it is noted that there will be increased traffic around an identified congestion hot spot for the District. As our Local Plan progresses we may wish to express further representations at the examination stage. This response outlines our key areas of concern and we trust our points raised will be duly considered at this stage.

Yours sincerely,



Infrastructure Delivery Officer
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