

Operation Brock Consultation

Introduction

Thames Crossing Action Group is a community group which represents thousands of people, in many areas including those impacted by Operation Brock, who are strongly opposed to the proposed Lower Thames Crossing (LTC). The £8.2bn+ LTC would be hugely destructive and harmful; it would not meet the project objectives, and is not fit for purpose.

Reason for responding

One of our many concerns about the proposed Lower Thames Crossing (LTC) is the fact that it would not solve the congestion and pollution problems associated with the Dartford Crossing.

As well as not fixing the problem of congestion and pollution at the current crossing, the proposed LTC would add not only to those problems but also create additional issues throughout the region, including in the Operation Brock area.

We therefore welcome the chance to respond to your Operation Brock consultation.¹

Response

As your consultation information details, Operation Brock is used as part of the current plan to manage the volume of both freight and tourist traffic using the Port of Dover and Eurotunnel when queues build up, and causes significant disruption.

We acknowledge that Operation Brock is not a long term or permanent solution for the border control issues, but that there are concerns that it could become the new norm.

Whilst the proposed Lower Thames Crossing (LTC) has not been granted permission, even if it does go ahead it would not open until 2030 at the earliest. By this time there most definitely should be better provision in place than Operation Brock.

However, we do feel the need to comment on the impacts the proposed LTC would also have, should it go ahead.

¹ <https://letstalkmaidstone.uk/engagementhq.com/the-m20-operation-brock>

THAMES CROSSING
ACTION GROUP
www.tcag.info

The proposed LTC was originally about solving the problems associated with the Dartford Crossing, and the impacts those issues have throughout the region on both sides of the river.

The design capacity of the Dartford Crossing is 135,000 vehicles per day, yet it regularly sees 180,000 per day.²

This means that we'd need to see a reduction of more than 25% to bring it back below capacity. Yet the proposed LTC would take as little as 4% away from the current crossing, thus leaving it over capacity.³

Not only that but the LTC is estimated to bring around 50% increase in cross river traffic.

Since the current crossing would remain over capacity, and we'd be seeing a significant increase in traffic, we can also expect to still experience high numbers of incidents.

National Highways are not considering or planning how traffic would migrate between the two crossings, if LTC goes ahead, when there are incidents and there would not be adequate connections. The result would be more chaos, congestion and pollution.

For instance, when there is an incident at the Dartford Tunnels and traffic attempts to migrate to the LTC, it would come off the M25 either directly onto the A2 coastbound, or by attempting to cut through to the A2 by any means possible. However, there would be just one single lane from the A2 coast bound onto the LTC.

The resulting congestion, would not only create issues in the immediate vicinity but would also soon spread across the region as it does now when there are incidents at the current crossing.

The A2, A229 (Blue Bell Hill), and M20 in particular would be impacted if the proposed LTC goes ahead.

At the time when route options were being considered one option called Option C Variant actually included the connection from the M20 to the A2 and new crossing via Blue Bell Hill (A229). This was ruled out.

Yet in the Local Refinement Consultation National Highways shared details of the necessary compensation in the vicinity of Blue Bell Hill, because of the significant

² <https://www.thamescrossingactiongroup.com/ltc-not-fit-for-purpose/>

³ <https://lowerthamescrossingthurrock.co.uk/wider-debate-is-needed-on-the-merits-of-ltc-creating-a-new-m25-outer-orbital-route>

THAMES CROSSING
ACTION GROUP
www.tcag.info

effects of nitrogen deposition from the increased traffic associated with the proposed LTC.

We also know that Blue Bell Hill Improvements are being progressed now as a separate stand-alone project, despite the fact that such improvements would be needed as a result of the proposed LTC.

Not only is this a false economy, it also highlights the fact that adequate consideration of alternatives has not been made, and that the proposed LTC has changed in design so much since the preferred route was announced that it really needs to be reviewed now.

The Port of Dover has also publicly expressed that additional investment would be needed to dual the A2 from Lydden down to Dover as a direct result of the proposed LTC if it goes ahead.⁴ This would then mean that both the A2/M2 and A20/M20 would be used as access routes to and from the Port of Dover.

When you consider the current issues suffered due to Operation Brock and port associated traffic on the M20, then add the possibility of the A2/M2 also becoming a main route, the concerns must grow.

Then in addition adding the factor of the impacts of the proposed LTC would have on Blue Bell Hill (A229) this surely adds to the concerns even further.

This is one of many reasons why Maidstone should be aware of the issues and concerns about the proposed LTC, as whilst the actual crossing may be a distance from Maidstone, the impacts caused by the proposed LTC would bring issues very close to home for Maidstone.

In addition, at a time of climate emergency the proposed LTC would be a hugely destructive and harmful project. The predicted carbon emissions for the proposed LTC are now over 7 million tonnes.⁵ When considering the South East's mission to reach carbon net zero, this is a huge amount regardless of anything else that may be planned for the region.

As you rightly point out Operation Brock is about managing the volume of both freight and tourist traffic using the Port of Dover and Eurotunnel when queues build up.

But why is it all so road focused? Why is there not a rail station at the Port of Dover? Why are we not utilising rail for freight instead of continuously putting more and more freight onto our already congested roads?

⁴ <https://youtu.be/hylZzY0Vgw?t=83>

⁵ <https://www.thamescrossingactiongroup.com/ltc-carbon-emissions/>

THAMES CROSSING
ACTION GROUP
www.tcag.info

Rail improvements between Ashford and Reading⁶ would negate the need for the proposed LTC, by removing a lot of freight off of our roads and getting it onto more sustainable rail.

Currently rail freight is London-centric and the lines are at capacity, which is why these rail improvements that provide east-west capacity orbiting London rather than passing through it could be a great solution not only for an alternative to the proposed LTC, but in general for reducing traffic on our roads, and offering a more sustainable option too.

Rail improvements could not only tackle the high numbers of road freight and associated congestion and pollution, but also if done correctly improve options for passengers too.

In conclusion, not only would the proposed Lower Thames Crossing be hugely destructive and harmful, and not solve the problems it was tasked to fix if it goes ahead, it would actually add to and create more issues throughout the region, including in the Maidstone area due to the poor design and increased traffic and associated issues that it would bring.

We therefore call upon Maidstone Borough Council to reconsider any support for the proposed Lower Thames Crossing, so as to avoid the future traffic issues it would bring to the area, in a similar way if not greater way than Operation Brock impacts now.

We thank you for the opportunity to respond to this consultation.

Response prepared on behalf of TCAG by Laura Blake, Chair
Email: admin@thamescrossingactiongroup.com

⁶ <https://www.thamescrossingactiongroup.com/rail-and-tram-alternatives/>