

# THAMES CROSSING ACTION GROUP

[www.thamescrossingactiongroup.com](http://www.thamescrossingactiongroup.com)  
[admin@thamescrossingactiongroup.com](mailto:admin@thamescrossingactiongroup.com)

Thames Crossing Action Group represents thousands of people along and from the surrounding areas that the entire proposed Lower Thames Crossing will impact if it goes ahead.

First and foremost we would state that we find it totally unacceptable that this consultation was not postponed until after the COVID-19 pandemic crisis has passed. We do not feel this Supplementary Consultation has been held adequately, and we will go into this in further details later in our response.

It is under complete and utter duress that we, Thames Crossing Action Group, and all our thousands of members respond to this consultation at a time when the whole world is immersed in the COVID-19 pandemic crisis. Some of us are grieving with the loss of loved ones, some of us are fighting for our lives, some of us are very sick, some of us are fighting to try and save those lives, some of us are going out of our minds with worry about loved ones, some of us are doing our utmost to ensure that everyone else have the food and supplies to survive. We are all seriously stressed and concerned, we are all doing our best to follow official advice, we are all doing the right thing and staying at home, we are all doing our best to try and stay safe, take care of and support each other.

We at TCAG and all our thousands of members are completely disgusted that at this time Highways England/Lower Thames Crossing are happily putting additional pressure on us at this most difficult and awful times, by continuing to inflict this consultation upon us, rather than postponing until after the COVID19 crisis has passed. It is despicable, unethical and immoral that HE/LTC are doing this.

This response to the Supplementary Consultation should be considered in addition to our response to the Statutory Consultation of 2018 and should be read in conjunction with that document – a copy of which can be viewed at [www.thamescrossingactiongroup.com/thames-crossing-action-group-response-to-ltc-consultation/](http://www.thamescrossingactiongroup.com/thames-crossing-action-group-response-to-ltc-consultation/).

As a group we remain strongly and completely opposed to the proposed Lower Thames Crossing.

It would create a hugely destructive toxic triangle that is not fit for purpose.

Laura Blake  
Chair, Thames Crossing Action Group  
[www.thamescrossingactiongroup.com](http://www.thamescrossingactiongroup.com)  
[admin@thamescrossingactiongroup.com](mailto:admin@thamescrossingactiongroup.com)

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# The proposed Lower Thames Crossing

## Original Criteria

The original criterion for a new crossing across the River Thames to the East of London was to solve the problems that we all suffer with due to the congestion and pollution at the existing Dartford Crossing. The Dartford Crossing consists of two tunnels from South to North, and QE2 Bridge North to South. The original criteria was not about economic benefit and growth.

## What are the issues that need addressing at the Dartford Crossing?

The two main issues that need addressing are congestion and pollution.

## What causes these issues?

We believe there are many contributing factors as to why we suffer with the problems we do due to the Dartford Crossing. Whilst we acknowledge sheer volume of traffic plays a part, we believe there are definitely other factors that could and should be addressed to help improve the issues.

We also believe that HE/LTC should learn from the issues at the Dartford Crossing, and take them into account when designing any new crossing, and not repeating and recreating the same problems at any new crossing.

They need to take responsibility for their action, past, present, and future, and do the right thing.

The following are some of the other issues we consider contribute to the problems due to the Dartford Crossing.

### Hazardous Vehicles

Coming for the south of the river to the north, there are issues due to the fact the existing tunnels are old, meaning they are smaller and possibly not considered to a high enough safety standard for hazardous vehicles to use them without the need for an escort.

In turn this means that to escort the hazardous vehicles through the Dartford Tunnels from the south of the river to the north, the traffic lights are turned red every 20mins, halting all A282 traffic, which in turn often also creates issues further back along onto the M25.

*As a reference point we remind the reader that the Dartford Crossing and roads either side are classified as the A282 and not the M25. We feel the need to state this since we have heard and read previous statements from Highways England saying that the Lower Thames Crossing would be the biggest road project since the M25 was completed. In actual fact the M25 is meant to be a motorway orbital, meaning it completes an entire loop, yet there is still a section that is not motorway, hence the M25 has not been finished.*

If you put traffic lights anywhere else around the M25, or any other stretch of highly used road, and turned the lights red every 20 mins you would likely experience the same issues.

Hazardous vehicles wishing to use the Dartford Tunnels have to come off at junction 1a and follow a diversion to the vehicle escort area. This diversion is displayed on signs as a hollow black diamond on a yellow background.

### Height Restrictions

In addition there is the issue that higher sided vehicles can only use one tunnel, which often causes the traffic lights to turn to red, while the offended vehicle is corralled into the vehicle escort area, and dealt with.

There are instances on record of this happening to lorries who are not over height too, so it is not 100% reliable, and whilst we understand the need to ensure safety through the tunnels and to ensure that no damage is done to the tunnels by over height vehicles, this does cause delays and cause congestion regardless of if there was a genuine need or not.

We understand that vehicles 4.8m or less can use any lane. Vehicles over 4.8m and under 5m have to use lanes 3 or 4 to use the right hand tunnel. With any vehicle over 5m being told to leave at junction 1a, and having to find an alternative route.

Any vehicles over 4.8m are not allowed to join the northbound carriageway at junction 1a. They have to follow a diversion that takes them back to junction 1b where they should access lanes 3 and 4 to use the right hand tunnel. This diversion is displayed on signs as a solid black diamond symbol on a yellow background.

### Signage overload issues

Notice how the two diversion signs around the junction 1a road network are extremely similar for hazardous and over height vehicles. Another example of extra confusion to drivers that will cause issues with traffic becoming slowed down, taking wrong turns, and generally causing issues.

Also the fact that it is scientifically proven that there is a limit of signage that can be safely used, due to attention and distraction of drivers. Considering these signs are in addition to A282 direction signage, local road network signage, crossing charges signage, and speed limit signage etc, there is a definite case of signage overload in this general area approaching and surrounding the Dartford Tunnels.

We would say that in our opinion this is the case for all traffic/drivers using this stretch of road, and not just the hazardous and over height vehicles.

This is a point we will reference again latter in our response with regards to serious concerns over complicated junctions on the proposed Lower Thames Crossing.

The confusion and need to change lanes and respond to the various signage can also lead to accidents happening, which again impact the traffic flow and can cause severe congestion.

### A282 not M25 and speed limits

As already outlined the Dartford Crossing and road to each end of the physical crossing are the A282, not the M25. The A282 also has a speed restriction that slows the traffic flow down. Not that we deny most times using it, especially heading northbound you would be lucky to be moving let alone able to drive to the speed limit.

### Busy junction too close to tunnel portals/bridge

The simple fact is that junction 1a is a very busy junction that services, not only shoppers for the popular Bluewater Shopping Centre, hotels, supermarkets, rail station, shops, restaurants, and local

homes etc., but also very busy industrial and logistics parks. Much of this traffic is using J1a and the Dartford Tunnels on a regular basis.

Junction 1a is simply too close to the tunnel portals and bridge for traffic to safely be able to leave and enter the A282 to and from the local road network.

This is another one of the reasons there are so many issues and so much congestion in the general area.

Junction 1a would have been built to industry guidelines and standards which proves that these standards are not always as good as they are cracked up to be, and that common sense and local insight needs to be seriously considered and taken into account.

#### QE2 Bridge wind issues

It is no secret that the QE2 Bridge regularly has to be shut down due to wind. This is due to the lack of wind shielding being built into the bridge's design. This was done to save money back when the bridge was built. This just goes to show that mistakes have been made previously, and why it is so essential for us to research and question everything to avoid such ridiculous mistakes from happening again.

We cannot simply trust that the right thing will be done.

The QE2 Bridge was designed in such a way that now wind shielding cannot even be added, a complete oversight.

#### Poor management of crossing and incident handling

It used to be the case that people thought you crazy if you commented that it felt like HE were controlling the Dartford Crossing to manipulate traffic to create more of a case for a new crossing, which brings them more work and money.

Now people think you are crazy if you don't believe that!

It has also been known for HE to shut off the whole QE2 bridge whilst a broken down motorcycle was recovered. That was one of the most memorable, but things like this seem to happen on an ever frequent basis.

Whilst there is no definitive evidence of this it is the general feeling of many members of the public, which if nothing else emphasises the fact people do not trust HE to do the right thing and act responsibly.

#### Development being allowed without adequate infrastructure in place

There are so many examples of how developments are being considered and allowed to go ahead, despite the fact that there are already serious issues with congestion and pollution in the region surrounding the Dartford Crossing, both South and North of the river.

A few examples are:

- Littlebrook Power Station was demolished and in its place will be a brand new logistics park. Right next to the already heavily over capacity Dartford Crossing in Kent. How can this possibly be considered sensible planning?
- London Resort is a huge theme park that is being proposed on the Swanscombe Peninsula in Kent. It is considered as a Nationally Significant Infrastructure Project (NSIP). Latest news on the projects website states that a consultation will be held in Spring 2020 before a DCO application is submitted in Summer 2020. A project as huge and advanced as this, and yet HE/LTC are not taking it into account when considering traffic modelling and planning for LTC.
- Arena Essex development site – Northlake (near Lakeside Shopping Centre) – a planning application for 2,500 new houses has evidently been submitted to Thurrock Council. Yet another large amount of homes that will of course also increase traffic on the roads in the Dartford Crossing area to the North of the river, which also has implications to traffic being able to adequately come through the tunnels from the south.

There is also the question as to why HE/LTC will not take into account the tens of thousands of new homes that have to be built both sides of the river. These are figures that come from the Government, not developers or the Local Authority. If the Government are telling the local authorities that they need to build this many houses then the impact it will have on the road network should be taken into account, and included in traffic modelling data for the proposed LTC.

Simply stating that these things do not have to be taken into account because they do not yet have planning permission is not acceptable and is completely irresponsible. While we can understand that smaller developments without planning permission may not be taken into account these are very large developments, that are either considered an NSIP, or come from Government directive.

Will LTC fix the problems we all suffer with due to the Dartford Crossing?

**Some data that proves the Lower Thames Crossing is not fit for purpose**

- The Dartford Crossing has a design capacity of 135,000 vehicles per day.(1)
- It is currently running at between 155,000 to 180,000 vehicles per day.(2)(3)
- Predicted traffic growth between 2016 and 2026 is expected to be between 17-23% (2) (4). Bear in mind that currently the proposed Lower Thames Crossing is not predicted to open until late 2027.
- Highways England predict that there will be a 22% reduction in traffic using the Dartford Crossing if the proposed Lower Thames Crossing goes ahead. (5)

Therefore if you take each figure that the current crossing is running at now, add the 17%, 23%, or an average of 20%, then take the 22% reduction off this is what you get:

155,000+17%=181,350 / 181,350-22%= **141,453** vehicles per day using the Dartford Crossing  
 180,000+17%=210,600 / 210,600-22%= **164,268** vehicles per day using the Dartford Crossing  
 155,000+23%=190,650 / 190,650-22%= **148,707** vehicles per day using the Dartford Crossing  
 180,000+23%=221,400 / 221,400-22%= **172,692** vehicles per day using the Dartford Crossing  
 155,000+20%=186,000 / 186,000-22%= **145,080** vehicles per day using the Dartford Crossing  
 180,000+20%=216,000 / 216,000-22%= **168,480** vehicles per day using the Dartford Crossing

**Clearly the Dartford Crossing would still be over it's design capacity of 135,000 vehicles per day.** The current cost of the proposed Lower Thames Crossing which will leave the Dartford Crossing still over capacity is £6.8bn+ of taxpayer's money. We all know these projects never run to budget, so that is a lot of money being spent on something that does not fulfil the original criteria of fixing the problems we all suffer with due to the Dartford Crossing. Clearly the proposed Lower Thames Crossing is not fit for purpose.

Another way of putting it is that the Dartford Crossing is currently running (or not running) between 115-133% over capacity. You then need to add 20% predicted traffic growth by the time LTC opens on top of that. Then take away the 22% of traffic that HE/LTC predicts will use LTC instead of the Dartford Crossing. Still over capacity, still doesn't solve the problems we all suffer with due to the Dartford Crossing, and still renders the LTC as not fit for purpose.

**List of links to references for quoted data**

(1) Ref – *Your Guide to Consultation* (Page 20)

(2) Ref – *2017 Environmental Impact Assessment – Scoping Report* (1.2.5)

1.2.5 – The existing crossing is heavily congested. Average daily two-way traffic flows are typically about 155,000 vehicles, and flows frequently exceed the design capacity of the crossing at peak periods. Forecast traffic growth is expected to result in an increase in traffic volume of 23% by 2025.

(3) Ref – *Case for the Project* (page 19)

6.2.32 – Traffic at the Dartford Crossing has increased significantly over time. On some days traffic using the Dartford Crossing exceeds 180,000 vehicles which is some 45,000 vehicles more than it was designed to take.

(4) Ref – *Case for the Project* (page 19)

6.2.37 – The average daily traffic flow using the Dartford Crossing without the Lower Thames Crossing is predicted to increase by 17% in the period 2016-2026.

(5) Ref – *Your Guide to Consultation* (page 22)

Tim Jones, who was LTC Project Director until he resigned in July 2019, had stated on numerous occasions that it will not solve all the problems we all suffer with due to the Dartford Crossing. Listen to him say this - [www.thamescrossingactiongroup.com/wp-content/uploads/2018/09/LTC-19-March-2018-Tim-Jones-Admitting-it-wont-solve-Dartford-Crossing-issues.mp3](http://www.thamescrossingactiongroup.com/wp-content/uploads/2018/09/LTC-19-March-2018-Tim-Jones-Admitting-it-wont-solve-Dartford-Crossing-issues.mp3)

If you wish to listen to the meeting in full audio can be found on the [Thurrock Council website](http://Thurrock Council website). (*The segment quoted above starts around 15 mins 20 secs in to the recording*)

#### Additional evidence

Further into this document we will cover the issues of lack of adequate connections between the LTC and the existing road network that reinforces the fact that the proposed Lower Thames Crossing is not fit for purpose.

We will also comment on the fact that HE/LTC have not given any consideration into how traffic will migrate between the LTC and the Dartford Crossing when there is an incident at either crossing.

## **Option A14 a better alternative**

Option A14 is one of the earlier design options created by Highways England that we feel would be a better alternative solution.

#### What is Option A14?

A long tunnel from around Junction 2 through to between Junction 30 and 29 on the M25.

#### No need to escort hazardous vehicles

Built to new modern safety standards would mean that hazardous vehicles and higher sided vehicles would be able to use it, without the need to be escorted. Thus removing the scenario that is experienced at the Dartford Tunnels whereby the traffic lights are turned red every 20mins to allow escorts to go through.

#### Improve air quality

With Option A14 being a long tunnel, it would also mean that the air could be filtered, which would also improve the air quality. There are plenty of new businesses setting up these days that actual benefit and profit from the by product, such as inks and things that can be made. This means that what is being cleansed from the air also becomes a commodity to generate additional income, as well as improving health and the environmental impacts.

Less impact to homes, communities, environment etc

Option A14 impacts would be minimal, especially in comparison to the proposed LTC route. It was also considered to be safer too according to HE/LTC data that was provided in 2016, seen in the image below.

	<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
Effectuated 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 = 100m2 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>

Completes the M25

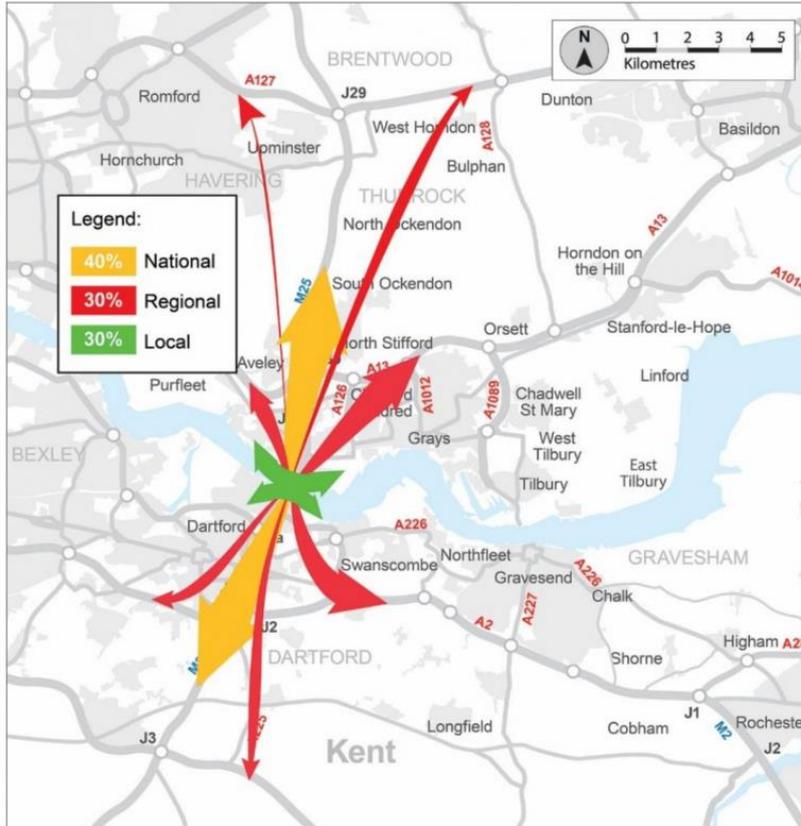
As previously mentioned the M25 has to date never been properly finished as a true motorway orbital, a complete loop.

Option A14 could finally complete that loop and create a true motorway orbital.

It would take more than 22% of traffic away from the Dartford Crossing

If designed and built correctly then Option A14 could take up to 40-50% of traffic away from the current crossing, as it would take all the national traffic, leaving the current traffic for local and regional traffic.

We reference the following graphic that shows these kinds of figures could be realistic.



HE/LTC suggest we have taken the above graphic out of context. To which we would reply if that is the case then it was most likely due to the material not being clear and informative, something they have a legal obligation to provide in consultation material!

We were told it would actually more likely be somewhere between 30-40% of traffic that would use Option A14 instead of the Dartford Crossing. To that we would state that it is still more than just 22% that would use LTC instead of the current crossing!

# Changes to the Route

## South of the river in Kent

We strongly oppose the LTC junction to the south of the river, it is too confusing and complicated, and can in no way be considered a sensible road layout.

We strongly oppose the removal of the hard shoulder on the eastbound link road along the A2. We considering the removal of hard shoulders to be a major safety issue, and do not consider a 1m hard strip to be an adequate replacement.

On the topic of hard strips, we would yet again remind HE/LTC that they have a legal obligation to provide clear and informative material, and since most members of the general public will not know what a hard strip is you should be providing this information to people within the consultation documents, in a clear and informative manner.

With regard to the M2/A2 narrowing, we do not consider any impact to the AONB or Shorne Woods Country Park to be acceptable, minimising the footprint of the road is not adequate, there simply needs to be no footprint of the road at all through the AONB or Shorne Woods Country Park.

We have serious concerns about the impact to the local environment, in particular the impact on ancient woodland in Shorne Woods and Ashenbank Woods.

This is another example of the LTC being the wrong crossing in the wrong location.

There is a distinct lack of a direct link between Valley Drive/Gravesend East to the A2 eastbound and the M2 is a concern

We still do not feel that HE/LTC have taken into account the impacts to the local road network. We have particular concerns that how traffic would migrate between the two crossings has not been given any thought whatsoever by HE/LTC, and the impacts to the local roads would be horrendous.

We strongly oppose the fact that HE/LTC seem to be avoiding acknowledging the impact LTC would have on the A229, and the improvements that would need to be made as a direct result of the LTC.

If the LTC is to go ahead then HE/LTC should **have** to take this, and all other associated road improvements that would be needed for the LTC as a whole, into account, and include those works within the LTC scheme and budget.

We believe that HE/LTC are refusing to do this in an attempt to improve the Benefit Cost Ratio, which would be a false economy. Anything that can be proven to be a direct impact result of the LTC should **have** to be considered and included in the LTC scheme.

We note and comment later in this document about the error in detailing the changes to a new link road connecting Valley Drive to the A2 eastbound, when it should have stated to the M2 eastbound.

We strongly oppose the widening of the service road, and also have concerns that it has not been made clear whether there will be some kind of barrier used.

We strongly oppose the impact to the popular Gravesend Golf Centre.

We strongly oppose the removal of the link between the A2 eastbound and the M2 at junction 1

We strongly oppose the lane and central reservation narrowing, the removal of ancient woodland and mature trees in the AONB and Shorne Woods Country Park, and the removal of the HS1 environmental mitigation planting. We would point out that HE/LTC tried to hide this info away in supporting documents rather than giving it any explanation in the main consultation guide, the hiding of information like this needs to be stopped, it is not clear or informative.

We understand that the connection from the A2 eastbound to the M2 between Gravesend East and the merge of the LTC eastbound exit slip road has been reduced from 3 lanes in 2018 to 2 lanes in 2020. We do not believe that HE/LTC have shared details of this lane reduction in the consultation documentation.

### Inadequacies of information

We do not feel that HE/LTC have provided adequate, clear and informative materials for the southern section of the scheme, and acknowledge that it is only because we have learnt from information shared by Abridge2Far that we have been able to gather much of this information. They like us spend a considerable amount of time wading through trying to fathom and question the various aspects and share it with others, as HE/LTC are not providing adequate information in a clear and informative manner. It should be up to us as groups to have to do this to help explain to others, HE/LTC have a legal obligation which they are not fulfilling, and that needs to change with immediate effect.

## **Previously proposed Tilbury Junction**

### Removal of Rest and Service Area

We note and are concerned that whilst you claim that the Rest and Service Area has been removed from the LTC, it is also still the case that you are discussing where one might be located as a separate standalone project.

If it warrants continued discussions then why has it been removed from the LTC scheme? We believe that if there is evidence to prove it necessary to be discussing a Rest and Service Area to service the LTC then it should have to be included in the design now, and go through the scheme DCO process, and not be added as a sneaky side project at a later date, just to improve your chances now.

### **Not that we want the service station or support it being anywhere in any of the communities along or in the surrounding areas to the proposed LTC.**

We believe it is because you are trying to reduce the amount of opposition and reduce the overall cost of the LTC project, and improve the Benefit Cost Ratio. We believe you are doing this to try and better your chances of getting to and through the DCO process and we find this totally unacceptable.

It leads us to question all the many many times during the 2018 consultation when we were told we had to have a Rest and Service Area because of safety guidelines. If it was deemed necessary for safety then, how can it be deemed safe now?

We would also call into question the fact that some in Statutory Consultation in 2018 could have backed the LTC in the consultation based on the fact that the Rest and Service Area was part of the scheme, and with its removal would no longer support it.

We know for a fact that the Road Haulage Association and Freight Transport Association are not happy with this decision. We acknowledge that they are large and powerful organisations when it comes to roads in the UK.

Did HE/LTC do the same to them as you did previously to the Port of Tilbury? You agreed to the Tilbury Link Rd as you knew it was the only way to get the ports backing of the scheme, and then removed it at a later date. Likewise you put a Rest and Service Area in which would have got support from companies and organisations like the RHA and FTA, and have now removed it.

We believe you are using and manipulating the situation for your own needs and gains, rather than in the interest of a genuine fair and adequate consultation for everyone.

Again, whilst we do not want a service station in our communities, we have concerns over not only the safety aspect, but where HGVs will now park; we already have issues with them parking up on our local roads and in our local communities. We also question whether it will increase the likelihood of breakdowns on the LTC, vehicles running out of fuel, meaning increased incidents which will impact onto our local roads and communities, and increase pollution levels, causing further increased impacts to our lives and health.

We stress again we do not want a Rest and Service Area in our communities, we are stating these factors as further reasons as to why the LTC is the wrong crossing in the wrong location, it is clearly not fit for purpose, and that we deserve a better and true solution to the problems we all suffer with due to the Dartford Crossing.

#### Removal of Maintenance Depot

Whilst we don't want a maintenance depot, by default of the fact we don't want the LTC full stop, we question whether the existing local maintenance depots have adequate resources to service the LTC in addition to their current workload. We do not feel that they would be able to adequately provide this service as they clearly can't adequately maintain the existing road network as it is. The road surfaces along many HE roads in the areas are shocking, with potholes etc., and the rubbish alongside roads like the A1089 is disgraceful.

#### Removal of Tilbury junction

Again whilst we don't want a junction a Tilbury, by default of the fact that we don't want the LTC full stop, we question how the Tilbury junction can be removed when the Government have announced in the Road Investment Strategy 2, that the Tilbury Link Road is a pipeline project for RIS3?

We feel that yet again the removal of the Tilbury junction is just another attempt from HE/LTC to try and ease the DCO application for the LTC through as quickly as possible, regardless of the false economy and unethical nature of proceeding in this way.

We again stress that we do not support the Tilbury junction by default that we do not support the LTC.

The removal of the Tilbury junction also removes the opportunity for any traffic that mistakenly takes the LTC southbound, especially in light of how complicated and confusing the A13 junctions are, to be able to turn around before having to pay to use the crossing charge.

Without a junction south of the A13 any traffic that gets on the LTC southbound in error will have a very long detour to get back on the right road, and they will also have to pay the crossing charges twice, once in either direction.

#### Tilbury Loop Railway Viaduct

The removal of the Tilbury junction has resulted in HE/LTC also lowering the viaduct over the Tilbury Loop Railway. If this has been done purely as a result of being able to now do it as the Tilbury Junction does not have to be taken into account, then how will that factor with the Tilbury Link Rd being in the pipeline for RIS3?

The removal of the Tilbury junction and lowering of the viaduct will mean either that the Tilbury Link Road would not be possible, in which case why is it featuring in the RIS3 pipeline projects, or it will mean huge additional cost and works to upgrade these things to allow for the Tilbury Link Road to be added.

Again this is short sighted and another example of HE/LTC trying to safeguard their future work, and trying to falsely improve the Benefit Cost Ratio of the LTC scheme.

We have serious concerns about this, but would also qualify that with the statement that we do not support the LTC or Tilbury Link Rd as projects full stop.

#### Safety concerns

We have serious concerns over three major safety factors of the viaduct.

**Firstly**, if the viaduct has been lowered would there be adequate clearance above the electrified train lines? Not just scrapping through, but proper and more than adequate safety clearance to remove any risk of power arcing from the railway lines to the bridge or anyone on the bridge.

We have spoken to a first responder about this, and he was seriously concerned about this having attended many instances of arcing fatalities with regard to railway lines, his concerns and questions relating to this could not be adequately answered at the info events.

**Secondly**, being a viaduct without a hard shoulder we have serious concerns about vehicles being stranded due to breakdown etc. on the viaduct leaving drivers/passengers are serious risk with nowhere to seek safety from the road.

We are aware of fatalities in similar circumstance whereby there was nowhere for people to seek safe refuge which ultimately resulted in the very sad loss of life.

We would consider it a case for Corporate Man Slaughter if you do not provide adequate safety provisions on this viaduct, and indeed all viaducts particularly, but not limited just to the viaducts

but the whole LTC 'smart' road. We will comment further about the 'smart' aspect later in this document.

**Thirdly**, we would ask if HE/LTC have given any consideration to the fact that the viaduct over the railway line could sadly become a possible suicide location?

#### Lack of adequate information

We have also struggled to find any visual reference for the viaduct to know what it would look like. At this stage in consultation we would expect clear and detailed images of what we should expect visually from features of LTC like this viaduct.

The one image on page 51 of the consultation guide is hardly enough, and doesn't clearly show the actual design of the viaduct.

We believe that HE/LTC are avoiding including this kind of detail so as not to draw attention to it, in the hope that people won't realise the true impacts of LTC.

Another instance when a 3D model would be extremely helpful and informative to people.

#### Tilbury Link Road

As we have already mentioned above we are very aware that the Tilbury Link Rd has been included in RIS2 as an RIS3 pipeline project.

The Tilbury Link Rd will not be able to be added in if Tilbury Loop Railway viaduct has been lowered and Tilbury junction removed, without huge cost and extra works to allow its addition.

#### Lack of adequate info

There has not been adequate information provided with regard to the tunnel control building, how big it will be, what it will look like etc.

#### Service Rd access

We do not feel there has been adequate info provided about the access to the service road, and whether there will be a barrier, or how it will really look or impact the area. HE/LTC clearly feel it ok to avoid providing clear and informative details of these kind of things.

### **A13/A1089 junction**

#### LTC to Orsett Cock connection

We strongly oppose this connection and feel that the design of it will cause congestion and also become an accident hot spot.

Within a very close distance to the Orsett Cock roundabout, traffic coming from the LTC (north and south) will be joining with traffic coming from the A13 (eastbound). This traffic will need to be merging, and there is a very short space between the merge point and the roundabout. Any traffic coming off the LTC wanting to go right on the Orsett Cock roundabout will need to be cutting from the left lane to the right lane. Equally any traffic coming off the A13 (eastbound) wanting to head left at the Orsett Cock roundabout will need to cut from the right lane to the left lane.

This is a ridiculous connection that we have no doubt will cause congestion and accidents, and we strongly oppose it.

#### Impact to Orsett Showground

Whilst we acknowledge that there will no longer be a 'new Rectory Rd' through the middle of the Orsett Showground, we are strongly opposed to the fact that there is still great impact with regard to the amount of land taken from the Orsett Showground due to the changes to the connecting roads between the LTC and the Orsett Cock.

#### Rectory Rd bridge

There has been no clear and information detail provide as to the proposed height of the Rectory Rd bridge.

Yet again we comment and voice or concerns that HE/LTC are not providing adequate info, and are avoiding sharing the necessary info with people. To simply say that the height is being increased is not enough, HE/LTC need to be advising us of what the height would actually be.

#### A13 lane reduction

Whilst HE/LTC state that they have reduced the A13 around the Orsett Cock area from 4 lanes to 2 lanes to remove the need for drivers to change lanes on the A13. We do not understand their reckoning on this, and strongly oppose this change.

Huge amounts of money are being spent and we are suffering the impacts of the current A13 widening project to ensure the A13 in both directions is at least 3 lanes all the way between the M25 and Stanford/Manor way junction. We comment on this elsewhere in this document. However, for HE/LTC to state that this change is to remove the need for drivers to change lanes on the A13 is ludicrous and makes no sense. What the change will actually mean is that there will be a bottleneck created that will mean severe congestion. We strongly oppose this change.

#### Road closure and realignments

We strongly oppose the closure of Hornsby Lane, and also the realignments of Baker Street and Heath Road. This will distance the junctions of the roads that connect Orsett and Orsett Heath, further distancing these communities due to the LTC.

#### Distances of the long connecting slip roads

We have requested details of what the distance are of the long connecting slip roads between the LTC and existing road network. To date HE/LTC have not provided us with this information. It is very difficult to judge distances etc. using the plans, and we wanted complete clarification from HE/LTC.

#### Heights of the connecting roads

We do not feel that anywhere near enough adequate info has been provided during this or the previous consultation with regard to the heights of LTC along the entire route.

At the complex and confusing sprawling A13 junction is no exception. The best guesstimate that anyone could give us at an info event was that there would be two sections, one either side of the A13 around the Baker Street area that would be around 2-2.5m higher than the existing A13.

We would refer you back to the 2018 consultation when we were told that the A13 sections of the LTC all be lower than the existing A13, clearly this is no longer the case, and we strongly oppose to this.

In relation to the heights of some sections we would also question what gradient there will need to be on the roads, as some seem to be considerable differences in height. For instance LTC northbound to A13 eastbound seems to require a considerable gradient to get from LTC level to around 2-2.5m higher than the existing A13.

We would stress that we were only able to gather this limited info by attending an info event. Some will of course been deprived of this opportunity. This is not the kind of info that can be answered over the phone.

We have also requested detailed information about the heights, lengths, and gradients of the connecting roads in this complex junction via email, but as yet have not received the info.

Another instance when a 3D model would be extremely helpful and informative to people.

#### Lack of adequate info

The only way to try and judge the heights would be to attempt to use the Map Book 3 – Engineering Plans. However, these plans are considerably confusing and complicated for the general public to use, unless they have some experience in using these kinds of plans.

The reality is that these plans without a guide on how to use and read them can actually do more harm than good.

We have witnessed a resident saying that according to their interpretation of the plans one of the sections near to Baker St would be around 75ft high. This is because they had attempted to read the Engineering Plans, without any clear guidance on how to use them. HE/LTC have a responsibility to ensure clear and informative materials in the consultation. Therefore we would expect them to issue a 'how to use' guide for the Engineering Plans, or to provide a public user friendly version whereby residents can easily gather accurate information about the heights of different sections of the LTC.

#### The Stanford Detour

We will detail the matter of the Stanford Detour under a later section, but suffice to say that even under normal traffic conditions there will be a lot of traffic needing to detour along the A13 to the Stanford/Manorway junction, to go up and around the traffic lighted roundabout, and then head back westbound along the A13 to access the LTC (both directions) and the A1089 (south).

More details further along in this document, but this is a direct result of the lack of adequate connections between the LTC and the existing road network.

We strongly oppose the fact that LTC will inflict all this extra traffic onto that section of the A13 and the people, businesses, and community in the Stanford and Corringham area.

#### Impacts to the A13 widening project work

We are all more than aware that we are currently experiencing many issues and impacts of Thurrock Highways A13 road widening project. The purpose of this project is to have 3 lanes in both directions between the M25 and the Stanford/Manorway junction.

We have concerns that the LTC would create a two lane bottleneck along the A13 around the Orsett area.

We find it unacceptable that the work and money invested by Thurrock Council will be impacted by LTC.

The section of A13 that would be reduced to 2 lanes can be seen in the image below. The yellow section being eastbound A13 and the blue being westbound A13 lanes being reduced to just 2 lanes.



We feel that this will also increase the congestion and pollution to the area, which of course we find completely unacceptable due to the impacts this would have to our lives and health.

On top of the section shown in the image above with traffic needing to take the Stanford Detour this will also negatively impact the section of A13 widening between Orsett and the Stanford/Manorway junction due to the increase in extra LTC generated traffic.

Yet more clear indications of how the LTC will actually have negative impacts on the existing road network.

## **Lower Thames Crossing and its junction with the M25 and M25 junction 29**

### Mardyke Viaducts

On page 69 of the Consultation Guide HE/LTC state that they have increased the total length of the viaducts in the area by approx. 50m.

But then then go on, on page 71 of the same guide to say they have shortened the viaduct across the Mardyke River and Golden Bridge Sewer river from approx. 450m to 350m?

This is confusing and misleading.

HE/LTC have not even bothered to clearly mark and label on any maps the locations of where the proposed viaducts will all be. We need clear and informative detail.

HE/LTC have not given adequate info and detail for people to know the sizes, lengths, and heights of the viaducts across the Mardyke and fens. Another instance when a 3D model would be extremely helpful and informative to people.

### Flood mitigation

How can changes to the viaducts mean less flood compensation is needed? This makes no sense at all and yet again there is no evidence or explanation for this.

If HE/LTC are going to make statements like this they need to back it up with evidence and explanations. If HE/LTC do not share the info that explains it then we are just being asked to blindly trust and believe what HE/LTC want us to believe. That is not what consultation is about, it is about us being provided with unbiased fact based evidence and information so that we can come to our own conclusions.

### North Rd green bridge

Residents in the area consider the new green bridge at North Rd to be threatening more impact visually as it is now proposed to be a lot wider so will also be so much more imposing.

Not that HE/LTC have clearly shared that info in the consultation material. It is not sufficient or adequate to state that a bridge has been lowered by 2m but neglect to actually provide the height. It is also not adequate of sufficient to avoid putting the measurements of the bridge, especially with it now being a lot wider.

Another instance when a 3D model would be extremely helpful and informative to people.

In the consultation guide it is stated that lowering of North Rd bridge over the LTC will help drainage, but we can't work out why HE/LTC believe this to be so. As always there is a definitive lack of adequate info on this from HE/LTC.

### Solar farms impacted

If LTC goes ahead it would impact the proposed solar farms in South Ockendon. At a time when our Government have declared a Climate Emergency, instead of respecting things like solar farms, HE/LTC are knowingly choosing a route that will impact solar farms.

Where do HE/LTC expect enough clean green energy to come from for all the electric vehicles they keep predicting, that are allegedly meant to improve pollution?

### Safety concerns over route being so close to solar farms

We also have concerns over the fact that the LTC route bends and curves around the area where the areas of the solar farm that would be able to survive. It is known that glare from solar farms can be a serious safety concern. The way the LTC is designed to bend and curve at this section of the route increases the likelihood of this being a potential risk.

When we contacted HE/LTC we were told that the LTC would impact the more northerly solar farm site. We were also told that the onus would be put on the solar farm having to ensure that there is no glare from the solar panels to cause issues to drivers using the LTC.

This again sounds like unacceptable behaviour from HE/LTC in not taking responsibility for their actions and the impacts this will have on those they are impacting.

For us it also sums up the lack of responsibility that HE/LTC are taking with regard to the environmental impacts of the LTC.

#### M25 junction 29 access

We strongly oppose the M25 junction 29 section of the LTC scheme. We think it is yet another confusing section of road. We do not believe that most people are aware that the current M25 northbound junction 29 access will be removed as part of the LTC plans.

Most think of LTC as a crossing between Gravesham and Thurrock and don't realise the true extent of what HE/LTC are proposing, and HE/LTC do very little to help the situation.

We also do not understand why this is being considered in the consultation as another junction, rather than part of the new M25/LTC junction. Presumably, as it has not been shared the LTC/M25 junction will actual become the new J29. It will all become part of one large sprawling junction from the A127 down to the LTC.

We strongly oppose the way HE/LTC have separated the parts that make up this huge sprawling junction.

HE/LTC need to start showing this as one sprawling junction. It is impossible to figure out using the maps in the consultation guide as they are pages apart, so you can't actually see the larger picture of how it all joins together along that stretch of the scheme where the LTC/M25/A127 all connect.

We strongly oppose the new parallel road that is proposed to run alongside the M25, which would impact Thames Chase.

We strongly oppose the changes made in relation to what HE/LTC refer to as M25 junction 29.

## **Conclusion**

We conclude that with regard to changes to the entire route we do not feel adequate information has been provided, or that satisfactory consideration has been given to the true impacts the LTC would have.

HE/LTC need to prepare and share clear and informative materials as they are legally obliged to do, and to run this consultation again, at a time when we are not all struggling with being in the middle of a global pandemic crisis.

We strongly oppose the changes to the entire route of the LTC, and the whole way the Supplementary Consultation has been run. In no way to do we consider this an adequate consultation or that we have been provided with adequate information.

# *Revised development boundary*

## **Large increase in development boundary**

We find it alarming that the development boundary has increased by over 30% since the Statutory Consultation. We do not deem to acceptable for such a large increase in the development boundary. We feel that such significant changes should have been decided upon prior to the Statutory Consultation. Such a large increase could have influenced the response to the Statutory Consultation, rather than waiting for a Supplementary Consultation to try and sneak it through.

We would also state the same with the huge increase in the development boundary since the 2016 consultation, along with other drastic changes, which again we feel would have influenced responses and the preferred route decision.

It concerns us also that HE/LTC have been unable or unwilling to provide a definitive figure for how many residential and business properties there now are in the revised development boundary.

The new development boundary is fixed, therefore HE/LTC should know exactly how many properties there are, and there should be no need for approximations.

## **Impacts to residents**

We have very serious concerns about the impact that HE/LTC decisions and communications are having on residents, especially those that come from the Land & Property Team.

They do not seem to care at all about how this impacts people's lives and health, as they continue to play their games.

We are aware that the stress and impact of dealing with HE/LTC with regard to their homes has and is causing serious health issues, including the mental well-being of residents.

We have experienced residents who have been literally suicidal when they contacted us. We will always do what we can to help people who come to us, but we are not qualified to trained to deal with this, we are simply concerned residents with a conscience trying to do the right things by those who need help, as we hope most would if they found themselves in this position.

We cannot stress enough the severity of the impacts HE/LTC actions are having on people, and the fact that HE/LTC either don't realise or don't care. You need to do something with immediate effect to ensure these impacts are reduced as much as possible and handled in a far better way, with more compassion and understanding.

We have serious concerns that if things carry on with the way HE/LTC are treating people that there could be serious consequences, as they are pushing people beyond and above the limit, and the impact is having on people's health and mental well-being is criminal.

Gammonfields travellers site residents have not only had the stress of dealing with the fact their homes and site would have to be relocated, but also the extra pressure created by HE's decision in proposing relocating their site closer to houses, which some residents in the area have sadly taken

issue with. Again this is another example of HE/LTC not truly caring about the true impacts their actions are having on people's lives.

In addition at info events HE/LTC staff have evidently been implying to some members of the public that the decision to move the traveller site closer to the houses is due to Thurrock Council deciding to do this. Let's be clear this is all a direct result and decision of HE/LTC choosing to put the route through the existing site, the decision to move the site is not one that Thurrock Council chose.

### **Poor communications**

We would state unequivocally that in our experience and the experiences of members of our group that communications from HE/LTC, and particularly the Land & Property Team have been absolutely diabolical and without any true care or understanding of the impacts these communications are having on people's lives and health.

### **Residents lives being played with in and out of the development boundary**

#### The moving development boundary effect

Some residents must feel like they are in and out of the development boundary so much that they are part of some evil form of the Okey Cokey.

We are also aware that some resident literally moved out of their homes, as a result of discretionary purchase, and literally within a week or so the consultation launched and their property was now within the development boundary.

How can this be considered acceptable or ethical? There is a big difference in the kind of deal that would be settled on under blight compared to discretionary purchase, like legal costs.

HE/LTC are putting people through hell, up turning their lives, impacting their health and well-being without any sign of true compassion.

#### Development boundary oversights

Another repeated theme from HE/LTC Land & Property team is not checking exactly what the development boundary looks like with regard to people's land and property on a map before the development boundary changes are agreed, announced, and letters sent to the land/property owners.

Sometimes the development boundary literally clips across the property/land and is non-essential.

When we have raised this, alongside the affected residents, at an info event, we were told it is very likely that these properties would be removed from the development boundary at a later date, as there appeared to be no real reason for them to be within it.

This means the residents go through all the stress and nightmare of finding themselves technically in the development boundary, and having to live with the consequences of this until such time as HE/LTC make any further change officially.

Yet again HE are not taking this seriously enough, or respecting how stressful this is for those affected.

This is not a game; this is people's lives, their health and well-being. Severe stress has implications on health both physically and mentally.

We question and have serious concerns over why HE/LTC are not being more careful to check things more thoroughly, to avoid these kinds of things happening.

In some instances of this happening the letters are not even being sent out at the start of consultation, but instead were sent nearly a month after consultation began. More on that below.

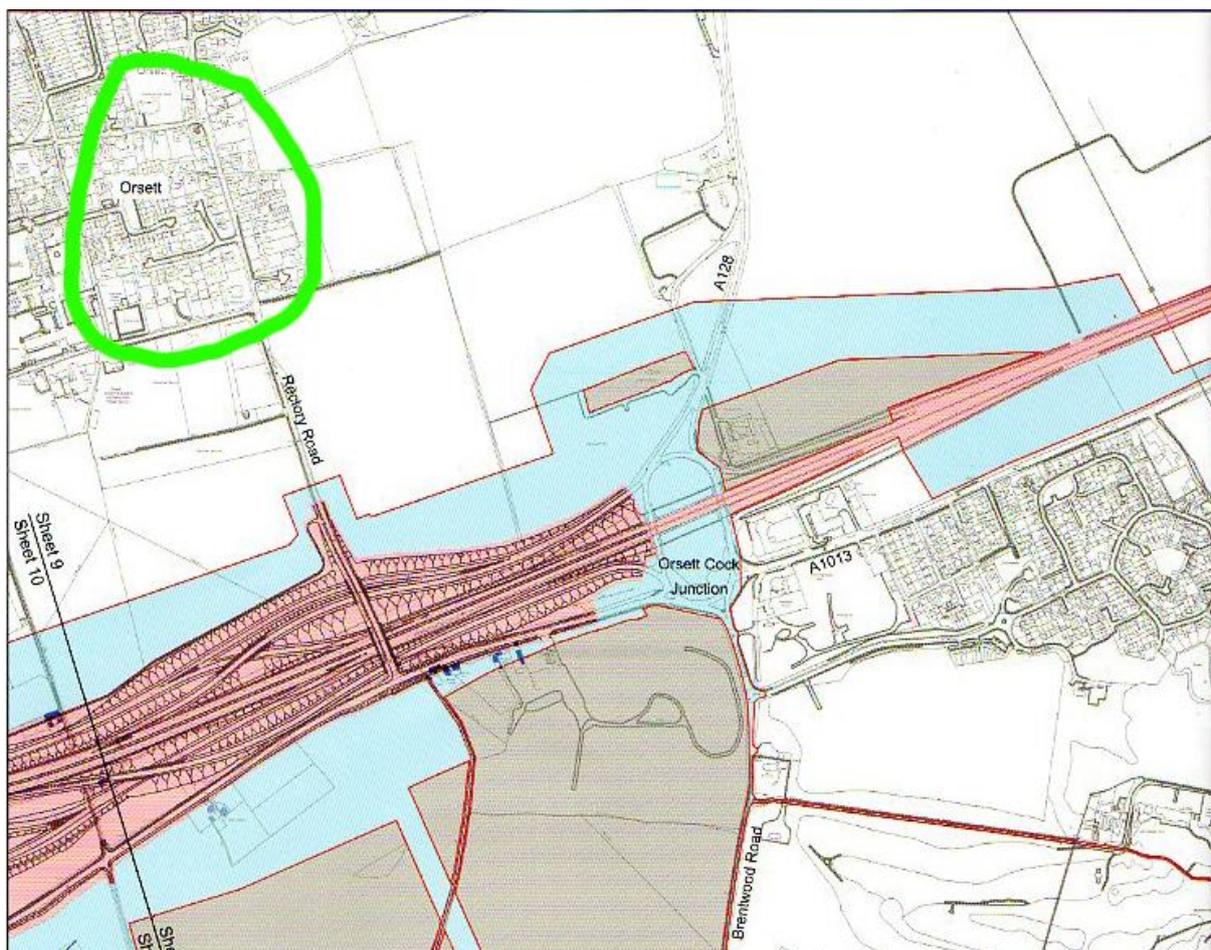
### Erroneous letters

At the start of consultation HE/LTC sent letters to residents with regard to the new development boundary for LTC.

We are aware that a number of these letters were sent erroneously and caused distress to the recipients, some of whom are in their 80s and 90s.

They were sent letters that stated their properties were now within or partially within the new development boundary.

As can be seen in the image below the area where some of these letters were received is circled in bright green. The development boundary can be seen outlined in red on the Land Use map.



This is certainly not the first time HE/LTC have made such errors, this has been an ongoing issues for years now sadly.

We have questioned a number of times now why adequate procedures and safeguards are not being put in place to stop this happening.

HE/LTC seem to fail to understand the impact erroneous letters like this have on people's lives and health.

We need HE/LTC to please finally step up and take responsibility. HE/LTC need to be held accountable for their actions.

We cannot stress enough how seriously concerned we are that if HE/LTC continue as they are in the way they are dealing with and treating residents that there could be serious consequences, as they are pushing people beyond and above the limit, and the impact is having on people's health and mental well-being is criminal.

#### Late letters

We are aware that HE/LTC sent come letters to residents that were received around the 21<sup>st</sup> Feb. We and residents have asked for an explanation as to why these letters were sent so late into the consultation, but to date we have not been provided with any such explanation.

To be clear these residents had not had any change to their land/property ownership, or change to their mailing addresses. All that we are aware of have lived at the address for a number of years.

We can think of no genuine reason as to why the letters that were sent late stating the properties were now in the development boundary were sent at this point, as opposed to at the start of the consultation.

#### *Now in boundary, but only just and likely to be removed at next change*

We discussed the issues of the late letters to residents, telling them they were now in the development boundary, with HE/LTC at the first info event alongside some of the residents who had received them, which coincidentally was the day that the letters were received.

No explanation could be provided there and then as to why these letters had only just been sent, and why they were not sent at the start of consultation. As highlighted above we and the residents requested that we be provided with an explanation when the matter had been investigated. That was on Feb 21<sup>st</sup>, to date April 1<sup>st</sup> we have not been provided with an explanation.

At the info event it was stated to the residents that looking at the letters and maps, it appeared that it would be highly likely that in fact it had been a mistake that would likely be rectified at a later date with the development boundary likely to be moved to avoid their properties.

The reason given was that the development boundary only clipped the land/property and in that area as it the development boundary related to utilities it was highly likely to be possible to realign the development boundary to avoid their land/properties.

This means that these residents are now living in limbo of not knowing, and all the impacts that your house technically being in the development boundary brings.

They will now be in this position until such time as any further announcement, of changes to the development boundary, are made. We know previously in similar situations to this it has meant literally years waiting for the development boundary change to be announced. This is not the first or only instance of this kind of thing happening.

These are yet more examples of the inadequacies, and the impacts it has on people's lives and health. Why does this keep happening? Why do HE/LTC consider this acceptable?

#### Correcting mistakes

Some of these letters stated that they were being issued to correct mistakes in previous letters that were sent out at the beginning of consultation.

This again increases the stress and impact on these residents, which is totally unacceptable.

It also yet again highlights that clearly HE/LTC do not have adequate procedures and safeguards in place to reduce the chances of mistakes being made and being sent to residents.

The general attitude of HE/LTC seems to be to offer lip service rather than actually investigating and seeking to put adequate procedures and safeguards into place.

#### Land Interest Questionnaires during COVID-19 crisis

We are concerned that HE/LTC have deemed it acceptable to be sending Land Interest Questionnaires out to residents during the COVID-19 crisis.

We are absolutely horrified to learn that this included sending them to some of the residents who are in their 80s and 90s, who were on the receiving end of erroneous letters from HE/LTC at the start of consultation. Comments on those previous erroneous letters can be found elsewhere in this document.

It is shocking that at a time when we are all facing and trying to deal with a worldwide pandemic due to COVID-19, and we are being told to take particular care and caution with regard to older members of our families and communities, as well as others who are considered vulnerable right now due to these unprecedented and uncertain times, Highways England decided to send residents letters and Land Interest Questionnaires, including residents who HE/LTC have previously been made aware are older members of our communities, and have previously been on the receiving end of confusing HE letters that contained serious errors.

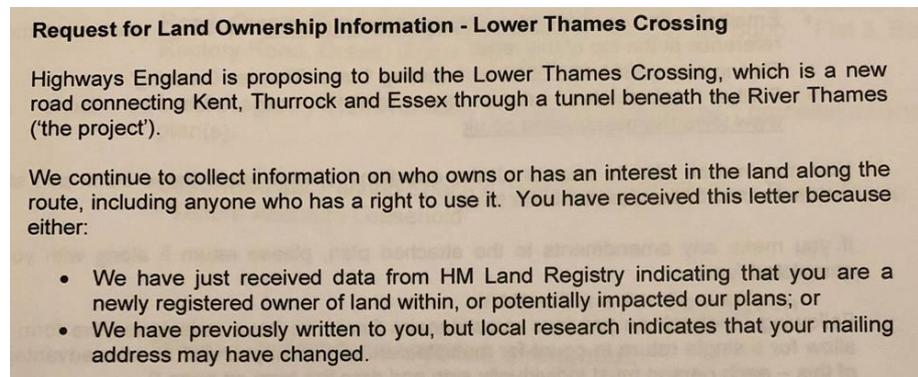
Letters of explanation and apologies for the distress caused were issued to these residents in response to the previous erroneous letters. How can those letters of apology be considered to be from genuine concerns when HE/LTC then go on to cause more distress?

To be sending such letters/questionnaires at a time when people are already finding themselves in such a stressful situation, and the older and vulnerable members of our communities are more isolated than normal is despicable and thoughtless. We need HE/LTC to stop doing these kinds of things, and to start taking their duty of care to all residents seriously.

We have followed up with HE/LTC for further clarification and comments on this matter, but we are still waiting for a further reply.

### Badly written letters

The letters that accompanied these questionnaires also left a lot to be desired. As can be seen in this photo the wording doesn't even make sense.



To begin with the first reason given doesn't even make sense, we can only assume it should read something along the lines of "or potentially impacted by our plans", and HE/LTC have missed the word 'by' out, as without that word it really doesn't make sense.

Another example of the fact that HE/LTC do not have adequate safeguards in place, to properly check these letters before they are sent out to residents.

When we queried this matter with Sarah Collins she acknowledged the mistake and said she would feed it back to the team. Our point in a follow up reply to her is that the letter comes with her name as the sender, as the Land and Property Lead, so it is ultimately her responsibility to ensure the letters being sent out in her name are adequate and correct. Not passing the buck to her team. We find it very frustrating the lack of willingness to take ownership of these many issues residents have had with HE/LTC. We believe this lack of ownership is part of the reason why these mistakes keep happening over and over again for so many years now. Somebody needs to take responsibility and be held accountable.

### Slow and greatly lacking communications

Residents, whose property and/or land that is directly impacted, are not being dealt with and kept in contact with in an adequate and timely manner. We are aware of residents who constantly have to chase HE, and wait long periods of times for responses and actions to be taken.

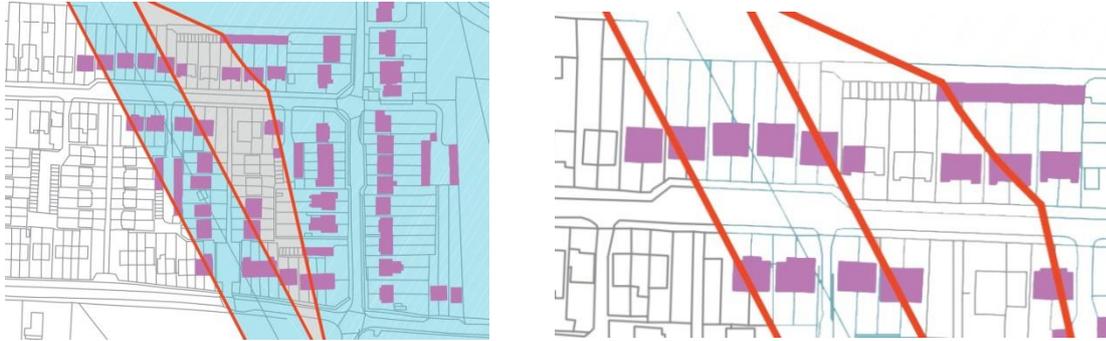
### Confusing maps and plans

Residents have been receiving letters along with Land Use maps and property/land plans. These are totally confusing and take some real understanding to figure out.

The property/land plans in particular are greatly lacking, especially in areas where it is harder to decipher whether you are looking at land/property that is consider in or out of the development boundary. These plans are not colour coded, and in some areas, for example where there are the grey shaded areas on the Land Use maps, it is hard to tell on the super close up plans what is inside and what is outside of the development boundary.

For example, take a look at this section of a Land Use map in the left hand image below. Then imagine removing the colour coding on a zoomed in version and trying to work out what is inside and what is outside of the development boundary like in the image on the right hand side.

Take a look at the plans you are sending residents, this is essentially what you are providing them with. We have avoided using a copy of an actual plan that has been sent to a resident to protect the privacy of residents.



### Lack of procedures to safe guard Land & Property team communications with residents

Constant errors over and over again, over many years now, and nothing improves

### Land & Property Team have too heavy a workload?

Questions and concerns that Sarah Collins is working on at least two major project, LTC and A14 Cambs project. We noticed on an out of office response from Sarah Collins that she gave instruction of who to contact in her absence for each project. We question if this is just Sarah Collins or all or more members of the team. This could be another reason for the mistakes and delays that residents are experiencing, because the workload on the Land & Property team is so great where they are working on more than one major project.

## **Conclusion**

We conclude that with regard to changes to the development boundary we do not feel adequate information has been provided, or that satisfactory consideration has been given to the true impacts the LTC would have.

We strongly oppose the changes to the proposed area of land that would be required to build the LTC, it would be hugely destructive and destroy homes, lives, communities, ancient woodland, greenbelt, agricultural land, the environment, flora and fauna, countryside and habitat and so much more.

We strongly oppose the LTC on all these grounds.

# Walkers, cyclists and horse riders

## **Lack of adequate info**

Whilst there are statements in the consultation materials suggesting that HE/LTC would make improvements and upgrades to the walking, cycling and horse-riding network, we cannot see any actual evidence as to what these will actually be, how they will be done, or what the actual end results and benefits would be.

There is not adequate information about things like the standards of these routes, the width, any gates, any markings/signage, what the surfacing will be like etc. Clearly these things are important for us to give proper consideration as to whether what is being proposed is acceptable and beneficial.

For instance the surface for a cyclist's needs will be different to a horse rider, because horse riders will want a relatively soft surface ie not a hard base, to ensure their horses do not suffer leg injury, whereas cyclists will want and need more of a hard surface to ensure safe riding conditions.

There is also the factor of considering the safety of walkers, cyclist and horse riders all using the same routes where horses can be spooked, pedestrians may not hear cyclists and horse riders approaching, which could result in incidents on shared paths.

No details are given to bridge crossings as to things like how high the sides/barriers would be, and if they will be safe for horse riders to actually be using, bearing in mind that horse riders are likely to be higher up, so safeguards need to be in place to ensure no risk as they use this bridge/crossings.

From what we can see in the photos of the area where the LTC and M25 meet the bridge connecting the east and west sides of Thames Chase certainly does not appear to be suitable for horse riders, and again no detail is given to explain why HE/LTC believe that it is.

## **Misleading info**

We have identified that some of the info that is shared in the Consultation Guide is misleading. For example on page 91 the legend shows red as being proposed, green as existing. Yet on number 6 you are marking it as red which would suggest proposed rather than existing, when in actual fact this is actually just realigning the existing route that runs alongside the A13 currently. The existing route clearly being destroyed by the LTC connecting road from the LTC joining the A13.

Page 93 in the Consultation Guide states that HE/LTC are providing a connection between North and South Ockendon. Yet when we look at what is being proposed there clearly is not connecting route between North and South Ockendon. The options for routes after passing over the LTC along North Rd then either take the routes either West or East, not in a Northerly direction to North Ockendon.

On page 95 of the Consultation Guide you also give the impression in the image that there will be a route to the south of the A127/M27 roundabout, by marking it as existing. However the way it is worded below is confusing and together the image and text do not give a clear indication that the existing route would not actually be safe and viable to use. Safe crossing points would be needed at this section to ensure continued and safe passage for users.

## Impacts to health and well-being

Having to walk, cycle, ride next to a huge new road with loud polluting traffic is not good for anyone's health and mental well-being.

There is scientific evidence to show that exercise and being amongst nature are beneficial to ones health and mental well-being, but these benefits will be impacted in a negative way if we are limited to walking, cycling, riding alongside such a huge and busy road as LTC.

There are also very popular routes like the Fort to Fort walk that runs between Coalhouse Fort and Tilbury Fort along the north side of the River Thames.

During construction access will be impacted, and even after that our enjoyment of the route would be impacted by the air and noise pollution from the LTC.

It would be the same for the popular area of Shorne Country Park in Kent. A place to escape and enjoy being a part of nature would be impacted by the increase in air and noise pollution.

Indeed this would be the case in so many popular locations along the entire length of the route and in the surrounding areas.

## Walkers

Whilst HE/LTC are stating that they are improving routes for walkers, there are instances where they are actually making it harder for walkers.

The LTC will cut through South Ockendon across North Rd, further isolating those in North Ockendon. There is no footpath link being proposed for those people to assist them with access to South Ockendon to lessen and help the fact they are being isolated by the LTC.

## Cyclists

### Crossing the river

In the 2018 Statutory Consultation we were told categorically that cyclist wanting to cross the river via the LTC would not be given a similar free service to that which is offered for cyclist wishing to cross the river at the Dartford Crossing.

We were told this was because the LTC would be a motorway, and cyclists are not permitted on motorways.

However, in the 2020 Supplementary Consultation the LTC has lost its motorway description. We have asked why, but we have not been provided with a response to date.

We have also asked if this means that cyclist will now be offered a similar free service they can use to cross the river at the LTC. Again we have not yet had a response to this question.

Since the Government have declared a Climate Emergency action is needed to ensure sustainable travel, such as cycling is supported. Spending such a huge amount of money on a project like LTC that purely focuses on motorised vehicles is ludicrous, and needs to be corrected with some balance given to sustainable transport such as cycling.

## **Horse Riders**

The impacts to stables, yards, grazing in all areas along the entire route are severely at risk due to LTC.

It is all very well HE/LTC stating that there will be improvements and upgrades to Bridleways, but where do HE/LTC expect the horses to be kept so that riders can actually use the bridleways?

The proposed LTC has such a severe impact on the equestrian community, it will wipe out stables, yards, grazing, it impacts businesses such as riding schools. A knock on impact of reducing and practically wiping out places for horses to be kept in some areas will also see direct impacts to others businesses, like farriers, vets, saddleries, horse feed shops etc.

There are large numbers of people who are desperately concerned that they will have nowhere to keep their horses and ponies if LTC goes ahead. There simply won't be enough suitable places to keep horses and ponies in the area.

Not only that, if LTC goes ahead consideration has not been given to the impact construction will have on businesses such as riding schools. Construction is very noisy and some of it would be taking place extremely close to a very popular riding school in Orsett. Loud noises have a very negative impact on horses and ponies, and can easily scare and spook them. With such excessive proposed construction hours, businesses like the riding school in Orsett will struggle to be able to safely continue with riding lessons for fear of the loud noise spooking the horses and ponies and causing accidents.

## **Conclusion**

We conclude that with regard to changes for walkers, cyclist, and horse riders we do not feel adequate information has been provided, or that satisfactory consideration has been given to the true impacts the LTC would have.

We strongly oppose the proposals for walkers, cyclists, and horse riders.

We strongly oppose the LTC on all these grounds.

# Environmental impacts and mitigation

## Pollution

### LTC Toxic Triangle



The proposed Lower Thames Crossing would create a toxic triangle with the M2/A2 running along the bottom of the triangle and the M25/A282 running up the left hand side, and LTC running up the right hand side of the triangle, as can be seen in the image to the left.

This would increase pollution in areas that already have illegally high levels of air pollution, and very high incidents of air pollution related illnesses.

### WHO standards on PM2.5

You can't see them, but every day, we all breathe in tiny toxic particles which damage our heart and circulatory health. They are an invisible killer. These are known as fine particulate matter or PM2.5.

This British Heart Foundation article states that around 15 million people in the UK live in areas where average levels of tiny toxic particles in the air exceed guidelines set out by the World Health Organization (WHO) – [www.bhf.org.uk/what-we-do/news-from-the-bhf/news-archive/2020/february/government-must-go-further-and-faster-on-air-pollution](http://www.bhf.org.uk/what-we-do/news-from-the-bhf/news-archive/2020/february/government-must-go-further-and-faster-on-air-pollution). Areas along the route are amongst those that already exceed WHO standards.

Research has shed light on how harmful pollutants like PM can enter the bloodstream and cause damage to people's heart and circulatory systems, increasing the risk of potentially deadly heart attacks and stroke.

We have seen articles like this – [www.essexlive.news/news/essex-news/essex-town-breathing-polluted-air-3618804](http://www.essexlive.news/news/essex-news/essex-town-breathing-polluted-air-3618804) that highlight the dangers, and make the comparison that our poor air quality is equivalent to smoking almost 140 cigarettes every year.

We remind Highways England that you have a duty of care to ensure that your roads are safe and not designed to put lives at risk. Clearly the proposed Lower Thames Crossing would put lives at risk by the very fact that it will increase PM2.5 in areas that are already exceeding WHO guidelines.

### Whole LTC route would fail against WHO standards on PM2.5

We are aware that Highways England appointed Karen Lucas, a Professor of Transport and Social Analysis at the University of Leeds, as an independent advisor to the community impacts work stream for LTC, providing additional rigour and objectivity to the assessment work being undertaken.

Professor Lucas also chairs the Community Impacts Public Health Advisory Group. The CIHP Advisory Group was established in November 2018 comprising an independent chair, representatives from the LTC project team and senior representation from Local Authorities potentially affected by the project (invited Local Authorities have been by virtue of their proximity to the project and registered interest and include Kent CC, Essex CC, Thurrock Council, Medway Council, Southend-on-Sea BC, Gravesham BC, Dartford BC, London Borough Havering and Brentwood BC).

In July 2019 Professor Lucas tweeted -

<https://twitter.com/drkarenlucas/status/1150561005199646720>



Clear evidence from HE/LTC appointed expert that the whole project exceeds WHO health guidance on PM2.5.

#### *London has committed to WHO standards on PM2.5 by 2030*

The Mayor of London, Sadiq Khan has already pledged to reduce fine particulate matter (PM 2.5) pollution in London in line with World Health Organisation (WHO) guidelines by 2030. (<https://airqualitynews.com/2019/10/11/london-commits-to-who-guidelines-for-pm2-5-by-2030/>)

In July 2019 the Government released this report on Assessing progress towards WHO guidelines for PM2.5 in the UK – [www.gov.uk/government/publications/air-quality-assessing-progress-towards-who-guideline-levels-of-pm25-in-the-uk](http://www.gov.uk/government/publications/air-quality-assessing-progress-towards-who-guideline-levels-of-pm25-in-the-uk)

In October 2019 there was talk about the possibility of a new Clean Air Act potentially being announced as part of the Government's upcoming Environment Bill. The hopeful news for us was that former UK Environment Secretary Michael Gove has evidently suggested that the Bill will enshrine WHO guidelines for PM2.5 in law. With Brexit and the General Election, and now Government being reformed after the election things seem to be taking sometime to be sorted.

We would point out that the northern part of the LTC scheme falls within the London Borough of Havering, and should therefore be complying with the Mayors commitment to comply with WHO standards on PM2.5 by 2030.

In line with that we would consider it discrimination for the rest of the route to not be granted the same level of air quality standards.

#### *Conclusion regarding WHO standards on PM2.5*

Highways England are currently predicting that the proposed LTC would open in late 2027/28 if they are granted a Development Consent Order. To be spending £6.8bn (which as we all know will likely keep rising since the Government allocated up to £8.2bn against LTC in RIS2) on a road

project that will not comply with WHO standards on PM2.5 by 2030, just a couple of years after opening seems ludicrous and totally unacceptable.

That is of course if it were to stick to budget and plan. We are well aware that the DCO application has already been pushed back by around a year. It seems that with everything going on and HE/LTC having already announced there will be a further round of consultation before DCO application that the submission of the LTC DCO application could still be pushed back yet again, meaning if it were granted the DCO it would be creeping closer and closer to the 2030 deadline to be compliant with WHO standards on PM2.5.

Yet another reason why the whole LTC route as planned is not fit for purpose and needs to be halted immediately.

#### LA105 Air Quality

We would also question if the new LA105 guidance on assessing air quality dating from Nov 2019 has been taken into account. We can see now reference to it in the Environmental Updates.

We would assume and expect that HE/LTC would have to take this into account since it forms part of the 'Standards for Highways'.

We would like further clarification on this, and also feel that it should have been included and reflected in the Environmental Update, and as it doesn't appear to we would consider that it to be yet another inadequacy of consultation. Either you have not presented it in a clear and informative way, or you have simply failed to include it, either way it is not adequate or acceptable.

#### CO2 / Net Zero

We have contacted HE/LTC to ask what the predicted increase in CO2 would be for LTC, including embedded CO2 during construction phase. We also requested a copy of the Appraisal Summary Table for the scheme.

We were told that the information that I had requested is being developed as part of your Development Consent Order (DCO) application and will be based on the scheme you take to DCO.

There were no other references in the email to point us in the direction of where to find any related info on this topic from current documents. We again emailed asking for further detail on this, and are yet to have received a reply.

We have since discovered that the PEIR document from the 2018 consultation contains details that 62,587 tonnes of carbon dioxide equivalent emissions are predicted in the opening year alone!

We find this information totally astounding and the predicted figures to be completely unacceptable considering the Government have declared a Climate Emergency.

It appears that the LTC will simply have no chance at all of being carbon net zero compliant.

We would also express that considering you are asking us about the Environmental aspects of LTC in this consultation to not provide us with clear and informative material to cover things like the data to show us how the LTC will or won't comply with things such as Net Zero is completely inadequate.

There isn't even mention of Net Zero in the latest Environmental Update.

Quite clearly you are trying to give the impression that you are seeking feedback from the public during the consultation, yet at the same time not providing us with the necessary info on important factors such as predicted CO2, despite the fact you are stating that there are changes to the traffic flows, which will of course also equate to changes to the impacts to our air quality.

We consider this yet another example of the inadequacy of this consultation, and the complete lack of any kind of duty of care and consideration to our right to breathe clean air, and take climate emergency seriously.

We would point out that you won't be able to sit and count the economic growth and benefits without clean air to keep us all alive.

#### Electric Vehicles questionable solution

HE/LTC seriously need to stop resorting to the excuse that by the time LTC opens (we add, if it goes ahead) there will be so many more electric vehicles (EVs) on the roads that pollution won't be such an issue.

It seems to us that HE/LTC are using this as some kind of imaginary get out jail free card, without any real consideration about whether what they are saying actually holds any real weight.

The simple fact is that people are not making the move to EVs as quickly as the car industry would like, and there are many good reasons for this.

Some people are concerned that the carbon footprint in production of EVs is considerably higher than continuing to use their existing vehicle, which has been proven to be true.

There is also the consideration that even if everyone did all of a sudden make the move to EVs, what would happen to all the old cars? Where would they all be disposed of?

Aside from that there is simply not enough clean green energy to meet demand if everyone were to move to EVs. This could result in more traditional power stations or nuclear power stations needing to be built. Not only are they high risks to the environment, historically the areas you are proposing to put the LTC are areas that have had power stations. This means that the pollution would come from the power stations rather than directly from the vehicles so there is no improvement or benefit to be had.

EVs are also not free from pollution, they still pollute from brake dust and tyre particulates etc.

The batteries are not exactly environmentally friendly and the toxic process also has an impact on the lives of those involved in sourcing the materials used, causing huge risk to health and lives.

Nobody yet seems to be considering where these batteries will be disposed of when they reach the end of their lives, as the batteries don't last forever.

There are not enough qualified EV mechanics in the UK, and most of those that there are, are main dealer mechanics that charge and arm and leg.

We are nowhere near a possibility of Electric HGVs becoming common place either, so a large percentage of traffic on the roads, ie the HGVs will remain.

EVs generally just stop working when they have an issue, they literally just shut down and stop, no chance to coast to safety if on a major road. Therefore EVs add to safety concerns on roads, especially major roads, and particularly 'smart' roads.

When they do brake down or are involved in incidents extra procedures and time is needed to deal with them, as being powered by electricity they can be live so again there are additional safety concerns.

To top it all off, even if for one moment you ignore all of the above and buy into the concept of EVs, there is still the fact that if people feel that EVs are greener and better for the environment etc, they will be more inclined to use them, which results in increased traffic on the roads, which in turn equates to congestion.

HE/LTC need to stop blindly and biasedly trying to use EVs as an excuse.

## **Impacts to Health**

Financial cost is always talked about, and that is of course important, since it would be tax payer's money being used. However, there are other things that need to be taken into account, real life costs, such as the real cost to our health.

Also what about the cost to the National Health Service in relation to all the air pollution related illness that people will suffer? As a Government company HE/LTC should be behaving in a way that protects people in the UK, and also avoiding doing harm to our National Health Service. Clearly moving forward with LTC would put both at risk and under extra pressure, which is not in any way deemed acceptable by us.

### Physical Health

Asthma, COPD, Cancer, Strokes, Heart Disease, and premature death are amongst the many health concerns relating to air pollution.

Some of the areas that the proposed LTC route passes through already have higher amount of people suffering this health issues than the national average.

HE/LTC need to start showing some genuine understanding and concern over this aspect of the LTC. People's lives are at risk, and that is too high a price to be paying for a new road.

Questions have been asked in relation to Cut and Cover along the route, but HE/LTC always come back with excuses and mentions of financial cost.

HE/LTC need to start considering the cost to our lives and health, and the future impacts it will also have in costs to the impacts on our NHS.

### Mental Health and well-being

There is scientific evidence that shows being in and surrounded by nature benefits the mental health and well-being of people.

The proposed Lower Thames Crossing would destroy so much of our local environment and green areas, it would have a detrimental effect on our mental health and well-being.

There is also the impact of living near to such a large road project both once open (if it goes ahead) and during the 6-7 year construction period would have on lives.

### Lack of adequate info relating to health impacts

From the limited info we have we are extremely concerned about the impacts it will have to the lives and health of our communities, and do not feel that there has been adequate information provided to us. We are not convinced that this aspect is a high enough priority of HE/LTC, and therefore also do not believe that the proposed mitigation will be anywhere near sufficient and protect the lives of those in our communities.

Progress on the Health Impact Assessment is considerably slow, and we deem it essential that this work is carried out adequately and shared with the public and consulted upon before the DCO application is submitted.

You wouldn't gamble your health and life without first thoroughly researching things, so you can make an educated decision, and responding to consultation on LTC without knowing the true risk that the impacts to our health hold should not be something we are asked to do.

HE/LTC need to provide us with more info and allow us adequate response.

### Whitecroft Care Home

We have serious concerns on the impact LTC will have to places like Whitecroft Care Home. This is a care home that provides skilled elderly and dementia care for up to fifty-six individuals. These residents should not be trapped amongst the LTC and it's connection roads. We strongly oppose the fact that the care home is impacted in such a way, it is totally unacceptable, and the impacts it will have on residents health and mental well-bring having to live amongst LTC roads.

### Schools

We also strongly oppose the fact that LTC and connecting roads will greatly impact some schools in the vicinity of the proposed LTC route. We find it highly unacceptable that HE/LTC would consider putting a major source of pollution so close to schools.

## **Loss and impacts to ancient woodland and veteran trees**

We are disgusted that Highways England has yet again failed to put a figure on the threat to the precious irreplaceable habitat.

We have managed to identify some particular areas of concern, despite the lack of info that HE/LTC have provided.

### Woodland Trust sites at risk

We agree with the identifications of ancient woodland and veteran trees at risk by the Woodland Trust, and share their serious concerns.

- Nine areas of ancient woodland are threatened with direct damage and loss, three of which are designated as Sites of Special Scientific Interest (SSSI) including the Woodland Trust-owned Ashenbank Woods SSSI.
- Three further ancient woods face deterioration from indirect damage.
- 15 veteran trees are within the development boundary and as such are under threat of damage or loss.

Ancient woodland cover stands at just 2.4% in the UK. Ancient woods are defined as land that has been continuously wooded since 1600 which makes them irreplaceable. Many are often centuries older.

Woodland Trusts own ancient woodland, Ashenbank Wood at Cobham in Kent, could be among those at risk. This wood is part of the Shorne and Ashenbank Site of Special Scientific Interest due to its deadwood, veteran trees and open ground habitat. Rare wildlife including great crested newt and dormouse make their homes here. This is just a small portion of what we could lose if the current tunnel plans go ahead.

The sites the Trust considers to be at risk are:

**Direct loss: (\*SSSIs)**

Kent: Shorne Wood\*, Brewers Wood\*, Brices Plantation\*, Ashenbank Wood\*, Cole Wood, Codham Hall Wood, Claylane Wood

Essex: Rainbow Wood, Ashen Shaw

**Indirect damage:**

Essex: Folkes Lane Woodland, Hobbs Hole, Frank Wood

Forestry England sites at risk

We would also add Jeskyns Community Woodland and Thames Chase Forest Centre to the at risk list. Jeskyns is located in Cobham, Kent and falls within the development boundary for LTC. Part of Thames Chase in Upminster, Essex also falls within the development boundary. Both are Forestry England sites.

Thames Chase

We are aware that Thames Chase Community Forest was created by volunteers in the early 1990's. Over a million trees were planted either side of what at the time was the new M25. This was done with the ambition that the negative impacts of the motorway could be mitigated. It was hoped that the trees would help with the noise and air pollution from the motorway traffic. Now years later it has matured significantly, and has created an amazing community forest for all.

To now be putting this area at risk due to the proposed Lower Thames Crossing it completely unacceptable. To be considering building a new road on land that was used as environmental mitigation for another road project (the M25) leaves so much to be desired.

How can you expect us to take you seriously regarding Environmental Mitigation when you are proposing such diabolical actions as this?

### Jeskyns

We are also aware that Jeskyns is a site not without previous environmental problems. The Forestry Commission bought the land to turn it into a community woodland. Much of the land was arable crops that would usually be harvested by the farmer after the young skylarks had left their nests, along with Corn Buntings and Meadow Pipets. All are classed as “red species” by the Royal Society for the Protection of Birds – the highest conservation priority because of their rapid decline in recent years.

However, teams of tractors were moved in by the Forestry Commission/Government and ploughed up the fields before around 60 nests full of newly-born skylarks and their eggs had grown and flown the nest. Conservationists fear that all of the birds are dead, killed as they nested. Evidently a liberal spraying of super-strength pesticide had also ensured that they and other forms of wildlife did not come back.

A Forestry Commission spokesman later admitted that the ploughing was an “operational misjudgement which we regret”. “We certainly had no intention of harming any birds,” he said. “We have commissioned an ornithologist to advise us on the way forward.”

This site should not be put at any further risk, and HE/LTCs plans with regard to this area are completely unacceptable.

### Other sites at risk

There are many other forest, woodlands and trees that are risk too, and at this time of global climate emergency we need to be doing all we can to save and protect them, not destroying them with pollution creating road projects like LTC.

### The Wilderness

The Wilderness has been a part of Ockendon for at least 400 years. It is home to many varieties of trees, plants, and wildlife, including mature elms, and at least 8 bat species, some of which are rare. It is now under threat from the proposed Lower Thames Crossing.

We don't think that HE/LTC have identified the importance and value of the Wilderness, and have taken it into account when designing the proposed LTC. Again we stress the importance of saving and protecting the priceless and essential woodlands and habitats that have been home to our local wildlife, and supported and provided our local communities with nature and air for literally hundreds of years.

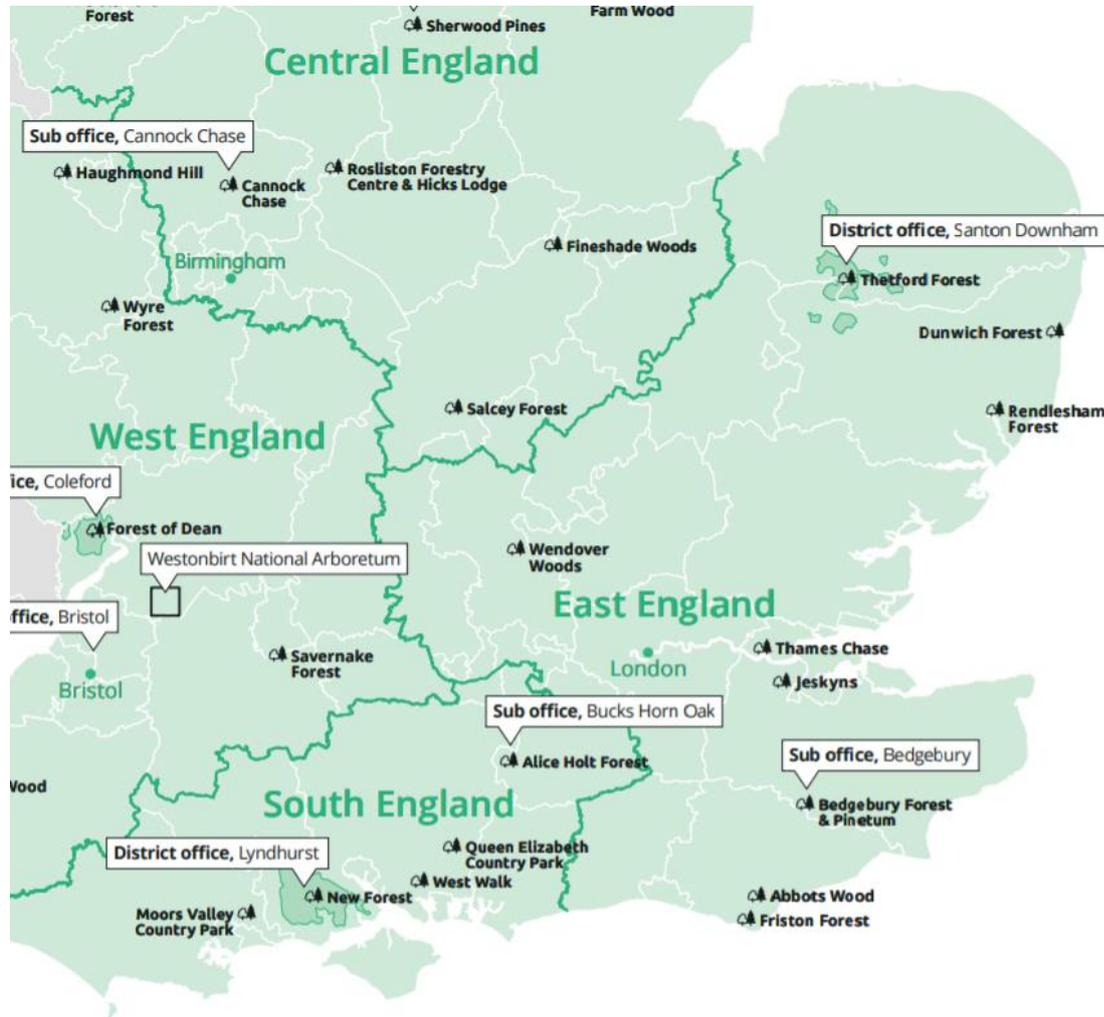
### Benefits of trees to our health and well-being

It is not just that trees and plants help clean the air we breathe, and give homes and food to wildlife, but also the value of recreation and wellbeing of us being out and connected to nature.

Forestry England are responsible for managing and promoting the nation's forests owned by the Government of the United Kingdom. They clearly identify the benefits of the forests and woodland. It is not just that trees and plants help clean the air we breathe, and give homes and food to

wildlife, but also the value of recreation and wellbeing of us being out and connected to nature. You can read their Natural Capital Accounts, which are annual reports where they measure all of these things for their woods – [www.forestryengland.uk/about-us](http://www.forestryengland.uk/about-us).

As you can see from the map below how few and far between these Government forests are, and how Thames Chase and Jeskyns play a vital role in this to the East of London. They need to be protected, not put at risk like this.



## Impacts to wildlife and habitat

We are living in a time where species are becoming endangered or worse going extinct at an alarming rate. We cannot ignore the true impacts of the proposed LTC to our wildlife and its habitat. Everything is connected and we are fast approaching the point of no return, and even if you don't believe that then what is there to lose. If those of us that believe this to be true are wrong we are all living in a cleaner greener world, but if non-believers are wrong then we're all going to die.

We cannot simply keep destroying our greenbelt, woodlands, countryside, it is vanishing at an alarming rate and needs to be saved and protected.

Simply attempting to re-home certain creatures in other areas is not good enough. Many are territorial so will not survive if moved into another creatures territory.

Others like badgers will always try to return home to their own territory, which will further put their lives at risk.

Bats will be impacted by the light pollution from the LTC.

The LTC will create a huge physical barrier along its entire length that will stop animals being able to move about as they have done previously. We are not aware of any provisions being put in place for wildlife crossings along the route.

We certainly do not consider HE/LTCs attempts of green bridges to be considered safe crossing for animals. From what we have seen and been told they are not proper green bridges, they would just be bridges that are wider than a regular bridge.

We do not consider what HE/LTC are proposing as green bridges to be true green bridges.

Real green bridges are created to allow the wildlife to cross within their natural habitat

HE/LTC 'green' bridges just appear to be regular road bridges, possibly a bit wider to accommodate the footpaths that are mentioned, with a bit of turf along the outer sides of the bridge. In our opinion this does not constitute a green bridge that will safely allow animals' safe passage.

#### In the river

We would also state that we have serious concerns on impacts to wildlife in the river in addition to the land dwelling creatures.

There have been increasing sightings of whales, and porpoises and seals are regular visitors and inhabitants of the river.

We have serious concerns about the impacts, particularly during construction with 4.5-5 year constant 24/7 drilling going on.

Many aquatic creatures rely on echolocation and the noise and vibration from drilling could have seriously negative impacts on them.

#### Lack of adequate surveys/desk studies

We are very disappointed and concerned that at this stage in the project, and at a time when we are being asked to respond about the environmental impacts of LTC adequate studies have not been completed, or that any level of information with regard to this has been shared with the public.

Our understanding is that HE/LTC have been using Essex Wildlife Trust data up to this point, which we know to be very limited. We have advised HE/LTC that we feel they should be using Essex Field Club's comprehensive records and knowledge, and hope that this will happen. We would also expect that this is done sooner rather than later as we feel the environmental impacts and mitigation will need to be reconsidered once this has been done.

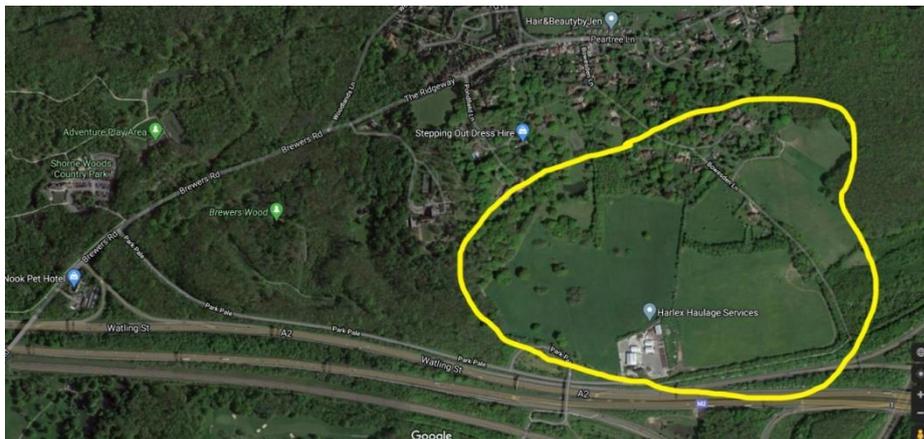
Again we ask how HE/LTC expect us to be able to adequately respond and comment on Environmental impacts and mitigation when the data we need to be able to review to make educated decisions and comments has not yet been carried out, let alone been shared with us.

We would ask that this work is done, shared with the public, and that we are consulted before the DCO application is submitted.

### Decisions about environmental mitigation

How do HE/LTC decide and validate what can be considered Environmental Mitigation? For example if there is an area of land such as that shown in the image below that is detailed as being proposed as Environmental Mitigation for LTC.

This area is thriving with trees, plants, wildlife, birds etc. This is a naturally thriving area, and 'mitigation' that HE/LTC propose could just as easily tip the balance on an already good ecosystem.



When we questioned HE/LTC about this we got a response including info about certain experts and specialist guidance. We would like it on record that we have no faith in HE/LTC to correctly research, survey, and record this kind of info in an adequate manner.

We know of examples on other HE projects whereby the Environmental and wildlife surveys were not carried out adequately, and HE/LTC have given us no reassurance to think it will be any better with regard to LTC.

As we have explained previously we know for a fact that HE/LTC have not carried out adequate surveys to date on LTC, as they have been using Essex Wildlife Trust data as opposed to the comprehensive records of the Essex Field Club.

How are we and everyone else supposed to give a response on our opinion on whether we feel the Environmental Mitigation for LTC would be adequate or not, when we are not being provided with adequate levels of information and data, because HE/LTC simply have not yet carried out adequate surveys etc.?

We strongly disagree that HE/LTC have given adequate info or consideration to Environmental Impacts and what mitigation would be needed, and would ask that this work is carried out and the findings are shared and consulted upon before the DCO application is submitted.

## **Agricultural Land**

We have always believed in the need to protect and support our British farmers, and with the current unprecedented times we find ourselves in there has never been a time that it has been more relevant or important to be acknowledging our food supply chain, and doing all we can to protect and support it.

There are areas along the entire route which are graded as some of the best quality agricultural land. HE/LTC have failed to identify the importance of this land in the information they have shared in the consultation materials both at this consultation and at the Statutory Consultation in 2018.

We find it totally unacceptable to be destroying agricultural land, and strongly oppose it's use for the proposed Lower Thames Crossing.

## **Lack of adequate information**

There are various locations marked out on the official LTC maps that show areas proposed for Environmental Mitigation. We and many others question as to how areas that are already teeming with trees, hedges, plants, and wildlife can be considered Environmental Mitigation. These sites will have their own value to the Environment, and will already be valuable habitat and food sources to various wildlife. How exactly do you calculate that land can be more beneficial to the environment by HE giving a tag as something that is Environmental Mitigation?

## **Flood mitigation**

Yet again we do not feel that HE/LTC have shared adequate info with us for us to be able to consider evidence and make an educated response.

When we see statements from HE/LTC relating to the fact that the lowering of the 'green' bridge at North Rd will help with drainage, without any figures or explanation as to how they came to this conclusion we do not consider this acceptable.

There is also no explanation or figures to prove why flood compensation can be reduced through the Mardyke section of the route, because of changes made to the viaducts.

HE/LTC need to realise that simply making statements like this is not sufficient unless it is backed up with data and explanations. We need and want to know the facts and refuse to trust HE/LTC blindly, as we have been looking into all this long enough to know better!

We also have concerns about flood risk in the area of the northern tunnel portals. This land is flood plain, it is there specifically to allow for flooding. This land is meant to be provision for when the Thames Barrier is closed to allow flooding. This is not the right place to be placing tunnel portals.

We are also aware that the Dartford Tunnels require pumps to clear the water in the tunnels. We imagine that it will be a similar scenario with the LTC tunnels.

We have submitted questions about this, but yet again to date (with one day to go) we have not received answers.

Where will any pumped water be released? If it is into the River Thames then we have to concerns. One being, the fact that the land where the tunnel portals would be is the natural flood plain for the river. Two, our serious concerns over contaminated water being released anywhere into the environment without first being cleansed. Any water from road tunnels will contain pollution of varying types, and we do not deem it acceptable to be released without first being treated to ensure it is safe to be released into the environment.

The River Thames is surprisingly clean, especially to what it has been historically. There are sea horses present, and they are known to only live in clean water. We need to ensure we keep things that way.

### **Historic toxic landfill sites**

As we have stated previously we also still have concerns over the proposed route going through and near to the historic toxic landfill sites in the area.

Based on the actions or HE/LTC with regard to following vital health and safety issues, including the 2m distancing rule during the COVID-19 crisis on LTC sites, apparently quite happily putting lives and the NHS at risk, we no longer have any level of confidence in HE/LTC's ability to be trusted to handle potentially dangerous situations on sites.

### **Impact to solar farms**

We again point out the impacts that the LTC would have on solar farms, at a time when the Government has declared Climate Emergency, and we should be doing all we can to follow good environmental practice, not negatively impacting clean green energy.

### **Conclusion**

We conclude that with regard to changes relating to Environmental impacts we do not feel adequate information has been provided, or that satisfactory consideration has been given to the true impacts the LTC would have.

We strongly oppose the LTC on all these grounds in this document, and consider the environmental impact of the LTC to be totally unacceptable as it would create irreparable damage on so many levels. Also for the fact that adequate research has not been carried out, and the resulting information shared with the public.

# Construction

## Excessive construction hours

We very strongly oppose the HE/LTC proposed construction hours for the LTC.

The fact we could have people working on construction sites from 6am-11pm Mon – Fri and 6am-5pm Saturdays, and some maintenance work on Sundays, with the possibility of night works, on top of 4.5-5 years of 24 hours tunnelling is completely and utterly unacceptable.

The fact this construction would be going on for around 6-7 years, or possibly long, since all large project usually run over, is of very serious concern to us and all our thousands of members.

We object to the highest level with regard to these proposed construction hours, and feel it goes against our human rights, due to the impacts it would have on our lives and health for such a long period of time with such excessive hours.

## Construction route impacts

We strongly oppose the proposed construction routes because of the impacts they will have on our lives, health and communities.

Construction traffic anywhere on any roads along the entire route would cause issues, and affect the quality of life and greatly impact the mental well-being of residents.

## Average monthly HGV movements

We note that on page 106 in the Supplementary Consultation Guide they list average number of HGV journeys per month. However as we are very aware from the Ground Investigations and Archaeological Trial Trenching Survey works that are currently being carried out at various locations, it is not just HGVs on the road in relation to these works.

We asked HE/LTC if they could provide predicted traffic movements in total for all LTC associated vehicles including staff vehicles on a monthly basis during the construction period, and we were told:

*“We will use a combination of the Strategic Road Network, local road network (which would be minimised) and offline haul routes to access our construction sites. Offline haul routes would be constructed alongside the proposed alignment and used temporarily to facilitate construction movements across the site to minimise use of the public road network. The numbers include all online HGV movements (including diggers etc.).. i.e. all movements using the public road network. It doesn't include staff movements (i.e. no LGV or cars etc.).”*

*We are continuing to develop the details of our construction analysis, this will enable us to provide more detail at DCO submission. The exact level of detail is still being developed as part of the preparation of our Environmental Statement. We will of course work with local authorities in the lead up to DCO submission and as the appointed contractor develops their detailed traffic plans.”*

We're a little confused as to whether the HGV making the offline movements have been included in the figures or not, as they have to get to the offline routes somehow using the Strategic Road Network and local roads. We have asked again and are awaiting further response.

We also question why certain construction areas have seen an increase in their average number of HGV journeys per month.

HE/LTC have listed increases in certain areas, but have not explained why this is. Area B north has increased by a whopping 800 extra HGV journeys per month, and Area D by an additional 200 HGV journeys per month. We consider this to be quite considerable, and also that some kind of explanation should have been given as to why this is, which hasn't been given. This is not clear and informative material.

### **Access to and from local communities**

We have serious concerns about how access to and from our homes and local communities will be impacted.

We have asked time and time again for reassurances that there would not be simultaneous road closures during construction that would leave homes and communities isolated, but to date HE/LTC have been unable or unwilling to offer any kind of reassurance.

We question and worry about it not only for our own personal access, but also for the access of emergency vehicles. HE/LTC need to start offering us adequate detail to offer us some kind of reassurances and explanations of how they plan to carry out this work if LTC goes ahead.

We have some residents whose property boundary literally butts up against the LTC boundary, in areas where there will be road closures, now fearful of how it will impact their lives due to potential limited access.

We are aware of businesses that rely on trade coming into their area, which have serious concerns over whether they would end up isolated and with extremely access to the extent that it could risk the future of their business.

Places like East Tilbury already suffer with access issues due to the railway crossing and barrier coming down. To put further reductions in place on access to these kind of areas would isolate them and add considerable stress.

Areas like Orsett will have access in and out of the village via Baker St, Stifford Clays Rd, Rectory Rd is all extremely impacted with long term closures, if any of this were to be carried out simultaneously it would be a nightmare for residents and businesses.

### **Impact to public transport during construction**

We are aware of some concerns from residents who rely upon public transport to get to work, school, shops, and generally getting about in their lives.

In particular there have been a lot of concerns voiced about the impact to the Ockendon Rd bus services.

*HE/LTCs response that, they will continue to engage with the councils to ensure diversions and alternative routes are put in place for local residents, is hardly satisfactory. Or actually even believable. How do they seriously expect a diversion/alternative route to work in such a location?*

The impact would be huge for affected residents, and they could literally be left stranded with no means to get to work, school, shops etc.

### **Spoil from the tunnelling**

The question has been asked time and time again by so many, yet still HE/LTC refuse to provide us with detail of how they propose to deal with the spoil from the tunnelling.

We know the vast majority of it will be chalk, and have been seeking information from HE/LTC as to how that would be disposed of, but nobody seems willing or able to provide further detail.

We have concerns that if it is simply spread across land, we will end up living in what will feel like a snow globe with white covered ground, which will blow about.

This would cause concerns over health issues, with the chalk dust etc.

### **Impacts of Construction to health**

Physical and mental well-being would be greatly impacted during construction.

It would be stressful living on a major construction site for 6-7 years, which is what it would be like for residents living anywhere in the areas along and surrounding the route.

There would be severe increases to HGVs on the road, all kinds of pollution, air, light, noise, vibration etc. All constantly having effects on our health and lives.

Noise from constant 24/7 for 4.5-5 years tunnelling will likely have serious mental health impacts on residents in the vicinity.

The same with the noise from pile driving across the Mardyke/fens which will carry across the land to nearby residential areas, as there will be nothing between the works and the houses to lessen the impacts.

Visually to see our homes and communities being destroyed during construction will have huge impacts on mental health for many.

### **Impacts of Construction to the environment**

As with the impacts to personal health and well-being, so too there will be an impact to the environment.

Irreparable damage to trees, flora and habitat, which not only offer homes and food for wildlife, but also provide us with air and places to connect with nature for our own health and well-being.

There will be pollution into the air, water, ground etc from the construction works again all of which we are strongly opposed to and find completely unacceptable.

We have serious concerns on when and how the construction work would be carried out. It's all very well quoting that you will follow all the standards and guidelines, but we are sure the HS2 staff said the same to residents with regard to that, and now we see HS2 (another Government company) committing wildlife crimes left right and centre. We have no reason whatsoever to believe or trust HE/LTC.

### **Responsible working during Construction**

Again in a similar vein we have no reason to believe or trust that HE/LTC would be responsible with work during construction.

We have again witnessed the lack of ethics and care from the likes of HS2.

More importantly we have also experienced the lack of responsible practice with regard to HE/LTC in relation to working on sites during the COVID-19 crisis.

### ***Lack of confidence in HE/LTC workers on site pre DCO***

#### HE/LTC not being aware of contractor enabling a site earlier without prior arrangement

During Ground Investigations and Archaeological Trial Trenching survey works we have experienced first-hand the fact that one of HE/LTC's contractors started immobilising works on a site without clearance from HE/LTC. We know this as when we enquired directly with HE/LTC if this was their works they said it wasn't.

After we then contacted the local authority to ask them if they knew who it might be, we were advised by them and also HE/LTC that indeed it was HE/LTC contractors who had started work on the site earlier than expected. Since HE/LTC had not been aware of this when we asked originally we can only assume this early work was done without prior knowledge and consent from HE/LTC.

This gives us no confidence in HE/LTC or their choice in contractors, or ability to communicate adequately and effectively with their contractors to ensure procedures are followed, and works are carried out responsibly.

#### Contractors parking on footpath/cycle path

At the same site as mentioned above, we also experienced first-hand the contractors using a footpath/pavement/ cycle path to park their vehicles during their working hours.

Again we do not consider this acceptable behaviour. It again represents that HE/LTC are clearly not making good choices about the contractors they are using, and there are not procedures in place to ensure that work is carried out responsibly.

This is another example of why we have absolutely no confidence in HE/LTC or their contractors.

### Contractors setting up super bright security lights unsafely, dazing drivers

Also at the same site as the two points above, and at some additional site also, we have first-hand experience of security lighting rigs being set up on sites irresponsibly. Clearly no concerns of safety checks were done to ensure these lights in no way impacted local residents or road users. The glare from these super bright lights was glaring in the eyes of drivers. It was also causing serious light pollution issues for residents in nearby properties.

When there was a serious Road Traffic Accident very close to one of the offending sites, people quickly started asking the question as to whether the HE/LTC contractors lights had been a factor in the accident. That is of course a matter for the police, but it illustrates the seriousness of the impacts HE/LTC are already having on our residents and communities, and the complete and utter lack of trust in HE/LTC.

When we brought the glaring lights issue to HE/LTC attention action was taken to get the lighting checked and realigned. Although we did have to ask again when further lighting was put up in a different location. Plus we really shouldn't have to be asking HE/LTC to ensure such basic health and safety measures are considered and met.

Again leaving us with no confidence in HE/LTC or their choice in contractors and their ability to work safely and responsibly.

### Mud on the local roads

It was a similar situation with mud on the road at one of the sites. Drivers expressed concerns and when reported to HE/LTC we were told that road sweepers when considered necessary, yet clearly it was not being monitored and carried to out to a level considered safe and acceptable to residents in the local area.

### Damage to verges on local roads

We have also experienced HE/LTC workers causing damage to verges and trees along local roads. They cannot be trusted to act responsibly and take adequate measures to ensure that they are not causing damage.

Again why should we trust, believe or have any confidence in HE/LTC or their contractors?

### Unacceptable use of local roads

There has been excessive use of local roads, including country lanes, and HE/LTC drivers are not being careful or respectful in our local communities.

They seem to think that because it is what they may consider to be a quiet country lane they can whizz along doing the speed limit, rather than driving to the condition of the roads and surroundings, and taking into account that these lanes are places that residents walk, cycle, ride.

We have had many concerned residents bring to our attention the fact that HE/LTC vehicles are putting lives at risk with the way they are driving along our local roads. It needs to be stopped.

Again is is really any wonder why we have absolutely no confidence in HE/LTC or their contractors?

Workers attempts to stop public access along Green Lane

HE/LTC workers have also attempted to stop a local from accessing Green Lane. HE/LTC do not have any official road closures in place and have not right to try and stop members of the public using a public road/byway.

Another reason that we have zero, zilch confidence in HE/LTC or their contractors.

Recruitment events in conjunction with Balfour Beatty were questionable

At the recruitment events that HE organised in conjunction with Balfour Beatty some recruiters were stating that they can offer 7 year contracts, starting in the very near future. This is misleading or illegal since LTC does not have DCO.

This was an event that was publicised as being an LTC recruitment event, the fact recruiters were stating they could offer such long term work is unacceptable.

It also makes us question how genuine HE/LTC and their partners for this event are, and whether they are behaving unethically and potentially illegally.

Whatever the case it does nothing to give us any reason to trust or believe any of them.

Clearly and repeatedly not complying with 2m social distancing rule during COVID-19 crisis

We have share evidence in Appendix B of this document showing that HE/LTC workers/contractors are clearly and repeatedly unable to abide by the 2m distancing rule during the COVID-19 crisis, outing not only the workers lives at risk, but also everyone else's and the NHS too.

Not only the direct risk from COVID-19, but also the fact that work sites like this have high risk, and god forbid there is an accident on site during COVID-19 as that would put unnecessary stress upon the NHS. Many people are also purposely avoiding driving, horse riding etc, things that people consider to be a risk, as they do not want to risk potentially having to put extra pressure on the NHS right now during the COVID-19 crisis.

We also comment further on this topic later in this document. Suffice to say that this kind of irresponsible, unethical, immoral behaviour of having these workers on site putting themselves, everyone else and the NHS at risk does nothing to give us any confidence or trust in HE/LTC or their contractors.

## **Conclusion**

We conclude that with regard to construction we do not feel adequate information has been provided, or that satisfactory consideration has been given to the true impacts the LTC would have.

We strongly oppose the revised proposals for how you plan to build the LTC, especially the excessively long construction hours, the impacts construction work would have on health and lives, the great impacts of the construction routes, and environmental impacts of construction.

We strongly oppose the LTC on all these grounds.

# Utilities

## **Increase in development boundary due to utilities**

We strongly oppose the huge increase to the development boundary which largely seems to be for utilities works.

The fact that HE/LTC have evidently not just become aware of a major, major gas pipeline that runs under and along the side of the A2 is quite frankly extremely worrying.

The fact that the proposed repositioning of this would result in the complete destruction of a section of the beautiful Shorne Woods is something we strongly opposed and find despicable.

None of the utilities works should impact on such important and valued land such as our woodlands in any location.

## **Impacts to resident during utilities works**

Disruption to supplies must be kept to an absolute minimum, with adequate provision put in place when needed.

There must be plenty of clear and adequate communication taking place, giving prompt and timely information as to what is happening, where and when, and for how long.

Full consideration and respect must be shown with regard to the visual impacts any changes with inflict on those in the vicinity of any works, who should be consulted adequately prior to the utility works beginning.

## **New Substation**

There has not been enough information and detail provided about the proposed new substation. It sounds like it will be of considerable size, yet no artist impression or architects drawings have been made available so that we know what this building will look like. Obviously when it will have such a visual impact it would be helpful when assessing locations to know exactly what it is we are considering.

We would ask HE/LTC to provide adequate information and detail about the proposed substation, including an artist impression, details of how much pollution it would generate, noise, light etc.

It would also be helpful to have details on exactly what it would be used for on a permanent basis.

We would ask that HE/LTC provide all this info and the opportunity for people to be adequately consulted on this before the DCO application is submitted.

## **Health impacts**

We strongly oppose proposals to bring utilities close to properties, as we have concerns over the impacts this will have to people's health.

We believe that things like electromagnetic fields and power from the electricity cables can be damaging and have a detrimental effect on people lives and health.

We do not consider it acceptable to be moving utilities such as electricity pylons and cables closer to properties, especially residential properties.

### **Impacts to the environment**

We have serious concerns and strongly oppose the proposal to carry out any utilities works in any location that it will cause damage or impact to the environment, particularly to the woodland areas.

### **Utilities cost over impact to residents**

It is apparent from the info provided that HE/LTC are putting financial cost over the well-being of residents. This is proven by the fact they would rather avoid utilities works, but moving the route closer to people's homes.

We know that moving electricity pylons is expensive, so it is probably a cheaper option for HE/LTC to just move the road closer to homes, to keep costs down.

We do not consider this to be ethical or acceptable, and strongly oppose to these changes to the route.

### **Random utilities at Bulphan**

We were extremely surprised and concerned to see a random utilities development boundary in Bulphan.

This random area of development boundary in no way connects to the rest of the development boundary, which is strange. If it is to upgrade in some way then surely it needs to physically connect to the area it will take the upgraded power to.

We would ask that if this goes ahead the impacts to residents must be taken into account. Plenty of clear and adequate communication must take place, giving proper and timely information as to what is happening, where and when, and for how long.

Full consideration and respect must be shown with regard to the visual impacts any changes with inflict on those in the vicinity of any works, who should be consulted adequately prior to the utility works beginning.

Disruption and power outages need to be kept to an absolute minimum, with adequate provision put in place when needed.

### **Utility Trial Trenching survey works**

Whilst we understand that these UTT survey works are not strictly part of the consultation, we feel the need to comment on it, due to it being a preliminary experience of what we could be in line for if a DCO is granted and construction were to go ahead.

The info that has been provided to us and residents has been extremely limited.

We have been given no info on the expectations we should have with regard to noise, dust, air, light pollution from these works.

We have concerns over road closures, especially as to whether any will be done simultaneously which in certain areas would cut places off. Most importantly how it could restrict emergency vehicle access. Places like East Tilbury and Linford etc. already struggle with access due to the railway crossing barrier, without the additional threat of road closures. Brentwood Road into Chadwell night closures, what if there was an emergency in that part of Chadwell, at the flats for example, how would emergency vehicles access the area? No reassurances have been offered in regard to any of this. The general attitude feels like a tick box exercise of HE/LTC informing people that they will be coming into our communities between now and August, we may or may not get further advanced warning, we're not being told exactly what will be happening, how noisy it will be, how much dust there might be, the impacts of lighting during night works (considering we have already suffered with serious issues with regard to lighting from other works already), or indeed why this work has to be carried out.

How are we meant to have any confidence if we get to construction stage, when what is by comparison considered minor works are causing so much concern and so many questions due to lack of clear and informative communications from HE/LTC?

## **Conclusion**

We conclude that with regard to changes to Utilities we do not feel adequate information has been provided, or that satisfactory consideration has been given to the true impacts the LTC would have.

We strongly oppose the utility works required to build the LTC, especially when some of it will impact communities outside of the development boundary purely to service construction sites with the power that they need. The huge increase to the development boundary for the purpose of utility works is strongly opposed.

We strongly oppose the LTC on all these grounds.

# Using the crossing

## Not fit for purpose

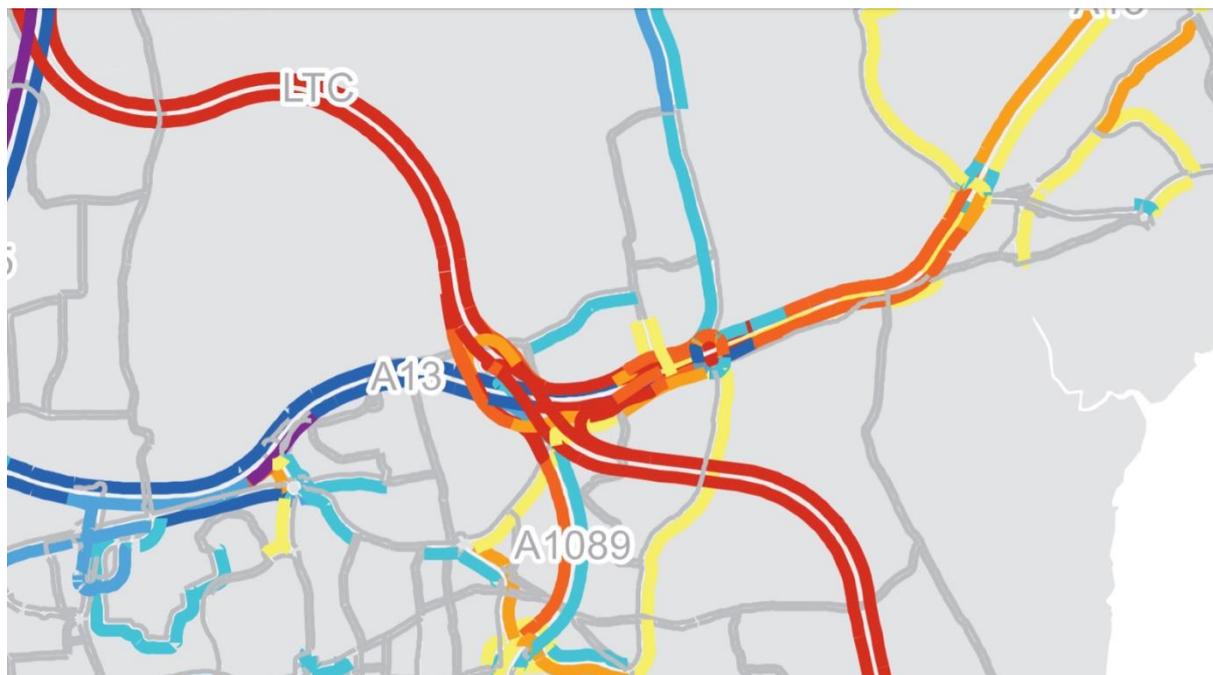
As already detailed earlier in this document, we do not believe the LTC is fit for purpose and we do not feel it would improve traffic conditions either at the Dartford Crossing, or on the existing road network. The Dartford Crossing would still remain over capacity even with the LTC, a fact proven using your own data. We also believe that not only would LTC not improve the conditions on the existing local road network, it would actually make it worse.

## Impacts to existing road network

The traffic modelling data provided clearly shows that many roads on the existing road network will actually see an increase in the amount of vehicles using the roads.

We also question the confusing diagrams that are meant to explain this data to us. If you view them online and zoom it to get a closer look it becomes even more confusing.

There are sections like the Orsett Cock roundabout that look like a rainbow with all the various colours. Considering the range that the various colours cover it is impossible to understand exactly how such drastic changes would be possible in one roundabout alone. See image below.



What are the other strange colourful variations too? Directly to the east of the Orsett Cock roundabout on the A13 it suddenly jumps from the bluey colour to the dark red back to the bluey colour. What does this mean or represent? Are there new magic portals that will be installed?

If this is a true representation of predicted traffic it is stating that from the east of the Orsett Cock traffic will decrease by between -100 to -249 PCU, then increase by over 1000 PCU, and then very quickly decrease between -100 to -249 PCU, and there's not a junction in sight to allow the traffic to enter or exit the road.

We would also question how traffic coming north on the A1089 increases considerably, yet traffic heading southbound decreases quite a bit. We would remind HE/LTC that if the traffic is able to make the journey north on the A1089, the vehicle making that journey had to at some point make a journey southbound to be at the southern end of the A1089 in the first place to start its journey northbound. Unless yet again, as we have asked many times previously, HE/LTC are installing some kind of magic portal. We have asked about this so many times, yet nobody at HE/LTC has ever been able to explain it.

There are numerous instances like this, that don't make any sense at all.

Another reason why we do not trust or believe the traffic modelling data.

A new and improved means of traffic modelling is needed, because clearly Webtag isn't fit for purpose.

We also strongly oppose the increases in traffic to the existing road network that the LTC would bring.

### **Crossing Charges inc Local Residents Discount Scheme**

We do not feel that the info shared on this aspect is adequate. We also feel that the info provided contradicts itself.

It is stated that equal charging scenario will:

- Simplify decision making for the driver as the choice of route will be informed by the easiest route
- Relieve congestion at the Dartford Crossing while balancing the use of LTC
- Minimise operational complexity enabling the combined operation of the Dartford Crossing and LTC charging schemes

However, it also states that the Local Residents Discount Scheme (LDRS) would apply to residents of Thurrock and Gravesham.

Thus, if the LDRS for the Dartford Crossing only applies for residents in Dartford and Thurrock, and for the LTC only applies for residents in Thurrock and Gravesham; LDRS users will not have the decision making process simplified at all.

It might be all good for Thurrock residents as they will be able to presumably use the LDRS for either crossing. However, Dartford LDRS users will not be able to use LTC, and Gravesham LDRS users would not be able to use the Dartford Crossing.

Also the idea of LDRS is to provide discount to local residents because of the impact the infrastructure has on their local area etc. However, HE/LTC have not mentioned any kind of consideration for residents in the Upminster area who have the northern part of the LTC scheme on their doorstep.

As we have already stated the LTC in general does not fix the problems we all suffer with due to the Dartford Crossing, and the current crossing will remain over capacity, so to suggest that the charging will do anything to ease congestion at Dartford Crossing is a bit misleading. We are not talking about

a do nothing scenario, we are talking about having the right crossing in the right location, which the LTC is not.

Whilst we admit that DartCharge needs all the help they can get with the operational side of things, as the customer service is frankly diabolical, especially for LDRS customers, we do not see that what is being proposed minimises operational complexity. As outlined above LDRS customers would certainly not find it any easier to deal with DartCharge on an operational basis for the reasons stated above.

We would also question if DartCharge were to manage both crossings there may be a need for a total rebrand as to call it DartCharge when it covers both crossings would bring additional operation complexity and cost.

Whereas if you simply scrap the LTC idea and go for the better alternative of Option A14 you could also get away with leaving DartCharge branded as DartCharge as it would service the Dartford Crossing and the Dartford Expressway (Option A14).

### **Migration between the two crossings not taken into account**

We find it completely unacceptable that HE/LTC are not taking into account how traffic will migrate when there is an incident at either crossing.

Simply using the excuse that it is not part of the requirements of building a road under industry standards and guidelines is ludicrous.

Quite clearly this is a rather unique situation due to the nature of there being limited means to cross the River Thames in the area.

To simply ignore this factor and refuse to identify or deal with the issue, and take them into account in the design process is frankly irresponsible.

Most of the general public will blindly trust that HE/LTC would take this major aspect into account when planning and designing a new crossing, because that would be the sensible and logical thing to do.

Whereas HE/LTC clearly prefer to just ignore it, bury their heads in the sand, and avoid dealing with the realities, and taking the responsibility. It is time that HE/LTC were held accountable for their irresponsible attitude and actions.

Any reputable company, if they identified a serious flaw in a project plan, would identify the project, find a suitable solution, and go to their client and explain the issues and the solution. But for some reason that seems to be incomprehensible to HE/LTC.

HE/LTC need to consider the consequences of not considering how traffic will migrate between the two crossings, and ensure that there are adequate connections to allow this to happen as smoothly as possible. If it cannot be done effectively then this just proves that LTC is the wrong crossing in the wrong location.

If HE/LTC continue to ignore this major flaw in their design, and the LTC goes ahead then it will create absolute chaos, and it will be at the health and lives of local residents expense, which is not acceptable.

### **Lack of adequate connections to the existing road network**

There are not adequate connection between the LTC and the existing road network under normal operations, let alone when there is an incident at either crossing.

In normal operational times this will mean extra traffic having to use the Stanford Detour, and times of an incident it will be absolute chaos throughout the whole area between the two crossings and surrounding areas.

### **The Stanford Detour**

#### Lower Thames Crossing (north or southbound) to A1089 (southbound)

As the chart in the consultation guide shows, traffic starting on the LTC northbound or southbound will not be able to directly connect to the A1089 southbound.

Any traffic wanting to come off the LTC (from either direction) and head southbound down the A1089 to Tilbury will have to detour eastbound along the A13 to the Stanford junction, up and around the traffic lighted roundabout (alongside all the DP World traffic), back westbound along the A13 to the LTC/A1089 junction which is just after you come back under the Rectory Rd (Orsett) bridge over the A13.

#### Traffic wanting to access the LTC (north or southbound) or the A1089 southbound from the Orsett Cock (inc A128 traffic)

The chart in the consultation guide also references traffic from the Orsett Cock roundabout with a red star. It shows that traffic from the Orsett Cock will not be able to access the LTC (in either direction) or the A1089 southbound.

This is because the LTC and A1089 slip road sits to the west of the Orsett Cock, and there would be a new slip road from the Orsett Cock onto the A13 westbound which will not merge onto the A13 until after the point that the LTC and A1089 junction leaves the A13.

#### When there is an incident in the Dartford Crossing/M25 area

##### Via the A13 eastbound

The connections chart above again shows that traffic heading eastbound on the A13 cannot directly access the LTC either north or southbound. So whenever there is an incident at or near the Dartford Crossing and traffic wants/needs to migrate to the LTC to cross the river it will not have direct access to it from the A13 heading eastbound.

Again, traffic heading eastbound on the A13 would have to detour all the way down to the Stanford Junction, up and around the traffic lighted roundabout, and then head back westbound along the A13 to the LTC junction just past where the Rectory Rd (Orsett) bridge crosses the A13. Remember you cannot access the LTC from the Orsett Cock roundabout (see above).

Via the A127 and down the A128 (or A12 through Brentwood and down A128)

As we have already mentioned traffic from the Orsett Cock roundabout, including A128 traffic cannot access the LTC. Yet again it will need to detour eastbound along the A13 to the Stanford junction, up around the traffic lighted roundabout, and then head back westbound to the LTC junction just after passing underneath where the Rectory Rd (Orsett) bridge crosses the A13.

Just take a moment to consider how often there are incidents at the Dartford Crossing (heading south) and along the stretch of A282/M25 that leads up to the QE2 Bridge.

Now consider that even if that traffic tries to migrate to the LTC via the LTC junction on the M25. It will potentially mean 5 lanes of M25 traffic trying to get onto just 2 lanes of LTC southbound all the way to just past the A13.

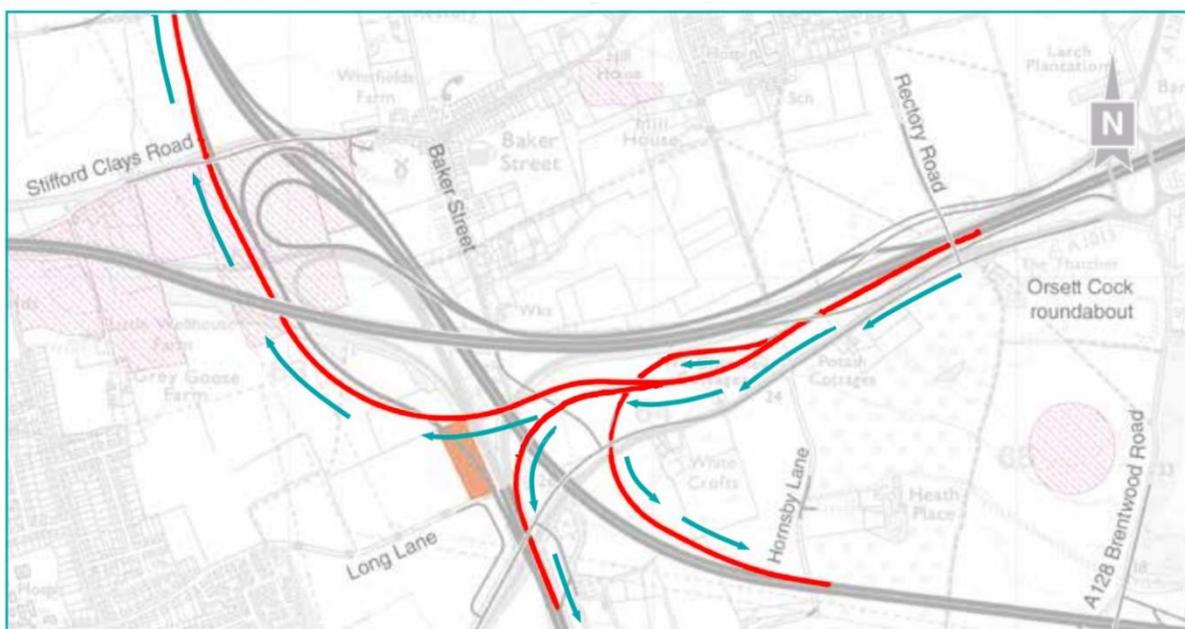
*Alternatively, traffic could also try cutting westbound along the A13/A127 etc. from the M25 to the Blackwall Tunnel and/or through London to get across the river. Also any time there is an incident traffic will in general rat run any possible route they can, as we already know only too well sadly.*

Please also visit <https://youtu.be/qga-s8S1AaQ> to view a video that covers our concerns on this matter.

## Get Lost LTC

If you are heading westbound on the A13 and take the LTC/A1089 slip road off. Where do you want to go?! At this junction alone you will be presented by numerous possibilities! The LTC South, the A1089 South, the LTC North, but make one wrong turn and you could end up on quite the adventure!

As you can see below at the first road split you will have to choose if you want to take the right lane to turn left onto the LTC South. Or if you stay to the left you will then go a little further up the road before again having to choose between going left to the A1089 south, or right to the LTC North.



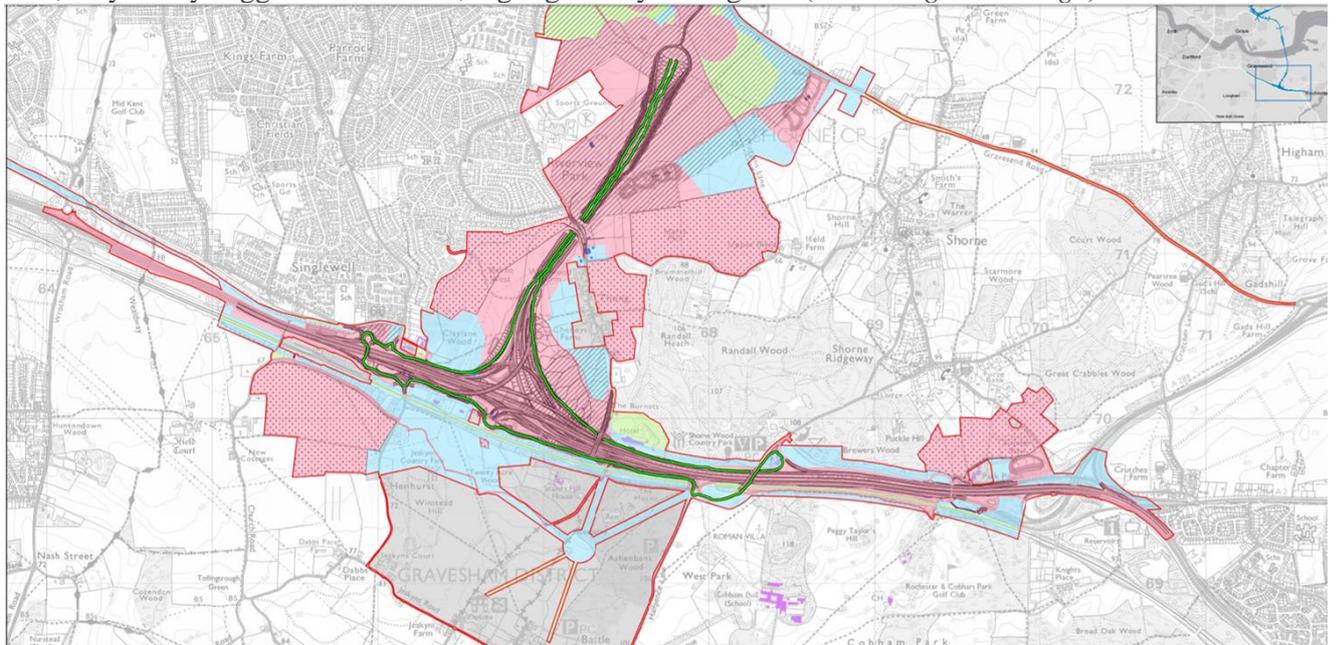
Ooops I ended up taking the LTC south from the A13 by mistake!

What happens if for instance you want to go to the A1089 south, and accidentally take the LTC south junction. I mean it would make logical sense if you have an idea of roughly where each is placed on a map that the A1089 would be to the right and LTC South the left. But hey that's not the way Highways England do things!

Well if you accidentally took the LTC South, you would then need to continue all the way down and through the tunnels, paying the charge of course! Then good luck as you try to figure out which way to go and where you will be able to find some way of getting back to where you want to be going!

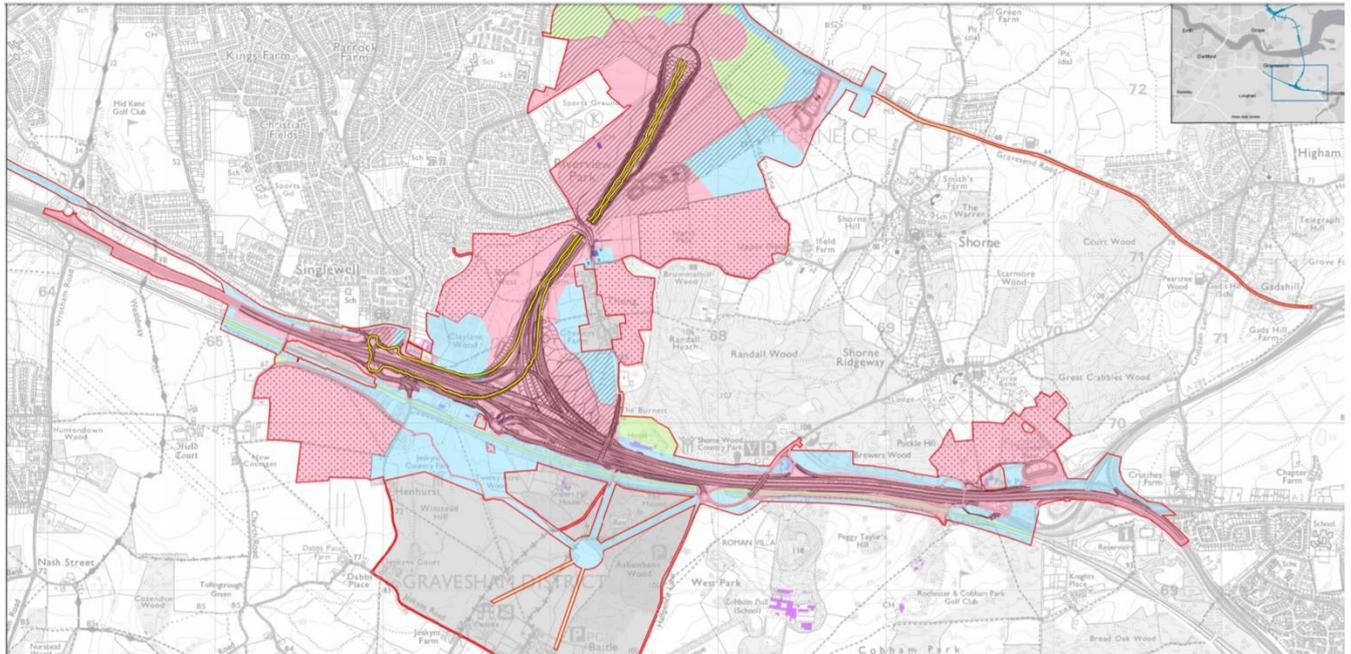
There are a few alternatives and none will be clearly signposted as “oops sorry you made a mistake with our confusing road let's help you get back to where you need to be!” It is highly unlikely as you come out of the southern portal of the LTC there will be a signpost showing you the route to head north on the LTC!

When we asked one of the staff at an HE info event the question of how exactly can traffic that heads southbound on LTC turn around south of the river to come back north and give it another shot, they firstly suggested this route, highlighted by us in green (*click image to enlarge*)!



Alternatively, if you come down and take the A2/M2 coast bound you could drive down to J2 and turn around using the roundabout at that junction and come back and take the exit to turn northbound up LTC, which using Google maps we estimate to be around a 7 miles detour purely on the stretch of A2/M2 road, not including the LTC section south and northbound.

If you were to head westbound towards London you can follow this route highlighted by us in yellow (*click the map to enlarge*)!



Or if it were us we'd probably just head westbound on the A2/M2 up to the M25 and then back across the Dartford Crossing and head north on the M25 to obviously head north, or turn eastbound on the A13 to reach the A1089 south junction if that was your original destination. So the LTC is meant to help ease traffic problems actually can very easily create them, and would more than likely in a situation like this end up with you just using the Dartford Crossing anyway, because better the devil you know!

**Ooops I ended up taking the LTC north from the A13 by mistake!**

Back at the various options after leaving the A13, if you accidentally missed the LTC south or A1089 south and ended up finding yourself on the LTC north by mistake. You would need to carry on North up the LTC, and as you reach the top end you would have two choices.

1. Take the left lane which would take you on the new parallel road up to the A127, you should then be able to go right the way around the roundabout and back onto the M25 south to the LTC junction and head back south .
2. Or stay on the LTC and merge onto the M25, but that way you won't be able to come off to turn around until you get to junction 28 (A12), then back down the M25 at which point depending on where you were originally trying to reach, you'd most likely decide to just carry on across the QE2 bridge at the Dartford Crossing to head south. Or go down to the Junction 30 and head eastbound if you want to go down the A1089 south. If you did decide to give LTC another shot, you would then need to come off at the A13, head eastbound head along the [Stanford Detour](#) and then back westbound to the LTC/A1089 south junction and hope for the best next time around!

**Ooops I ended up taking the A1089 south instead of the LTC north or southbound!**

You will head down the A1089 and if you come off at the first junction you will be out and about on the local roads, which if you're not a local will get very confusing very quickly, especially without satnav! If you continue down to the roundabout where Asda and Amazon etc are, then you can go all the way around and head back North up the A1089. At the top of the A1089 you will be able to choose between options to go on the LTC North, LTC South, and either Westbound or Eastbound on the A13! Best pay attention because a wrong turn will again mean another adventure!

If you accidentally take the LTC Southbound instead of Northbound then it's all the way south of the river down to the A2/M2 and hoping for the best to find somewhere to turn around and find your way back to the LTC junction to head north again!

If you accidentally take the LTC North instead of South then it's all the way up to the A127 via the LTC and new parallel road, before you head back down Southbound!

If you accidentally take the A13 westbound or eastbound rather than LTC. If you head westbound you will be able to go to the next junction at Stifford Clays, up and around the roundabout, and then have to head eastbound all the way back down to the Stanford junction, up and around the roundabout, and then back westbound to have another shot at the LTC junction! If you accidentally head eastbound on the A13 you will again need to take the Stanford Detour back to the LTC junction!

### Conclusion

We strongly believe that the LTC is not fit for purpose for so many reasons, including but not limited to the fact that the junctions are so complicated and confusing that there will be so many people getting lost, adding to the congestion and pollution, getting stressed, and also running the risk of having an accident because people will be too busy trying to figure out where they should be going and not enough of driving and other traffic around them.

HE/LTC seriously need to address how complicated and confusing all the junctions and connection to and from the LTC are. Yet again we deem LTC to be the wrong crossing in the wrong location.

### **Bottlenecks**

There are bottlenecks that HE/LTC have built into the design of LTC. For a road that is meant to be about solving congestion issues, the creation within the design of bottlenecks is something we strongly oppose.

There would be a bottleneck along the A13 where it would be reduced to just 2 lanes in each direction in the Orsett area.

There would be bottlenecks south of the river too along the LTC/A2/M2 junction.

Plus the big bottleneck on the LTC southbound from the M25 to just past the A13.

Whereby this stretch of road is now just 2 lanes southbound for that stretch it means that as well as a bit of a bottleneck in general use is likely, when there is an incident on the M25 it will mean 5 lanes of traffic needing to migrate onto just 2 lanes to head southbound either to bypass that section of the M25 or to get across the river using LTC.

## **Dangers of 'smart' technology**

We very strongly oppose the LTC being designed as a 'smart' road. It is being proven time and time again, and many lives have been lost due to the inadequacies of 'smart' technology, lack of hard shoulder, and poor road design.

HE/LTC need to realise that man of the public have no faith at all in 'smart' roads, and feel they are a high risk, putting lives unnecessarily at risk.

We have not been given adequate info about this 'smart' technology or how HE/LTC propose to operate this 'smart' tech.

With all the negative media coverage and general negative feeling towards 'smart' motorways HE/LTC need to identify that it is no longer acceptable to be building or creating in any shape or form more 'smart' roads. What we need are safe roads, where lives are valued and protected.

HE/LTC should also provide further and adequate detail and info on this aspect of LTC prior to DCO submission, and not until they have fully reviewed and taken into account the Government's latest investigations into 'smart' motorways.

## **No hard shoulders**

We strongly oppose the fact the proposed LTC does not have hard shoulders. We feel this is a severe safety risk to all road users, and will put lives unnecessarily at risk.

We don't support the use of hard strips in place of Hard Shoulders. 1m of tarmac instead of 3m is certainly not enough to provide safe refuge.

We do not consider a road without hard shoulders to be safe for road users.

If people die due to lack of safe refuge area on a major road then HE should be held accountable for Corporate Man Slaughter. That is the extent of how serious we consider this matter to be.

## **Lack of adequate Emergency Refuge Areas**

We have requested adequate info about how many Emergency Refuge Areas (ERA) are proposed for LTC, along with details of distances between each of them, as well as where they are all located. To date HE/LTC have not responded to provide us that info via email.

From the very basic info we were able to get at one of the info events, we do not feel that there are adequate ERAs along the route, including on the connection roads, and they are not close enough together.

It is not good enough to take the basic essential distance, this is a brand new road and safety should be paramount, and therefore the road, if it is built, needs to be built to the safest standard possible, which means more ERAs not just a bare minimum.

We also want to see the viaducts included in that criteria for adequate safety provision. Anyone who finds themselves broken down or stranded due to an accident or whatever on a viaduct needs to have a safe refuge to go to, where they can be safe and protected.

## **Safety and RTA data**

Whilst there have apparently been updates to the traffic modelling data, there doesn't appear to have been any update in relation to the predicted accidents and road safety with regard to LTC.

HE/LTC have a duty of care to ensure that our roads are as safe as possible for everyone. The fact there doesn't seem to be any readily available up to date data on this aspect of LTC is worrying to say the least.

We particularly take issue with this considering the recent media coverage and serious concerns of many of road safety with regard to so called 'smart' roads.

Where is your up to date info on this HE/LTC? If the traffic modelling has been updated and is showing change, then we deserve to have updated data on the safety aspect too.

We yet again question the lack of clear and informative material, or in fact any kind of updated info at all in relation to road safety.

## **LTC Design Capacity**

To date HE/LTC have been unable to provide us with a figure of what the design capacity will be for the proposed LTC. We are seeking an equivalent to the figure that is always quoted as the design capacity for the Dartford Crossing of 135,000 vehicles per day. Whilst HE/LTC seem happy to use and state that figure in consultation materials, there has been no equivalent shared for the LTC. We are curious as to why this info has not been shared.

The general consensus is that HE/LTC only used figures and data in ways that suit themselves, rather than giving unbiased figures and data, with like for like equivalents like in this instance for example.

## **Misleading extra road capacity**

Again we stress that we find it misleading that HE/LTC have quoted that LTC will provide 90% extra road capacity. Most will interpret that as meaning lanes, as that is how the general public think of road capacity.

There are currently 4 lanes in each direction at the Dartford Crossing if you add 90% to that you get 7.6 lanes. Whereas 4 +75% is actually 7 lanes. So the 4 lanes each direction at Dartford Crossing, plus the 3 lanes across the river in each direction at LTC would give you a total of 7 lanes in each direction.

Regardless of attempted explanations by HE/LTC as outlined elsewhere in this document, we stand by our opinion that to suggest LTC would provide 90% extra road capacity is misleading to the public.

We would also question why HE/LTC feel the need to again use data and figures in ways like this to suit their own needs, rather than sharing things in a clear and informative way, as they are legally obliged to do.

### **Inadequacies of WEBTAG and Industry standards and guidelines**

We are aware that Webtag that HE/LTC use for traffic modelling is considered by many, including the industry to be outdated.

We yet again question and raise our serious concerns that outdated guidelines and standards etc are being used for such a major project.

We are fed up on hearing from HE/LTC about industry standards and guidelines that all seem outdated and not in keeping with general common sense and logic.

We also note that we are more than aware that unless the Government give HE/LTC specific directive about anything including considering and updating where necessary things like Webtag, and the use of Industry standards and guidelines, nothing changes. HE/LTC just continue as normal without a care for the fact the impacts and future issues it will create.

We would even go so far as to say that it appears as though HE/LTC could be attempting to future proof their own jobs, by ensuring the need for upgrades moving forward, upgrades that will generate more work and income for themselves, safe guarding their own futures, rather than ensuring sensible and practical spending and use of taxpayers money, and the impacts to residents, lives, health, communities, and the environment etc.

### **Conclusion**

We conclude that with regard to using the crossing we do not feel adequate information has been provided, or that satisfactory consideration has been given to the true impacts the LTC would have.

We strongly oppose the view that the LTC would improve traffic conditions either at the Dartford Crossing, or on the existing road network. We actually believe that not only would it not improve the conditions, it would actually make them worse.

We also do not feel that spending £1.6bn per minute saved on a journey between J2 and J31 on the M25 is acceptable use of taxpayer's money, and would seriously question the Benefit Cost ratio of the LTC.

We strongly oppose the LTC on all these grounds.

# Inadequacies of the consultation

## Historic inadequacies of LTC consultation

For reference Location A was a variety of options in the general vicinity of the current Dartford Crossing. Location B options crossed the river in the general area where the new London Resort theme park on the Swanscombe Peninsula is proposed. Location C options were in the vicinity of where the LTC is proposed to be. Options D and E were further East along the river towards Canvey and Southend area.

Findings of the 2013 consultation show that the location with most support was A. The one that was most opposed was B, closely followed by C. Mainly businesses supported Location C options, and largely residents supported Location A options.

When HE/LTC came back for the 2016 consultation we were given 3 options at Location C, Options C2, C3, C4.

This is a little bit like asking someone who doesn't like cheese, if they would like a cheese and tomato, cheese and onion, or cheese and pickle sandwich. They don't want cheese, and we don't want Option C3. See the image below of page 19 of the 2016 Consultation Booklet which can be found online at [https://highwaysengland.citizenspace.com/ltc/lower-thames-crossing-consultation/user\\_uploads/lower-thames-crossing-consultation-booklet.pdf](https://highwaysengland.citizenspace.com/ltc/lower-thames-crossing-consultation/user_uploads/lower-thames-crossing-consultation-booklet.pdf)

You can clearly see that HE/LTC were biased in favour of C3 even though this is meant to be a consultation to allow people the chance to have their say. HE/LTC should be presenting unbiased information for people to use to make their own decisions on, not being biased and trying to control the outcome by limiting and controlling what info is shared with the public, as was the case in this consultation.

## Routes and junctions

### North of the river in Essex

We are seeking your views on three routes north of the river. Each route would perform similarly with respect to solving the transport challenges and unlocking economic potential. Each would directly, to some extent, affect greenbelt and areas of ancient woodland.



### Conclusion

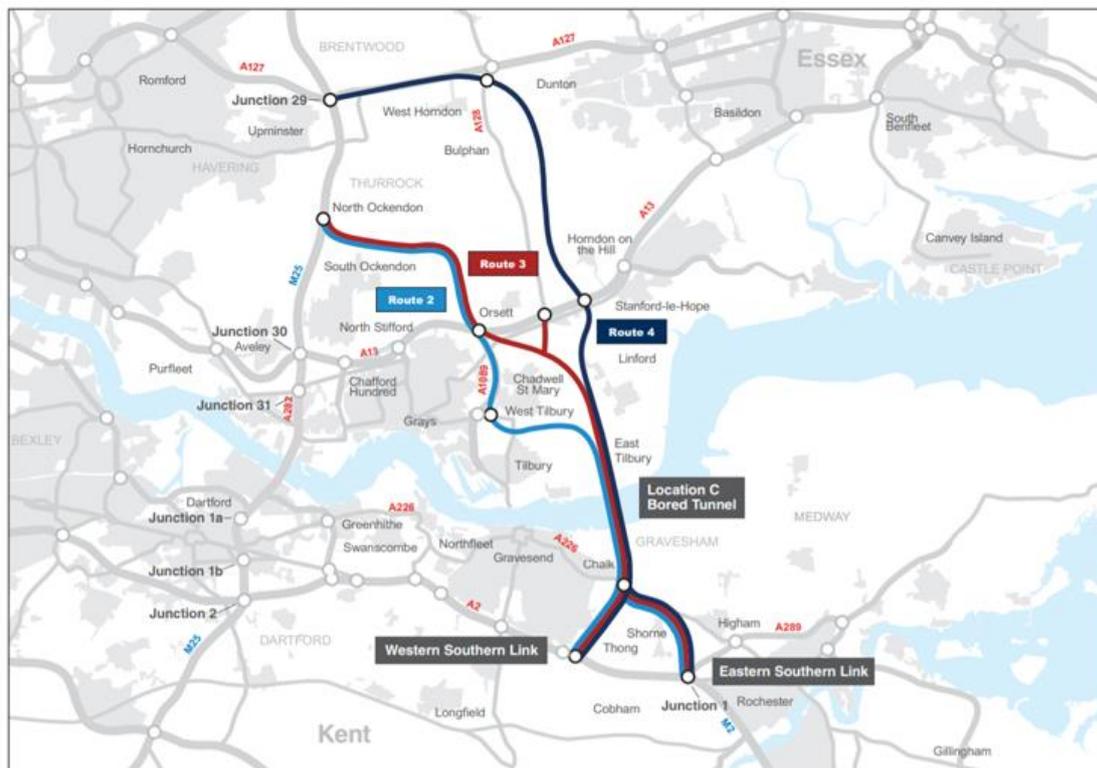
Route 3 is proposed as it would provide the shortest route, the greatest improvement to journey time and, being an entirely new road, would deliver a modern high quality road. It would also have the lowest environmental impact of the three options.

**Route 2** would be closest to existing urban areas and have greater noise impacts than Routes 3 and 4. It would also impact on ecological and heritage sites and affect an Environment Agency flood storage area. It would involve upgrading the existing A1089, is constrained by closely spaced junctions and would mix local with long distance traffic.

**Route 3** would be the shortest route and would be a completely new road which could be designed to modern highway standards over its whole length. Although it would impact local ecological and heritage sites, the impact would be less than Routes 2 and 4.

**Route 4** would involve a new road, an upgrade of the existing A127 and an upgraded junction where the A127 joins the M25. It would affect ancient woodland, a conservation area and a registered park and garden. The overall route is longer and more expensive than either Routes 2 or 3.

Despite the fact the Government had given directive to HE/LTC to further consult on Locations A and C HE/LTC did not give both locations equal representation in the consultation. The 2016 consultation was clearly biased in favour of Location C options to the extent that Location A wasn't even shown on the route maps. See image below taken from page 29 of the 2016 Consultation booklet which can be found online at [https://highwaysengland.citizenspace.com/ltc/lower-thames-crossing-consultation/user\\_uploads/lower-thames-crossing-consultation-booklet.pdf](https://highwaysengland.citizenspace.com/ltc/lower-thames-crossing-consultation/user_uploads/lower-thames-crossing-consultation-booklet.pdf)



From this consultation the then Secretary of State for Transport, Chris Grayling, decided upon and made the preferred route announcement as C3 in 2017.

The alignment, detail, and design of the route has changed extensively since then to the extent that we and many others consider the changes to be so significant that it no longer represents what was consulted on and proposed at that time when the decision was made.

We also seriously question the fact that the then Transport Secretary, Chris 'Failing' Grayling obtained that nickname for a reason.

Mr Grayling has also be found to have acted unlawfully in his decision making process for the Heathrow Expansion.

We believe that in light of all his failings, all his decisions on major projects needs to be investigated before any are allowed to proceed further, to be fully analysed and if any are questionable they should have to start over and go back to the relevant stage of decision making. It would be negligent to not investigate his decisions, especially when humungous amounts of taxpayer's money are being proposed to pay for them.

We have never, and still do not, consider the consultation and decision making process on the route choice for LTC to have been carried out adequately, as the above evidence clearly shows.

We would also go on to point out that the Port of Tilbury publicly stated that they would only support Option C3 if they got direct access, what became known as the Tilbury Link Road.

However, the Tilbury Link Rd was removed from the design at the launch of the 2018 Statutory Consultation.

We imagine that the Rest and Service Area that was added in the 2018 consultation also created some support from the likes of the Road Haulage Association.

However, yet again that was then taken out at the launch of the 2020 Supplementary Consultation.

We believe HE/LTC are manipulating things, companies, and people to get the results that suit them, and we do not consider that to be ethical or acceptable.

## **Residents not adequately informed of the Supplementary Consultation**

### Leaflets

We are aware of many residents who have said they have had no notification from HE/LTC that the Supplementary Consultation was being held. This included some in areas that are greatly impacted by the LTC such as Orsett village, amongst other places.

We were told by HE/LTC that thousands of leaflets with details about the consultation had been sent to residents.

We questioned at a number of the info events and by email asking for details of where exactly these had been sent, how many, and when. To date we have still not had a response to this giving these details.

When we asked specifically about Orsett at the info event at Orsett Hall Hotel, we were told that all properties in the RM16 3 postcode were sent the consultation leaflets. However we know that certain properties in that postcode area did not receive a copy of the leaflet as a matter of fact, because it includes our own Chair who lives in Orsett and did not receive a copy through the post from HE/LTC.

When we asked how they would have been delivered, we were told using Royal Mail delivery service. We are unsure as to why HE/LTC would choose yet again to use the Royal Mail service considering we exposed they had proven inadequate when HE/LTC sent LTC Ground Investigation leaflets out during August 2019 via the Royal Mail 'Drop and Go' service. The letters/leaflets did not end up with adequate postage or whatever was needed for this service to be delivered, and unpaid postage warning cards were instead delivered to residents who were asked to go and pay a charge to collect the mail.

HE/LTC are more than aware of this issue, as they expressed how unhappy they were with us reporting it as an inadequacy at the time.

When we quizzed them about the missing leaflets this time they said it was up to Royal Mail to deliver them, but we pointed out they chose to use this Royal Mail service, so they had to take some responsibility, especially knowing it had problems when they used it previously.

They advised us that they would be contacting Royal Mail about it and asking for it to be investigated. When we queried how that would help with the issue of residents not knowing about the consultation and therefore missing out on their change to have their say, they said they weren't sure and they assumed that could be taken into account if it was proven that the leaflets weren't delivered.

We are unsure why HE/LTC could not actually organise for a small team to deliver the leaflets door to door. They said that would involve too high a cost as it would need so many staff to do that, they believed it would take 100s of staff. We know realistically and from experience this would not be the case and that door to door leaflets like this can be distributed very quickly and easily with just a small team, and would be far more reliable and ensure that residents were properly made aware of the consultation and given the chance to take part if they wanted.

#### Other means

Aside from the leaflet they suggested they had used a local newspaper, which is no longer delivered door to door, and local radio which we are not aware of anyone we have spoken to having heard it.

#### DartCharge Customers

We also questioned HE/LTC about the fact that it appears DartCharge customers were emailed about the consultation. We were told that it wasn't all DartCharge Customers, but postcode specific to the local area. However, we are aware from our members that these emails have been received by people as far away as mid Kent. We did ask for a list of postcodes that the emails were sent to, but to date we have not been provided with that information.

NB. This request for a list of the postcode areas was also requested due to an issue we have over the lack of adequate consultation info/public events which can be read elsewhere in our response.

### **Consultation materials**

We requested copies of all available Supplementary Consultation materials including maps and any available documents be sent to us as soon as possible in line with consultation launching. This request was emailed a few days prior to the launch.

We did not receive the requested copies. We actually ended up getting copies of the 'Environmental Impacts Update', 'Traffic Modelling Update', and 'Utilities Update' ourselves at one of the info events. Bearing in mind the consultation launched on 29<sup>th</sup> Jan and the first info event wasn't until 21<sup>st</sup> Feb, there had been plenty of time for our request to be fulfilled.

With regard to obtaining paper copies of maps to take with us to local community forum events, again there was a delay in sending these out, when we had given adequate time in advanced of when we needed the maps.

We were told that our request for copies of the consultation guides, and response forms/envelopes could not be fulfilled immediately and that instead we would need to go to local Deposit Location and Information Points to obtain copies from the supplies at those. We are aware that they only

have a limited amount of stock at these locations, and were trying to do the right thing and not go in and clear out the stock levels, which would have left none for other members of the community. We were also given incorrect info as to which of these locations we should try, and one that we were advised to visit was not even a Deposit Location or Information Point.

Also in regard to our request for copies of guides and response forms/envelopes to be delivered directly to us, we were initially told that there was an issue with stock availability, as there wouldn't be new stock until sometime the following week. When we questioned why you didn't have adequate stock levels at the start of consultation the previous comment was back tracked on.

Not a sign that you were ready for consultation, again giving the definite impression that you were attempting to rush the consultation through to try and speed the process up so you can get the DCO application in asap since you are already so far behind on schedule.

### Physical 3D models

Yet again there are no 3D models of the scheme. This is yet another example of how HE/LTC seem to believe that is ok to avoid providing the public with adequate consultation.

How are we meant to be able to get a realistic idea of what the LTC will be like when you refuse to provide us with a physical 3D model that would clearly provide us with so much information and insight into the proposed LTC?

Without such physical 3D modelling it is impossible for us to be able to get any idea of the size and heights of the scheme.

The junctions are complex and confusing; a 3D model would help greatly in better understanding of the scheme. We would question whether that is the reason why you refuse to provide us with one. We have after all been asking for a 3D model for years now.

We understand that it may be difficult to produce one for the whole route, as displaying something of that size could prove difficult. However, you could either produce two, and display them at easily accessible venues either side of the river, to allow people to view. Alternatively, or in addition to that you could create physical 3D model sections that wouldn't be so vast and could be displayed at the public info events. For example showing various sections of the route, like the each of the sprawling 3 junctions (m2/A2, A13, and M25), the tunnel portals, and the various viaducts along the route.

How do you expect us to understand the height and scale of the scheme without such visual aid? It is impossible for the general public to comprehend the Engineering Plans, in fact they just make most even more confused and concerned, due to the complex nature of the plans that can very easily be misunderstood unless you have an engineering background, or have some understanding of how to read such plans.

At very least some kind of guide on how to use and understand the Engineer Plans could and should be provided to assist people in obtaining the info.

## Consultation has been rushed and ill prepared

It is very apparent that this consultation was rushed to fit in with the General Election, Government reforming, and prior to the expected purdah for local elections (which obviously then got postponed until next year due to COVID-19).

We would point out that if COVID-19 is deemed major enough to postpone local elections then it should certainly be major enough to warrant postponement of the consultation, and also your non-essential investigative works.

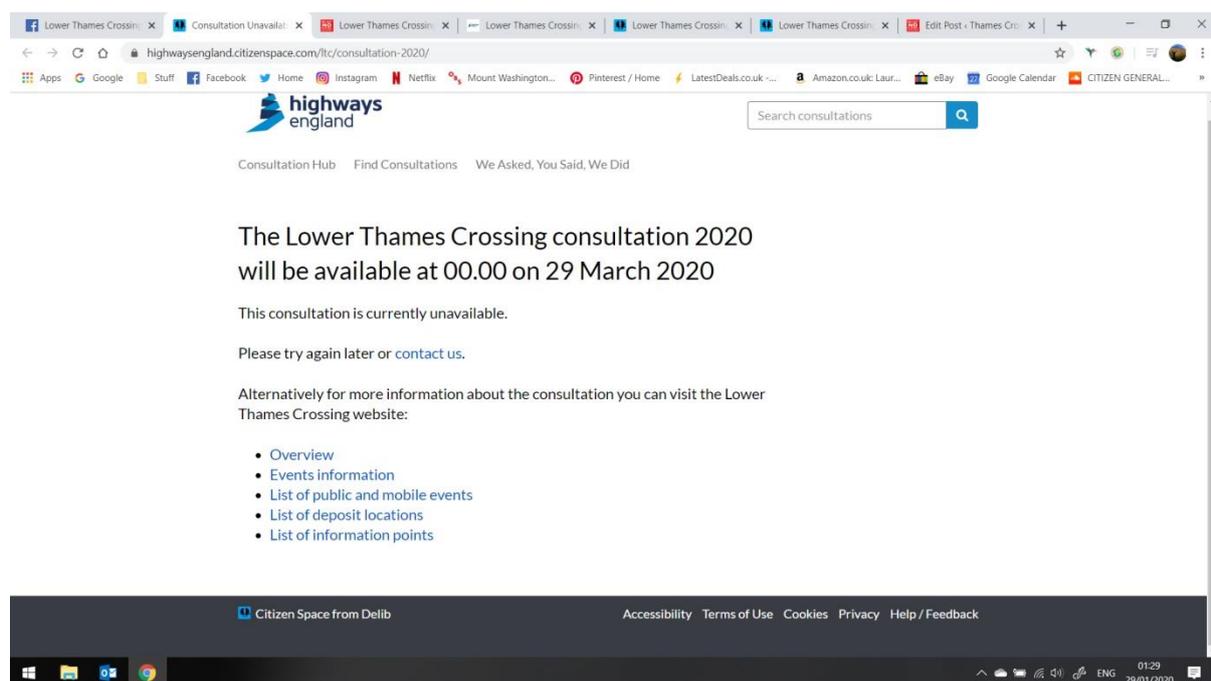
There are many examples of the fact this consultation has been rushed, some of which can be found below.

## Consultation website taken down within an hour of launch

Another sign that HE/LTC were not ready for the consultation, and were trying to rush it through as quickly as possible because you are already so far behind on schedule.

Within an hour or so of the Supplementary Consultation launching at 00:01 on Jan 29<sup>th</sup> the HE/LTC website went down.

Below is a screen capture of the page that was displayed during this time.



When we asked HE/LTC about this we were told it was only for a short time and that analytics showed that only two people were trying to visit the site at the time.

We would question this as we were of more than 2 people who were online trying to view the site at the time, and would suggest the analytics for the site are not very accurate.

Regardless we would also point out that the page used on the website during this down time, shown above, is not even accurate or adequate. To say that the consultation will be available at 00:00 on 29<sup>th</sup> March is completely incorrect, and misleading.

We were told by HE/LTC that this had to be done to make some change to improve the user experience.

**Firstly**, the fact the website needs to be taken down whilst updates are done is ridiculous, and proves HE/LTC are not even capable of making the right choice with regard to how the website is set up. There is absolutely no need to have to take a website down to be able to update. It a choice that HE/LTC made, to have a website that can't be updated without taking the site down.

**Secondly**, the fact that it was deemed necessary to have to update the user experience within an hour of launch is unbelievable. Clearly another example of HE/LTC not being adequately prepared, most likely because the consultation was being rushed to fit in between the General Election, Government being re-formed, and before the expected purdah for local elections (which of course have since been postponed).

**Thirdly**, why was the website not ready and check before launch?

## **Inadequacies of the official Highways England Lower Thames Crossing project website**

Details and evidence of the inadequacies of the official HE LTC project website are available in Appendix A.

This information clearly shows that the official LTC project website contained out of date information, which was extremely misleading during the Supplementary Consultation period.

Having out of date maps, videos and information at any time is bad enough, but during a consultation is totally unacceptable.

HE/LTC link to this official website for the LTC project from their social media accounts. It is also provided as a reference point within the consultation guide. Not to mention that if anyone searches online for LTC they would find this project website in the top search results.

The response we got from Chris Taylor, Director, Complex Infrastructure Programme at Highways England states that the thorough review which we provided of the project website has been passed onto the digital team, and will be incorporated into updates to the website that will take part following the conclusion of the consultation in April.

How on Earth do you consider this an adequate response? You have missed the point completely. People will have visited the project website to search for info about the LTC to assist them with their consultation response. The whole point we were making is that the project website is out of date and therefore extremely misleading and inadequate. The fact that even after we bring this to your attention, having done your job of reviewing and assessing the accuracy of the website for you, you purposely decide to wait until after the consultation ends before making any updates. Astounding.

## Lack of clear and informative materials

### Maps

Maps are confusing to understand, especially with the arrow pointing North changing in each page of the map books.

The maps are also cropped to avoid it being clear exactly how close the propose route comes to certain areas, and also to avoid showing clear overall pictures of how it impacts areas by the fact it is broken up over various different maps which are difficult to piece together.

The map legends are also confusing to the general public, and further advice has been needed by us and many residents as to what they actually meant. It appears that HE/LTC have not given adequate attention to ensuring that the map legends are in simple to understand wording for the general public.

Things like the grey shaded area on Land Use maps, which many now find their properties within, is listed in the legend as “Land not included within the Order limits”. We are not aware of anyone in the general public who knew what that meant without seeking clarification from HE/LTC. Not only is this not clear or informative, it is also highly stressful for everyone, especially those whose homes now fall within these areas.

Or the blue shaded area on the Land Use maps, which has greatly increased in size along the entire proposed route. It is listed as “Temporary Possession of Land and Permanent Acquisition of Rights”. Again another lot of wording that means nothing to the general public, and requests for clarification needed to be sort by many. Again this caused much concern from many residents.

Some of the pink cross shaded areas for Environmental Mitigation areas have also been a cause for concern, as it was not clear and informative exactly what is meant by that and many were worried as some of these areas are not close to the proposed route, and sometimes very close to people’s homes.

We were told that the wording had changed on the legend explanations on the Land Use maps to conform to how the areas are likely to be labelled on the plans submitted as part of the DCO application. If this is the case surely HE/LTC also have an obligation to provide an additional legend or some form of explanation alongside it that is user friendly for the general public, in line with their legal obligation to provide clear and informative materials to us during the consultation.

At the beginning of consultation HE/LTC were showing incorrectly labelled map diagrams. As can be seen in the images below they had mismatched the images to the incorrect text description, mixing up north and southbound. This has since been corrected; however it was up and could have added to confusion to some visitors to the website.



Page 40 in Map Book 1 labels Stifford Clays as Little Thurrock. If anyone is looking through trying to work out the impacts LTC may have on their area and they see Little Thurrock instead of Stifford Clays they may not identify the true impacts, because of this error.

We also noticed that Tilbury Power Station is still shown and labelled in the HE/LTC map books. The Power Station has been demolished, so we cannot understand why the footprint of the buildings are still being shown on maps, including the Land Use maps for Property.

When we queried this at an info event we were told it was on there purely as a reference point that locals would know. We do not buy into this, as the footprint of the building is still marked on the Land Use map showing the building as being at risk.

We would also question why Tilbury 2 footprint is not being shown on the maps, and therefore we would assume not being taken into account.

Same inadequacies are previous consultations

We have brought to HE/LTC attention previously the fact that the maps and diagrams are not adequate for most people to be able to understand the complicated and confusing junctions.

We at Thames Crossing Action Group have spent hours colour coding the various connecting roads different colours, and then adding a legend to make it easier for people to better understand each connection/junction.

We have done similar in previous consultations and asked HE/LTC to do something along the same lines in future consultation. We have even had comments and compliments from some of the HE/LTC team with regard to our colour coded maps/diagrams.

We are not trained experts in road design, we are not getting paid for this, we are people whose lives and the lives of people we know are being unfairly and unacceptably being impacted beyond belief, and being treated appallingly in many cases.

It would be so much quicker and easier for HE/LTC to colour code the map/diagrams than it does for TCAG to do it, as we have to obtain the images online, often by means of screen capture, and then use Photoshop to colour code as best we can. We don't have the original design files as those who create the consultation materials do.

We again call on HE/LTC to ensure that any further consultations have easier to understand colour coded maps/diagrams of all connections and junctions.

### Press and media

We also wish to express our concerns over the fact that it seems HE failed to supply press and media with an up to date copy of the overall route map.

This has resulted in many, including national press using old out of date maps from 2018.

It is hardly surprising considering the LTC project website is so outdated, as stated elsewhere in this document.

We feel that HE/LTC should be sending all press and media a copy of the whole route map as a matter of course, rather than making them try to hunt one down. Clearly a visual of the route map is pretty essential when reporting on a proposed new road.

We would also point out that HE/LTC do not appear to be actively watching press coverage and requesting corrections when misleading or incorrect info has been reported by press and media.

We as an action group have a Google alert set up for Lower Thames Crossing, which very quickly and quite comprehensively shares details of many of the press and media coverage. It wouldn't take much for HE/LTC to do as we do. It shouldn't be up to us to be contacting these press and media contacts etc. to request corrections, which is what we are having to do to stand any chance of reducing the misinformation out there, which is usually a direct result of HE/LTC's inadequacies.

### Other info

One of the key points that HE/LTC seem to be focusing on, in order to try and 'sell' LTC is their claim that it will provide 90% extra road capacity. We find this to be completely misleading.

From that statement you may be inclined to think that it is giving 90% more capacity by nearly doubling the lanes across the river.

However, when you do the math that is not the case. There are currently 4 lanes in either direction at the Dartford Crossing, so 8 lanes total. The proposed LTC would be 3 lanes in either direction through the actual tunnel crossing section, so 6 lanes total. This would actually work out at 75% increase in lanes, not 90%.

*The reasoning that it is actually "calculated based on the capacity of each lane at the Dartford Crossing and at the Lower Thames Crossing. The capacity of the northbound crossing at Dartford is impacted by the Traffic Management Unit (which closes all lanes to allow escorts to take place, and to enable high sided vehicles in the wrong lane to be removed etc.) and as such a lower effective capacity is applied. As there is to be no TMU of the same nature at LTC, the capacity per lane is higher than at Dartford, which results in the 90% increase quoted, as opposed to 75%, which is the increase in the number of lanes".*

We do not find this to be clear and informative, and considering it is used as such a big selling point of the LTC, we feel this leaves a lot to be desired, and feel it is being used to purposely mislead people into thinking the benefits are greater than they are.

Everybody other than HE/LTC staff that we asked thought it meant a 90% increase in lanes across the river. As stated the way HE/LTC have used this is not clear or informative, and is actually very misleading, which we strongly oppose.

We are also aware that there was a mistake in the consultation guide, which was only corrected in the later part of the consultation that had referred to 'a new link road connecting Valley Drive to the A2 eastbound', which should have stated to the M2 eastbound.

These kind of errors are not deemed acceptable, and certainly do not fulfil the obligation to provide clear and informative material.

#### Considerable effort needed

We at Thames Crossing Action Group have had to spend considerable time and effort to gather the knowledge and understanding that we have managed to gain during the consultation period.

We have been spending every waking moment working on this, it has not be easy, and we still don't feel we have been provided with as much info as we feel we need and should be provided.

We also have a head start in the fact that we have already gained a lot of knowledge and experience from prior consultations and dealings with HE/LTC.

For more members of the general public they will not realistically been able to put the same amount of time into this. If we have struggled due to the lack of clear and informative material, then others will likely have found it even harder.

We have been doing our best to share the info that we manage to find, and our own insights into the changes and LTC. But it is not our job to be helping others understand this info, that is your legal obligation, one which you seem happy to ignore.

We do what we do because we feel people have a right to know what is going on, and what HE/LTC are proposing, and clearly HE/LTC are not able or willing to provide adequate clear and informative materials, and consult people adequately. Therefore we have no option but to step up and do what we are trying to do. However, again we stress that because we are helping inform people does not mean that the HE/LTC consultation has been adequate, because it most certainly has not.

### **Erroneous letters sent to residents**

As outlined in the earlier section of this document we consider the sending of erroneous letters to residents totally unacceptable and a further inadequacy of the consultation and HE/LTC.

### **Late letters sent to residents**

As outlined in the earlier section of this document we consider the fact HE/LTC sent some letters out around a month after the consultation, being told their properties were now within or partially within the development boundary is diabolical, and another example of the inadequacies of the consultation and HE/LTC

### **Consultation Events**

#### Info and mobile event locations

As soon as we were informed of the locations of the info and mobile events we were very disappointed, and consider this to be another inadequacy of consultation.

There were locations which clearly to us deserved and needed a consultation event, but were missing from the list. When we initially questioned it we were told as it was a Supplementary Consultation the events would only be held in locations that would be affected specifically by the changes. We do not agree that this has been the case.

By the very nature of how reducing the LTC southbound between the M25 to just past the A13 will impact all areas throughout the whole of Thurrock, and likely some of Havering and the general Brentwood area and surrounds. This is based simply on the fact that when there is an incident at the Dartford Crossing or the M25 traffic will need to migrate to the LTC and the 5 lanes of M25 traffic will not be able to effectively migrate onto just 2 lanes of LTC southbound. This will in turn create traffic to find every and any way it can to migrate meaning all local roads are likely to be impacted.

After some interaction a mobile event at Stanford was agreed, which proved very popular. In the time we were there the van and staff were busy, we even witness people turning away because the van was full. Luckily on one occasion we noticed one couple and encouraged them to come back and talk to the HE/LTC staff that we had been talking to outside the van. Had we not have been there these people would have missed out as they felt there wasn't adequate facility for them to attend as the van was so full. Obviously we don't know if or how many others may have missed out because of the van being full both at this event and others.

#### Refused events

We also asked if it would be possible to have events at Lakeside Shopping Centre, Bluewater Shopping Centre, and The Hub in South Ockendon.

We were told that no further events would be added to the schedule.

The reason we were given for not having them at Lakeside and Bluewater left a lot to be desired. We were told it is because they are not local shopping centres and would have people from outside of the local area there.

However, we are also aware that DartCharge users from outside the local area were emailed and invited to take part in the consultation.

We queried this with HE/LTC and were told the DartCharge emails were postcode specific. We have asked numerous times for details of which postcode areas received the DartCharge emails and to date we have not been provided with that info.

We know for a fact that DartCharge users in mid Kent have received the email, so we do not feel HE/LTC argument is valid.

We will assume that if we had the data it would not look good against the argument of why events at Lakeside and Bluewater would attract responses from those that are not local in a Supplementary Consultation.

We also stress that many residents from the West of Thurrock were angry that there was not an info event available to the west of the borough.

Also that events at Lakeside and Bluewater would have both been perfect accessibility for those who rely purely on public transport as both have very good public transport connections.

We conclude that we do not feel that HE/LTC held adequate public info/mobile events, and we find that highly questionable.

*Staff lacking knowledge at events*

We experienced and witnessed various occasions where members of the HE/LTC team did not respond correctly to members of the public.

At the first event a member of the HE/LTC advised a member of the public that she could respond to the consultation using the [info@lowerthamescrossing.co.uk](mailto:info@lowerthamescrossing.co.uk) email address. Clearly this is not an official channel of response. It was only that the resident knew us and asked us if that was correct, that we were able to bring it to the staff members attention, and they went off clarified we were correct and that it had to be the official channel [LTC.CONULTATION@TRAVERSE.LTD](mailto:LTC.CONULTATION@TRAVERSE.LTD) email address. Had we not have been there, or had the resident not questioned it, then their response may not have been accepted and counted as a response, and who knows how long and how many times the staff member would have continued to share the incorrect info.

At the first event in Upminster we specifically asked to talk to a member of the Construction team. We even clarified with the member of staff that was introduced to us as a member of the Construction team that they were indeed a member of the Construction team. We asked them some questions about various aspects of Construction in relation to LTC. When we queried about how long the construction hours were, he didn't seem to be aware of how long the hours are proposed to be. In fact many of the team around the map table where we were having the discussion, who were listening in, seemed quite surprised when we stated the proposed hours and how long they are.

It is of great concern that someone who is reporting to be Construction team is unaware of the proposed construction hours. Some of the staff tried to play the length of the hours down by saying that the hours wouldn't be that long or late near to properties.

We are more than aware that you are at least a year behind on your schedule, as are still attempting to stick to the original predicted opening of LTC. We therefore don't believe that these proposed construction hours are just being proposed for the fun of it, or just in case, or in certain situations might be used. We whole heartedly believe and expect that HE/LTC will use as many of the proposed hours as they can, whenever they need and want.

We then went onto to have a conversation with someone in Land & Property, and when the topic of impacts of the construction hours to the residents came up, she said she had to agree that long and sometimes overnight works near to the property would not be ideal.

So we went from some staff trying to tell us that there is no way construction hours would be that long or that late near properties, to being told that not only would they be exactly that but also with some overnight work too.

We are also aware that the phone events were no better either, we are aware some people were given incorrect information over the phone. We were told by HE/LTC that team members were working from home due to Coronavirus. We feel in some cases this was a very bad move, as they

clearly are not knowledgeable enough to be left to take queries on their own without other staff around to support them. They would probably be worried that they would get themselves in trouble if they had to report/transfer so of the calls to others, if that was part of the procedure put in place. We can only assume that HE/LTC tried to continue following the same guidelines they followed at info events, whereby if a member of the team doesn't know an answer they are supposed to pass the questioner onto someone on the team who can help them.

In one instance someone asked them *"If I am on the M25 heading South, intending to use the QEII Bridge, and then the bridge is closed (as it is periodically) can I migrate to the LTC if I have already passed the M25/LTC junction."* The response over the phone from the HE/LTC team member was that they would be able to take the A13 eastbound from the M25, and then connect with the LTC southbound at the junction with Dock Road (the A1089).

The person was surprised by this answer so asked the same question again in case anybody had got their wires crossed, and the same response was given.

Because the info they had been given was not what they were expecting to hear they then emailed HE/LTC for further clarification, and were told, *"I understand how frustrating this must have been for you to get the conflicting information and waiting to get the right information, I apologise for that. After checking all the information I can confirm that you are right about it. It's not possible to join the LTC in either direction if you are approaching it on the A13 from the west. To join you would need to either go down the A1089 and take a U-turn at the first junction or you could continue on the A13 to the Stanford junction and take a U-turn there."*

This is clearly a case that the HE/LTC team member on the phone had given incorrect info to the caller. We have heard of other instances of staff providing bad information and not being able to assist over the phone.

We find it greatly concerning and totally unacceptable that HE/LTC staff have such varied answers and levels of knowledge, especially when they are considered to be the 'experts' in these fields.

We realise that not all staff can be expected to know everything on all topics. However, they are meant to identify if it is something they don't know, and attempt to find someone who will know for the person asking the question.

This is not what was often experienced by members of the public. This means many people have been misled and/or given incorrect information. Yet again we stress the importance and legal obligation for HE/LTC to provide clear and adequate information, which has not been our, or our members experience.

### **Consultation response form**

The wording in the consultation response form is confusing and not considered user friendly by many.

## **Lack of meaningful engagement**

This a major factor for so many reasons. Consultation should be about HE/LTC providing everyone with fact based evidence and information, in an easy to understand format, so that we can form our own opinions based on facts, and offer our comments in the form of consultation responses.

It should not be about HE telling us what they want to do, with no evidence or clear and informative materials, and a lack of general and meaningful engagement.

Everybody needs and deserves to be consulted fairly and adequately, and to have meaningful engagement with HE/LTC, this not what has happened during the Supplementary Consultation.

We would ask HE/LTC to take this into account alongside all the other inadequacies of this consultation and to consider holding a fair and adequate consultation after the COVID-19 crisis has passed with a little time for people to recover.

### Local Authorities

We are aware from our involvement in the LTC Task Force that Thurrock Council feel there is a lack of meaningful technical engagement from HE/LTC.

As part of our role on the LTC Task Force committee we have also read the final draft consultation response and are seriously concerned by what we have read with regard to some of the points raised by Thurrock Council, and how the lack of information and engagement has put them in a very difficult position when it comes to being able to respond to the consultation.

We are also aware that Gravesham Borough Council says it will be writing separately to Highways England and the planning inspectorate highlighting several concerns as the plans continue to face harsh criticism from councillors

### Thames Crossing Action Group

Whilst we appreciate that we have had to raise a great number of questions and points during this Supplementary Consultation, we feel that this is a direct reflection of the inadequacies of the consultation and the consultation materials.

We have experienced troubles getting hold of consultation materials as detailed elsewhere in the document.

We have also experienced long waits for certain info, and some we have not received any response to still just a few days away from the consultation ending.

We have had numerous occasions whereby the questions we have been asking have been ignored and avoided, and instead what appears to be standard copy and paste responses that in no way answer the questions raised.

In these instances we have had to respond and point his fact out and ask for an actual answer to our query. We still have numerous instances where this has been the case that we have again not yet received responses to, with only a few days left in the consultation.

We would also point out our concerns that a day before the consultation ends we still have a large number of email enquiries that have not yet been answered, so we will not have been provided the adequate info we need to be able to fully respond to the consultation at the level we like to.

#### HE CEO responses

We have had reason to feel it necessary to contact someone at a higher level than the general [info@lowerthamescrossing.co.uk](mailto:info@lowerthamescrossing.co.uk) email address due to the seriousness of some recent issues. Previously we would have emailed Tim Jones directly, which he was always ok with. Since he resigned in July 2019 as mentioned elsewhere in this document we have had no contact at all from the Interim Project Director.

We have been emailing Highways England CEO, Jim O'Sullivan. We are aware that he has taken the time to respond to residents emails, however our emails always seem to be simply passed onto someone else to deal with.

Considering on one occasion we emailed about exactly the same issue, and a resident got numerous direct responses from Mr O'Sullivan, yet we have not had a single direct response from him, we feel this is an obvious avoidance of dealing with us because we represent an action group.

In a response we got from Chris Taylor, Director, Complex Infrastructure Programme at Highways England, he stated:

*"I understand there are a number of other queries you are waiting for a response to; I have asked the team to gather these together and provide a single response to you shortly. As always, we will endeavour to respond to any new enquiries within our published timescales.*

*This is an unprecedented time, and I would like to take this opportunity to thank you for your ongoing engagement with the project. I understand that you have a wide range of questions relating to the project and the team is working hard to respond to your questions and to those submitted by other people as quickly as possible. This would be made easier if you could group your questions together in a smaller number of emails."*

The reason we try to keep our emails to your team as short and direct as possible, rather than grouping them together in what would end up as very long emails, is because we keep experiencing a definite lack of actual response and answer to the questions raised. We then have to follow up with a further email to point this out, and request an actual answer to our questions.

If there is a struggle to gain answers to our questions when we make the emails as short and to the point as possible, then what hope would we have if we started grouping together our questions?

Again to stress, the reason we keep it short rather than grouping is to keep it as easy as possible, and yet still it seems HE/LTC struggle.

We would also state that the outstanding emails have still not been responded to, and it is now the day before consultation ends. Some of these outstanding emails date back to early March.

### Residents in general

We definitely feel there is a lack of meaningful engagement from HE/LTC to the general public.

Questions, requests, and comments in relation to LTC have been ignored on so many levels, especially in relation to concerns over COVID-19 and the general inadequacies of the consultation.

We have heard from many residents who like us are experiencing a lack of answers to questions via email. Again like us they have to respond pushing for an actual answer to their questions, instead of obvious copy and pasted text that is being used to avoid answering specific questions.

We are also hearing of and experiencing residents at info events asking the same question to 3 different members of the HE/LTC team and getting 3 different answers. This does not give any sense of confidence in either the fact that these staff are all knowledgeable to be attempting to answer our questions, that the info they have been given is not clear and adequate enough for them to be able to answer our questions adequately, or that they care enough about ensuring the public are getting the answers they need and deserve. Whatever the reason it is not acceptable.

Mobile info events in particular have also been a bugbear of our members, as the mobile events have limited info and staff. The van can be very busy, and with extremely limited staff and staff knowledge compared to an info event, getting answers to questions can be frustrating and difficult.

The fact that HE/LTC refuse to identify that they have a responsibility to ensure that the public are aware of the consultation and events etc. also gives no confidence in HE/LTC or the consultation process.

HE/LTC need to realise and respect that not everyone is online, or has internet access at home. We do not get local newspapers delivered door to door. We do have a demographic of older residents who need to be included in the consultation process, and to be treated with respect and consideration. Not everyone is able to read and write so may need further assistance and the opportunity to come and verbally gather the info from events and then seek assistance from someone to compose their response. As HE/LTC are aware from the Statutory Consultation we also have some who need sign language interpretations. Not everyone has a car to access info events, so public transport access for the events also needs to be taken into account.

**There is a definite lack of meaningful engagement from HE/LTC to our Local Authorities, our MPS, us as an action group representing thousands of residents, and the resident directly. We find this totally unacceptable and extremely concerning.**

### **Inadequacies in relation to COVID-19 crisis**

Highways England/Lower Thames Crossing did not react quickly enough to the COVID-19 crisis. In the early days of the crisis info and mobile events were still taking part and there were no visible precautions being taken.

### At events

There were still touchscreen tablets at the exits of the events, encouraging people to touch the screen and rate the consultation event.

Whilst we were, when we asked, told that staff were being informed and reminded about the importance of them washing their hands more and using antibac, there was initially no signage or antibac available to the public at events.

It seemed that it was only when we started questioning this that provisions were made to have antibac available at the events.

It was not taken into account that the elderly and those most at risk were having to avoid the public info and mobile events as they feared risking their lives to attend. The fact that HE/LTC feel it acceptable to think that these members of our communities should miss out on the opportunity to attend an info event is questionable.

Even when HE/LTC finally made the decision to cancel the remaining info and mobile events they refused to acknowledge that there would be many residents who were being discriminated against since they are not online and would not be able to access maps, plans, videos, images, etc that they would have been able to view at the info/mobile events.

HE/LTC seem oblivious, or are just ignoring the fact that there are genuine reasons why this consultation needs to be postponed, and why people are not able, and even being discriminated against taking part in the consultation under the current circumstances.

Not everyone is online, even those with email addresses etc. do not necessarily have online access at home and usually rely upon internet access at libraries which are of course closed.

There is also the instance that there are members of our community who may not be literate, so they have missed their chance to go along to an info/mobile event and ask questions verbally to get the answers they want and need to assist them in getting someone to help with their response. Again they may also be limited to getting that assistance in helping write the response at this time due to social distancing rule.

Also the very people who would be most concerned and at risk from the increase in pollution and health impacts from the proposed Lower Thames Crossing are also those who are most at risk from COVID-19. They should therefore have been given full and adequate opportunity to take part in the consultation. This is not the case, as they were too fearful for their health and lives to be attending the info and mobile events. We do not consider this to fair or ethical that HE/LTC continued in this way and ignored this fact.

Calls for the postponement of the consultation until such time as it could be carried out safely and adequately were ignored.

A majority of the Deposit Locations and Information Points were closed until further notice due to COVID-19. The remaining Deposit Locations and Information Points were only open reduced hours. Yet still HE were stating that they were all open and available for people to view docs and get copies of the response form and freepost return envelopes.

It was only when the Government announced that all libraries were closed that HE/LTC finally made an announcement that the Deposit Locations and Information Points were now longer available.

The 1 week extension to the Supplementary Consultation was only advertised to those it reached online. We are not aware of any other attempts of communicating this information by any other means offline. Yet again discrimination against those who are not online.

#### Inadequacies of the phone events

The two phone events are also not considered to be adequate. It would be impossible for HE/LTC staff members to answer certain things over the phone adequately without visual aids, such as maps, plans, images, video. At the info events we attended it was perfectly clear that these kind of visual aids were used constantly by the HE/LTC staff to help answer peoples questions. To remove that option would clearly have left big gaps in their ability to answer questions efficiently and adequately.

For instance if someone wanted to know where the Emergency Refuge Areas are along the route, this is not something that could be done over the phone. We are aware of at least one person asking this question during one of the phone events, and the HE/LTC staff member ended up admitting that they couldn't share that info, and wasn't sure if there was any way to get that info for the caller.

As well as the fact that the quality of factually correct info was lacking, which just highlights again the lack of knowledge of some of the HE/LTC team, notification of the actual phone events happening was extremely limited. Yet again HE/LTC discriminated against those who are not online.

Bearing in mind those who are not online rely heavily on being able to attend info events, or visiting the Deposit Locations to view maps/plans etc. So when these were no longer options they no longer had the option of access to consultation materials that they need and deserve to be able to take part in the consultation adequately.

#### Lack of compassion over the impacts of COVID-19

HE/LTC have not taken in to account the impacts COVID-19 is having on people's lives and how people have and are unable to concentrate and give the LTC consultation the attention they usually would because they are trying their best to deal with the COVID-19 crisis.

Some residents will be actually suffering with COVID-19 severely ill and possibly fighting for their lives. Considering the fact this is a pandemic it cannot be compared to the usual amount of people who may have been ill during the consultation period. And the loved ones of those who are ill will of course be pre-occupied with this and trying to take care of them as best they can, and also themselves since they will also be at greater risk if they have been in contact with someone with COVID-19.

Some will be dealing with adapting to working from home, and others will have their own businesses that they are trying to make provisions for and figure out what actions they need to take to protect their staff, with concerns over the threat of losing businesses that they rely on financially.

Some will have had their children at home needing care and attention as they were not at school because of closures due to COVID-19. This was happening even before the Government decision to close schools for the majority, because of things like essential deep cleans etc. Usual childcare provided by grandparents and those who during COVID-19 crisis are considered vulnerable, are no longer an option for childcare.

Generally just dealing with and adapting to everything during the COVID-19 crisis has impacted every single person's life in some way. Priorities have had to change to things like finding and getting food and essential supplies, and trying to stay healthy and take care of ourselves and our loved ones when we can.

Our critical keyworkers have been literally doing all they can to keep our country alive, whether it be our awesome NHS staff, or lorry drivers and food retail workers, or any of the other true essential key workers who are risking their own lives and their families lives to do their best to take care of everyone else. Seriously, how do HE/LTC expect these amazing people to have found the time and energy to also take part in the consultation? The proposed LTC will directly impact their lives, homes, health etc, yet whilst they are prepared to literally risk their lives to try and save our lives, HE/LTC haven't even had the decency to allow them the opportunity to take part in the consultation. It is a complete disgrace, and HE/LTC should be thoroughly ashamed of themselves.

#### Unacceptable compared to other major consultations

We are aware that other major projects have handled their consultations far better than you during the COVID-19 crisis.

Whilst we are still of the opinion that all consultation should be postponed until after the COVID-19 crisis has passed to allow everyone far chance to attend public info events, and have the time, energy, and right headspace to be dealing with any of these consultations, Bradwell B have extended their already 12 week consultation by a further 5 weeks through until 1<sup>st</sup> July 2020. In addition they have created a virtual exhibition online that mimics exactly what people would experience at a public info event. Again we would stress that this still doesn't help those who are not online, but our point is that what you have done is in no way near adequate if you persist in continuing with the consultation during the crisis.

For reference the Bradwell B details can be found on <https://bradwellb.co.uk/> and from even a basic perusal is far superior to the HE/LTC website. We would also stress that this is a first stage consultation, so if they can be so much more advanced at this early stage of the project then shame again on HE/LTC for your poor effort at the advanced stage that the LTC project has reached.

#### Letters being sent to residents during COVID-19 crisis

As outlined in an earlier section of this document we were shocked and disgusted that HE/LTC chose to send letters/questionnaires to residents during what is already an extremely stressful time when people are adapting to unprecedented times during COVID-19.

The fact that some of these residents were in their 80s and 90, had already received letters of apology for the distress caused by erroneous letters that were sent at the beginning of consultation, we find this further communication at a seriously stressful time, whilst these resident are considered to be at high risk, are self-isolating and therefore more isolated than usual for any kind of support from loved one. This behaviour is an inadequacy of the consultation, HE/LTC, and also considered by us to be despicable behaviour.

### Workers during COVID-19

Please see Appendix B for details and evidence of HE/LTC workers/contractors breaking the 2m distancing rule on sites repeatedly during COVID-19 crisis, putting not only the workers lives at risk, but everyone else's and the NHS too.

We all question the fact that working on sites like this are high risk, and god forbid there were to be an accident at one of the sites, this would also put unnecessary pressure on the NHS, during COVID-19. Also most people are taking the decision to reduce risk in their lives right now to try and avoid potential accidents where avoidable so as to not put extra unnecessary pressure on the NHS during COVID-19. Avoiding driving, horse riding etc., these workers are all clearly needing to use vehicles to get to site, which again increases the risk of potentially having to put unnecessary pressure on the NHS.

Also if any of them are using public transport to reach meeting places before going to site, then it is also increasing the pressure on public transport which should be there purely for critical essential frontline workers.

We know from previous experience of attending a GI site visit that many of these workers are not local and travel into the area for work. This means again that they are increasing the risk levels as far as potential for spreading COVID-19, and putting lives and the NHS at risk.

### HE/LTC reaction

We are shocked that when one of the residents who took some of the photos in Appendix B contacted Highways England CEO, Jim O'Sullivan his response was to thank the resident for advising them, and stating that it would be helpful when they remind their contractors to work to government requirements.

Why on Earth should they need reminding, this is a global pandemic crisis, it's not secret.

It also wasn't just a one off brief oversight, it has been happening repeatedly for days.

We would expect that after saying something like this the CEO would have taken immediate action to remind the contractors, yet still since then the same thing is happening. The only difference if any is that now the workers seem to be working a further distance away in an attempt to try and stop more photographic evidence.

We find this not only irresponsible, but also completely unethical and immoral.

This is not the time for business as usual. We would remind HE/LTC and their contractors that people are dying, and our amazing NHS workers are doing all they can and risking their own lives to try and save lives.

HE/LTC haven't even submitted a DCO order yet, let alone been granted one, so this work should not be deemed as essential or a major factor in the country's recovery after COVID-19 as the project doesn't have permission yet.

The work is not essential or critical, what is critical is that people stay at home and save lives, not blatantly ignore government advice and rules.

HE/LTC and their contractors need to stop work on all sites until after the COVID-19 crisis has passed, with immediate effect.

### Further Consultation

We are aware that Highways England/Lower Thames Crossing has already announced that they plan to hold a further round of consultation for the Lower Thames Crossing project. Since this announcement was made before the Supplementary Consultation had ended, this would imply that they weren't suitable ready for this consultation, as clearly they have already identified the need to hold further consultation.

Please see the image below that clearly states that a further round of consultation would be held.

**Lower Thames Crossing  
Supplementary Consultation update**

Our supplementary consultation is to be extended by one week, now ending on Thursday 2 April at 23:59 hours.

We're planning a telephone consultation event on Monday 23 March and Wednesday 25 March from 2pm to 8pm. This is for those who were unable to attend an event in person. More information about this coming soon.

Unrelated to Coronavirus, we are holding a further round of consultation ahead of submitting our Development Consent Order later this year. This will provide you with a further opportunity to consider our proposals and share your views.

#LTCconsultation2020



This was also hinted upon at the February Lower Thames Crossing Task Force Meeting at Thurrock Council offices. David Manning and Highways England/Lower Thames Crossing up until this point had always been clear that if the Supplementary Consultation happened it would be the final chance for us to have a say before the Development Consent Order application was submitted. However at this meeting the tone changed with comments about there is a chance that further consultation may be needed.

We would suggest that this is because even at this stage it was known that a further consultation would be needed, but rather than wait until such time as they were suitably ready to hold an adequate consultation they instead continued with the rushed and inadequate Supplementary Consultation.

How can notice of a further round of consultation be announced during another consultation that has yet to be completed?

During the 2018 Statutory Consultation it was apparent very early on in the consultation that further consultation would be needed, in light of the fact that HE/LTC realised very early on that they had

incorrectly identified the Orsett Showground and impacts putting a new Rectory Rd through the middle of the showground would cause.

It was actually given as an example to us by one of the HE/LTC staff as to what could constitute the need for further consultation.

However, nobody would officially state or agree that further consultation would be held, and always stated that they could not comment about further consultation until after the consultation had ended and all responses had been analysed.

Indeed the Supplementary Consultation was not confirmed and announced until shortly before it launched, regardless of how many times we asked.

It is vital that HE/LTC do not hold the further round of consultation until after the COVID-19 crisis has passed and everyone has had adequate opportunity to recover from it all. People need to have the chance to take part in an adequate consultation with clear and informative materials at a time when it is safe to do so, and at a time when we are not already suffering under stress from other things such as global pandemic crisis where we are literally doing everything we can to survive and keep ourselves and our loved ones safe. Please HE/LTC show us the respect we deserve and do not hold any further consultation until the time is right.

## **Conclusion**

We conclude that with regard to the consultation we do not feel that HE/LTC have consulted adequately or fulfilled their legal obligation to consult adequately since the consultation materials are not clear and informative on so many occasions and on so many levels. The whole consultation process has been ludicrous, and we need and deserve better.

We found the materials and information to be of a very poor standard, and do not consider very much of it to have been clear, informative, or easy to understand, in fact we would say it has been greatly lacking.

We found the quality of the events to be very poor, especially since some were not even held due to COVID-19. We do of course agree and support the need to not hold those events. However, we feel that in light of this need the whole consultation should have been postponed until such time as the COVID-19 crisis has passed, and the consultation can be held safely and adequately.

Also many of the staff were clearly not able to provide a satisfactory level of information, and answer questions clearly and correctly on many occasions, which is completely unacceptable.

We do not consider the locations of the events to have been at all suitable or adequate, and would rate the choice of locations very poorly.

We would rate the promotion of the consultation to be very very poor, and inadequate.

We strongly oppose the LTC on all these grounds.

# Further comments

## Cost

Although the current cost estimate sits between £5.4bn and £6.8bn, the Government announced in RIS2 part of the Spring Budget announcement that up to £8.2bn has been allocated against the proposed Lower Thames Crossing. We do not feel that the Government would allocate so many billions more than is currently estimated unless they seriously considered it likely needed and necessary.

This would mean that at a cost of £8.2bn the LTC would come in at a cost of nearly £573.5m per mile.

Even if you take the top end of the current estimate of £6.8bn, it works out at £475m per mile.

This is a lot higher per mile than even HS2 which was estimated to be £307m per mile of track.

(Taken from *The Guardian* in Feb 2020 - [www.theguardian.com/uk-news/2020/feb/03/at-307m-per-mile-of-track-can-the-cost-of-hs2-be-justified](http://www.theguardian.com/uk-news/2020/feb/03/at-307m-per-mile-of-track-can-the-cost-of-hs2-be-justified))

We all know how HS2 has been questioned and quizzed over in relation to cost.

We strongly oppose the proposed spending of this ridiculously huge amount of tax payers money on a project that is not fit for purpose, will not solve the problems we all suffer with due to the Dartford Crossing, and will still leave the Dartford Crossing over capacity.

## False Economy

We strongly oppose HE/LTC cutting costs now in an attempt to improve the Benefit Cost Ratio and consider it to be a false economy.

Things like the removal of the Rest and Service Area, Tilbury junction, and Tilbury Link Rd all seem to be geared up to reducing costs now, with every attention of these features being added but to be considered as separate standalone project.

Also moving the route in certain areas to avoid the cost of having to move utilities we consider to be a false economy and sly attempt to try and improve the Benefit Cost Ratio, at huge impact cost to residents lives and health, since it will instead move the route closer to homes.

Lack of cut and cover, putting cost before health and lives. Again another false economy as it will end up costing in Health Care. HE/LTC have stated that it could cost 6-20 times as much to put in cut and cover along the route. The cost to the NHS and cost of lost quality of life and actual lives holds a far greater cost in our opinion. Cost cannot and should not be put before the health and lives of residents.

## Health Impact Assessment

We have again been advised that progress on the Health Impact Assessment is slow. Again this is resulting in a lack of information, and reduces the information that has been made available to us, to be able to respond fully to the consultation.

How can we decide our opinions on the LTC and the proposed mitigation etc, when we have not had a chance to review the evidence that these decision are being made on. In fact we would event go so far and to ask and query whether HE/LTC have adequate info and evidence to base their proposals on? If they do then they should be sharing it with the public, if not then they should not be proceeding until such time as they do and are able to share it with the public and local authorities etc.

There is no doubt in our mind at all that the proposed LTC is and would have great impacts to the health and wellbeing of people, and a greater level of care and understanding is needed from HE/LTC with immediate effect

## **Impacts to Emergency Services**

We have serious concerns on the impacts the LTC would have on our Emergency Services.

The areas along the route of the proposed LTC already have a very high number of high risk areas for Emergency Services to service, such as Lakeside and Bluewater Shopping Centres, a lot of very busy and dangerous roads, including the M25, M2, A2, A13, A128, as well as industrial areas, the Port of Tilbury, DP World, Thames Gateway Enterprise Park etc.

To have another busy major road on our doorstep will only increase the pressure on our emergency services.

We have serious concerns about the impact this will have on them due to the LTC, as well as to us as residents. Whilst we fully and thoroughly appreciate our local emergency services we know realistically they are pushed to the limits now, without the extra impact of the LTC.

We have seen no evidence that this has been taken into account by HE/LTC, and worry about the lives that could end up being put at risk if the LTC goes ahead, as no additional provisions have been mentioned in relation to emergency services in light of LTC.

We do not believe that there is adequate emergency coverage if the LTC goes ahead, and fear that lives will be put at risk.

### Emergency vehicle access to LTC/A1089

We have concerns that the emergency vehicle access we have been told about for LTC and the A1089 could have negative impacts to our local communities.

### Station Rd access to tunnel portals

We question how secure the emergency vehicle access off Station Rd will be, and if it could potentially be used by regular drivers attempting to access the LTC.

More importantly we seriously question that this will not be an adequate or safe access point for the LTC tunnels. We have brought to HE/LTCs attention numerous times previously the fact that the East Tilbury area, amongst others in that vicinity, are regularly left completely isolated due to the railway tracks and the crossing gate being closed on such a regular basis, and often stuck down.

God forbid there is an incident that needs to be accessed via this emergency vehicle access route and the railway crossing barrier is down.

Residents in these areas have to live in fear of this every day, and there are first responders to assist.

This is not deemed acceptable for or by residents, and certainly cannot be deemed acceptable for a major road like the LTC if it goes ahead.

Further research and planning needs to be taken into account if this road goes ahead, as clearly a proper and adequate risk assessment has not been carried out. If HE/LTC believe it has then they are clearly should not be allowed to be put in the position of making such decisions. This is a matter of life of death and it would be negligent to build such a road without proper risk assessment and provisions included in the design.

#### *Brentwood Rd to LTC (north and south)*

The emergency vehicle access to the LTC in both directions from Brentwood Rd is questionable, especially the access to the northbound LTC which appears to involve the need for an extreme turn, whereby the vehicle most likely to be travelling southbound on Brentwood Rd would have to do a very sharp right turn and then north to join the LTC North. As seen in the image below with the left hand side of the V section being the route to LTC north.



This is the route that emergency vehicles including fire from Orsett, and Ambulance from Basildon would have to take. Bearing in mind Brentwood Rd is quite a windy and also quite an accident hotspot we're not convinced this is an adequate route for emergency vehicles to have to take to access LTC.

#### *LTC (north and southbound) to the north of the A13 to the M25*

We also question the extra time it will take for emergency vehicles to access the LTC on the section to the north of the A13 up to the M25. The emergency vehicles will have to head south down Brentwood Rd to be able to head north on the LTC. Or alternatively for southbound traffic the emergency vehicles would have to be accessing the LTC from the M25, not a good option considering how busy and how many incidents occur along that stretch of the M25.

Not to mention if they need to attend an incident on the southbound carriage of the LTC chances are the LTC and M25 would be congested in a very short space of time, since LTC south is just 2 lanes.

### Heath Rd to A1089 (south)

We also question the emergency vehicles access to the A1089 south from Heath Rd. This will involve fire from Orsett and ambulance from Basildon having to use the old A13 (A1013) to reach Heath Rd.

## **Unexploded Ordnance concerns**

### Our concerns

We and many others have concerns over the likelihood of HE/LTC contractors coming across Unexploded Ordnance (UXO) during the construction, and indeed investigative preparations works.

Local history and knowledge shows that the whole route passes through areas that have historically been targeted by Ordnance during wartime, and UXO have been found many times in various locations over the years, both in the river and on land.

We are concerned about unexploded V1 & V2 vengeance weapons which we know were fired at London. Hundreds of the weapons fell into the river Thames and sank into the soft clay without exploding. There is a large amount of these weapons in the river, which entered the Thames in an area between Southend and Sheerness and up river to the site of the proposed Lower Thames Crossing.

In addition HE/LTC need to seriously consider the concept of sympathetic detonations, whereby a direct strike on one V1 or V2 could set many others off causing a tremor, which could affect the Richard Montgomery and the rest of the ordnance still located under the Maplin sands.

If this were to happen, Southend, Sheerness, the River Medway could be destroyed with a massive tidal wave surging to London itself.

The SS Richard Montgomery was wrecked off the Nore sandbank in the Thames Estuary, near Sheerness, England in August 1944, whilst carrying a cargo of munitions. Around 1,400 tonnes (1,500 short tons) of explosives remain on board.

We would insist that whoever does the risk assessment is aware and fully competent in advising with regard to the proposed Lower Thames Crossing, and that all workers carrying out construction work are properly briefed and follow procedures are put in place and followed to ensure everybody's safety.

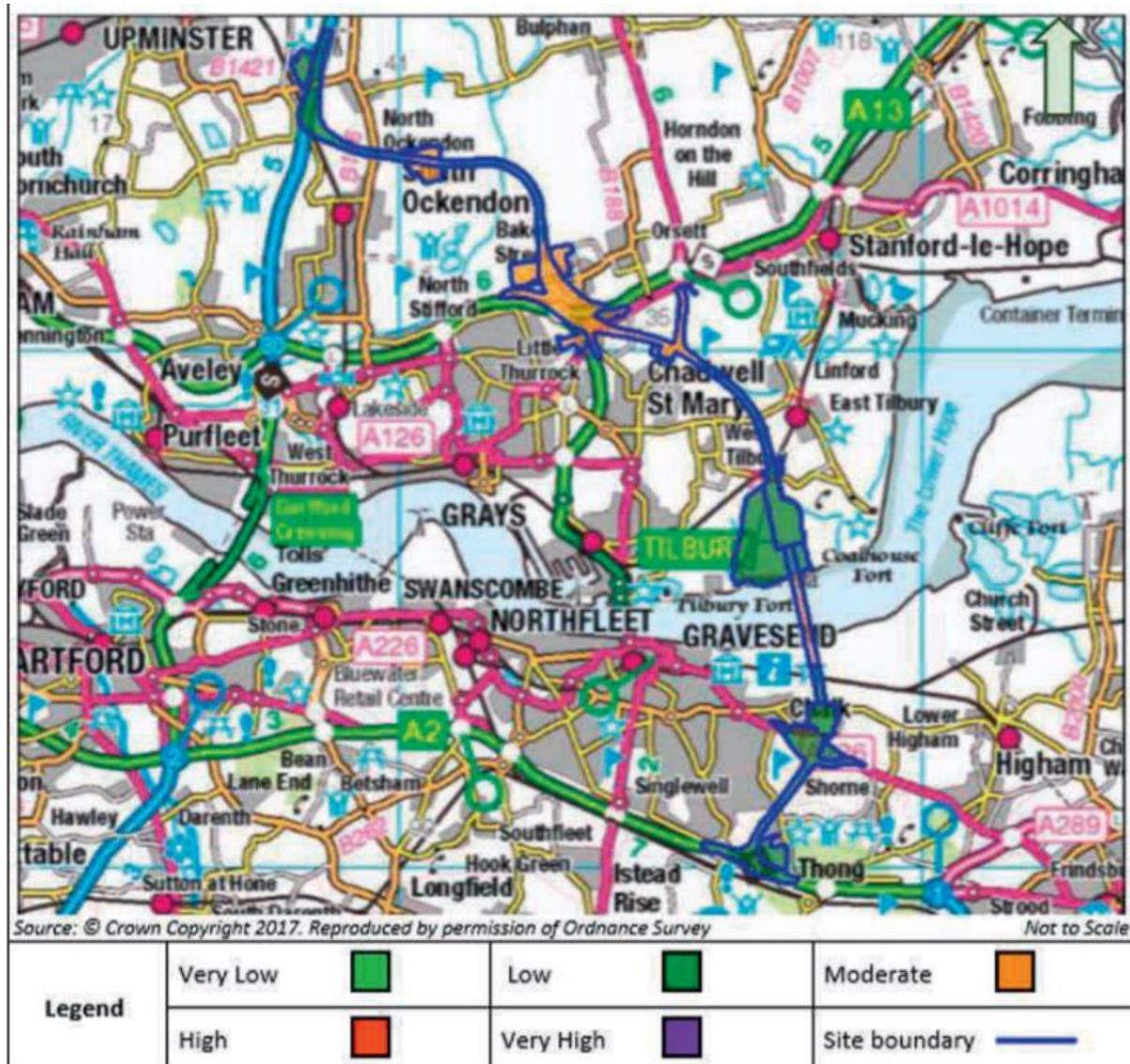
Sadly, our experience of dealing with HE/LTC contractors to date, during general investigative works has given us no confidence at all. More can be read on this elsewhere in this response document.

### Lack of adequate clear and informative material on UXO

We are concerned that the only information relating to Unexploded Ordnance (UXO) has been on page 188/305 in the *Environmental Impact Assessment Scoping Report (Oct 2017)* where there is a very short section referring to Unexploded Ordnance (UXO). It states:

A UXO desk study has been undertaken by Zetica for the proposed route. A number of potential sources of UXO hazard have been identified relating World War II bombing, including Milton Range and the River Thames.

The Plate below (Plate 10-1) is an extract from the report which shows the UXO hazard along the Scheme and associated risk rating.



We have concerns that the higher risk areas are all where HE/LTC are proposing the most complex involved works, like the tunnel section, and the huge sprawling A13 junction.

We also consider it highly unlikely that the area between Coalhouse Fort and Tilbury Fort would be low or very low risk. These are both forts that were used during the World Wars, so would they and the surrounding areas would have been prime targets.

The LTC/M25 junction area is another area that we would think would rate higher than low or very low risk also, due to it is in close vicinity to the aerodrome at Hornchurch.

Since this document is dated 2017 we would also question how relevant and up to date it is considering the changes to the route since then.

We have identified Zetica online and notice that they offer a free preliminary desk study. We haven't had confirmation to our question to HE/LTC as to whether the data above is indeed one of the free preliminary desk studies. We're not sure what would be worse the fact HE may have only done a free preliminary desk study on this, or the poor quality of the info if HE have paid for the chart above!

Regardless of whether it has been paid for or not, we certainly don't feel it is adequate info to provide the public when considering a £6.8bn+ project, and neither do we consider it to be clear or truly informative.

When we have tried contacting HE/LTC for further information and clarification on the matter UXOs the response has been concerning, and lacking, with certain questions being ignored, so we have had to reply asking for questions to not be avoided. (A common theme when asking questions to HE/LTC).

We have received a response from HE/LTC today which in part covers the topic of UXO, however yet again they have ignored and avoided our questions.

It is also a worry that in the response we have had the focus seems to be purely on detection of UXO in the river, and not also on land.

Attempted reassurances that "the safety of our staff and all our road users remains one of our top priorities", do not reassure the general public/residents who are not one of their road users.

Whilst this may seem a petty comment to make, it is simply pointing out the lack of genuine thought and care in HE/LTC's response, and supposed acknowledgements of genuine concerns of the public/residents. The general lack of duty of care to us is beyond belief on so many occasions.

Based on the actions of HE/LTC with regard to following vital health and safety issues, including the 2m distancing rule during the COVID-19 crisis on LTC sites, apparently quite happily putting lives and the NHS at risk, we no longer have any level of confidence in HE/LTC's ability to be trusted to handle potentially dangerous situations on sites.

## **LTC Project Director**

### Tim Jones resignation as Projector Director

Clearly Tim Jones resignation in July 2019 left HE/LTC in the lurch. This was not something that had always been planned, as has been suggested previously. Otherwise why was there not a smooth hand over between him and a new Project Director. We will probably never know, but we certainly think it was a curious move.

### Why has a new LTC Project Director still not been appointed?

Equally curious is why a new LTC Project Director seem to be proving so hard to find and appoint. We are not heading into 9 months later and still there hasn't been an announcement about a

permanent replacement as Project Director. If this project is as good as HE/LTC keep saying then why is it so difficult to fill this position?

We were told via email on Feb 12<sup>th</sup> that a new Project Director would be announced shortly, not at the beginning of April and still no announcement.

Interims what have they and are they actually doing? What are we paying them for?

Until extremely recently, and after we officially raised it alongside similar comments from one of our local MPs the LTC Project Director and his deputy had been noticeable by their absence.

There had been no public communication whatsoever from the Project Director. We only learnt about the Interim Project Director and Deputy Project Director from searching ourselves online, we have not been kept aware of the situation.

Tim Jones used to write the foreword for consultation, make the announcements etc, yet even though Mr Seywright has been paid for his position as Interim Project Director there has been no sign to the public whatsoever of his involvement or work with regard to LTC. It has been Chris Taylor who has been doing these things.

We also question whether Mr Seywright is suitable for the position considering the major issues that have arisen with the Queensferry Crossing in Scotland, as Project Director of that project during development stage. The crossing has been closed to all traffic due to risk of ice and snow falling from cables of the bridge. Whoever would have dreamt they would get snow and ice in Scotland of all places?!! Surely this is something so obvious that should not have been overlooked. This gives us no confidence at all.

Considering the working relationship we had with Tim Jones including meetings and contact, that level of interaction dropped off completely when the interim Project Director took over after Tim Jones' resignation. We are aware that this has not just been the case for us as residents, but that local MPs have also not had any interaction with Mr Seywright with regard to LTC.

We understand that Mr Seywright may have attended one of the Consultation info events in Kent. Tim Jones used to attend a number of events during consultation, and always made a point to take time to chat to us. At the first event in 2018 he made a point of coming and introducing himself directly to us and having a chat. This has not been something that Mr Seywright has taken the time to do. Again until very recently we have seen no sign of him doing anything at all in relation to LTC.

As a Government company, it is taxpayers money that is paying HE/LTC and we have a right to expect and know that our money is being used wisely and to see signs of what it is being spent on. This 'noticeable by their absence' experience has not gone down well with the public, or installed any sense of confidence.

Lack of communication or announcement when new Deputy Project Director was appointed

It was only very recently when we asked about the interim staff that we were informed that a new Deputy Project Director had been appointed. Again no interaction or notification to the public including us. Especially since we have asked numerous times about when the roles would be filled permanently, replacing the interims.

## **Conclusion for the Supplementary Consultation Spring 2020**

We still have the same serious concerns about the overall impacts of the proposed Lower Thames Crossing upon the communities and lives along the entire proposed LTC route.

The huge amount of destruction to both people's home and lives, and the damage to our environment, flora and fauna would be horrendous enough if it were to actually fix the problems that we all suffer with due to the Dartford Crossing.

However, the proposed Lower Thames Crossing is not fit for purpose and does not solve these problems, so we remain 100% completely and strongly opposed to it.

**To be very clear Thames Crossing Action Group do not feel that HE/LTC have provided us with adequate information, or an adequate consultation. Thames Crossing Action Group are most definitely very strongly oppose the proposed Lower Thames Crossing, as we do not consider it to be fit for purpose. LTC is the wrong crossing in the wrong location.**

# Appendix A

## Inadequacies of the official LTC project website

Below are the details we listed page by page to show the inadequacies of the official Highways England Lower Thames Crossing website, highlighting the inaccurate and misleading info.

### Home Page



**On the home page the only suggestion that there is currently a Supplementary Consultation happening is a small update at the very bottom of the page, dated Jan 23rd. This is an extremely discreet mention considering this is the only notification on the home page of the official LTC website that is currently running.**

We have screen captured the Home page and circled the reference to the Supplementary Consultation in red. Bear in mind this image shows the page zoomed right out to allow us to screen capture. If you visit the site/page yourself you will likely need to scroll down before even seeing the area circled in red.

**The image used is a stock image from the Statutory Consultation which does not give the impression of drawing attention to something new and current. The title of the section is abbreviated so that you can't even see the wording of Supplementary Consultation in the title. It's almost like HE are trying to hide the fact there is a consultation happening!**

### About Page

We have highlighted some of the errors on the About page in red in the image below.

**HE are showing the route at approximately 14.5 miles, yet in the latest update they are now referring to it as being approximately 14.3 miles.**

**We have always questioned "3 lanes in both directions" since they started announcing it as that during the 2018 Statutory Consultation, as there was a 2 lane section around the A13**

**junctions.** However, now they have actually announced in the latest update that the LTC southbound between the M25 and A13 will be 2 lanes, so again this is not a true and accurate representation.



“two 2.5 mile (4km) tunnels” is also inaccurate as the latest changes state that the tunnels will now be two 2.6 mile (4.3km) tunnels.

We also question how they get the figure of 90% extra road capacity, and have emailed to ask for an explanation.

There are currently 4 lanes in each direction at the Dartford Crossing.  $4 + 90\% = 7.6$  lanes.

The proposed tunnel section of LTC is 3 lanes in each direction.  $4 + 75\% = 7$  lanes. Last time we checked  $4 + 3$  was 7 and not 7.6!!

**Reference to the 2016 consultation is also outdated and could have commented on the 2018 Statutory Consultation.**

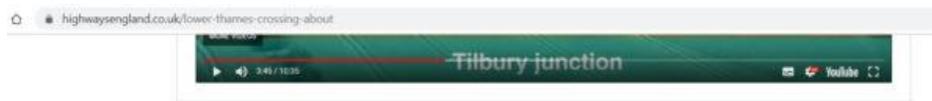
The latest info can all be confirmed on [pages 6 and 7 of the Supplementary Consultation Guide](#).

highwaysengland.co.uk/lower-thames-crossing-about



The video included on this page is definitely out of date and not a true representation of the current proposed route. It is the fly through video that HE produced for the 2018 Statutory Consultation.

One of the most obvious inadequacies of the video, amongst many, is it still clearly shows things like the Service Station and Tilbury junction which have now been removed.



**When captured on Feb 17th the time line shown at the bottom of the page, stated 2018 Statutory Consultation and then jumped straight to 2020 as Submission of DCO Application.** No mention of the Supplementary Consultation.

Many people are concerned and confused as to what is happening, and where we are within the time line of what has to happen.



**When checked again on 6th March** they have now added the Supplementary Consultation to the time line. However, the outdated and now misleading fly through video can still clearly be seen just above it still! Why are they updating certain things but not others?!

## In My Area Page

Again another reference and chance to watch the now out of date fly through video of the proposed route which was released in 2018.



### What's happening now?

Following the publishing of the [update on the Lower Thames Crossing project](#), there will be an opportunity for the local community to come and discuss the report and other project related queries with the team. ([Click here to view dates and locations](#))

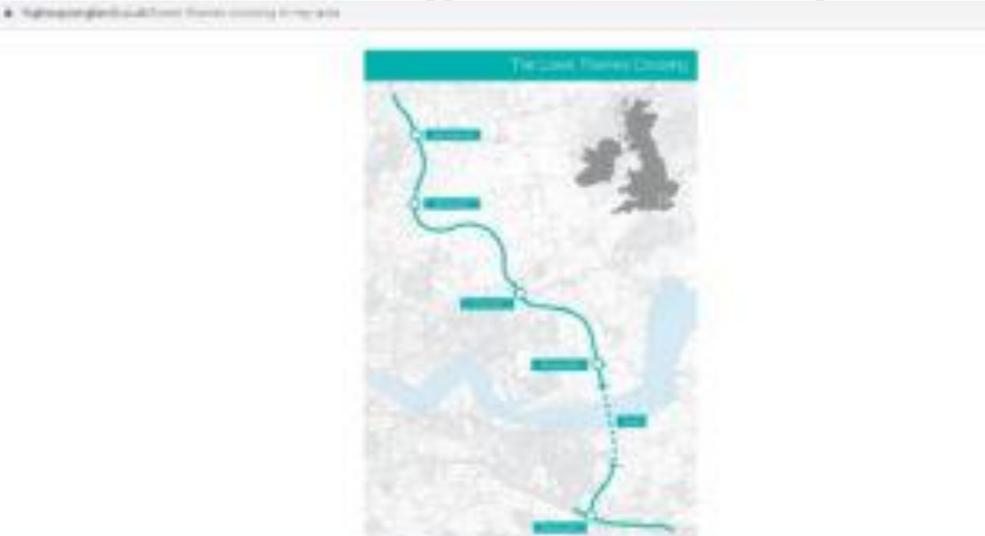
We have launched a comprehensive programme of Ground Investigations (GI) along the route of the Lower Thames Crossing. Tests will be carried out at over 700 locations, including over 400 boreholes, ground water sampling and monitoring, shallow trial pits and a wide range of unobtrusive geophysical surveys. [Read more here.](#)

We are going to start Ground Penetrating Radar surveys (GPR) starting from Monday, 28<sup>th</sup> October and go on for six months. [Read more here.](#)

Our priority is to carry out this programme of work in a way that will have the smallest possible impact on the nearby community and environment.

[More detail on where and when we're working, and what we're doing can be found on our website.](#)

A section titled '*What's happening now?*' which makes no mention of the Supplementary Consultation at all. In fact the info they share about the Summer 2019 Project Update, Ground Investigations and Ground Penetrating Radar Surveys were announced in July 2019. It even includes a link to the Summer Engagement events that happened in 2019. But no mention of the current Supplementary Consultation or public info events.



Under the same heading of '*What's happening now?*' a clearly **out of date map**, as it still shows the Tilbury junction, which has been removed as part of the Supplementary Consultation!

More questionable statements highlighted in red in the image below.

highwaysengland.co.uk/lower-thames-crossing-in-my-area

### Design changes

Road height - we have lowered the height of the road in some locations by as much as 5-6 metres to reduce its visual impact. This change was made following feedback from the 2016 consultation.

Number of lanes - the route will be a motorway with three lanes in each direction, along the whole route from the M25 to the A2.

It will have no hard shoulders in common with smart motorways.

This will provide enough capacity for peak hours and to meet future demand. It will reduce journey times across the Thames and increase capacity for road users across the river by more than 90% east of London.

**Again it is not 3 lanes in both directions**, there is a 2 lane section southbound between M25 and A13.

It is also stated that it will be a motorway. HE have categorically told us that the road has yet to be categorised, suggesting when asked at the February LTC Task Force Meeting that it would likely be categorised an all purpose trunk road.

The fact they list it as **having no hard shoulders in common with smart motorways**, also is a cause for great concern considering how dangerous Smart Motorways are. Not forgetting that we specifically asked David Manning, Development Director, HE at Feb LTC Task Force if it would be a smart motorway.

Listen to a section of audio recording of that meeting which covers this on the original article on our website about these inadequacies - <https://www.thamescrossingactiongroup.com/yet-more-he-inadequacies/>

*If you wish to hear the answer to the second part of this question, or indeed the audio of the whole meeting it can be found [here](#).*

Again another reference to the **90% extra road capacity** that we are waiting for HE to explain!

highwaysengland.co.uk/lower-thames-crossing-in-my-area

### What areas are affected

We are already talking with landowners and occupiers affected by the Lower Thames Crossing and we will continue to work closely with them. We understand that if you live in the area, you will have concerns about how the project may affect you - and we will provide all the help and support we can.

While significant areas of land are required for the scheme, we are seeking to reduce the impact on landowners. We are talking to landowners at every stage to understand their specific concerns.

We have set out a development boundary, pictured opposite, that outlines the extent of the land we may need. Since the preferred route was announced in April 2017, we have contacted people whose land or property we believe is within the boundary. Our dedicated team is working with them to explain the proposals and rights they may have.

Within this boundary, some of the land along the route of the new road will be needed permanently and other areas, such as construction sites or land needed to divert utilities including power lines or gas pipes, may only be needed temporarily.

The updated development boundary is shown here; Large scale land use

You can also find a [development boundary comparison plan](#) which shows the changes that have been made to the boundary since it was last published in July 2018.

When work is complete, any land that is not needed permanently or for environmental purposes will be returned to its previous use wherever possible.

There is more information about the compulsory purchase process and when compensation may be available in the Highways England publications listed below:

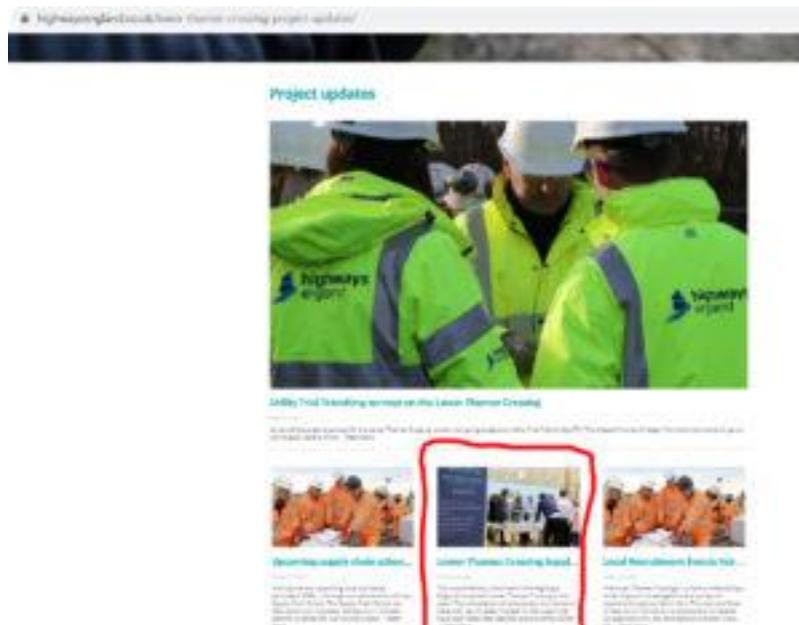
- [Your Property and Blight](#)  
Information for property owners within the development boundary
- [Your Property and Discretionary Purchase](#)  
Information for those who live outside the development boundary but may need to sell their property
- [Your Property and Compulsory Purchase](#)  
How compulsory purchase works
- [Guide to Part I compensation](#)  
How to claim for the effects on your property of new or altered roads

Finally on that page of their website a section called 'What areas are affected'.

**The map they refer to as the updated development boundary ([this map](#)) is clearly out of date**, it is from Statutory Consultation in 2018.

**The [development boundary comparison plan](#) is also out of date (2018).**

## Project Updates Page



Again the **Supplementary Consultation is being hidden away**. The current featured update relates to the Utilities Trial Trenching survey works. Then there is an article about the Supply Chain School events.

Considering HE have NOT submitted a DCO application yet, let alone been granted one, maybe they should be giving more priority to ensuring that everyone is aware of the Supplementary Consultation!

## Keep in touch Page

This page states “You may also visit one of our [information points in local communities](#) to pick up Lower Thames Crossing print material.”

The link provided takes you to a list of locations that do not all have the most up to date info about the Supplementary Consultation. We know this as we, along with many of our members have been along only to find there are no Supplementary Guides and response forms etc at some of these locations!

On this page they also state “We want to make sure that information about the Lower Thames Crossing project is accessible to as many people as possible.

That is why we are sharing an update on the progress of the scheme with local communities by post this week. You can view this information on our [November project update](#) page.”

Seriously, the latest info they provide is November, and no comment about keeping in touch with the latest updates by getting involved in the Supplementary Consultation?!!

# Appendix B

## **Evidence of HE/LTC workers/contractors breaking the COVID-19 2m distancing rule, putting lives and the NHS at risk**

On the evening of March 23rd our Prime Minister put our country on lockdown. Only critical essential workers that couldn't work from home should be going to work. He clearly stated as have many other officials that we all need to #StayHomeSaveLives. He has said it is vital that those that do have to go to work should be following Public Health England rules on social distancing and "ensure" the necessary protection.

So why on March 24th are we seeing LTC workers on sites, carrying on working as though it is business as usual? Just to be completely clear here, we the admin team have not been out ourselves, the info comes to us from concerned residents who can see the sites from their homes/gardens.

Also to be clear we are under the impression that some of these workers do not seem at all happy about being made to work with things as they stand. Remember they may be in a position where they feel the don't have any other option. It is Highways England and the companies they have contracted to carry out these survey works that should be closing down the sites at this time.

### **Orsett area**

We know from previous communications with Highways England that the Ground Investigations and Archaeological Trial Trenching works being carried out in this area, off Stifford Clays Rd, and Green Lane is being carried out by Balfour Beatty.

We have also previously been advised that they are using the compound near Sainsburys, Chafford Hundred, near Lakeside (the old Lakeside coach park for those that remember it) for the staff to meet, and then they are taken by minibus to the site locations.

Here is an example of what has been witnessed on 25th March 2020, taken by a local resident from the safety of their own property. Clearly these staff are not following the social distancing rules of having 2m between them, and this is just one of the photos taken.





At one point of the workers actually approached the resident, thankfully there is a ditch between the field and his property which forced a safe distance. The resident was told he was not allowed to film. Bearing in mind he was on his own property and very concerned at what he has been seeing. Makes you wonder what HE have to hide?!

*Face blurred for privacy*





Still breaking 2m social distancing rule on 26th March 2020.

These images taken on 27th March 2020 were taken at a distance so apologies for the quality. It seems HE are now trying to keep the workers as far away from the residents property to lessen the chances of them being captured breaking the social distancing rules.



As well as the two workers in the red box who are clearly close together, take a look at the two on and at the rear of the truck.

They appear to be either loading or unloading the cones to or from the truck, which clearly involves close interaction and both operatives handling the cones between each other.

So again not following the social distancing rules of keeping 2m between them.

### **Baker St, Orsett site**



Also in Orsett along Baker Street this was witnessed on 26th March 2020, by a resident from the safety of their own home. Faces have been blurred for privacy.

The resident shouted across the road to them asking “*which bit of “distancing ” did they not understand ... and why are they at work anyway“*”.

This resident's daughter is one of our amazing and brave NHS nurses currently risking her life on a daily basis to try and save others.

Of course we at TCAG respect and thank all the amazing critical keyworkers in our country, How disgraceful that Highways England it seems do not respect and value them, and their own staff, and all the rest of our lives.

### **Gravesend area**

Another resident who lives in very close proximity to Southern Valley Golf Course in Gravesend, Kent got these images on March 25th 2020, and from a long distance had a quick chat with the workers, they confirmed they were LTC staff, and the resident got the impression the staff didn't

want to be there working any more than we want them there working, they would rather #StayHomeSaveLives.

As you can see in the first photo below zoomed in they are clearly not working to 2m social distancing rules.

Anyone else wondering how they got that tank equipment off the back of the HGV to unload it on site without having some manpower, most likely working closer than 2m social distancing rules. There were two of these HGVs recorded on site, which can be seen in the insert image which was captured from a video that was taken.

