

# Inadequacies of the Lower Thames Crossing Consultation Process

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## Contents

Introduction .....	3
2016 LTC Consultation .....	4
Consultation Questionnaire .....	4
Consultation Confusion .....	6
Consultation Events issues .....	8
Consultation Booklet .....	9
Community Factors .....	14
Distortion of the Consultation Results .....	14
Benefit Cost Ratio .....	15
Petition .....	16
The 17 reasons Thurrock Council oppose the consultation and routes of Option C .....	16
The Alternative .....	18
2018 LTC Statutory Consultation .....	20
Consultation Events .....	20
Consultation Materials .....	20
Misleading info .....	23
Communication issues .....	26
Biased info .....	26
Consultation Response Form .....	27
2020 LTC Supplementary Consultation .....	28
Timing of the consultation .....	28
Notification of consultation .....	28
Consultation website issues .....	28
LTC official website out of date .....	30
Erroneous letters sent by HE/LTC Land & Property team .....	30
Consultation material .....	30
Consultation Events .....	34

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COVID-19 .....	35
2020 LTC Design Refinement Consultation.....	36
COVID-19 .....	36
The Consultation .....	36
LTC official website out of date .....	37
Consultation materials .....	37
Additional inadequacies.....	41
Poor communications .....	41
Additional inadequacies.....	42
2017 business presentations .....	42
Common omissions in consultation materials.....	42
Investigative works issues .....	42
Inconsistencies throughout consultation .....	43
Failure to provide requested info .....	43
LTC Project Director .....	43
Misleading and biased reporting .....	43
Tilbury Link Rd .....	43
Land & Property letters.....	44
Conclusion.....	45
Appendix A .....	46
Inadequacies of the official LTC project website .....	46
Home Page .....	46
About Page .....	46
In My Area Page .....	48

# Inadequacies of the Lower Thames Crossing Consultation Process

## Introduction

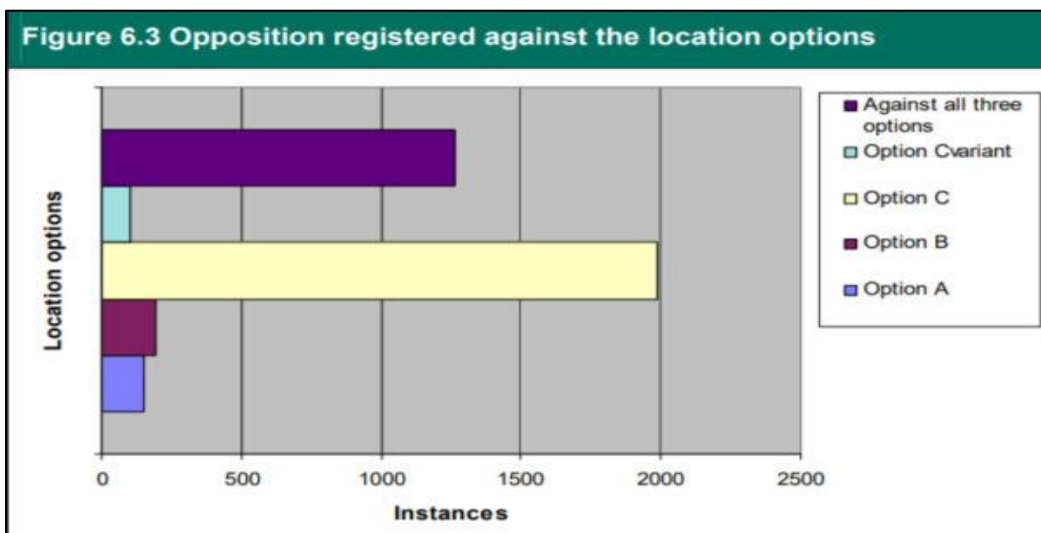
Following their 2013 public consultation to ask for views on the location of the proposed crossing the Department for Transport (DfT) published the LTC Consultation Response Summary<sup>1</sup>. In that Summary there are some very interesting points to bear in mind.

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

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

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

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



Highways England (HE) were then asked by the Government to hold a further consultation in 2016 to assess the economic, traffic, environmental and community impacts for locations A and C.

<sup>1</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/321116/consultation-response-summary.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/321116/consultation-response-summary.pdf)

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## 2016 LTC Consultation

The below contains the concerns around the conduct and credibility of the Lower Thames Crossing (LTC) consultation held by Highways England (HE) in 2016.

It is our belief that the consultation was manipulated to favour the route preferred by HE, as they omitted detail that would support the alternative.

We also note that HE informed DartCharge users about the consultation, which we feel yet again creates bias in HE's favour. Many DartCharge users will just be aware they pay to get stuck in traffic at the Dartford Crossing and will think any other new crossing has to be better, without any real consideration or research.

## Consultation Questionnaire

According to HE the consultation was an opportunity for members of the community to have their say on the routes being proposed. The whole process was manipulated to favour and push people to favour the Option C route. Points highlighted in red and detailed below. Inserted images taken from the official 2016 Consultation Questionnaire.<sup>2</sup>

1. No map or route detail on the front cover of the brochure, even though in the paragraph of text adjacent it says they are consulting on Location A as well as Location C.



2

### HE failure to consult

Received too late in the consultation period to distribute

## Lower Thames Crossing Consultation questionnaire

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

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

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

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



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- ### Routes north of the river

**For more information** see pages 19 – 22 of our booklet

☐ Route 2

☐ Route 3☐ Route 4

☐ Another route

☐ None of these☐ Don't know

7. Thinking about the three route options north of the river, on balance do you agree or disagree with our proposal for each of these?

[illegible]

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6. HE already established this was their favoured route and was very overt in discussing this, which could have influenced people not furnished with all the information to agree with the so called experts.

The proposed scheme

6

10. Having evaluated the options, our proposed scheme is a new bored tunnel road crossing at Location C, following Route 3 north of the river and the Eastern Southern Link south of the river.  
For more information see page 24 of our booklet

On balance, do you agree or disagree with our proposed scheme?

☐ Strongly agree

☐ Tend to agree

☐ Neither agree nor disagree

☐ Disagree

☐ Strongly Disagree

☐ Don't know

### Consultation Confusion

HE began the consultation informing residents and council that Location A was not on the table or being taken forward, causing a huge amount of confusion.

At the consultation events held across the borough and with local businesses, HE only had large scale maps of the routes at Location C, none at Location A.

Again showing the bias towards Location C and manipulating the process to get people to favour this route.

In addition it took the Transport Secretary Andrew Jones to confirm that Location A was still being consulted on, halfway through the consultation.

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

Road's Minister Andrew Jones: *"I can confirm that Option A is included within the consultation and remains an option for consideration."*

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

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

**A:** *In summary, Highways England's assessment has shown that a crossing at location A would not solve the traffic problems at Dartford and would do little for the economy. Location C, by contrast, provides double the wide economic benefits of Option A, and provides a clear alternative route to the Dartford Crossing, reducing congestion*

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*there and improving the resilience of the road network as a whole. In light of these findings Highways England have concluded that a route option at Location A will not be taken forward and therefore this option is not included in the public consultation.*


The Government later confirmed that Location A at Dartford was in fact included in the consultation. However, this was several weeks into the consultation period, and this important change of tack was not conveyed to the 1.2 million individuals and organisations who had been invited to respond to the consultation.


In any event, it was too late for those individuals who had already responded.

It also does not change the fact that there were no questions about Location A.

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

Detailed below is the official response to this from Thurrock Council. <https://www.thurrock.gov.uk/news/thames-crossing/government-told-stop-crossing-consultation>

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## News

### Government told: Stop crossing consultation

**2 March 2016**

The three political party leaders at Thurrock Council have again written to the Secretary of State for Transport - this time asking for him to bring the [Lower Thames Crossing consultation](#) to a halt.

Labour and Council Leader, Cllr John Kent, Conservative Leader, Cllr Rob Gledhill, and Cllr Graham Snell, leader of the UKIP group, joined with Planning, Transport, and Regeneration Overview and Scrutiny chair, Cllr Brian Little, in signing the letter.

They had previously asked for the Highways England consultation to be extended, but following the announcement by Transport Minister Andrew Jones last month that Option A - close to the current Dartford Crossing - was still being considered, they have called for the whole thing to be stopped.

The letter to Patrick McLoughlin says: "Earlier this month the Transport Minister Andrew Jones confirmed that Option A remained a viable option and was under consideration. This was confirmed by Highways England at the consultation event at Tilbury on 25th February.


"As you will know the many thousands of leaflets and the on-line consultation portal contain no information relating to Option A. It was dismissed as uneconomic and described as offering no solution to congestion problems at the Dartford crossing. It was also considered to do little for the economy. Similar comments to these were made again by Highways England at the Tilbury consultation event."

It explains: "As no information or evidence about Option A is contained in the consultation material it is impossible for the public and businesses to offer comments or take a view. If Option A is part of the consultation then it should have been made clearer and have supporting information that is comparable to Option C."


The letter adds a concern because Options C and A "perform completely different functions" and asks what is the function of the new crossing - "Is it to build an expensive by-pass to the crossing and junction 30? or is it to provide a new strategic route for freight traffic travelling from the Channel ports to the Midlands and the North?"

And it states: "Given the ease with which Option A has been reintroduced part way through the process, why not Option D?"

But because "with only three weeks of the consultation period remaining it is just not practical for one or two Options to be reintroduced with the same level of information as Option C, and for it to be considered a fair consultation process" the consultation should be stopped.

[Letter to Secretary of State for Transport, 29 February 2016 \(PDF 54.45KB\)](#) 

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[Thames crossing](#)

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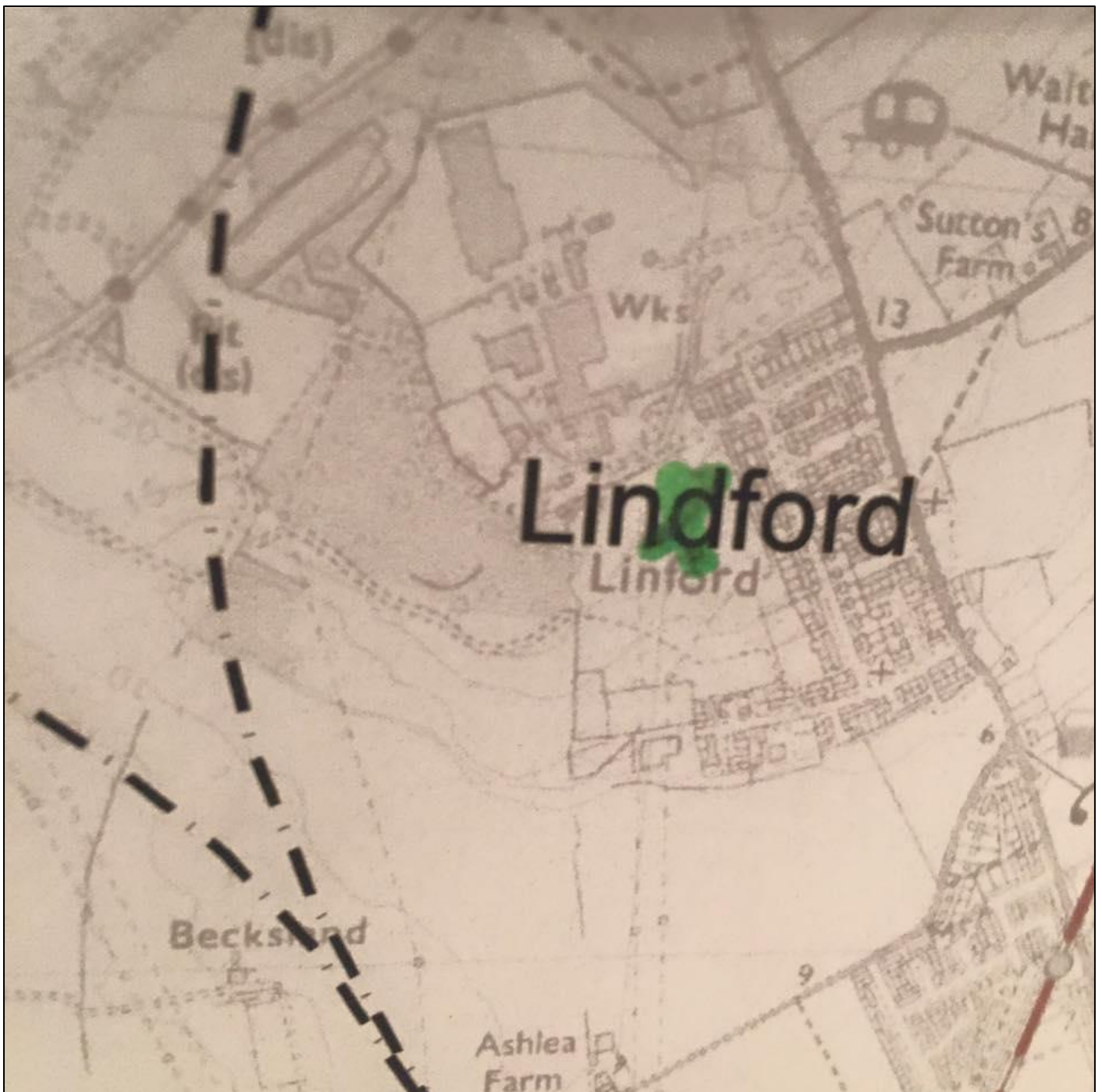
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### Consultation Events issues

HE were not at all prepared for the public consultation events in 2016. For example at the event that took place on Feb 3<sup>rd</sup> at Orsett Hall Hotel, which ran from 11am – 7pm. HE ran out of consultation response forms in the morning. There were large queues all day, with people waiting over an hour to even get in. Later in the day police were called, and residents were being turned away, and not even allowed to join the queue because the event would have ended before they reached the front of the queue. By 8pm they were asking people to leave. This most definitely was not an adequate consultation event.

They consultation materials were not adequate either, with errors like spelling Linford incorrectly on maps, despite the fact they had added it just above the Ordnance Survey map labelling which was correctly spelt.



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## Consultation Booklet

Inserted images taken from the official 2016 Consultation Booklet<sup>3</sup>

1. Location A mentioned here in the introduction but again on page 4, not route is shown on the diagram.

## Introduction

Highways England is consulting on proposals for a new road crossing of the River Thames connecting Kent and Essex. A new crossing is needed to reduce congestion at the existing Dartford crossing and unlock economic growth, supporting the development of new homes and jobs in the region.

There are important choices to be made and your views on our proposals will inform the decision later this year on the route and crossing location.

Please take the time to read this booklet and the supporting material, attend an event and provide us with your comments using our questionnaire.

## Background

For over 50 years, the Dartford Crossing has provided the only road crossing of the Thames east of London. It is a critical part of the UK's major road network carrying local, national and international traffic.

Congestion and closure of the existing crossing occur frequently and this, together with a lack of alternative transport links, creates significant disruption and pollution. This impacts communities and businesses locally, regionally and elsewhere within the UK.

The removal of payment barriers and the introduction of electronic payments recently improved traffic flow and journey times but do not address the need for increased capacity. Already carrying 50 million

vehicles a year and with traffic volumes forecast to increase, the freeflow improvements will only relieve congestion in the short term and major improvements are needed to provide a long-lasting solution.

In addition to reducing delays for drivers, a new crossing could transform the region by providing a vital new connection across the Thames. It would stimulate economic growth by unlocking access to housing and job opportunities, and deliver benefits for generations to come. This would not only benefit the region but the whole of the UK, providing better journeys, enabling growth and building for the future.

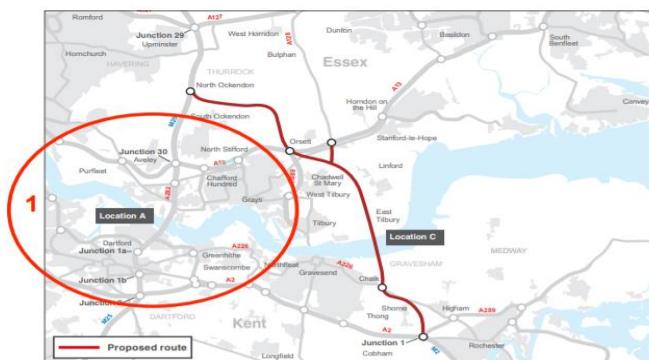
## A new crossing

Following a series of studies and a public consultation in 2013, the Government commissioned Highways England, the operator of the country's motorways and major roads, to consider options at two locations. These are shown on the map overleaf, at the site of the current crossing, known as Location A, or a new crossing location further east, known as Location C.

1

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

3



## Our proposal

We have completed our evaluation and are recommending a new road crossing through a bored tunnel at Location C.

Our proposed scheme would be a dual carriageway connecting junction 1 of the M2 to the M25 between junctions 29 and 30. This crosses under the River Thames just east of Gravesend and Tilbury. Of our potential options, this route would provide a 70mph motorway-to-motorway connection with the greatest improvement in journey times and a modern, high quality road along its entire length.

In addition to easing congestion and providing an alternative to the existing crossing, a new road and crossing at Location C would also offer wider economic benefits. Our economic assessment indicates that it could add over £7 billion to the economy by stimulating investment and business opportunities, and create over 5,000 new jobs nationally.

Estimated costs are between £4.3 and £5.9 billion (including allowances for inflation). User charges would be applied, in line with current government policy. Subject to the necessary funding and planning approvals, we anticipate that the new crossing would be open in 2025, if publicly funded. If private funding is also used to meet the costs of the project, we anticipate the crossing being open by 2027.

## Have your say

This is your opportunity to give your views on our proposals. In this booklet you will find a summary of these proposals, where to find further information and how to access our consultation questionnaire. See section six for details on how to respond.

**Please get involved and provide your responses by 24 March 2016.**

## What happens next

We will review the responses and report our findings and conclusions to the Department for Transport. Your views will help us to inform the Government prior to its decision on the location, route and type of crossing.

4

<sup>3</sup> [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)

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- None of the traffic modelling or studies showed what impact the 3 crossings further into London, all of which the Government are supporting, will have on the Dartford Crossing. These will only have a positive impact on the crossing and omitting this information is deceptive. They say it would not provide a significant improvement but do not substantiate with data.



## East London river crossing proposals

Transport for London is developing proposals for up to three additional river crossings in East London, which are shown on the image above. The first of these would be the Silvertown Tunnel which could be open for traffic in 2022/2023. Additional crossings at Gallions Reach and Belvedere are also being considered for opening in 2025.

While these would reduce congestion and improve the reliability and resilience of the local road network within London, they would not provide significant improvement at the Dartford Crossing.

We are working with Transport for London to ensure that all new river crossing proposals take each other into account.

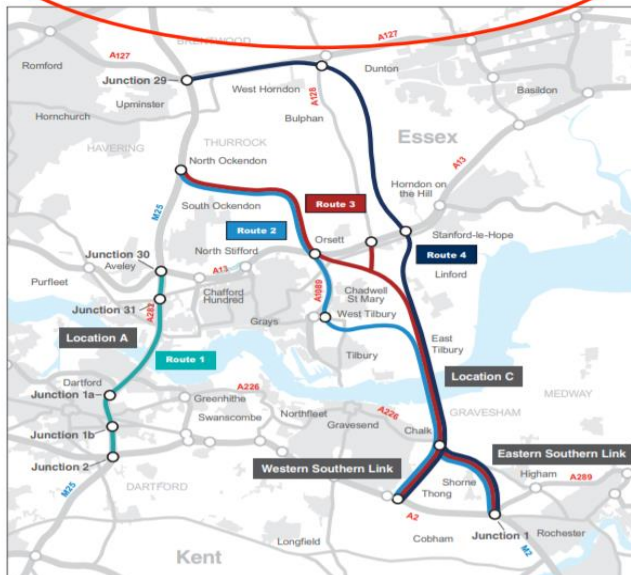
8

- Here HE show that location A is being taken forward and shortlisted but did not consult on the route.

## Shortlist

One option was shortlisted at Location A. Three options were shortlisted at Location C, based on routes described on page 13 and refined through our technical work and discussions with local authorities and environmental bodies.

The final shortlist is shown below and summarised in the table. These were taken forward to be developed and assessed in more detail. This is described in the next section.



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4. No benefits of Location A are mentioned here only negatives. Not a fair appraisal.

Positives included in the Lower Thames Crossing Consultation Summary Business Case<sup>4</sup>

2.7.2 A new crossing at Location A could increase crossing capacity by 60% in the opening year and would deliver journey time benefits of up to 5 mins between Junction 3 and Junction 28 on the M25.

2.7.3 From an ecological perspective, a crossing at Location A would likely have a lower impact on protected habitats and species than a crossing at Location C

As you can see there are positives to the route that if consulted on properly and fairly could of given a completely different response to the consultation.

## Appraisal of the shortlist

In assessing the shortlist there have been three main considerations:

- **Location** – whether a new crossing should be built at Location A, close to the existing crossing, or at Location C, east of Gravesend and Tilbury.
- **The crossing** – whether the crossing structure should be a bridge or a tunnel.
- **Routes and junctions** – how to strike a balance of environmental factors, local access and highway design standards.

To assess the shortlist we have:

- carried out computer modelling of forecast traffic flows, taking into account planned housing and commercial developments
- developed engineering designs of feasible crossing types
- designed preliminary alignments for highways and junctions
- considered the impact on people and property
- identified the environmental and ecological impacts both long term and during construction
- estimated the costs and benefits to quantify the value for money that each route offers

### Location

A new crossing at Location A (Route 1) performs poorly against the traffic related scheme objectives. As Location A does not provide an alternative route, traffic would still be funnelled through the existing corridor from junctions 2 to 29 and incidents at Dartford would potentially still cause long delays and severe congestion on local roads.

Route 1 would not provide additional connections to local roads and by attracting more traffic to the existing corridor, congestion on the adjacent A2 and A13 would also increase.

- 4 Construction would take at least six years and would cause considerable disruption to traffic using the existing Dartford Crossing with 40mph average speed restrictions and complex traffic management affecting millions of journeys. Even when the scheme is complete, there would be limited improvement for drivers as the current 50mph speed limit and closely spaced junctions would remain.

Additionally, a crossing at Location A would offer poor value for money in comparison to Location C and would perform poorly against other scheme objectives such as safety, noise and air quality.

A new crossing at Location C would provide a high quality, safer transport solution with a 70mph road providing improved journeys. Crossing capacity would increase by 70% in the opening year and, as a new route, it could be constructed without impacting the already congested Dartford corridor.

<sup>4</sup> [https://highwaysengland.citizenspace.com/ltc/lower-thames-crossing-consultation/user\\_uploads/lower-thames-crossing-consultation-summary-business-case.pdf](https://highwaysengland.citizenspace.com/ltc/lower-thames-crossing-consultation/user_uploads/lower-thames-crossing-consultation-summary-business-case.pdf)

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## 5. No comparison done for Location A on community and environmental factors

Comparison of community and environmental factors 5

Feature	North of river			South of river	
	Route 2	Route 3	Route 4	Western Southern Link	Eastern Southern Link
Air quality	Limited impact on air quality immediately adjacent to the routes but improved air quality at Dartford.			Limited impact on air quality immediately adjacent to the routes but improved air quality at Dartford.	
Noise	All routes reduce noise disturbance for properties close to the existing Dartford Crossing.  Has the greatest impact in terms of noise disturbance as the route is closer to more densely populated areas.			Reduced noise disturbance for properties close to the existing Dartford Crossing. There is little to differentiate between the Eastern and Western Southern Links in terms of noise.	
Biodiversity	Routes 2 and 3 have lower impacts on ecological sites than Route 4.		Greatest impact on ecological sites.	Affects Claylane Wood ancient woodland and Shorne and Ashenbank Woods SSSI**. Less overall effect of the two options.	Affects areas of ancient woodland and local wildlife sites east of Shorne and Great Crabbles Wood SSSI**.
Landscape	Routes 2 and 3 run through greenbelt in Thurrock.		Route 4 runs through greenbelt in Thurrock and Brentwood.	Lesser area required within the Kent Downs AONB***.	Greater area required within the Kent Downs AONB***.
Cultural heritage	Requires land within West Tilbury conservation area and scheduled monuments. Potential impact on listed buildings.	Requires land within a scheduled monument. Potential impact on listed buildings. Avoids conservation areas. Has the least impact of Routes 2, 3 and 4.	Runs through Thorndon Park, a Registered Park and Garden and conservation area. Potential impact on listed buildings.	Potentially impacts the setting of listed buildings. Route is close to but not in the conservation area of Thong.	Potentially impacts the setting of listed buildings. Route is close to but not in the conservation area of Shorne.
Properties*	9 residential 3 agricultural	14 residential 22 traveller plots 3 agricultural	14 residential 9 commercial 3 agricultural	4 residential 3 commercial	10 residential 2 commercial

\*Properties which may require demolition, based on preliminary illustrative route design

\*\*SSSI = Site of Special Scientific Interest

\*\*\*AONB = Area of Outstanding Natural Beauty

21

## 6. No comparison done for Location A on cost, benefits or journey times

Comparison of costs, benefits and reductions in journey time



Features	Western Southern Link with		
	Route 2	Route 3	Route 4
Estimated cost (nominal)	£4.1 - £5.8 billion	£4.1 - £5.7 billion	£4.4 - £6.2 billion
Adjusted benefit cost ratio*	3.1-2.2	3.1-2.2	2.9-2.1
Value for money*	High	High	High
Reduction in journey time between junctions 3 and 28 on M25 using the Dartford Crossing	3 mins southbound, 4.5 mins northbound	3 mins southbound, 4.5 mins northbound	3 mins southbound, 5 mins northbound
Reduction in journey time between M2 junction 4 and M25 junction 28 using new crossing at C	9 mins	10 mins	9 mins
Route length	13.8 miles	13.3 miles	15.9 miles

Features	Eastern Southern Link with		
	Route 2	Route 3	Route 4
Estimated cost (nominal)	£4.3 - £6.0 billion	£4.3 - £5.9 billion	£4.6 - £6.4 billion
Adjusted benefit cost ratio*	3.3-2.4	3.4-2.5	3.1-2.2
Value for money*	High	High	High
Reduction in journey time between junctions 3 and 28 on M25 using the Dartford Crossing	3 mins southbound, 4.5 mins northbound	3 mins southbound, 4.5 mins northbound	3 mins southbound, 5 mins northbound
Reduction in journey time between M2 junction 4 and M25 junction 28 using new crossing at C	11 mins	12 mins	11 mins
Route length	14.7 miles	14.2 miles	16.8 miles

\*To Department for Transport and Government guidelines

22

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7. Not a fair consultation if you are influencing which route to choose and not substantiated with data as above

## Have your say

Having taken into account the existing conditions, the nature of the problems at Dartford and the needs and plans for the area, we are proposing a scheme which, in our view, best matches the objectives and balances the needs of road users, the community, the environment and business.

There are important choices to be made. Through this consultation we are inviting you to provide your views and comments on our proposals. Your views will be taken into consideration before a final decision is made by the Government later this year.

In summary, our assessment has shown that a crossing at Location A would not solve the traffic problem at Dartford and would do little for the economy locally, regionally or nationally. Our proposal is a bored tunnel crossing at Location C, east of Gravesend and Tilbury.

We have developed three routes north of the river and two routes south of the river which meet the scheme objectives and on which we are seeking your views.

8

### North of the river - Essex

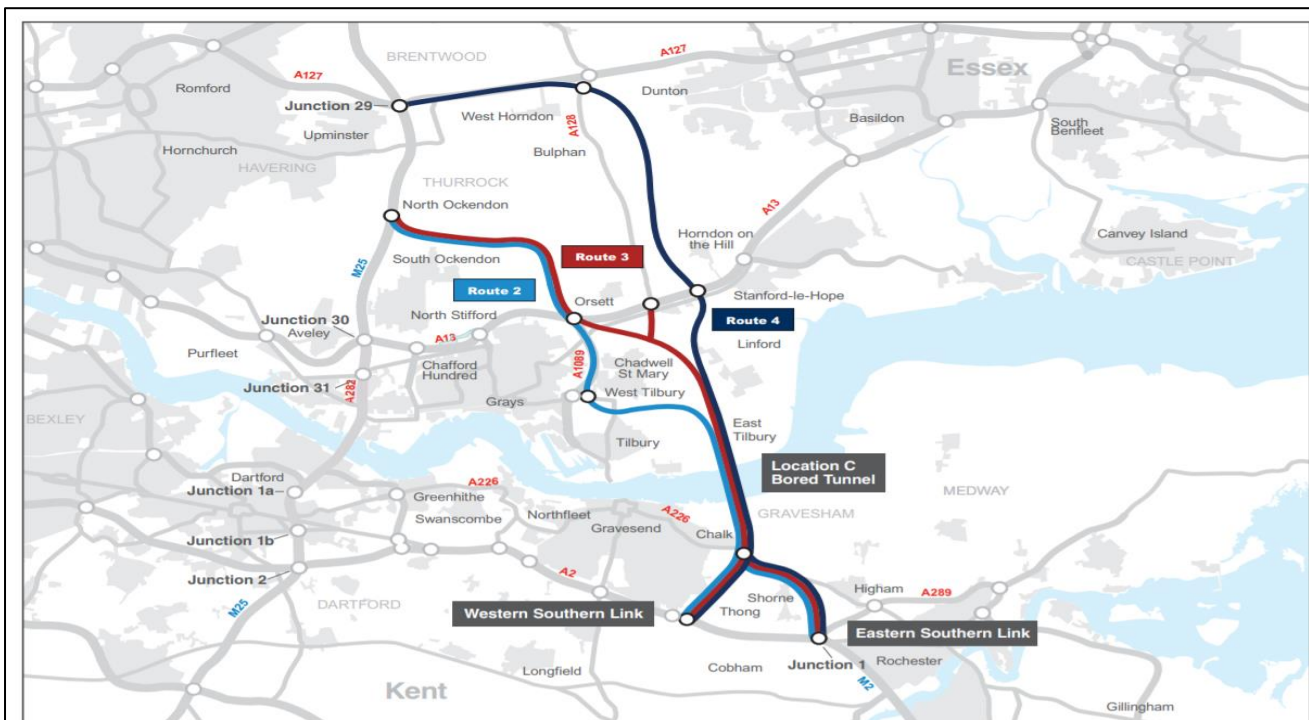
There are three routes to be considered. Each has potential to unlock opportunities for housing and jobs and all offer high value for money. They each meet the transport objectives, although they offer different opportunities to connect with local roads. While there are important differences in the local and environmental impacts of each option, we consider all of these options to be viable.

### South of the river - Kent

There are two routes and we consider both of these to be viable. The Eastern Southern Link is a more direct, motorway-to-motorway connection and as a result better meets the economic and transport objectives. It has greater community and environmental impacts. The Western Southern Link has a lower community and environmental impact but, as a less direct route with a lower speed junction on the A2, it is weaker against the economic and transport objectives.

28

8. Again only mention of 3 routes for people to have their say on, not 4 including Location A.
9. And yet again no mention of Location A on the map in such a prominent position as on the Have Your Say section.



29

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## Community Factors

Copied below is the community impacts of the routes within option C. These are completely deceptive to show that the route is not as destructive as it will be.

E.g. Thames Crossing Action Group were aware of 24 homes in an estate in Orsett alone who had all been served blight notices yet HE state that only 14 residential properties were at risk along the ENTIRE ROUTE.

LOWER THAMES CROSSING - SUMMARY BUSINESS CASE

TABLE 2.3 - COMPARISON OF COMMUNITY AND ENVIRONMENTAL FACTORS NORTH OF THE RIVER

Feature	Route 2	Route 3	Route 4
Air Quality	Limited impact on air quality immediately adjacent to the routes but improved air quality at Dartford		
Noise	All routes reduce noise disturbance for properties close to the existing Dartford Crossing		
	Has the greatest impact in terms of noise disturbance as the route is closer to more densely populated areas.	Noise disturbance is less than Route 2 but greater than Route 4.	Has the least impact in terms of noise disturbance as the route is further away from urban areas.
Biodiversity	Routes 2 and 3 have lower impacts on ecological sites than Route 4.		Greatest Impact on ecological sites.
Landscape	Routes 2 and 3 run through greenbelt in Thurrock.		Route 4 runs through greenbelt in Thurrock and Brentwood.
Cultural Heritage	Requires land within West Tilbury conservation area and scheduled monuments. Potential impact on listed buildings.	Requires land within a scheduled monument. Potential impact on listed buildings. Avoids conservation areas. Has the least impact of Routes 2, 3 and 4.	Runs through Thorndon Park, a Registered Park and Garden and conservation area. Potential impact on listed buildings.
Impacts on Property <sup>2</sup>	9 residential 3 agricultural	14 residential 22 traveler plots 3 agricultural	14 residential 9 commercial 3 agricultural

## Distortion of the Consultation Results

The IPSOS MORI report<sup>5</sup> has been distorted to 'support' Highways England's preferred outcome.

The responses from 1,358 individual Gravesham residents opposed to the crossing have been discounted from 'members of the public' and allocated to 4 'special interest' groups.

This included:

- Gravesham Says No – 229 responses
- Shorne (erroneously identified as Higham) Parish Council – 946 responses
- Adam Holloway – 42 responses
- Higham Object to Option C – 141 responses

<sup>5</sup> [https://highwaysengland.citizenspace.com/ltc/lower-thames-crossing-consultation/supporting\\_documents/ipsos%20MORI%20Lower%20Thames%20Crossing%20Consultation%20Analysis%20of%20findings%20report.pdf](https://highwaysengland.citizenspace.com/ltc/lower-thames-crossing-consultation/supporting_documents/ipsos%20MORI%20Lower%20Thames%20Crossing%20Consultation%20Analysis%20of%20findings%20report.pdf)

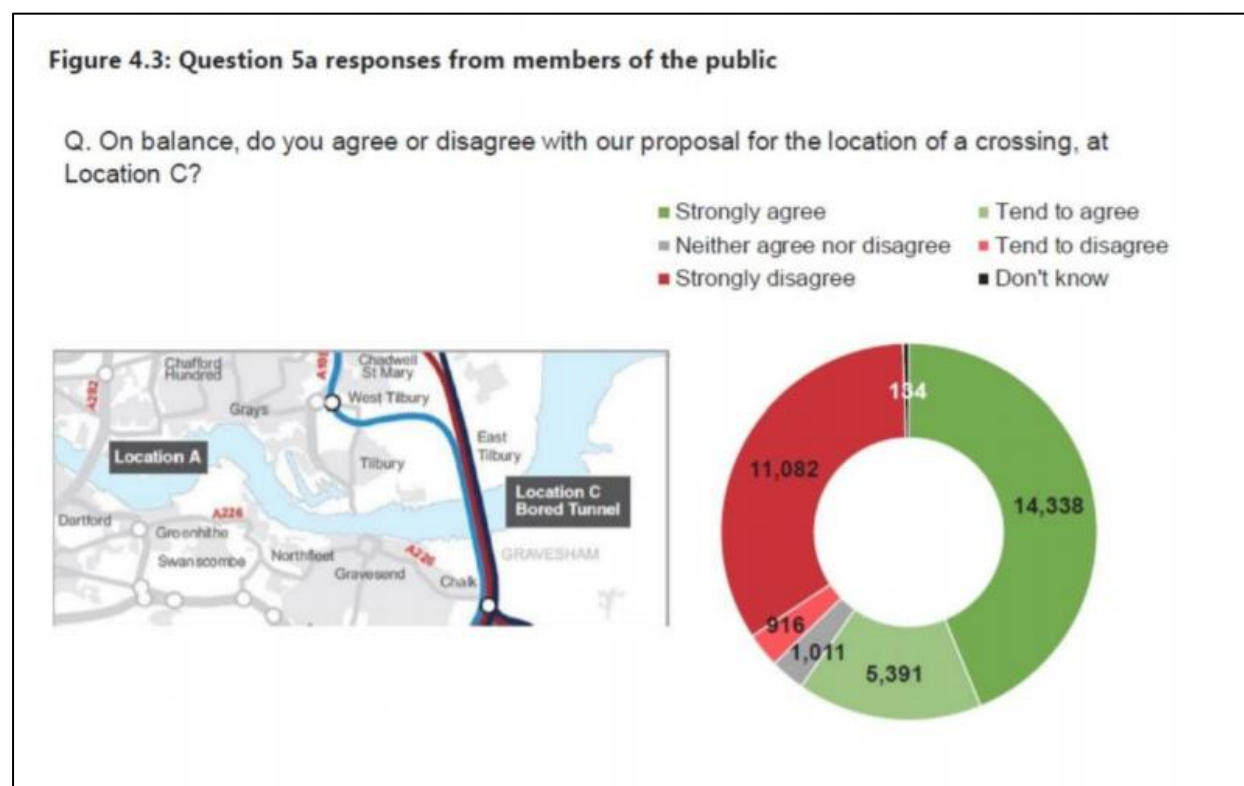
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A further 6,257 individuals from the Thurrock area were discounted as members of the public and allocated to 6 groups, and 5,625 members of the Woodlands Trust were counted as one organisation.

If these 13,240 individuals were counted as members of the public, this would have made a massive difference to the results.

For example, in question 5a “On balance, do you agree or disagree with our proposal for the location of a crossing, at Location C”, Ipsos MORI has reported that a total of 19,729 either agreed or strongly agreed, against a total of 11,988 who disagreed or strongly disagreed. If these ‘votes’ had been included, the total number of members of the public who disagreed would have increased to 25,238.



### Benefit Cost Ratio

Boris Johnson signed the Paris Climate Agreement, ratifying it on behalf of the UK. This commits the UK to cut its CO2 emissions from 500 tons to 120m tons a year by 2050, and down to less than 20m tons by the end of the century. You would have thought this would mean that CO2 emissions would be an important factor when choosing a route, wouldn't you? Highways England's benefit cost ratios (BCRs) show that Route 1 (Option A) at Dartford will generate additional CO2 costing at £144m (2010 prices). Route 3 ESL (HE's preferred option) will generate additional CO2 costing at £288m. So Route 3 ESL will produce twice the amount of additional CO2 emissions than Option A at Dartford. I'm not quite sure how you can put a monetary value on extra road accidents, but Route 1 (Option A) at Dartford will cost an extra £74 million, while Route 3 will cost an extra £120m. So clearly, a crossing east of Gravesend will generate twice as much extra CO2 and 60% more serious accidents than an extra crossing at Dartford. But don't worry – the cost of these increased emissions and increased accidents on Option C is more than compensated by the benefits to Business (only a paltry £1.6bn for Dartford but a whopping £3.4bn if Route 3 ESL is

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chosen). Strangely, although a new bridge at Dartford was by far the cheapest option in 2013, and offered the best value for money in terms of Benefit Cost Ratios (BCR), it is noticeable that the cost of this relatively simple option increased by 170% between 2013 and 2016, making it much less attractive. Conversely, the BCRs for a new crossing east of Gravesend doubled between 2013 and 2016. The Treasury is now being presented with an entirely different business case on which to base its decision. At the very least, we would have thought this needs investigation before deciding to spend £5bn of public money as it was at that time.

### Petition

As you will see below HE, did not take into account the significant official petition that opposed Option C. This gathered 31,408 signatures and was not taken into account.



### The 17 reasons Thurrock Council oppose the consultation and routes of Option C

1. The traffic movement data on which the appraisal partly relies is historic - 2001 demand data. It is the foundation of the Highways England (HE) decision making yet there have been significant new developments in the sub-region over the last decade, and trip making patterns have changed as a result.

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2. Route 3 has a slightly higher benefit to cost ratio, but there is no clear headway between options. Benefit to Cost ratios at lower end do not include wider economic benefits but the upper end does.
3. For the Highways England's preferred route (Route 3) these are 2.3 (lower) and 3.4 (upper). For every £1 invested HE claim a return of £2.30 - but this return is made up substantially of time savings arising from traffic on the new route. Given there are significant questions over the accuracy of the data from 2001, there must be questions over the accuracy of the modelling and therefore the travel time savings, and hence over the accuracy of the benefits.
4. Route corridors A and C fulfil substantially different strategic functions. Location C is likely to be less effective in alleviating congestion at Dartford Crossing than location A.
5. If a new crossing is built at location C, when incidents occur on the Dartford Crossing, there is no evidence that the local road network can cope with traffic diverting from the Dartford Crossing to the Lower Thames Crossing. Highways England's preferred option may cause worse community and environmental problems over the wide area, particularly on the key roads of the A13 and A2 when diverting traffic hits bottlenecks.
6. Any gridlock will worsen pollution in the area in increased emissions from vehicles and the number of vehicles. The future modelled scenario has an increased traffic movement from 140,000 vehicles a day now with the existing crossing to nearly 240,000 a day in total by 2041.
7. At the existing crossing traffic volumes in 2025 are predicted to be around 14% lower than a scenario without a new crossing. By 2041 they are predicated to be just 7% lower. This suggests that location C options have very limited benefits in terms of the main objective 'to relieve the congested Dartford Crossing and approach roads'. In consequence, there is unlikely to be a significant long term difference to general traffic conditions at the existing crossing.
8. The detailed information available to Highways England is yet to be published. There is a lack of information to make an informed decision over any route and the strategic case tests have not been met. More information is specifically required on wider traffic flows and impacts on junctions.
9. The need for a new crossing has not been demonstrated. Further work is required to explore alternative modes of travel. More freight could go by rail. It is not shown how the options could support sustainable travel and land use integration as set out in Government Guidance.
10. The environmental harm caused by the scheme has not been fully assessed or quantified, including the impacts on health and local amenity and this may not be out-weighed by any economic or transport benefits - clearly further work is required on air quality and public health before the Government makes a decision. It must be given weight alongside economic and transport benefits.
11. As Option 1 within Corridor A has been reintroduced, after the consultation has started, a full 'like for like' assessment should be provided.
12. The public interest 'compelling case' required for Compulsory Purchase Orders has not yet been met.
13. The consultation has been flawed, with inadequate comparative information, inadequate capacity at venues, and inadequate hard copy consultation materials. The consultation should be at least extended but preferably halted to allow further work.

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14. The Council has written two letters to the Secretary of State for Transport to this effect, but has yet to receive a reply. It has also not received a response to its letter to the Chancellor of the Exchequer.
15. What is needed is a full strategic road network and local access road review to maintain resilience over the next 10 years.
16. The Council requests that joint work be instigated by Thurrock Council, the Department for Transport, and Highways England on the effect of pollution from vehicles on the health of residents.
17. Should Government insist on progressing a LTC option after the consultation that Thurrock Council should have a seat around the table to help protect residents and businesses from the least - worst option.

### The Alternative

It is our belief that the Option deemed Location A Option 14 (a environmental tunnel going from J2 on the M25 to a new between Junction 30-29) warrants further consultation and evaluation.

The benefit table shows the assessment merits and clearly show the impact on the wider community is drastically reduced and the reduction in traffic at the current crossing will jump from 14% (*correct figure in 2016*) Option C to 40% Option A14.

With the Borough of Thurrock already deemed to have illegally high pollution levels the ambition should be to reduce this rather than increase it, regardless of cost.

The rationale that HE used to omit A14 was cost but the table below shows no official figure was issued. When TCAG followed this up in writing a response was issued by the Deputy Director at the DfT stating the estimated cost of Option A14 was £6.6bn. Comparing that to the estimated cost of C3 at the time, £5.7bn, and taking into account how much superior Option A14 was on improving air quality, safety, environmental impact etc we do not understand why HE neglected to share the cost.

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# LTC OPTION A14

## Executive Summary

Thames Crossing Action Group

## ASSESSMENT MERITS

### Context and Objectives

This report sets out our assessment of feasibility for the construction of a new crossing within the Lower Thames Region, reviewing capacity at each of the three locations; 'Option A Route 14, Option C Route 3 and Option C Route 4.

	Option C3	Option C4	Option A14
Cost	£4.1 - £5.7Bn (Southern Links)	£4.4 - £6.2Bn (Western Links)	No Official Figure issued
Construction Period	Open 2025-2027	Open 2025-2027	Open 2025-2027
Road Length	13.3 Miles	15.9 Miles	~7.5Miles
Installed Capacity	70% increase	70% increase	Matches M25
A282 Traffic Reduction	14%	14%	40%
Blighted Homes	26 Residential, 22 Traveller Plots 3 Agric (HE Info)	26 Residential, 9 Commercial & 3 Agric (HE Info)	Minimal
Green Belt use (ha)*	350 to 452ha	350 to 452ha	Minimal
Overall Impact on Landscape	Largest Adverse Impact	Largest Adverse Impact	Least Adverse Impact
Number of SSSI Areas	Scheduled Monument	Park & Garden + Conservation Area	None
Effectuated Floodplain	Tilbury & Shornmede Marsh	Tilbury & Shornmede Marsh	None
Neg. Impact No. AQM sites	1 (Tilbury)	1 (Tilbury)	None
Detour Distance Back to M25	~10Miles	~10Miles	None
2041 Expected Conditions on the A282 (exiting crossing)	90% of capacity - Often Queuing	90% of capacity - Often Queuing	75% or less very few queues
Greenhouse Gas Impact (60yr Period)	Increase 1,300,000t	Increase 1,300,000t	Reduction of 693,000t
No. of Accidents (60yr Period)	Increase 60,000-62,000	Increase 60,000-62,000	Increase 26,000

\*ha = Hectare = 100m<sup>2</sup> or ~ 2.47 Acres

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## 2018 LTC Statutory Consultation

### Consultation Events

HE listed the Upminster Information Point as being South of the river, and Gravesend Information Point as being North of the river. It was only when we pointed this out that they even realised the errors, which gave us no confidence whatsoever.

Awareness events were not listed on consultation event promo or the official website until we questioned seeing them on social media. This is another example that HE were not adequately promoting events to give people a fair chance to attend.

East Tilbury which would be greatly impacted by LTC didn't even get a Statement of Community Consultation (SoCC) event, only got a poorly publicised mobile event. These mobile events were on a van with limited staff, materials, and information. We do not consider this to be adequate or acceptable. We also note that HE considered it appropriate to hold events in areas like Dover and Suffolk, because of the business support they would gain there, so biased in favour of HE and not genuine consultation including impacted residents.

The nearest full info event for residents in East Tilbury was in Linford. However, that event was also inadequate as many people had to queue for some time outside due to large numbers of attendees. Some simply weren't able to wait in the queue long enough to even enter the event, let alone speak to a member of the LTC team.

There were info events at Orsett, South Ockendon, and West Horndon that people also struggled to get to, and couldn't get to, due to serious road incidents in the area. Despite HE knowing the scale of the impact this had on people attending, they made no attempt to offer additional events.

At a mobile event that was held in Corringham the HE van was parked in a one way road which resulted in members of the public having to walk in a busy road to gain access to the roadside entrance to the van/event. Another inadequacy and serious health and safety issue.

Staff at all info events have often not appeared to have the knowledge to answer questions from the public

Some HE staff were removed from events after we had to put complaints in about their inept handling of dealing with members of the public, giving misleading info, and also one with a particularly confrontational and aggressive attitude towards some of us, which was totally unwarranted (as proven by the fact we were told that member of the team would not be attending any more events as a result of our complaint).

It should also be noted that when HE staff were unable to answer questions at events, they would tell residents they would get back to them. However, it was extremely rare that they ever had pen and paper to note down the question and contact details to respond.

### Consultation Materials

**Length, complexity, and volume of consultation** - Due to the sheer volume and complexity of consultation materials the length of the consultation, 10 weeks, was not adequate. The timing of the consultation also fell at a time of year, in the run up to Christmas, that is a very busy time for most and we feel should be taken into consideration as another barrier for people to adequately take part. This was very intimidating and confusing to everyone, definitely

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not clear and informative. Legends/keys/descriptions were often greatly lacking in materials, making it very difficult for people to understand.

**Fly through 'fairy tale' video<sup>6</sup>** - this video was a very misleading representation of the proposed route that was inaccurate, misleading, and confusing.

Around 6mins 12sec when they show the A13 junctions they chose yet again not to represent the Orsett Windmill a landmark that would help most identify and get their bearings, even though we have previously mentioned this being missed out in previous presentations.

At 8mins 45sec they show the area between the M25 and the LTC motorways as a lovely area of trees, failing to show the real implications of the route and show the fact that they are stranding families locked in this space between the two motorways, with at least one of the families homes being literally within the motorway embankment. This adds insult to injury for those families, and also misleads people who may not realise the real implications and impacts of the route. Some, if they had seen families homes stranded in that section, may have changed their opinion of LTC, as trees look great, families homes stranded does not however portray the mess that HE have made of those particular homes, very misleading!



The video also fails to show changes like the removal of the Rectory Rd bridge in Orsett, or the replacement road through the middle of the Orsett Showground. This does not show the design of the Lower Thames Crossing at the time of statutory consultation as suggested at the start of the video. The only reason for the removal of this bridge and destruction of the much loved Orsett Showground is due to the LTC, so surely it should be shown as part of the design, not hidden away so many won't even know what will happen if this option goes ahead.

<sup>6</sup> <https://www.youtube.com/watch?v=jufC1teUcc4&t=3s>

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**Map Books** – the way the maps were presented was extremely confusing, with the North orientation arrow pointing in a different direction practically every map page to page. This made it almost impossible for most people to get their bearings. The way the pages were cropped also made it very difficult for people to identify and get a clear overall image of the true impact to their area.

**Private funding** options (PFI and PF2) were abolished by the Chancellor in the Autumn Budget, in October (a couple of weeks after consultation began) meaning that consultation materials were then incorrect and misleading – page 122 of Your Guide to Consultation<sup>7</sup>. Cost is obviously a huge part of the project and the fact it would now be funded entirely by public money (not private) also means that they will have to pay VAT on it, meaning a huge increase in cost. HE did nothing to update the info, which could have influenced people's response to consultation.

**The cost of the project** was only mentioned once in the consultation guide and was hidden away on page 122. Since the cost of the project would be relevant to whether the project offers value for money when considering ones support of LTC, we do not consider enough prominence was given to this, especially since the price had risen considerably from £4.3-£5.9bn in the 2016 consultation to £5.3-£6.8bn in 2018.

This was highlighted even more to us when we were having a conversation with the Cabinet Member for Economic Development for Essex County Council who was not aware that the cost has risen in the 2018 consultation.

**In the Preliminary environmental information summary**<sup>8</sup>, page 11 states under Existing conditions "There are areas that currently do not exceed UK Air Quality Strategy thresholds" yet further down that section on the same page it is stated " This baseline information indicated that air quality is currently exceeding UK and EU limits across the study area". This information is confusing, misleading, and does not provide facts that demonstrate properly the fact that impacted areas already have very poor air quality.

**In the consultation guide** on pages 60 and 62 the A13 is shown according to the legend for the images as a motorway, which of course it is not. Followed by definite inconsistencies on pages 64,65, and 66 where the A1089 north connection to the LTC is not shown on some of the maps, when clearly other routes are shown whether they are highlighted as what is being described or not. Again confusing, misleading, and not providing the facts clearly.

**In light of our previous 2016 evidence** when HE firstly stated that Location A was not included in the 2016 consultation, and then changed their mind when the Minister said it was.

'The Case For the Project'<sup>9</sup> in the 2018 consultation materials - Point 5.1.5 again states that only Option C variants were consulted upon in 2016. Clearly HE still can't decide whether they consulted upon Location A in 2016 or not!

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7

[https://highwaysengland.citizenspace.com/ltc/consultation/supporting\\_documents/LTC%208%20Consultation%20Brochure.pdf](https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/LTC%208%20Consultation%20Brochure.pdf)

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[https://highwaysengland.citizenspace.com/ltc/consultation/supporting\\_documents/LTC%206%20Preliminary%20Environmental%20Information%20Report%20PEIR%20%20Non%20Technical%20Summary.pdf-1](https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/LTC%206%20Preliminary%20Environmental%20Information%20Report%20PEIR%20%20Non%20Technical%20Summary.pdf-1)

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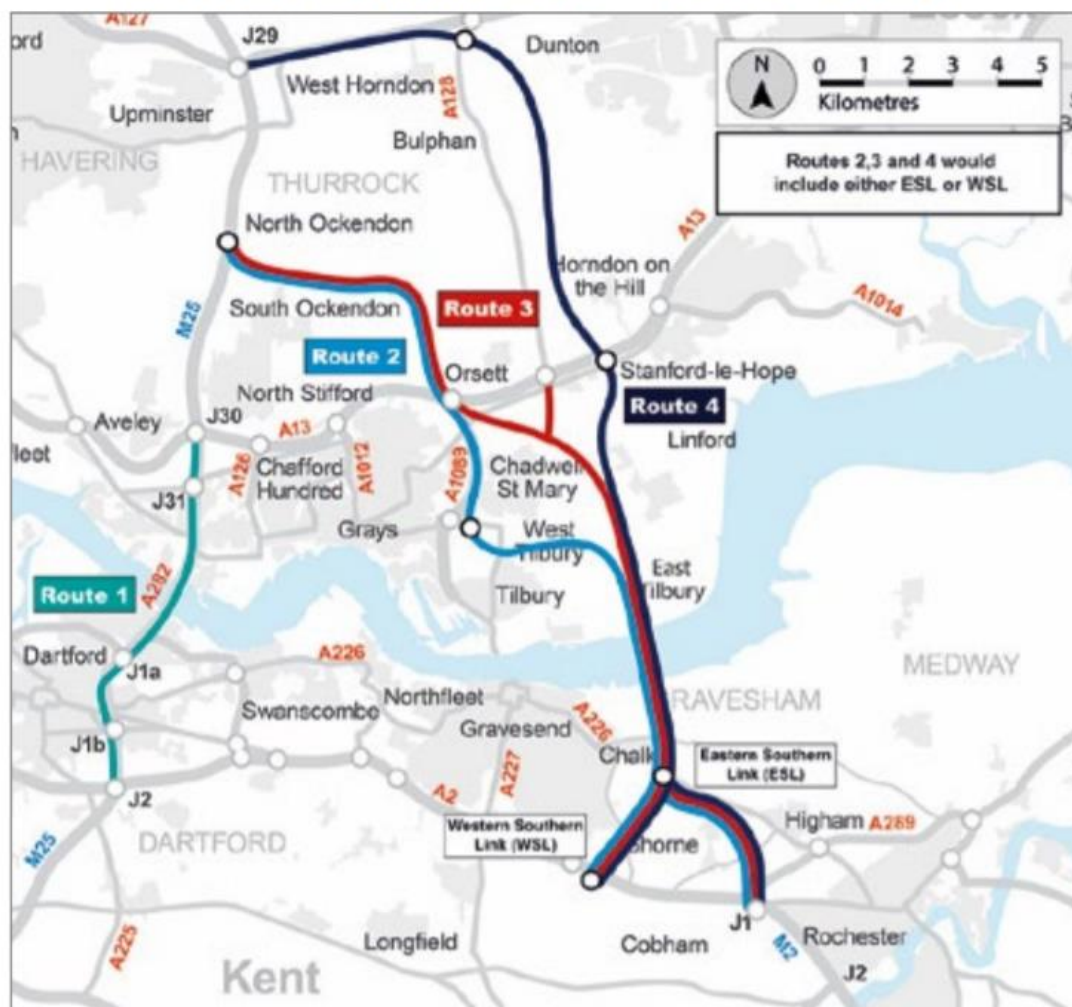
[https://highwaysengland.citizenspace.com/ltc/consultation/supporting\\_documents/LTC%205%20The%20Case%20for%20the%20Project.pdf](https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/LTC%205%20The%20Case%20for%20the%20Project.pdf)

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- 5.1.5 We held a non-statutory public consultation in 2016 which proposed a crossing at location C and presented three route options. These were identified as routes 2, 3 and 4. Each option included two different routes south of the Thames: the Western Southern Link and the Eastern Southern Link (see Figure 5.2).

**Figure 5.2 Shortlisted routes considered in the 2016 study**



### Misleading info

**HE kept stating the LTC was 3 lanes all the way from the A2 to M25** when in fact a section around the A13 dropped to 2 lanes, creating a bottleneck. Even LTC Project Director (at this time) Tim Jones was not aware of this and kept using this incorrect statement in public, at presentations and to the media. We do not consider this to be clear or informative. In fact we consider it to be very misleading, and would have led many to believe the LTC to be better than it truly is, as many would question a built in bottleneck if they were aware of it, but this fact was hidden away. It also gives us no confidence that the Project Director was not even aware of this major fact, a person who is supposed to be in charge of the whole project.

**HE have been consistently using the wording that LTC will provide 90% extra road capacity** which is misleading to the public. The realities of this figure are a lot more complicated than it makes it sound. 90% extra capacity would

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make you believe that there would be 90% more when considering lanes crossing the river. However, there are currently 4 lanes in each direction at the Dartford Crossing, 8 in total. LTC tunnels would have 3 lanes in each direction, 6 in total. This would mean that lane wise the LTC only has 75% extra lane capacity compared to the Dartford Crossing.

HE eventually explained to us in 2020 that “This is calculated based on the capacity of each lane at the Dartford Crossing and at the LTC. 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”.

This is a very complex way of working things out that is not what the majority of the public will expect or understand the statement about providing 90% extra road capacity to mean. This statement was used in a very prominent way, which we feel has been used to try and influence people who will not fully understand what it means and will assume it is to do with the amount of lanes.

**HE's traffic modelling** doesn't reflect real life traffic that we experience on a daily basis, especially due to the current crossing. They have told us they take an average month, March in this case (a month that in previous years has been the worst month for incidents at the current crossing), they then record the traffic data.

However, if there is an incident that means that traffic is not what they consider to be 'normal' they remove that data from the traffic modelling. What they consider to be 'normal' with regards to traffic and incidents at the current crossing is certainly not what we consider to be normal, and we live with it on a daily basis.

The very fact they are removing the data that reflects the very problem that they were originally asked to fix, ie the problems at the Dartford Crossing, is questionable to say the least.

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**Fixing the problems at the Dartford Crossing** – HE stated that LTC would take 22% of traffic away from the Dartford Crossing. However, this is again very misleading as when you research deeper into HE's own figures it clearly shows that the Dartford Crossing would still be over capacity. HE have failed to communicate this fact to the public clearly, instead choosing to give the impression that the LTC would solve the problems at the Dartford Crossing. We feel this has misled many into supporting the LTC, who would otherwise oppose it if they realised it will not solve the problems that a new crossing was first tasked to fix.

- The Dartford Crossing has a design capacity of 135,000 vehicles per day.<sup>10</sup>
- It is currently running at between 155,000 to 180,000 vehicles per day<sup>11 12</sup>
- Predicted traffic growth between 2016 and 2026 is expected to be between 17-23%<sup>11 12</sup> Bear in mind that currently the proposed Lower Thames Crossing is not predicted to open until late 2027/28
- Highways England predict that there will be a 22% reduction in traffic using the Dartford Crossing if the proposed Lower Thames Crossing goes ahead.<sup>13</sup>
- 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.**

LTC Project Director (at the time) Tim Jones has also stated that LTC will not solve all the problems north and south of the river due to the current crossing, we have an audio recording<sup>14</sup> of him stating that fact from an LTC Task Force meeting at Thurrock Council, and he has also stated it again numerous publicly.

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<sup>10</sup> Page 20 -

[https://highwaysengland.citizenspace.com/ltc/consultation/supporting\\_documents/LTC%208%20Consultation%20Brochure.pdf](https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/LTC%208%20Consultation%20Brochure.pdf)

<sup>11</sup> Point 1.2.5 -

[https://highwaysengland.citizenspace.com/ltc/consultation/supporting\\_documents/Environmental%20Impact%20Assessment%20%20Scoping%20Report.pdf](https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/Environmental%20Impact%20Assessment%20%20Scoping%20Report.pdf)

<sup>12</sup> Page 19 – Points 6.2.32 and 6.2.37

[https://highwaysengland.citizenspace.com/ltc/consultation/supporting\\_documents/LTC%205%20The%20Case%20for%20the%20Project.pdf](https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/LTC%205%20The%20Case%20for%20the%20Project.pdf)

<sup>13</sup> Page 22 -

[https://highwaysengland.citizenspace.com/ltc/consultation/supporting\\_documents/LTC%208%20Consultation%20Brochure.pdf](https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/LTC%208%20Consultation%20Brochure.pdf)

<sup>14</sup> <https://www.thamescrossingactiongroup.com/it-wont-solve-dartford-crossing-issues/>

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**Migration between two crossings** – HE have not made it clear that they have not taken into account or planned for how traffic will migrate between the two crossings when there are incidents, and made apparent the lack of adequate connections to do so.

Again this is misleading and inadequate clear and informative material to hide this fact that most would assume will be taken into account as a matter of course, especially due to the unique aspect of the scheme being to fix problems crossing the river.

## Communication issues

Delays in response by HE to questions submitted via email during consultation period

Letters sent in error to residents telling them they are within the development boundary when they weren't, causing much concern and stress.

Thurrock Council raised concerns over the lack of meaningful engagement by Highways England

The amount of misleading info has been a concern. Right up to the present day, where we are still witnessing LTC/HE on Twitter retweeting articles that include old out dated maps, that still show the Tilbury link road which was removed when the details of consultation were issued. To us this means that HE/LTC have not provided clear and accurate info if media and others are using out dated maps etc. The fact they are then promoting this misinformation by retweeting it just about sums up their inadequacies and the fact they are happy to be misleading everyone over LTC.

## Biased info

Press releases such as [www.gov.uk/government/news/lower-thames-crossing-opens-its-doors-at-first-of-sixty-public-events](http://www.gov.uk/government/news/lower-thames-crossing-opens-its-doors-at-first-of-sixty-public-events) for the consultation have been heavily biased in favour of the crossing, to the extent that no opposition was noted at all, only support. There is plenty of opposition to the LTC yet they included none of it. We have emails, letters and conversations from various people, businesses, local authorities, councillors, MPs who are all opposed, you don't have to go far to find them. Yet again HE chose not to represent this in their consultation and promotional activities.

Online promotion of the LTC consultation has again been biased to show only support of the project, not giving fair representation. Where were the voxpops for residents? None, only for businesses that feel they stand to benefit from LTC, again biased representation. And these businesses are fed a different story to that portrayed to the residents that will lose their home or have their lives turned upside down. These businesses have only ever been offered C3, obviously with a need for another crossing they are quick to support it but we doubt that would be the case if they were fully informed, or given other alternative routes to choose from.

At HE info events there is no indication of any negative points in any of the display material, it is all positively biased. With a project of this size it cannot be 100% positive, yet HE have chosen not to display any kind of negative impacts, again leading to biased view and misrepresentation of the LTC. The point of the consultation being to present the facts in a clear, easy to understand, unbiased manner so that people can review the info and give their own educated opinions.

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We again note that HE informed DartCharge users about the consultation, which we feel yet again creates biased in HE's favour. Many DartCharge users will just be aware they pay to get stuck in traffic at the Dartford Crossing and will think any other new crossing has to be better, without any real consideration or research.

## Consultation Response Form

We consider question 1 to be misleading and biased in an attempt to get the support they need and want for the project. It is worded in a way that confuses people into showing support for LTC specifically, rather than just a new crossing in general.

### 1. The need for the Lower Thames Crossing

The case for the Lower Thames Crossing, including the reasons why we consider it is needed, is set out in Section 4 of **Your guide to consultation** and in the **Case for the Project**.

**Q1a.** Do you agree or disagree that the Lower Thames Crossing is needed?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know

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## 2020 LTC Supplementary Consultation

### Timing of the consultation

The consultation was rushed and pushed through in an attempt to fit it in between the General Election and what should have been Purdah for local elections (which were cancelled due to COVID-19)

The fact HE announced there would be a further consultation later in 2020 before this consultation had even ended is evidence that they rushed it and already knew they would need further consultation.

Rather than prepare a consultation efficiently and wait until they were truly ready they ended up creating consultation fatigue by forcing two consultations, within 15 weeks of each other, on people when one consultation could have been held to cover what they ran in two separate consultations.

### Notification of consultation

There was not adequate notification of the consultation, especially to residents in impacted areas. When quizzed about missing leaflets that were meant to inform residents of the consultation HE passed it off as it is down to Royal Mail once they send them. No genuine concern of our reports that people were not receiving the leaflets and many did not know about the consultation, or if they found out about it it wasn't from HE and was later on, limiting their opportunity to respond.

HE said they had also used local newspapers and radio to promote the consultation. Local papers are no longer delivered in our area, and nobody has ever recalled hearing promo on the radio.

We do however note that HE informed DartCharge users about the consultation, which we feel yet again creates bias in HE's favour. Many DartCharge users will just be aware they pay to get stuck in traffic at the Dartford Crossing and will think any other new crossing has to be better, without any real consideration or research.

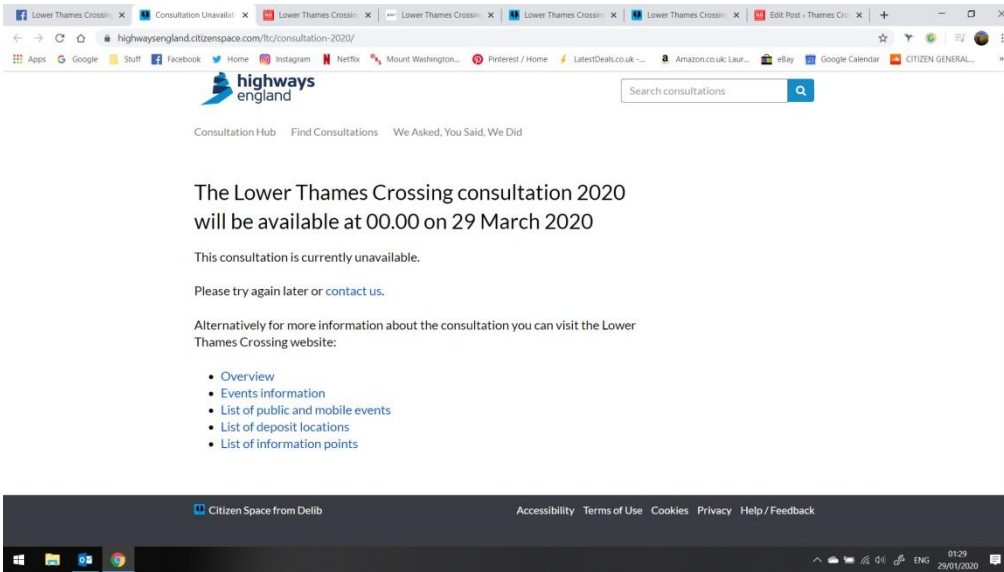
We also wish to express our concerns over the fact that it seems HE failed to supply press and media with an up to date copy of the overall route map. This has resulted in many, including national press using old out of date maps from 2018. We can only assume they obtained the maps from the out of date HE/LTC website.

### Consultation website issues

**There were major issues with HE's consultation website** with it having serious accessibility issues within an hour or two of the consultation launching. Including at one point a message saying that the consultation was not available and didn't start until 29th of March, even though it will only actually run until 25th March. People turned to social media to question what was going on and how to access the info.

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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 checked before launch?

**Much of the info was confusing and contradictory.** E.g. HE are struggling to know which way is North and which way is South again! Image clearly show which direction North is yet the arrow showing the directions of traffic contradicts this.



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## LTC official website out of date

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 place following the conclusion of the consultation in April.

## Erroneous letters sent by HE/LTC Land & Property team

There were yet more inadequacies with HE sending letters telling residents their property is now in the development boundary, when it is not. HE only accepted and admitted error and sent apology letters after it was brought to their attention. It is not acceptable for such stress inducing mistakes to continuously happen.

## Consultation material

TCAG 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 on Jan 29th. 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 the first info event on Feb 21st.

Also there were delays in getting TCAG paper copies to take with us to community forums we were speaking at early on in the consultation, ie before COVID-19. HE did not show willing to ensuring we had the copies needed, and near the start of consultation we were told there was an issue with stock availability. Another example of how they were not prepared for consultation and that it was rushed.

Materials were yet again not clear and informative as is required. Technical and industry terminology was often used, which was confusing and often alienated the public from understanding what was being said.

Info was also yet again misleading and biased in favour of HE's wants. E.g. they promoted key points that said the Rest and Service Area and Tilbury Junction/Link Rd had been removed. However, when you went deeper into the documents it became clear that discussions are still being had about the rest and service area as a separate stand-alone project. The same with the Tilbury Junction/Link Rd, which is now a RIS3 pipeline project.

We feel this was done to avoid public conflict to the LTC scheme, and in an attempt to make the LTC benefit cost ratio look better than it truly is. Inadequately representing the true cost of the project. It should also be noted that this inadequate representation of cost should also take into account things like the Blue Bell Hill Improvements which are currently being consulted upon as a direct result of LTC impacts, and are estimated to cost £142m. Biased presentation of the scheme yet again.

We were also told in 2018 consultation that the rest and service area 'had' to be included at the time because of industry health and safety guidelines, the fact they were removed clearly means we were being given bad info in 2018 as they did not 'have' to be included. We question again if this was to gain support from the likes of Port of

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Tilbury, Road Haulage Association, Freight Transport Association in 2018. HE again manipulating consultations to get the results they wanted.

**Map Books errors** – It became apparent that there was an error in Map Book 3 during Supplementary Consultation, which was confirmed in the Design Consultation when HE admitted *“This map book also contains updated existing ground levels from chainage 5+500 to chainage 20+250 which were shown incorrectly in the supplementary consultation map book 3. The existing ground level figures were shown shifted north by 250 metres.”*

**There was also a missing page in Map Book 2** that should have showed that the development boundary now goes all the way up to J28 on the M25. When HE are promoting LTC as a new river crossing from Gravesend to East Tilbury it doesn't help when they miss showing the realities of the impact all the way up to J28 on the M25 in the maps. This fact is also not shown in the maps throughout the consultation guide.

**Map legends** were confusing, and not easily understandable by the public. Things like 'Land not included within the Order Limits' means nothing to joe public and there was no explanation or glossary. We had to ask HE to explain, this is another example of inadequacies and materials not being clear and informative.

**Cranham Solar Farm** info was inadequate and confusing. The consultation guide never showed that Cranham solar farm was to be demolished. The guide actually listed it as a proposed solar farm, even though it has been operational since 2016! The Land Use map was very confusing in Supp Con as it shows the Solar Farm as colour coded as 'building requiring demolition', but also being shaded as 'environmental mitigation'. How demolishing a solar farm can be deemed environmental mitigation is baffling.

**M25 junction 29** - HE have never made it clear that the current M25 northbound junction 29 access will be removed as part of the LTC plans. They also split the images of the two sections of the junction to try and hide this. Pages 70/71 and 78/79 in the consultation guide. This means it is not clear or informative to view the junction as a whole. Many have only realised what is planned after investigative works have started since consultation period ended, due to seeing works in locations and having to find out why.

**Public rights of Way** maps and details, were confusing and misleading. In some cases stating they were proposing footpaths when in actual fact there is an existing footpath there now. They state things like they are connecting South and North Ockendon which is misleading because there is not actually a footpath being proposed to connect the two areas as the footpath only goes east or west once across the North Rd green bridge over the LTC, not in a northerly direction to North Ockendon.

**Lack of adequate wildlife/habitat surveys/desk studies** Our understanding is that HE/LTC have been using Essex Wildlife Trust data up to this point, which we know to be very limited. Essex Field Club's comprehensive records and knowledge would be far more adequate. How can we be consulted adequately when we are not fully aware of the true environmental impacts to know if the proposed mitigation is adequate?

**Pages 69 and 71 in the Guide to consultation<sup>15</sup> state contradictory information** about the lengths of the viaducts in the Mardyke valley.

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<sup>15</sup> [https://highwaysengland.citizenspace.com/ltc/consultation-2020/supporting\\_documents/Guide%20to%20Consultation%20digital%20version.pdf](https://highwaysengland.citizenspace.com/ltc/consultation-2020/supporting_documents/Guide%20to%20Consultation%20digital%20version.pdf)

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Page 69 – “Overall we have increased the total length of the viaducts in the area by approx. 50m”

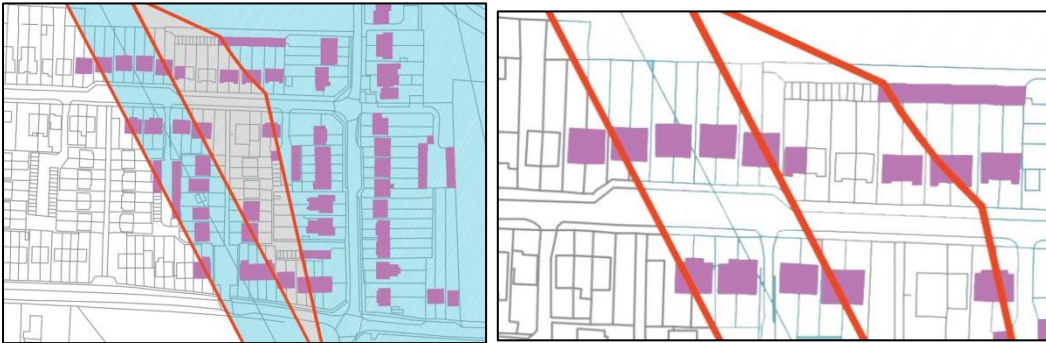
Page 71 – “The viaduct across the Mardyke River and Golden Bridge Sewer River have been shortened from approx. 450m to 350m”

How is anyone expected to make sense of these statements that are referred to being increased on one page and shortened on the other?

**Flood mitigation** HE were asking us to comment on environmental aspects such as flood mitigation, but did not provide unbiased fact based evidence and information so that we can come to our own conclusions. There has been no data provided about flood risk to assist us in meaningful responses.

**Poor communications** We would state unequivocally that in our experience and the experiences of members of our group that communications from HE, 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. Late letters, erroneous letters, residents being put in and out of boundary, poorly worded letters causing stress and confusion. All reported time and time again over the years, yet still no improvement or safeguards have prevented this from keep happening continually.

**Confusing maps and plans** Residents have been receiving letters along with Land Use maps and close up property/land plans. As can be seen in the two images below the Land Use map is colour coded, yet the close up is not, which makes it very confusing to try and work out what is considered inside the boundary and what is not. Hardly clear or informative.



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Impacts to existing road network The Traffic Modelling Update shows increases and decreases on the existing road. However, when you view the data online and zoom it to get a closer look it is very 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. As highlighted by arrow in the image below.



**Crossing Charges inc Local Residents Discount Scheme – The info is contradictory.** Unless the LDRS covers all local impacted areas for both crossings it cannot simplify the choice of which crossing to use.

**Complex junctions** – HE do not make it apparent how difficult it would be to turn around and correct a mistake if you take the wrong junction, some leading to detours miles long, and the need to pay the crossing charge twice (once each way) for your mistake.

**Emergency Areas** - There was not adequate info on where the Emergency Areas would be on LTC, considering the public interest in this kind of info in light of all the media coverage of the dangers of smart motorways, HE avoided sharing this info in a clear and informative manner.

**Design Capacity** - HE refused to provide us with a figure for the design capacity of LTC, despite constantly using the design capacity of Dartford Crossing in their materials.

**Inadequacies of WEBTAG** - we are aware that Webtag which HE use for traffic modelling is considered by many, including the industry to be outdated.

**Easy read guide** – not at all clear or informative

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**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.

**Tilbury Power Station** is still shown and labelled in the HE 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. 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.

**HE keep displaying junctions in confusing ways** - their own staff have complimented us on the colour coded keys/maps we create for junctions each consultation that makes it so much easier for people to understand. Yet even though we have suggested it, they have never made any attempt to make their own maps easier to understand, leaving most people very confused about the complex junctions.

HE removed one lane (in both directions) from the A2 to the M2 at the LTC junction. We are not aware that this was mentioned anywhere in documents, and was only picked up on by someone zooming in on Map Book 1 and comparing it to the same in the 2018 Map Book 1. Another example of HE hiding away significant changes.

When the consultation was first published, the guide erroneously referred to “a new link road connecting Valley Drive to the A2 eastbound”, when in fact it connects to the M2 eastbound. It was not until the second half of the consultation period that this was quietly corrected to refer to the M2. By this time, the damage had been done – many consultees to the east of Gravesend are still under the false impression that the new link road will provide them with direct access to the A2.

The consultation guide detail about the AONB and Shorne Woods Country Park was biased and misleading, and did not accurately reflect the info in the Environmental Impacts Updated.

Overall there was a general lack of detail that people needed and wanted throughout the consultations, particularly in relation to how things would look visually, and more info on heights and junctions etc. The complexity of the documents meant that considerable effort was needed to even try and understand consultation materials that certainly were not clear and informative.

## Consultation Events

At HE info events there is no indication of any negative points in any of the display material, it is all positively biased. With a project of this size it cannot be 100% positive, yet HE have chosen not to display any kind of negative impacts, again leading to biased view and misrepresentation of the LTC. The point of the consultation being to present the facts in a clear, easy to understand, unbiased manner so that people can review the info and give their own educated opinions.

Inadequate info and mobile events, which didn't include certain areas that would be impacted and should have had opportunity of an event to attend.

We experienced and witnessed various occasions where members of the HE team did not respond correctly to members of the public. For example, but not limited to, HE staff telling members of the public they could respond to consultation by emailing [info@lowerthamescrossing.co.uk](mailto:info@lowerthamescrossing.co.uk) which was not an official response channel. Construction team staff not being able to state proposed construction hours.

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We are also aware that the phone events were no better either, we are aware some people were given incorrect information over the phone.

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

**Lack of meaningful engagement** - There is a definite lack of meaningful engagement from HE 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.

## COVID-19

Consultation events had touch screen pads near the entrance/exit inviting attendees to log their thoughts on the event. It was some time before HE properly provided and used adequate sanitisers to cleanse these touch screens, and the maps, books, tables, and general surroundings/handles etc at the events, including the mobile van unit.

The very people that would be most impacted by health issues due to LTC were the same ones most at risk from COVID-19, and no consideration was given that they were in fear of attending the events because of the virus, but had no adequate means to obtain info and be able to respond to the consultation. Calls for the postponement of the consultation until such time as it could be carried out safely and adequately were ignored.

HE kept promoting that Deposit Locations and Info Points were still available despite the majority of them being closed due to COVID-19. This meant that people were without access to get copies or view materials. This would have impacted those who do not have internet access in particular, limiting their ability to take part in the consultation.

Later consultation events were cancelled, meaning many missed the opportunity to attend an event.

The one 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.

The two phone events are also not considered to be adequate. It would be impossible for HE 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 staff to help answer people's questions. To remove that option would clearly have left big gaps in their ability to answer questions efficiently and adequately.

Land Interest Questionnaires sent during COVID-19 lockdown caused much confusion and stress to all, especially to older members of the community who had no support due to lockdown, and when everyone was dealing with lockdown stress in unprecedented times.

HE failed to take into account the very genuine and serious impact that COVID-19 had on everyone's lives, and how that affected their ability to participate in the consultation during such unprecedented times.

**Further Consultation** – the fact that HE announced a further round of consultation implies that they weren't suitable ready for this consultation, as clearly they were identifying the need to hold further consultation before the current consultation had ended. This is also not in keeping with keeping consultation fatigue to a minimum.

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## 2020 LTC Design Refinement Consultation

### COVID-19

In addition to the issues already raised in relation to COVID-19 in the Supp Con HE then inflicted a further round of consultation upon us during a global pandemic. With no consultation events whatsoever it had a huge impact on people's ability to gather info and knowledge during the consultation. Digital first meant that many who are not online missed out. Even those who are online could be limited to phone screens etc which makes viewing maps and some documents very difficult as you can't view the whole thing in enough detail on smaller screens. Considering the COVID-19 crisis we also consider the length of the consultation to have been inadequate.

**Webinars** – were not as easy and beneficial as HE were making out. You had to download software/app, instructions were vague and confusing. HE did not log any unanswered questions submitted during the webinar and then send responses later, plus they didn't give adequate opportunity for you to copy and paste any questions you had submitted that weren't answered. HE did not allow adequate time during webinar for Q&As and no opportunity to follow up for clarification of answers if you were lucky enough that your question was asked. In general the webinar was just another excuse for HE to advise you to email or phone with questions, rather than being a source of information. Lack of promo that the webinars had BSL interpreters and captioning

**Telephone Call Back Service** At least one HE helpdesk agent not aware they were arranging LTC callbacks. Some callbacks that were booked were not made. The phone number was not a Freephone number meaning if you needed to call you to get info you had to pay for it.

**Emails** - Slow response time on email replies for answers to questions. Many emails not replied to until within 24 hours of consultation ending. HE often avoided answering specific questions instead preferring to offer standard copy and paste replies that did not provide the info requested.

**Info points** Whilst limited due to COVID-19 the ones that were open many didn't know about, due to purely online promotion of them, which was hidden away to say the least

**Leaflets** were only sent to properties within 2km (1.2miles) of route not acceptable, a far greater area will be impacted by the route and everyone needs to be aware of any consultation.

**Lack of promotion** due to everything going on with COVID-19 we do not consider that there was adequate promotion of the consultation, and most expected it to be paused due to COVID-19.

### The Consultation

**Another rushed consultation** - we feel this is yet another rushed consultation, with HE just trying to tick all the boxes and progress through the process as quickly as possible without real care or consideration.

**Consultation fatigue** – HE clearly didn't prepare for the earlier 2020 consultation adequately since this later consultation was announced before the Spring one had ended. This resulted in unnecessary additional consultation fatigue having two within 15 weeks.

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## LTC official website out of date

Despite the fact that during the Supp Con we brought to HE's attention, and expressed our great concern about the official LTC website being out of date during that consultation period, we note that yet again the official LTC website was out of date during Design Consultation.

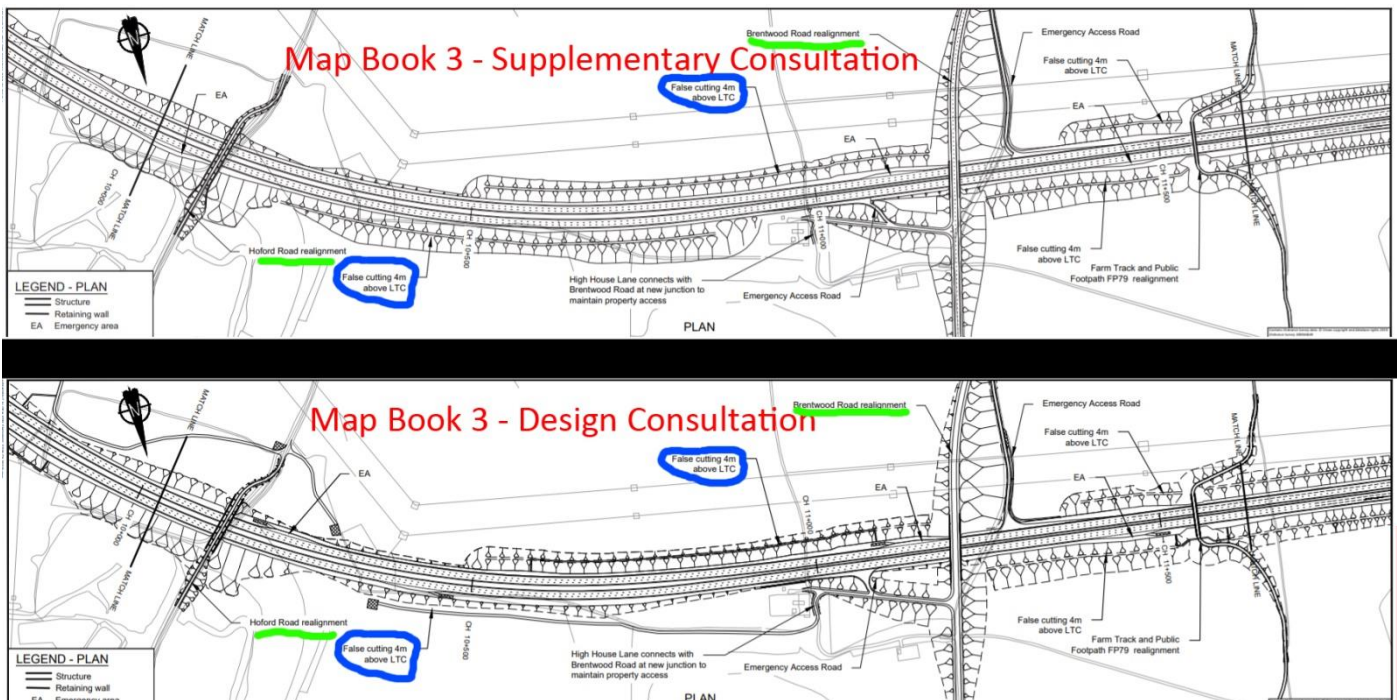
This included things such as an LTC timeline which didn't list the Design Consultation despite the fact it was live. No mention of the consultation on the 'What's happening now' page. Out of date maps on the route page. Out of date details referring to the Tilbury junction. We note that the new interactive map had been added, so clearly some maintenance had been done to add this, so why have other such important updates not been done?

## Consultation materials

The consultation guide quality was greatly lacking to say the least, as it actually started falling apart in your hands very quickly without excessive use. Pages falling out certainly doesn't help when you are trying to understand the content.

There was no mention that there had been a significant increase in the estimated cost of LTC

**Map book errors** – whilst HE stated that the false cutting had been removed, there was no sign of it being removed in Map Book 3 (see image below)



**Maps** – Stifford Clays was labelled as Little Thurrock. Stanford spelt Standford. Visual evidence of this is available on the TCAG website<sup>16</sup>

There is no continuity in the map legends in the consultation Guide, Map Books, and the Interactive maps. This leads to confusion with differences in the keys for the same items across the various maps, and keys that are too similar for different things being used. E.g. diagonal lines in different colours get confusing when black diagonal lines over a coloured background are also used.

<sup>16</sup> <https://www.thamescrossingactiongroup.com/design-consultation-materials-inadequacies/>

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There was an Environmental Impacts Update booklet, but this wasn't advertised clearly, or sent out as a matter of course when people ordered paper copies of materials, since there were not events etc to go to to get copies due to COVID-19. People had to discover the booklet existed and then contact HE to request a copy be sent.

This Environmental Impacts Update also kept referencing the PEIR which was not available offline.

The paper copies of maps sent out were lacking the detail most needed and wanted, and also omitted some details of the design, but HE did not make it clear that other detailed maps were available upon request.

HE stated that they were limiting paper copies of materials to one per household, which is not adequate considering there are many multiple occupancy homes these days. Whilst we are not aware of anyone being refused copies, the fact HE put this statement in writing could have deterred people from requesting copies.

Also no facility on the order form to request additional response forms if needed.

HE failed to provide adequate info/imagery with regard to what people can expect from some of the utilities aspects of the project. They are again using industry tech terminology such as Gas Pipeline Compounds and Electricity Switching Stations that nobody is familiar with. Footprint dimensions alone do not give adequate detail of what to expect, or the operational aspects of these facilities, eg noise, safety/risk etc.

No virtual 3d models or videos to show heights, junctions etc of LTC yet again, despite the fact we have commented on numerous occasions and requested some form of 3D modelling or an adequate new video of the proposals that would help everyone have a better understanding of exactly what is being proposed.

Whilst the Map Books in the Design Consultation highlighted the errors/corrections made since Supplementary Consultation with regard to Map Book 3, they omitted to highlight the fact that Sheet 21a of Map Book 2 was missing in Supp Con.

Map Book 2 is also still labelling and showing the foot print of Tilbury Power Station which closed and was demolished between 2016-19. Tilbury 2 is being constructed yet it is not shown at all in any of the maps. The map is labelled Tilbury Power Station and shows the footprint of the power station as though it is being acquired. Using out of date map info is not acceptable, clear or informative.

North changing position on every page in Map Books is still an inadequacy that makes it very difficult and confusing when trying to view the route.

There were issues with the Interactive maps not working/loading . Sometimes the maps would not load at all, sometimes they had error messages, sometimes they loaded but not the overlay that showed the detail/legend.

HE failed to provide adequate info on lengths of noise barriers. E.g. stating noise barrier is less than 1500m does not commit to anything, as the barrier could be 1m or 1499m.

They also refused to provide evidence of how and why the noise barriers locations were chosen as presented, simply stating the info would be available in the Environmental Statement at DCO. How are we supposed to give meaningful responses when HE refuse to provide us with the relevant data for us to assess the level of noise mitigation?

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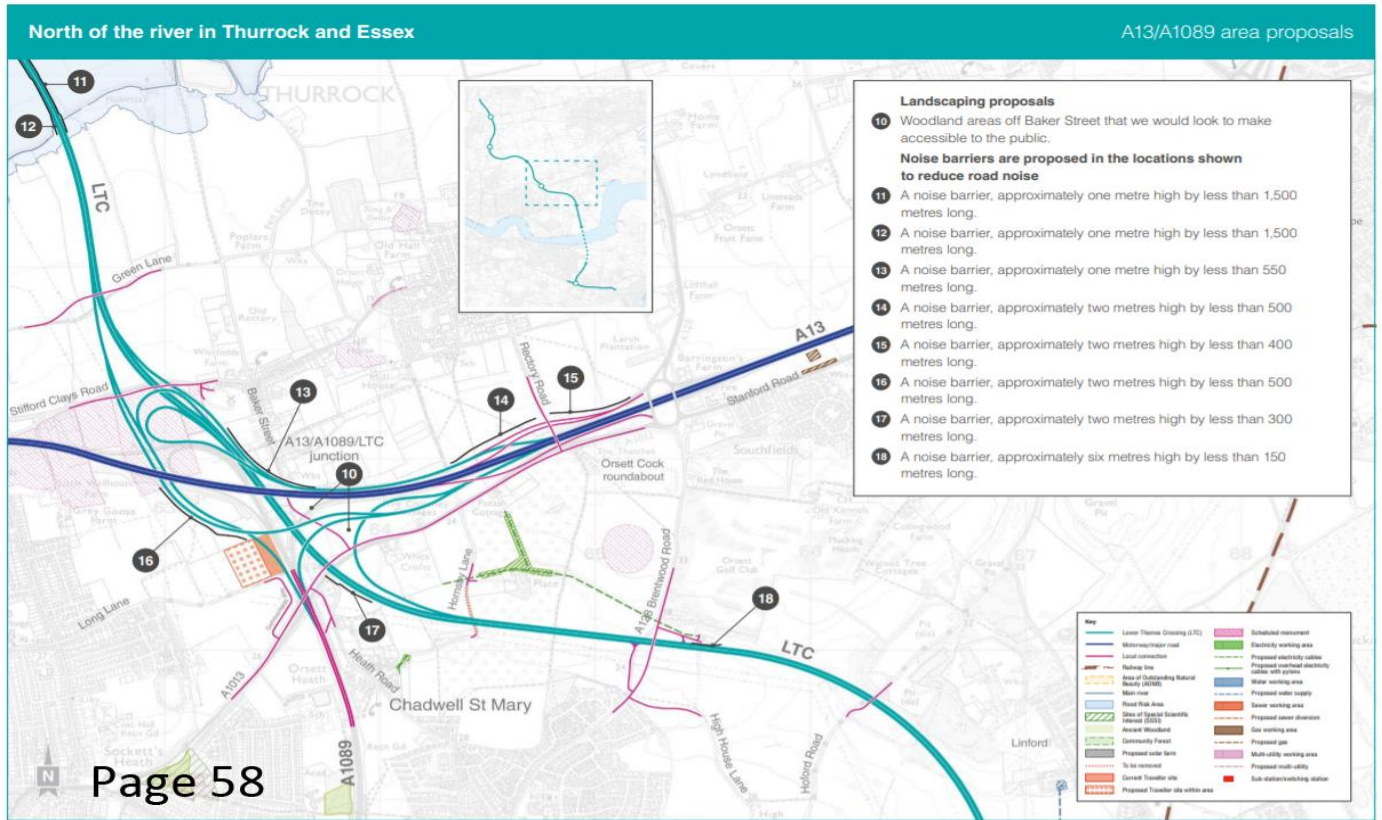
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Noise barriers were not identified adequately in the consultation guide and many were confused as two barriers, numbered 11 and 12 in the top image were actually the same barriers that were numbered as 13 and 14 on the map

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in the bottom image.



There was also some contradictory info regarding construction compounds. Previous confirmation that one compound would purely be an enabling compound, meaning it would be offices and welfare facilities, has now

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changed to being told it would be a main construction compound, although this point was only identified due to residents questioning HE on the phone.

## **Additional inadequacies**

Thurrock Council raised concerns over the lack of meaningful engagement by Highways England

HE rushed this consultation so soon after the previous Supp Con. They didn't even release any summary of the Supp Con before launching the Design Consultation, or detail any changes in the Design Con that were made as a result of Supp Consultation responses.

HE had not even finished analyzing Design Consultation responses, let alone had time to take them into account and incorporate any changes before starting to say about submitting DCO application. E.g. at LTC Task Force Meeting in late Sept they said they were unable to disclose outcomes of Design Consultation as they were still analyzing responses, yet at the same meeting told us they would be submitting their DCO application in October.

## **Poor communications**

Yet again the Land & Property team failed to ensure letters were sent correctly, without errors. There were numerous residents who would be directly impacted by LTC who did not receive letters from HE as they should have during consultation. HE yet again just blamed Royal Mail, despite knowing that the service has caused them previous issues and was greatly impacted by COVID-19. General consultation info packs were sent using a signed for courier service, yet important letters from Land & Property were sent using a regular Royal Mail service. When residents realized and contacted HE about the missing letters, some as late as the day consultation ended, HE only gave a 1 week extension for them to respond to consultation.

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## Additional inadequacies

### 2017 business presentations

HE were giving a completely different 'sales pitch' on LTC to businesses than they were to residents and local authorities. At the Nov LTC Task Force meeting we asked to have access to any videos being shared with the business community and were told there were none available. Yet when we attended a business event the very next day a video was used in the presentation. Yet another example of biased behavior.

### Common omissions in consultation materials

**PM2.5** The Mayor of London has committed to London being compliant to WHO standards on PM2.5 by 2030. The north of the LTC route is in the London Borough of Havering, yet no mention to WHO standards for PM2.5 are mentioned in the consultation docs.

**LA105 Air Quality** HE have not made it clear if the new LA105 guidance on assessing air quality, which forms part of the 'Standards for Highway', dating from Nov 2019, has been taken into account. We can see no reference to it in the Environmental Updates.

**CO2 / Net Zero** When we asked HE/LTC what the predicted increase in CO2 would be for LTC, including embedded CO2 during construction phase, and for a copy of the Appraisal Summary Table for the scheme, we were told those figures would not be available until the ES is ready at DCO stage. 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 were not provided with this info or alerted by HE to the fact this info was available, even though we were asking for it during consultation. There have also not been any references as to how LTC complies with the Paris Agreement or Carbon Net Zero.

**Ancient woodland and veteran trees** HE has yet again failed to put a figure on the threat this precious resource.

### Investigative works issues

With extensive investigative works going on for some time, many people believe that construction had already started and therefore did not feel it worth while to take part in the consultation. HE have not gone out of their way to publicise the fact the works are purely investigative, sometimes using terminology such as preliminary works, which again suggests the start of construction. We have no doubt this impacted consultation response levels.

Also there have been many issues and concerns regarding the investigative works along the entire route, which has resulted in much time and effort needing to have been spent dealing with HE's inadequacies relating to the investigative works, which impacted the time and efforts that could be spent responding to consultations.

This included serious concerns during lockdown over the continuation of investigative works, and the blatant and repeated lack of social distancing by LTC workers. Damage by LTC workers to local roads, trees, communities. Inadequately placed lighting causing glare to road users and properties. Mud on roads, dangerous access to sites and poor signage in accident black spots. Workers parking on footpaths and cycle routes. LTC workers attempting to stop the public using public rights of way. LTC workers urinating in public. LTC workers taunting the public. LTC workers parking inappropriately. Two retrospective planning applications to Thurrock Council for an LTC compound that was already in use. Recruitment events where people were being offered 7 year contracts despite HE only being able to commit to investigative works, not long term employment. Concerns over investigative works being carried out in areas of toxic historic landfill sites, and moderate to high risk Unexploded Ordnance areas.

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All of these, and other inadequacies/concerns, have had to be dealt with, which has added to the impact the whole LTC process has had on lives and health of many residents in a negative way, whilst trying to take part in consultations.

## Inconsistencies throughout consultation

Throughout the consultation period there has been no consistency in the description of the actual road. It has been referred to as a road, a motorway, an expressway, and an all-purpose trunk road. In 2018 associations to smart motorways were being made, but by 2020 after much negative media coverage of smart motorways, HE stopped using the terminology of smart motorway, and indeed the word motorway, instead referring to smart technology and signage. We do not feel that this can be considered clear or informative to keep changing the way they refer to the LTC in this way, it is again evidence of HE manipulating things to their own favour.

## Failure to provide requested info

Throughout the consultation process HE went from 'go to statements' such as 'We'll get back to you on that' yet never actually responding. Another response to questions was "please raise your concerns in the consultation", whenever we were in a consultation period. And finally we reached a point when we asked questions that we were told the info would be in the DCO documents and we would have to wait.

## LTC Project Director

The LTC project was without a Project Director between July 2019 when Tim Jones resigned and late June 2020 when we were told by HE a new Project Director had been appointed. The interim PD was noticeable by his absence, and there was a distinct lack of leadership and of anyone taking proper responsibility for the scheme and day to day running of the project during this time which included consultation periods.

## Misleading and biased reporting

There has been ongoing misleading and biased reporting of LTC throughout the consultation period. Much of this has been down to HE's inadequacies, such as not providing up to date route maps, and instances like the 2019 Gravesend Reporter article<sup>17</sup> whereby HE's Complex Infrastructure Director, Chris Taylor was quoted saying "More than 29,000 people took part in our consultation last year, with more than 86 per cent of respondents agreeing with the need for a new crossing and clear majority in support of our proposals." However HE's own report states 28,493 took part, and we can't find a reference that adds up to 86%. We would also point out that the public were never actually asked if they agreed with a new crossing, but simply the Lower Thames Crossing which is a specific crossing not just a new crossing.

The estimated cost of LTC is also something that is so often misquoted due to HE's lack of transparency in the ever rising cost.

We have no doubt that these kind of misrepresentations will have impacted consultation participation and outcomes over the years.

## Tilbury Link Rd

The Port of Tilbury made it publicly and perfectly clear that they would only support LTC if they got a direct connection to it. This became known as the Tilbury Link Rd. The Tilbury Link Rd was included in maps, including

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<sup>1717</sup> <https://www.gravesendreporter.co.uk/news/highways-england-determined-to-see-all-responses-to-thames-crossing-consultation-1-6189501>

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those released by HE in July 2018. Yet by the Statutory Consultation starting in Oct 2018 the Tilbury Link Rd was removed. At this time a junction was in place that could be considered as a possible provision for the link road at a later date, but that has also since been removed.

We find it questionable to say the least that the Tilbury Link Rd was detailed and shown in official LTC materials, yet was never publicly consulted upon, and was also a key factor in HE gaining the likes of the Port of Tilbury's support for the scheme.

We also consider it to be an inadequacy despite the fact it was officially being shown as a feature on the LTC, and then removed, to now being listed as a separate stand-alone RIS3 pipeline project.

## Land & Property letters

Since the Design Consultation ended additional letters have been sent to some residents. Most recently at least 1800 letters regarding HE's desire to acquire land rights for sub soil. These letters were, for some residents, the first letter from HE's Land & Property team regarding their land. Surely anyone who is advised of a potential CPO if DCO is granted should have been advised of this potential threat during consultation period, and not after it ended, so they could have the opportunity to respond to consultation as an impacted party.

Generally communication with Land & Property is slow, confusing template (not personalized) letters are sent and then the onus is on residents to email or call and then have the stress of waiting up to 15 working days (and sometimes longer) for a response.

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## Conclusion

We definitely consider the consultation process to have been completely inadequate as a whole. The completely inadequate and not fit for purpose consultation in 2016 led us to a decision of a poor and unacceptable preferred route being announced and 'developed'. Our understanding is that there are certain policies that HE need to follow and fulfil, and that the bar is low in their favour. However we would sincerely appreciate genuine consideration being given to the sheer volume of issues and inadequacies that have surrounded this consultation throughout, and how so many things that some may consider to be small, can amount to one very large inadequate and highly flawed consultation process. This is not just a case of sour grapes, we the people have very serious concerns that the whole LTC consultation process from start to finish has most definitely been inadequate, and that the resulting DCO application should not be accepted due to lack of adequate consultation with clear and informative materials, giving adequate opportunity for we the people to respond in a fair and adequate manner.

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## 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.

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**“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](http://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.

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**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.**

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## 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.

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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 1 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).**

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## 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?!!