

Spending Review Representation

September 2021

Thames Crossing Action Group (TCAG) represents thousands of people who are opposed to the proposed Lower Thames Crossing (LTC). We object to the proposed Lower Thames Crossing for many different reasons, and do not consider the project to be fit for purpose.

Our LTC Community Impacts Consultation response¹ contains further detail of our reasons for opposing the LTC project

This representation on behalf of TCAG highlights our concerns over the ever rising cost, and poor value for money of the LTC project.

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¹ <https://www.thamescrossingactiongroup.com/wp-content/uploads/2021/09/TCAG-Community-Impacts-Consultation-Response-Summer-2021.pdf>

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Introduction

The proposed Lower Thames Crossing is a Highways England (HE)/National Highways (NH) project on behalf of the Government. It would see a new 14.3mile road connecting between the A2/M2 in Kent through to the junction 29 on the M25, with a junction at the A13, and with the tunnel section under the River Thames stretching 2.6 miles.

The Government asked HE/NH to consult the public on possible routes in Locations A and C in 2016. Options at Location A were options in a similar location to the current Dartford Crossing. Options at Location C all crossed the river where the current LTC (Option C3) route is.

However, HE/NH instead chose to consult the public with route options biased in favour of Location C. This was actually to the extent that it wasn't even apparent at the start of the consultation that any options at Location A were even being consulted on. Due to this major inadequacy we would call into question the legitimacy and adequacy of the LTC consultation process.

The preferred route choice was made by then Secretary of State for Transport, Chris Grayling. In light of Mr Grayling's nickname Failing Grayling due to his history of bad decisions, we would again request that further assessments should be taken as to the decision making of the preferred route.

Inadequate and biased Consultations

It wasn't just the 2016 consultation that was inadequate either, every consultation has had considerable inadequacies. A copy of the report we published in 2020² will be further updated shortly to include details of the inadequacies of the recent Community Impacts Consultation.

This evidence, along with the Adequacy of Consultation representations made by impacted Local Authorities was part of the reason the Planning Inspectorate (PINS) were due to refuse the LTC Development Consent Order (DCO) application in Nov 2020, had HE/NH not withdrawn the application.

HE/NH state they are working on the resubmission, and they held the Community Impacts Consultation too, yet they failed to bother to adequately update relevant information or correct some of the mistakes and inadequacies that were reported in previous consultations, as well as there being new inadequacies to add to the ever growing list too.

The inadequacies and lack of certain information during consultation period has meant that both the public and Local Authorities have not been in a position to fully understand important aspects of the LTC project and provide meaningful responses as a result. Again inadequacies of

² <https://www.thamescrossingactiongroup.com/wp-content/uploads/2020/11/Inadequacies-of-the-Lower-Thames-Crossing-Consultation-Process.pdf>

consultations impact the overall adequacy of assessments of the project that ultimately would be paid for using taxpayers' money.

We have also experienced and witnessed through the consultation process where info and detail focuses purely on the 'positive' sales pitch rather than bringing attention to the negatives which there will inevitably be with a project of such a huge size.

Their sharing of info in press releases and on social media is also always biased in favour of the LTC project. We again feel these aspects should be investigated and taken into account as they influence the project and associated consultations and press coverage in a biased manner which is not favourable when it is such large amounts of taxpayers' money being spent.

Greenwashing

At a time when the climate change and the environment should be being taken seriously, and the value of our precious environment taken into account, HE/NH have been blatantly attempting to greenwash the LTC project.

As well as failing to publish/share figures on just how much greenbelt, woodland (including ancient woodland), agricultural land (including grade 1 listed land), hedgerows, wildlife and habitats etc would be lost and impacted if LTC goes ahead. Which would provide a clearer image of what is under threat from the LTC, and reveal the true cost. Instead HE/NH keep putting off sharing such info and detail.

Their press releases and social media posts always make claims about how many trees, hedgerows, habitats etc they would provide, but never cover the figures of what would be lost and impacted.

They never make it clear that things like solar farms would be destroyed or impacted. They have even had the nerve to show a solar farm that would be destroyed due to the proposed parallel road being highlighted on a Land Use map as Environmental Mitigation land. On what planet can destroying a solar farm be considered environmental mitigation?

In recent developments they are now proposing dumping the spoil from the LTC tunnelling near to the tunnel portals in a claim of creating new parks for the communities. In our opinion this is more to do with a convenient way of them finding somewhere to dump the spoil in an attempt to reduce the carbon footprint of the spoil movement.

They have also attempted to greenwash the project with press releases about Hole Farm Community Woodland. They have been trying to give the impression it is part of the LTC project, yet at the same time been stating that it will go ahead regardless of whether LTC gets permission or not. We know that this means it cannot legally be part of the LTC project as nothing can go ahead with anything that is considered part of the project unless a DCO is granted. Just another example of greenwashing attempts and HE/NH generally attempting to mislead the public.

Inadequacies of Highways England/National Highways

In addition to the Inadequacies of the Consultations the Inadequacies of HE/NH should also be noted, as we feel it very relevant since it is them that are developing this project (and others) that taxpayer's money would be spent on.

Clearly it is the inadequacies of HE/NH that produced the inadequacies of the LTC consultation process. Many of these inadequacies were brought to their attention time and time again, but not only the public, but also NGOs and Local Authorities. Ultimately this was picked up on as mentioned previously by PINS.

HE/NH have been called into question over their cover up culture by us and many others.

It is on public record that HE failed to deliver on what was signed off in regard to 'Smart' Motorways. This along with the latest news of the serious concerns over the major issues of the 'Smart' Motorways just shows that they should not be trusted and need to be held accountable for their decisions and actions.

Why have the Government announced the recent re-branding of HE to NH? Is it to try and wipe clean the bad reputation that HE have created? We also feel that the likely many millions of pounds being spent on the rebranding could be better spent. Also that HE/NH are not fit for purpose and would be better abolished and replaced by a National Transport incorporating all kinds of transport, including active travel.

How can the Government ever expect to find better solutions whilst focusing purely on Highways and not a transport network that best serves everybody as well as the environment?

The proposed LTC does not even make it viable for public transport options, since there would not be adequate connections for a bus route. It doesn't not allow for a cycle crossing in a similar way to the Dartford Crossing currently offers.

HE/NH continue to work to outdated policies and industry standards and guidelines, because it suits their needs and wants. Any reasonable company would bring to the attention of those they work for the needs and options for improvements, rather than continuing to work in the way HE/NH are.

It is also worth noting that this way of working is also conducive to allowing them to build into the designs issues that will need further money spending on them to correct at a later date, also future proofing their own jobs.

Inadequacies of the proposed LTC

For instance, they are not considering how traffic would migrate between the two crossings when there are incidents, because they don't have to according to industry standards and guidelines. Yet when you're supposed to be fixing the problems created by there only being one road river crossing to the East of London, and would be leaving that current crossing still over design capacity and suffering with similar numbers of incidents, surely it would be essential to ensure adequate connections between the two crossings?

There are many different areas of concern about the lack of adequate connections if the proposed LTC goes ahead. Some of the concerns in respect of how traffic would migrate when there are incidents have been highlighted on our website ³.

Take the example of the fact there is just one single lane from the A2 coast bound onto the LTC, and then imagine the absolute chaos, congestion and pollution that would create when there are incidents at the Dartford Crossing tunnels and traffic needs to migrate to the LTC to cross the river.

If the LTC goes ahead, how long do you think it would be before there are calls to make improvements to things like this? Adding further cost to taxpayers, and keeping HE/NH and the their contractors in further work. Surely things like this should be incorporated into the initial quote/cost as clearly there are inadequacies that can be noted even at this stage before permission has been granted.

This is not the only instance of such inadequacies, there are other similar instances that are noted on our website, and we feel should be taken seriously into account when considering the proposed LTC.

It is also important to note that HE/NH are not taking into account large projects such as the proposed London Resort, which has reached DCO stage and would generate more traffic to the road network, and in particular around the area between the current crossing at Dartford and the proposed LTC, and involved parking facilities both south and north of the river, meaning extra traffic that HE/NH are not taking into account with the LTC.

There are also some questionable planning decisions being made, like a new logistics hub/Amazon in the Dartford Crossing vicinity south of the river which will only add to the problems that the LTC was tasked with fixing. HE/NH figures show that the Dartford Crossing would still be over capacity, but surely it defeats the point of spending billions of pounds trying to find a solution to keep adding more developments to an area that is already suffering with terrible congestion and illegally high levels of air pollution?

We feel all these points ultimately not only prove the LTC to be unfit for purpose, but also that it would be a false economy.

³ <https://www.thamescrossingactiongroup.com/incidents-ltc-dartford-crossing/>

Cost Discrepancies

There appears to be evidence that there are some considerable cost discrepancies.

For example, take a look at the valuations of the LTC contracts according to HE/NH compared to those detailed in Sept 2021 in the Infrastructure and Projects Authority and HM Treasury National Infrastructure and Construction Pipeline 2021 policy paper⁴..

Roads South contract was listed by HE/NH at £600m which is the only one that seems to be quoted at the same amount.

Roads North contract was listed by HE/NH at £1.3bn but in the policy paper is listed at £2bn, a **notable difference of £700m**

The tunnels and approaches contract was listed by HE/NH at £2.3bn, but in the policy paper is listed at £4bn, a **considerable difference of £1.7bn**

Office of Rail and Roads Report

According to the Office of Rail and Road (ORR) - Annual Assessment of Highways England's Performance April 2020 to March 2021⁵ the proposed LTC cost has risen by £363 million and is likely to rise even further.

*"Since the 2020 Spending Review, an increasing number of large enhancement schemes have reported delays, creating a capital forecast underspend of £583 million (2.8%) at Q4 for the whole road period as costs have moved into RP3. These delays and a **£363 million forecast total cost increase on the Lower Thames Crossing** project have contributed to an increasing cost pressure on funding requirements for RIS3." – (page 12)*

*"In addition, on Lower Thames Crossing there is 12-month delay in the development phase because Highways England is resubmitting its planning application. This is not currently reflected in the forecast as the company has not yet completed its assessment of the financial impact of this delay. Therefore, the underspend is **likely to increase** once this is included in the forecast." (page 51)*

The ORR report also states that

"We are concerned that there is a significant risk to the company obtaining timely planning consents for all schemes where it is required. Thirty-four schemes require a Development Consent Order (DCO) in RP2 of which 21 are yet to receive DCO approval. It is a complex and nuanced picture and with the evidence we have available to us it is difficult to judge the extent to which Highways England should be held to account for these planning delays. Highways England has provided us with further detail of its DCO applications and the

⁴ <https://www.gov.uk/government/publications/national-infrastructure-and-construction-pipeline-2021>

⁵ <https://www.orr.gov.uk/sites/default/files/2021-07/annual-assessment-of-highways-englands-performance-2021-web.pdf>

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company's estimate of approval dates, so that we can better assess the risks to delivery of the RIS2 portfolio. The company is also carrying out its own review." (Page 12)

The ORR report also stated that they *"are concerned that whilst the delay was known in November 2020, Highways England was still evaluating the RP2 and total outturn impact at year-end."* (Page 108) This again shows further inadequacies from HE/NH.

"The main cause of the forecast total outturn increase of £756 million are the Lower Thames Crossing scheme, largely due to scope changes to meet safety/environmental requirements and address scope uncertainty (£363 million)" (Page 112)

Yet evidence obtained shows increase in accidents and huge negative environmental impacts if it goes ahead.

In Nov 2020, when discussing the invitation for tenders for the LTC tunnels contract⁶, Keith Bowers, the Lower Thames Crossing's tunnels and systems director, said:

'From our bidders we're looking for outstanding construction, health, safety and wellbeing performance.'

'We have committed to targets that mean by 2040 nobody will be killed or seriously injured on our roads and motorways, and we need our contractors' design and delivery to meet that target for our road users and workers.

'We are setting priorities in our contracts that will reward excellence during delivery by offering an enhanced share of cost savings for high performance in areas including health and safety, customer focus, delivery, environment, people and communities and economics.'

Yet a Freedom of Information request⁷ highlighted that there are forecast to be 2,147 additional accidents over 60 years, including 26 fatalities, 220 serious injuries and 3,122 slight injuries.

HE are quoted⁸ as saying that *COBALT, and therefore the appraisal techniques, are not able to take into account the actions being taken by National Highways to achieve its target of having no one killed or injured on the strategic road network by 2040.*

If COBALT is not able to take into account the actions by HE, then why is an outdated appraisal technique still being used?

This again highlights a lack of transparency, as well as more inadequacies from HE/NH, and in addition to the fact that throughout the whole process they have continued to attempt to present the LTC projects in a biased and often unrealistic manner. It also highlights the additional costs the LTC would bring in regard to emergency services costs and health care costs to serve the route in regard to accidents, if it goes ahead.

⁶ <https://highways-news.com/highways-england-invites-tenders-for-lower-thames-crossing/>

⁷ https://www.whatdotheyknow.com/request/lower_thames_crossing_appraisal

⁸ <https://www.newcivilengineer.com/latest/lower-thames-crossing-safety-concerns-raised-20-08-2021/>

False Economy

HE/NH have removed certain aspects/sections of the proposed LTC that are still now being progressed as separate stand-alone projects, so misleading on the cost.

The Tilbury Link Road was originally added to the LTC project when the Port of Tilbury said they would only support Option C3 if they were given their own junction/connection.⁹

It appears that HE/NH added the Tilbury Link Road to appease the Port and to get HEs choice of route, Option C3 approved as the preferred route, and then it was removed.

However, whilst HE removed it from the LTC project, without any real clear reasoning as to why it was removed, it is now being progressed as a separate stand-alone project. It has even been listed as a RIS3 pipeline project.

The removal of the Tilbury Link Road also creates a need for more traffic to be using what has become known as the Stanford Detour. This involved traffic wishing to access the A1089 southbound either from the LTC in either direction, or from the Orsett/A128 junction on the A13 having to detour eastbound on the A13 to the Stanford/A1014 junction, up around a traffic lighted roundabout and then back westbound to the new joint LTC/A1089(south) slip road just past (but not accessible from) the Orsett junction. The LTC would also mean a drop to 2 lanes in both directions on the already busy A13 even though it is currently having millions of pounds spent on it to take it up to 3 lanes in each direction from the M25 through to the Stanford/A1014 junction. It would also impact the roundabout at the Stanford Junction which is heavily used by DP World and London Gateway ports, so again likely to have negative impacts on the traffic movements causing further pollution and economic implications.

We feel this definitely gives a false costing of the proposed LTC, as it should include the cost of the Tilbury Link Road. After all you can't have a Link Road without the LTC to link to, plus it was the reason the Port supported Option C3.

Removing the Link Road, was followed by the removal of the Rest and Service Area and ultimately the Tilbury junction.

Again we are told that the Rest and Service Area, was at the time it was added essential for road health and safety aspects of the proposed LTC, is now being discussed/progressed as another separate stand-alone project. Again reducing the overall cost of the LTC project but still needing costing taxpayers'.

To date we have been unable to obtain a figure as to the reduction in cost of removing the Tilbury Link Road, Rest and Service Area and by association the Tilbury Junction, but it is obvious that it

⁹ <https://www.forthports.co.uk/wp-content/uploads/2018/03/3661.pdf>

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will have a considerable difference to the cost of the LTC project which will of course also make a difference to the Benefit Cost Ratio assessment of the LTC project too.

There have been calls by Thurrock Council and local MP, Jackie Doyle Price to include the junction at Tilbury and provision for a further junction as South Ockendon. Both options again adding further cost to the LTC project, and further future proofing work for HE/NH without including it in the cost now.

Other MPs and councils are also calling for other road projects/improvements as a direct result of the proposed LTC if it goes ahead.

In late 2020 Kent County Council held a consultation for the Blue Bell Hill improvements, which were stated to be needed because of the proposed LTC. The estimated cost of these improvements is said to be around £142m. We agree that this route would be negatively impacted if the LTC goes ahead, due to all the traffic needing to cut through from the M20 onto the M2/A2 to access the LTC, so yet again surely if this work is needed as a result of the proposed LTC it should be included and considered as part of the cost of the LTC project?

Also in late 202, Romford MP Andrew Rosindell asked about Gallows Corner in the first ever virtual Prime Minister's question time. He asked, *"As part of the government's plans to 'Build Back Better,' will the prime minister commit today to guarantee the necessary funding to replace and reshape this junction? **Especially as it will form a major route to and from the new Lower Thames Crossing.**"* So yet another existing road junction that is referred to as being necessary due to the proposed LTC, and therefore yet more taxpayers money having to be spent as a result of LTC.

The fact that the A13 (3 lanes down to 2) and A2 (4 lanes down to 2) would both see lane drops as a direct result of the LTC if it goes ahead would create bottlenecks on the existing strategic road network, that would very likely need further improvements to rectify the problems this would create.

There are other connections and improvements that would follow if the proposed LTC goes ahead in its current form, as it simply isn't fit for purpose and doesn't offer adequate connections. Again we believe this is HE/NH attempting to push through an inadequate not fit for purpose project knowing that this will lead to future proofing of their jobs, by creating the necessity of future works due to the poor design being pushed through now.

Threat of further legal challenges

The Government will already be more than familiar with the growing number of legal challenges being made and won against them in regard to road projects and on climate grounds.

Other road projects DCO have been quashed. An appeal has been submitted in regard to climate grounds. You have finally agreed to review the National Policy Statement for National Networks (NPS NN) because of

a legal challenge due to the roads policy being so outdated it doesn't even take into account the UK law on Carbon Net Zero.

Yet you are currently refusing to suspend the roads policy whilst it is being reviewed. This is ludicrous as if you deem it necessary to review the policy then the projects that are governed by the policy should also be reviewed. Projects like the LTC clearly are not compliant with UK law on Carbon Net Zero.

It is not purely about the cost savings of avoiding legal challenges like this; it is a waste of taxpayers' money to be spending on such projects that clearly break the law, as well as the cost to the environment.

Legal challenges in regard to air pollution have been made and will continue to be made. Again, not just the cost of legal cases, but also the cost to our lives, health and the NHS.

Surely it would be better to fully consider and take action in advance of legal challenges needing to be made, rather than risking wasting further tax payers' money on yet more legal cases?

Cost to Health

The World Health Organization has recognized air pollution as the biggest single environmental threat to public health globally.

Environment Minister Rebecca Pow pledged in January 2021 that “...we will achieve Royal Assent before COP26”. Her Lords counterpart Lord Goldsmith reiterated this welcome commitment in June, reassuring peers that “it is absolutely our intention that the Bill be passed before COP26”. He went so far as to stress that missing this deadline would “weaken our hand in these extraordinarily important climate and environment negotiations”.

On 6th Sept 2021 the Lords voted for the Environment Bill to include WHO standards for PM2.5 to be met by 2030. This Bill and WHO standards on air pollution need to be enshrined in UK law as a matter of urgency, and this should also be taken into account when considering whether taxpayers’ money should be spent on projects like LTC. You are effectively proposing spending our money on causing us harm if you allow it to go ahead.

We also respectfully remind you that Electric Vehicles still emit PM2.5 too, in fact many EVs emit more PM2.5 due to their heavier weight due to the batteries. PM2.5 also pollutes our water sources.

In the Government’s own ‘Decarbonising Transport A Better, Greener Britain’¹⁰, The Rt Hon Grant Shapps MP, Secretary of State for Transport stated,

“Because transport is not just how you get around. It is something that fundamentally shapes our towns, our cities, our countryside, our living standards, our health, and our whole quality of life. It can shape all these things for good – or for bad. Bad is spending longer and longer stuck in traffic. It’s the huge increase in rat-running down roads which were never meant for it. It is millions of people literally, if slowly, being poisoned by the very air they breathe. Every one of these things also contributes to climate change.”

The report goes on to state:

“Despite the progress we have made at national and local levels, transport remains one of the largest sources of air pollution in the UK, and poor air quality could cost health and social care services in England £5.3 billion by 2035”

This figure is purely in relation to air pollution related health costs. In addition to physical health there is also evidence of negative impacts to mental health and wellbeing¹¹. Plus the impacts from noise and light pollution on our health.

In regard to noise pollution, The Dept for Environment, Food and Rural Affairs state,

¹⁰ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf

¹¹ <https://www.theguardian.com/environment/2021/aug/27/air-pollution-linked-to-more-severe-mental-illness-study?>

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*"It is estimated that the annual social cost of urban road noise in England is £7 billion to £10 billion."*¹²

Whilst these figures may relate to the UK as a whole, they go to show that the financial costs of such impacts are considerable, and should definitely be properly taken into account when making decisions about projects such as the proposed Lower Thames Crossing.

When it comes to the proposed LTC there has been a distinct lack of information available about the Health and Equalities Impacts. At the request of Local Authorities in the areas surrounding the proposed LTC route, Highways England agreed to produce a Health and Equalities Impact Assessment. Yet work has been slow on the assessment and Local Authorities have publicly voiced serious concerns about the health impacts to people if the proposed LTC goes ahead. In a report prepared on behalf of the Local Authorities¹³ it states,

"a number of concerns have been raised with the source documents" such as a transport assessment, and it was also unclear whether health impacts could be "mitigated against".

It concluded that based on guidelines from the Wales Impact Assessment Support Unit, Highways England's assessment,

"does not fully meet the best practice requirements of the guidance".

According to figures published by NHS England, an average of 5% of deaths in those aged over 30 can be attributed to PM2.5 air pollution. That's 1 in every 20 deaths. Sadly, you will also be familiar with the fact that a coroner ruled that air pollution contributed to the death of 9 year old Ella Kissi-Debrah in London in Feb 2013.

There is no figure that can be placed on the loss of lives. But it seems quite apparent that the evidence shows that the proposed LTC would be harmful to our health and well-being. The associated costs to people, health care, and the economy through their loss of ability to work and sick days etc should be taken into account when considering such harmful projects as the proposed LTC.

Health concerns and issues we considered should not be limited to just the areas that the surround the proposed LTC, but should also include those areas suffering with terrible air pollution due to the Dartford Crossing too, as that that would still be over capacity, so still suffering with similar levels of congestion and pollution. The proposed LTC would just create an even larger area suffering from air pollution health concerns and issues, and all the associated health care costs, and cost to the economy, our lives and health.

¹² <https://www.gov.uk/guidance/noise-pollution-economic-analysis>

¹³ <https://democracy.thurrock.gov.uk/documents/s31011/LTC%20Task%20Force%20Paper%20-%20Update%20on%20HEqIA%20Review%20020721.pdf>

Cost to Environment

Carbon Emissions

In June 2019 the UK Government made a legally binding commitment to Carbon Net Zero by 2050.

In April 2021 the UK Government made a legally binding commitment to cut emissions by 78% by 2035 compared to 1990 levels.

Yet according to the estimate obtained via Freedom of Information¹⁴ the carbon emissions for the proposed Lower Thames Crossing are estimated to be **5,272,562 tonnes** of carbon dioxide equivalent. The prediction being that of that figure 2 million tonnes would be from construction, and the rest (over 3.2 million tonnes) would be during the first 60 years of operation, if the road goes ahead.

We do not believe that carbon emissions from Land Use, ie cutting down of trees, hedgerows, habitat, digging of ground/soil etc have been taken into account in the estimate, so we believe the emissions would actually be much higher.

Recently, Lord Deben, chair of the Climate Change Committee (CCC), whilst praising the Government's ambition and target setting, lambasted its failure to come up with a proper plan to deliver meaningful carbon reduction. He also strongly questioned the continued investment in the Road Investment Strategy (RIS2), the first time that the CCC had directly criticised the Government's road building programme.

In June 2021 the Climate Change Committee (CCC) report stated:

*"New roads should only be built if they can be shown to not increase emissions."*¹⁵

By that reckoning the proposed LTC should not be built.

Tree Planting

In your Tree Strategy Consultation it was stated "The £640m Nature for Climate Fund announced in the March 2020 budget provides significant funding for tree planting..."

This amount is a tiny fraction of the amount being proposed to be spent on LTC and RIS2.

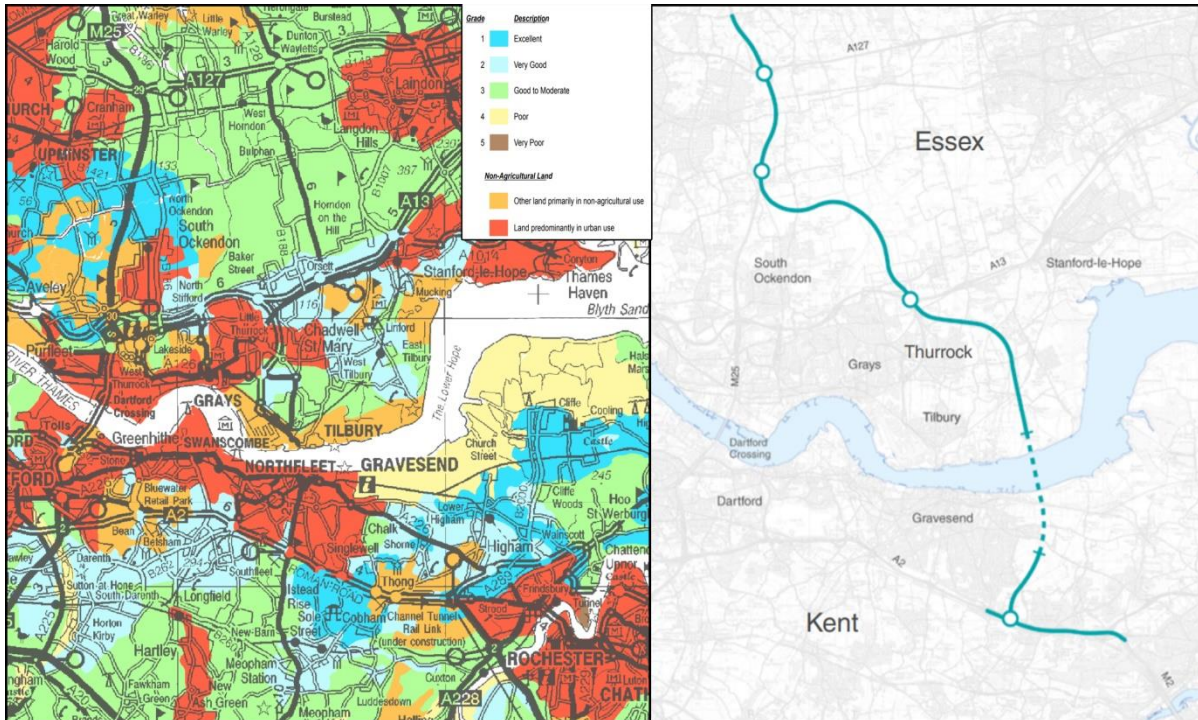
We need to be saving, protecting, and planting new trees. Yet again HE/NH have failed to detail how many trees would be destroyed and impacted by LTC if it goes ahead. Regardless of the numbers you simply cannot put a price on or replace the many mature and ancient trees and woodlands that we know it would destroy and impact.

¹⁴ https://www.whatdotheyknow.com/request/carbon_assessment_of_lower_thame#incoming-1687136

¹⁵ <https://www.theccc.org.uk/publication/2021-progress-report-to-parliament/>

Agriculture

To date Highways England have refused to share a figure of how much agricultural land they would take and impact if the LTC goes ahead. However, by looking at maps on Natural England's website¹⁶ alongside a map of the proposed LTC route it is obvious that the amount of agricultural land that would be lost or impacted would be thousands of acres.



Farmers are already suffering from having LTC investigative works being carried out on their land, which is having a negative impact of their businesses. Whilst compensation is paid, this doesn't take into account the fact that some farmers are apparently close to losing contracts with supermarkets that they supply because they are not currently able to fulfil supplies due to the investigative works.

If the proposed LTC goes ahead it would mean some farmers are likely to face the reality of whether they can even carry on with their businesses, due to the loss of land, impacts to land, and loss of access to their land during the long 6-8 year construction period.

Now more than ever we need to be ensuring that our country is as self-sustainable as possible, both to strengthen the supply chain for our own food, and to reduce the carbon footprint of our food and drink as much as possible, and reduce the negative impact this has on the environment and air quality.

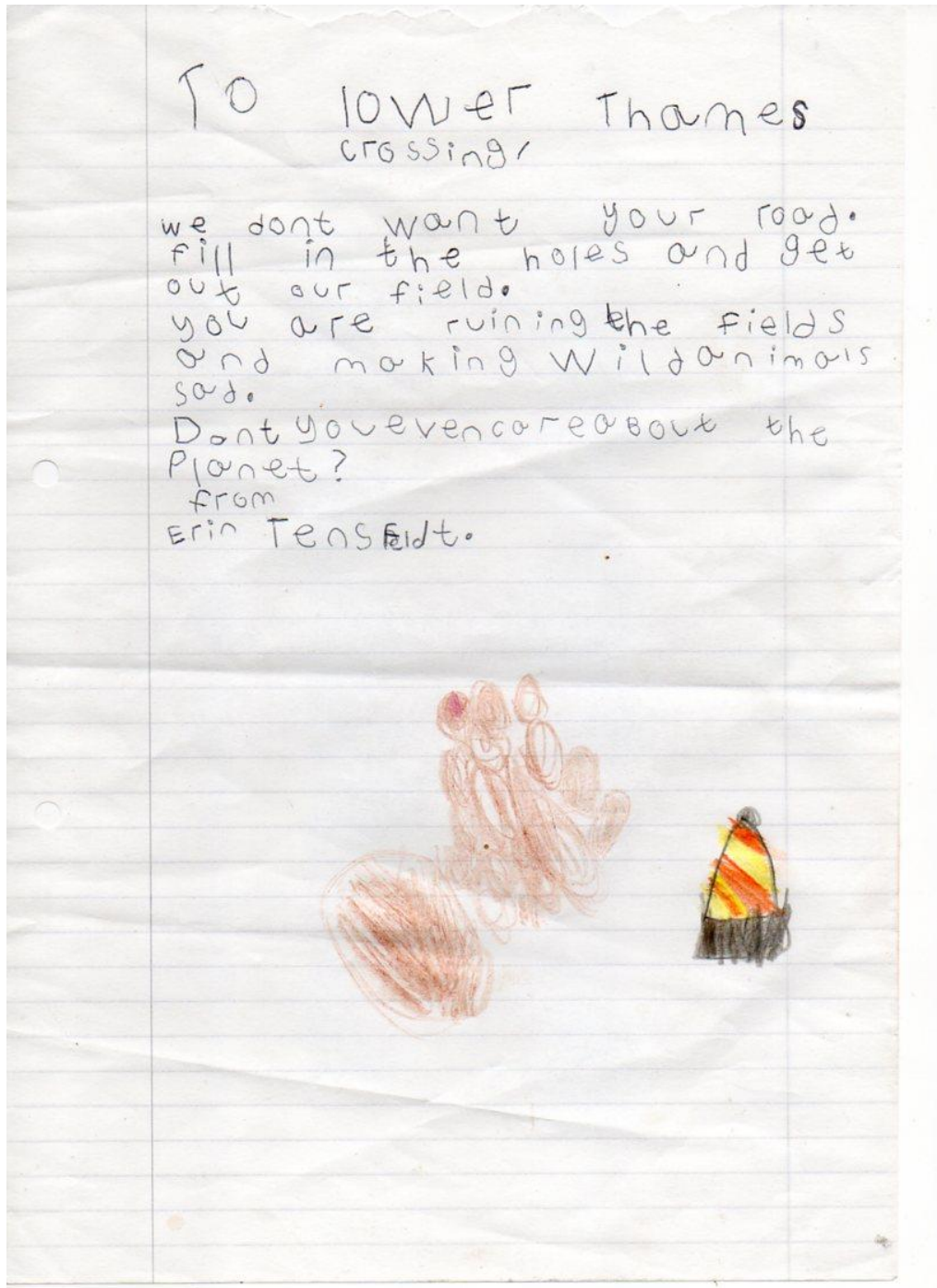
We simply should not be spending money on projects like LTC which destroy agricultural land, including the highest quality grade 1 land.

¹⁶ <http://publications.naturalengland.org.uk/category/5954148537204736>

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The following letter comes from one of our younger supporters, a daughter and grand daughter of a local farming family who have farmed their land for generations. We feel she sums it up perfectly as a voice of those who will inherit the decision that are made now in regards to projects such as the LTC.



Now more than ever we need to be saving and protecting our environment. We simply shouldn't be allowing hugely destructive and harmful projects like the proposed LTC to go ahead.

No evidence of economic benefit

The only estimate on economic benefit that we are aware of is around £8bn which was the figure being quoted in 2017 when the preferred LTC route was announced. The cost of the LTC is now up to £8.2bn.

Yet to date HE/NH continue to state that the LTC would create economic benefit and growth, yet refuse to share an estimated figure on that economic benefit.

Surely if it were as good as they like to portray they would be shouting an estimated figure from the rooftops? We would ask that you obtain such detail when considering the Spending Review in regard to spending on LTC. Surely we the public should also be entitled to know what this figure currently is too?

As a slight aside we would also comment on the fact that HE/NH have not provided updates on the ever rising cost of the proposed LTC. This is again something we feel is very relevant for the public to know, as should be a key factor in consultations. Especially when any significant changes are supposed to be consulted upon.

Thurrock Council have published a [report](#)¹⁷ that states at least £150m in loss to Thurrock as a direct result of LTC if it goes ahead.

In their [meeting](#) on Sept 9th 2020¹⁸, Brentwood Borough Council's concerns over LTC were discussed. It seems the council have concerns over the damage the proposed LTC would have on economic growth plans in the borough.

If these impacted local authority reports this kind of impact then surely it can be considered that the other impacted areas will also be impacted in a similar way?

More expensive per mile than HS2

Taking everything into account we have no reason to believe that the proposed LTC would come in under the top end of the allocated funding of £8.2bn. In fact we question that it will even come in at or under that top end figure, we predict it would likely be considerably higher, especially when you take all the false economy factors into account.

However, if we take the £8.2bn figure and work out the cost per mile, you are looking at nearly £573.5m per mile.

¹⁷ <https://www.thurrock.gov.uk/sites/default/files/assets/documents/thamescrossing-economiccosts-report-v01.pdf>

¹⁸ <https://brentwood.moderngov.co.uk/ieListDocuments.aspx?CId=392&MIId=2220>

Compare that to the cost of the highly controversial HS2, which is being scrutinised over a cost sitting at at £307m per mile of track.

To be clear we are not commenting that one is any less impactful than the other, this reference is purely to highlight the fact that there is a lot of attention over the cost of HS2, and LTC is a lot more expensive per mile.

Poor Benefit Cost Ratio

We hope you will see from the evidence provided that there is no way the Benefit Cost Ratio for the proposed LTC should be seen as anything other than extremely poor. Along with being poor value for money.

The Benefits are low/unknown, and the Cost is huge, and ultimately the project would fail to meet any of the Scheme Objectives.

Possible alternatives

We believe it is vital that further assessment is made to compare the proposed route with other alternatives. These possible alternatives should include researching and reviewing things like Option A14 (one of HE's original alternatives that should have been included in the 2016 consultation).

As well as other alternatives such as the rail improvements between Ashford in Kent and Reading, that are said to negate the need for the LTC, and would see improvements for both rail passengers and rail freight which is currently estimated to have a cost of £3bn-4bn. We currently have fuel issues and a shortage of HGV drivers worldwide. A single train can carry the load of 40 lorries. This would not only see economic benefits to companies, but also help improve passenger travel options too, at a time when we need more sustainable transport options. Let us know forget that this rail proposal was due to be privately funded, but the Government evidently refused it due to concerns that the Government may need to intervene with taxpayer's money if the scheme ran into difficulties. Yet they have instead proceeded with the proposed LTC, which is entirely funded by taxpayers' money and is seeing the cost rising ongoing.

And/or the Kenex Tram estimated at £800m. Public transport is extremely limited between Kent and Thurrock/Essex meaning more people rely on cars. Active travel options across the river are also very limited and HE/NH are failing to incorporate any viable options for either public transport or active travel into the LTC project.

Now more than ever we are living in a time of considerable changes. Some of these changes are being inflicted upon us due to COVID, but have taught us what is possible and created positive lifestyle changes for many, such as working from home, thus reducing commuting via roads. Brexit

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has seen changes and reductions in freight movements to and around the country. Climate emergency being declared around the world and the ever growing evidence that we need to act as quickly as possible to make the necessary changes to ensure our survival. These and other things are all good reasons why the LTC should be seriously reconsidered.

We stress again the importance of the adequacy of the proposed LTC to be reconsidered and analyzed against other alternative options. At the end of the day the proposed LTC would be hugely destructive and harmful, and is simply not fit for purpose.

Fails Scheme Objectives

In the Guide to Community Impacts Consultation, Highways England list the objectives of the LTC:

To support sustainable local development and regional economic growth in the medium to long term

The definition of Sustainable in the Cambridge English Dictionary is:

‘Causing little or no damage to the environment and therefore able to continue for a long time’

An £8.2bn road project that would be hugely destructive and harmful can in no way be considered sustainable, either in its own right or as part of local development.

As for regional economic growth, we question why Highways England are quick to state the words economic growth and also often economic benefits. Yet they fail to put an estimated figure against these statements, and refuse to share such info even when it is requested.

If the economic growth and benefit were truly as good as HE attempt to make out then surely they would be shouting the figure from the rooftops.

Conclusion on this point – The proposed LTC would not support sustainable local development, and since HE fail to provide and refuse to share when requested, an actual estimated figure for economic growth we can only come to the conclusion that this objective would not be met, as there is no evidence provided to suggest otherwise.

To be affordable to government and users

The ever rising cost of the proposed Lower Thames Crossing is now up to £8.2bn. However, we do not consider this to be a realistic figure and have serious concerns that the true cost would be a lot higher.

Highways England removed the Tilbury Link Road and the Rest and Service Area from the proposed LTC scheme, yet both are being progressed as separate standalone projects.

If the Tilbury Link Road is detailed in RIS2 as a RIS3 pipeline project, what reason was there to remove it from the LTC project? It cannot be because there is not a need for it, if it is being progressed in this way regardless.

The Link Road was added to the LTC project because the Port of Tilbury would only support Option C3 if they got their own link road. It was added to the LTC project, and then once they gained the port's support and the preferred route was decided the Link Road was dropped. This means either it is still being progressed because there is a need for it, in which case why has it been removed

from the LTC project, or HE only ever added it to the scheme to garner support from the port, knowing once confirmed they would drop the Link Rd, which is hardly ethical or professional.

Unless the proposed LTC goes ahead there is nothing for the Tilbury Link Rd to link to, therefore if it is deemed necessary to progress as a link road then it should be part of the proposed LTC scheme.

There is also the factor that if the LTC goes ahead then other roads in the existing road network would need improvements as a direct result of LTC. Again these associated works should be considered in the analysis of the cost of the proposed LTC, anything else would be a false economy.

The cost of healthcare that would be needed as a direct of the LTC, if it goes ahead, should also be included when considering the true cost/affordability and value for money. The LTC would mean more pollution and related illnesses resulting in rising healthcare costs. Also there would be a negative impact on economic benefits, as health issues would also have an impact on people's ability to work.

Due to the poor design and lack of adequate connections there would also be a negative impact on the economy due to the chaos, congestion and pollution that the proposed LTC would create if it goes ahead.

Also the cost of the carbon emissions need to be taken into account for the negative impact they would have on the environment. We understand that new figures for this have just been announced and that this should be taken into account also, and would make a considerable difference, due to the huge estimated carbon emissions.

There is also an associated cost to impacted Local Authorities whilst they deal directly with the LTC consultation and DCO process, and then with the actual construction and operation of the LTC if it goes ahead. Plus the impact the LTC is having on their Local Plans because they cannot proceed with these whilst the outcome of the LTC is unknown, and by the time that is known there will be a considerable increase in costs for everything associated to the Local Plans. All these kind of costs are at the taxpayers' expense.

When it comes to cost to users, there has been no clear information into what the cost to use the LTC would be. Only the suggestion that it would work in a similar way to the current Dartford Crossing.

HE do not seem to be proposing an interchangeable user charge, especially for those entitled to local residents discount. Therefore this would have a negative impact on the cost to users, it would also mean that drivers would need to make a conscious decision as to which route to take when it comes to crossing the river, with cost being a factor. This will most likely result in users taking the cheapest option available. For instance those in Dartford are not going to be inclined to use the LTC regardless of their journey as they would only be entitled to local resident discount on the Dartford Crossing, and vice versa for those in Gravesham etc.

There is also the issue that whilst users in Havering will be negatively impacted by the proposed LTC route, HE are not proposing to give them local residents discount entitlement at all. We understand

that the reasoning behind the local resident discount scheme is supposed to be because of the negative impacts locals suffer due to having a major infrastructure on our doorstep, so all residents should be entitled to local residents discount if they live in close proximity to the LTC. Again this does not make it a fair charge for users.

Conclusion on this point – the LTC would not be affordable or value for money for the government or users. It is a false economy to proceed with the proposed LTC. In fact it would actually be a complete waste of taxpayers' money as it is simply not fit for purpose and shows no evidence of solving the problems at the Dartford Crossing, neither has any evidence been provided as to any economic benefit from LTC.

To achieve value for money

As outlined above not only would the LTC not be affordable to the government and users. We also point out that adequate detail and information relating to the cost of the proposed LTC have not actually been shared.

For instance we have seen no mention of the cost of the proposed LTC in the latest consultation materials, and do not believe the cost is listed on the LTC website.

In addition to this HE refuse to share an estimated figure of the suggested economic benefit of the LTC, if it goes ahead. HE repeatedly state there would an economic benefit but fail and refuse to share the info to back up the claim. If the economic benefit of the proposed LTC is as good as HE suggest surely they would shouting the estimated figure from the rooftops?!

This is another example of how HE fail to share the relevant and adequate information for people to be able to make meaningful comment, since we have not been provided with enough information.

Conclusion to this point – since relevant and adequate info on the cost and alleged economic benefits etc have not been shared there is not any evidence to show that the LTC would achieve value for money. We can only carry out our own research and make our assumptions based on those and the little information that HE have shared. We do not believe that the LTC would be value for money.

To minimise adverse impacts on health and the environment

We have already touched on the adverse impacts on health and environment in response to the objectives on affordability and value for money. But of course it is not purely the financial aspect of the impacts to health and the environment that need to be considered.

Since the proposed LTC would create over 5 million tonnes of carbon emissions we deem this to be extremely harmful and by no stretch of the imagination can it be considered a minimal adverse impact to the environment.

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Yet again HE have failed to share adequate info on the true impacts of the proposed LTC on the environment. Air and noise pollution assessments have not been shared with us or impacted Local Authorities, meaning that we simply do not have a full picture of the impacts of the proposed LTC on such serious aspects as this. We have to make our own assessments based on the info we do have, and that is not in any way favourable. We cannot see how the proposed LTC could be anything other than hugely destructive and harmful.

Conclusion to this point – from the information provided we cannot see that any real attempts are being made to truly minimise adverse impacts to health and the environment. The LTC would create a hugely destructive and harmful toxic triangle.

To relieve the congested Dartford Crossing and approach roads, and improve their performance by providing free-flowing, north-south capacity

HE's own data shows and proves that the Dartford Crossing would still be over capacity from day one even if LTC goes ahead. Currently often around 180,000 vehicles per day, and a predicted 20% traffic growth by the time LTC opens (if it goes ahead) taking it up to 216,000 vehicles per day. Take away the predicted 21% that HE say the LTC would take away from the Dartford Crossing, and **you're still left with 170,640 vehicles per day when the design capacity is 135,000 vehicles per day.**

That figure is still very similar to what we are experiencing and suffering with now. HE go on to state **that it would drop to taking just 14% of traffic by 2044 in opening year (2029/30), so even worse within 15 years of opening, hardly seems value for money at £8.2bn of taxpayers money.**

Since HE are not considering how traffic would migrate between the two crossings, and there wouldn't be adequate connections then we simply cannot see any possible way that the LTC would improve performance at or around the Dartford Crossing, or offer free-flowing north-south capacity.

Conclusion on this point – It is beyond belief that HE make such statements when clearly their own data shows and proves it to be incorrect.

To improve resilience of the Thames crossings and the major road network

As mentioned previously the Dartford Crossing would still be over capacity.

HE also admit in the Operations Updates page 126

'When the project opens some of the traffic that currently crosses the river using the Dartford Crossing is predicted to divert to the Lower Thames Crossing because it would offer a shorter route for their journey. Some of the space this creates at the Dartford Crossing would be taken up by people who were not using it before because they were deterred by high traffic levels and unpredictable journey times'

The Cambridge Dictionary lists the definition of resilience as

‘the quality of being able to return quickly to a previous good condition after problems’

We have problems due to the Dartford Crossing. HE’s data shows that the LTC would not solve those problems, and the statement above far from showing it would improve resilience actually shows that it would also offer no resilience as the problems would remain.

LTC Exec Director Matt Palmer actually recently stated on BBC Essex Radio that the LTC is being created to last at least 30 years. Not long for the amount of money being potentially spent on it. Also showing yet again that it would not improve resilience as he admitted that other infrastructure development would be needed.

Conclusion on this point – Yet another example of HE listing objectives that their own data proves are not possible or correct.

To improve safety

We have covered the important topic of safety further in our consultation response. Put basically due to serious concerns over how dangerous ‘smart’ motorway design and standards are we do not consider the proposed LTC to be safe or that it would improve safety. Far from it! How can you say your objective is to improve safety yet your own data only shows an increase in accidents, but that data shows deaths and serious injuries.

Conclusion to this point - the LTC would not be safe or improve safety.

Overall Conclusion of all objectives

We have covered some of these aspects throughout our consultation response, but our overall conclusion of all objects are as follows:

- The proposed LTC would NOT support sustainable local development and regional economic growth in the medium to long term
- It would NOT be affordable to government and users
- It would NOT achieve value for money
- It would NOT minimise adverse impacts on health and the environment
- It would NOT relieve the congested Dartford Crossing and approach roads, and improve their performance by providing free-flowing, north-south capacity
- It would NOT improve resilience of the Thames crossings and the major road network
- It would NOT improve safety The proposed Lower Thames Crossing is not fit for purpose and should be stopped NOW

Conclusion

The proposed Lower Thames Crossing (and indeed the whole RIS2 programme) is expensive and unaffordable. They would increase traffic, congestion and pollution, making things worse. They would increase carbon emissions at the very time that we should be reducing them as quickly as possible.

Prime Minister, Boris Johnson, has recently spoken on the world stage saying things such as,

“We must show we are capable of learning and maturing and finally taking responsibility for the destruction we are inflicting, not just upon our planet, but upon ourselves”

“I passionately believe that we can do it by making commitments in four areas – coal, cars, cash and trees”

“every other country to follow its lead and commit to net-zero carbon emissions by the middle of the century” and “specific plans to cut emissions... well-before this deadline”

As you will see from our representation we strongly agree that now is the time for our country and the world to step up and take responsibility. We need actions to back up the talk of carbon emissions and taking care of our environment. The environment needs to be put ahead of economic benefit, after all what good is money without a healthy planet to sustain our survival, and clean air to breath?

We feel the Government is currently in the perfect position as hosts of COP26 to show the rest of the world that as a country we are going to back the Government’s words with actions, and put a stop to projects like the proposed Lower Thames Crossing.

Show the world that we mean business when it comes to Climate Emergency and the Environment. Stop the huge amounts of carbon emissions. Clean up the air we breathe. Save and protect our environment, wildlife and habitat. Save and protect our agricultural land and industry, and lead the way in doing all we can to become more self-sufficient as a country and reduce the carbon footprint of our food and drink.

All of this and more is possible by stopping projects like LTC and other RIS2 projects, and instead investing in a greener cleaner future for us all.

We repeat again, at the end of the day evidence shows that the proposed Lower Thames Crossing would be hugely destructive and harmful, and is simply not fit for purpose for so many reasons.

We urge you to remove funding for the proposed Lower Thames Crossing and other RIS2 projects as a matter of urgency in your 2021 Spending Review.