

## THAMES CROSSING ACTION GROUP

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Thames Crossing Action Group represents thousands of people who are opposed to the proposed Lower Thames Crossing. We are people whose homes, land, lives, health, communities, businesses are directly at risk. We are people who believe we should have the right to breathe clean air. We are people who care about wildlife, habitats, our woodlands, greenbelt, waterways, agricultural land, countryside and the environment. We are people who believe that the spending £8.2bn+ of tax payers money on a road project that is hugely destructive, harmful, and simply not fit for purpose is ludicrous and wrong. This response represents all of us as a group, and provides information on why we are strongly opposed to the proposed Lower Thames Crossing.

This response to the Community Impacts Consultation should be considered in addition to our responses to all previous consultations, and should be read in conjunction with those documents. The Statutory Consultation<sup>1</sup>, Supplementary Consultation<sup>2</sup>, and the Design Refinement Consultation<sup>3</sup> – copies of which are linked in the Footnotes.

We would begin by stating that we do not feel this consultation has been adequate, neither do we believe we have been given adequate time to review the consultation materials and respond. These points will be covered further into this response.

We are not ashamed to admit that this is the toughest LTC consultation to respond to to date.

We have done our best to wade through the consultation documents, in order to submit this response, and as a group state here and now, we remain strongly and completely opposed to the proposed Lower Thames Crossing.

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

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<sup>1</sup> TCAG response to LTC Statutory Consultation - [www.thamescrossingactiongroup.com/thames-crossing-action-group-response-to-ltc-consultation/](http://www.thamescrossingactiongroup.com/thames-crossing-action-group-response-to-ltc-consultation/)

<sup>2</sup> TCAG response to LTC Supplementary Consultation - [www.thamescrossingactiongroup.com/wp-content/uploads/2020/04/TCAG-Supplementary-Consultation-Response-Spring-2020.pdf](http://www.thamescrossingactiongroup.com/wp-content/uploads/2020/04/TCAG-Supplementary-Consultation-Response-Spring-2020.pdf)

<sup>3</sup> TCAG response to LTC Design Refinement Consultation - <https://www.thamescrossingactiongroup.com/wp-content/uploads/2020/08/TCAG-Design-Refinement-Consultation-Response-Summer-2020.pdf>

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# Objectives of the LTC

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In the Guide to Community Impacts Consultation, you 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 you 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 you attempt to make out then surely you would be shouting the figure from the rooftops.

**Conclusion on this point – The proposed LTC would not support sustainable local development, and since you 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 not 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 you 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.

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.

**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 will cover the important topic of safety further into this 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 will cover 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**

**We strongly oppose the LTC on the grounds it is not fit for purpose and would not meet the project objectives.**



# LTC legacy and benefits

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In the same document you list the LTC legacy and benefits as including:

- Bringing people closer to jobs, and businesses closer to their customers and suppliers
- Involving 22,000 people with the project during construction including hundreds of apprentices and graduates
- Offering free training for businesses to give them the skills needed to work on this project, and the many schemes in their area and across the UK
- Enhancing habitats for wildlife
- Creating a network of green spaces that leave a lasting legacy for local communities
- Two new landscaped parks, one each side of the river by the LTC tunnel entrances, giving local communities panoramic views of the Thames
- Replanting six square metres of new woodland for every square metre of Ancient Woodland lost
- Creating 46km of new, realigned or improved footpaths, cycleways and bridleways
- Building seven green bridges that would connect new pathways.

You would not bring people closer to jobs, businesses closer to their customers and suppliers. As already highlighted the LTC would not solve the problems, and would bring it's own set of problems too, adding to the chaos, congestion and pollution.

We note that you have changed the wording on the detail about 22,000 people being involved in the project during construction, as opposed to 22,000 jobs, which was misleading.

There is absolutely no way you would be enhancing habitats for wildlife. How on earth do you come up with such nonsense? How can building a hugely destructive and harmful road project enhance habitat for wildlife? You would be destroying and impacting habitat with the entire route, fact.

Again, are you serious, you would be wiping out huge amounts of greenbelt, woodlands including ancient woodland, countryside, and so much more with a huge and harmful road project.

The only legacy you would be leaving local communities is one of harm and destruction, more congestion, more pollution, less wildlife and habitat, and over 5 million tonnes of carbon emissions.

For two new landscaped parks, read two dumping grounds for spoil from tunnelling that would create flood issues and negatively impact the area, wildlife and habitat that exists in said habitat now. Low lying marshes and flood plain habitats are not going to be the same as high landform habitats.

You simply cannot replant ancient woodland, once it is gone it is gone. You're not even willing to acknowledge The Wilderness as ancient woodland despite evidence, you've not even bothered to research it properly. We suppose it is easier for you to deny that you are prepared to destroy ancient woodland to avoid a landfill site. We also have serious concerns about what surveys have been done in regard to tree and hedgerows and whether the surveys are accurate.

We do not trust your claims about the amount of PROWs, as we know that some you claim to be new are existing. You are simply attempting to try and tick a box and make the project look better than it actually would be in reality.

What you consider to be 'green' bridges is not what most of the public expect from a green bridge. We are also aware that it will be down to the contractor to decide exactly what the green bridges will end up being, and we have no doubt that they will just do the bare minimum and whack something in there as cheaply as possible. We also know that at least one of the 'green' bridges can't even have adequate planting because of safety concerns with visibility issues for road users.

**We strongly oppose the LTC on the grounds it would not meet the legacy and benefits aims**

# The Dartford Crossing

The original reason it was decided that there was a need for another crossing was due to the problems we all suffer with due to the Dartford Crossing.

All too often there are serious issues, for various reasons relating to the Dartford Crossing and surrounding areas.

## **Would still be over capacity even with LTC**

Considering the original task given for a new crossing project was to solve the problems we all suffer with due to the Dartford Crossing, it is questionable to say the least that HE are not required to actually provide the data to show what the figures would be if the LTC goes ahead, in a clear and informative way, instead of having to hunt down the figures buried within the details of pages and pages of documentation and work it out for yourself.

HE state that the Dartford Crossing is often at 180,000 vehicles per day.

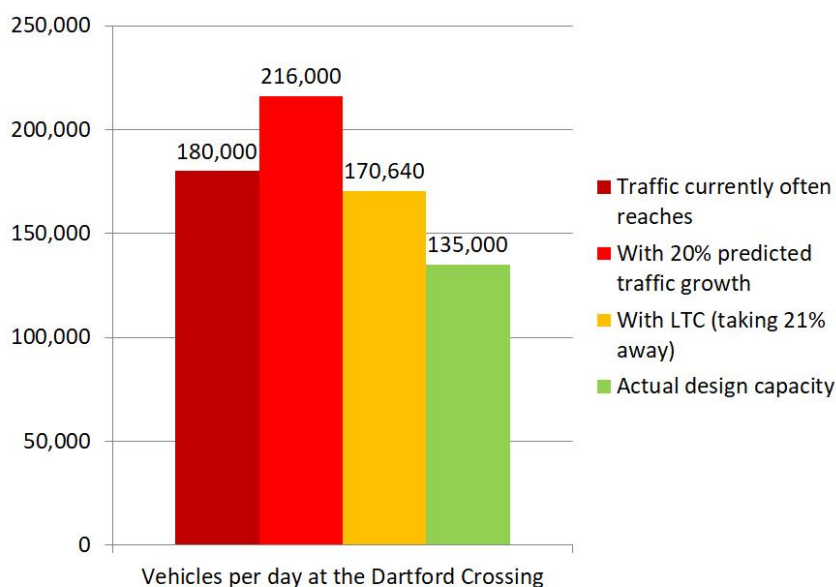
The predicted traffic growth by the time LTC opens is around 20%

This brings the predicted figure of how much traffic is expected to be using the Dartford Crossing at the time the LTC opens to be around 216,000 vehicles per day.

HE predicts that LTC would take 21% of traffic away from the Dartford Crossing, which would mean there would still be 170,640 vehicles per day at the Dartford Crossing.

The Dartford Crossing has a design capacity of 135,000 vehicles per day.

What's more HE predict that the 21% reduction would drop to just 14% by 2044, just 15 years after it opens, making the situation even worse.



Again you 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’*

So the figures clearly show that the Dartford Crossing would remain over capacity, we’d all still be suffering with the same issues, and incidents are likely to remain at a similar level causing further negative impacts.

It is of great concern that HE are not considering how traffic would migrate between the two crossings, if LTC goes ahead, as clearly there would not be adequate connections.

**We strongly oppose the LTC on the grounds it would not solve the problems we all suffer due to the Dartford Crossing, and would add to the problems creating more chaos, congestion and pollution**

# Lack of adequate connections

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There is absolutely no doubt in our minds, and the evidence is there to back up the simple fact that there would not be adequate connections if the proposed LTC goes ahead.

## **Stanford Detour and A13 bottleneck**

Much traffic would need to take what is now known as the Stanford Detour. Along the A13 eastbound up and around the traffic lighted roundabout (alongside DP World and London Gateway and other traffic), back westbound on the A13 until just past the Orsett/A128 junction on the A13 to the new joint LTC/A1089(south) slip road.

This would add traffic to an already very busy section of road. This section of road is also being widened by Thurrock Council, with part funding from DP World to ensure three lanes all the way in both directions from the M25 through to the Stanford junction on the A13. Yet if LTC goes ahead sections in each direction would be reduced back to two lanes. This bottleneck would then create yet more congestion and pollution and impact the area further.

## **A2/M2**

Firstly, we would comment that this is a seriously large and complex junction. We do not feel that HE have put adequate info into sharing info about this proposed junction with the public. Many are still unable to fully understand the possible movements at and around this junction due to its complexity.

After much studying, quizzing of HE materials, and sharing of info between many different people, our understanding of the LTC around the A2/M2 and other local roads that would form or connect as part of this junction is as follows.

If the LTC goes ahead then the A2 coast bound would drop to just 2 lanes for a section coast bound near Nells Cafe.

This screen capture was taken from the LTC interactive map.

## **From left to right**

The yellow marker shows where the lane markings separate the road with just 2 lanes to the right for the A2, and the 2 lanes to the left for local access and LTC access routes.

The red marker is where the A2 would become just 2 lanes. The orange marker shows where the A2 becomes 3 lanes, and the green marker where the A2 would be back up to 4 lanes.



### London bound on the A2

This screen capture was taken from the LTC interactive map.

### From right to left

The yellow marker shows where the lane markings separate the road with just 2 lanes to the right for the A2, and the 2 lanes to the left for LTC access route

The red marker shows where the A2 drops to 2 lanes. The orange markers highlights where A2 goes to 3 lanes. And the green marker is where the A2 would again be 4 lanes.





None of the above seems to suggest that traffic would flow smoothly at the best of times, let alone when there are incidents.

### A2 to LTC bottleneck

In addition to less lanes on the actual A2 there is also another bottleneck for traffic coming coast bound on the A2 to get onto the LTC. There would be just one single lane connecting from the A2 onto the LTC. Imagine roads when there's an incident at Dartford Crossing and traffic needs to migrate to LTC, all having to go through that single lane to get onto the LTC!!

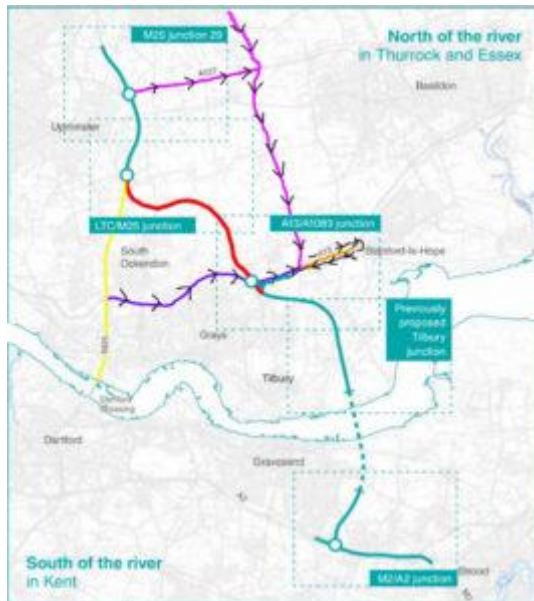
This screen capture was taken from the LTC interactive map. We've highlighted the section in question with a blue marker at each end of the single lane section to help you find it (as it's a complicated junction). Click through and zoom in and take a look!



### **M25/LTC bottleneck**

The fact that if the LTC goes ahead the M25 would be five lanes in the vicinity of its connection to the LTC, means you are creating a horrendous bottleneck, since the LTC southbound would be two lanes from the M25 through to past the A13.

Whilst HE state that this is all that is needed, you are not taking into account how traffic would migrate between the two crossings when there are incidents, which is when this will become chaos central.



Traffic would be bottlenecked trying to get from the M25 onto the LTC southbound.

Remembering that there would be no direct access for traffic trying to migrate via the A13 eastbound onto the LTC from the M25 too, without taking the Stanford Detour, this would add to the problems.

Traffic would not be able to directly access the LTC south by cutting off the M25 earlier at junction 29 and cutting along the A127 and down the A128, as that too would need to take the Stanford Detour. Similarly traffic attempting to cut off at Junction 28 and cut through Brentwood and then down via the A128 to Orsett would have to take the Stanford Detour.

Whilst all these issues would exist it wouldn't stop people attempting to take these routes, and the result would be absolute chaos.

### **Incidents and migration routes**

These are some scenarios and concerns we have identified if the LTC were to go ahead

#### **When there's an incident at the Dartford Tunnels**

If traffic comes off the M25 onto the A2 coast bound in an attempt to get onto the LTC there would be just one single lane from the A2 coast bound onto the LTC.



Or maybe traffic would come off the M25 earlier at junction 3 onto the M20, down to the A227 or A228 to cut through to the A2/M2, and then try to get onto the LTC that way.

How long do you think it would take for traffic to start trying to cut through by any route it can either to try and access the LTC, or start heading westbound into London to use a different crossing, as it does now?

### **When there's an incident at the QE2 Bridge**

If traffic were to come off the M25 onto the A13 eastbound (junction 30), it would have to go all the way down to the Stanford (1014) junction. Then up and around the traffic lighted roundabout. Remembering this junction is used by the likes of DP World and London Gateway so already a busy junction. Then back westbound on the A13 until just past the Orsett (A128) junction, to the new joint LTC (both directions)/A1089(southbound) junction. Note neither the LTC nor the A1089(south) is accessible from the Orsett junction. This has now been dubbed the Stanford Detour.

If instead it attempts to come off the M25 directly onto the LTC, the M25 at this point would be 5 lanes of traffic, and the LTC southbound (between the M25 until just past the A13) is just 2 lanes of traffic.

When that all starts to back up, if traffic instead tried to come off the M25 onto the A127 (junction 29) to cut down the A128 in an attempt to reach the LTC it would need to take the Stanford Detour, because remember there is no access to the LTC from the Orsett/A128 junction.

Alternatively, traffic could also very likely start heading into London on the various routes it currently does when there are incidents.

### **When there's an incident on the LTC between the M25 and A13 (for traffic travelling southbound)**

#### **For traffic travelling southbound**

If traffic continues southbound down the M25 it would then either take the Dartford Crossing, which would still be over capacity. Or it would take the A13 eastbound, again having to take the Stanford Detour as outlined previously.

Alternatively, some traffic may think it can come off the M25 at junction 29 onto the A127 to cut down the A128. But of course yet again it would need to take the Stanford Detour to get back onto the LTC to cross the river.

#### **For traffic travelling northbound**

If traffic came through the LTC tunnels heading northbound and then could not continue on the LTC past the A13, it would have to come off the LTC at the A13, but have to head east. Traffic would either then come along the slip road from the LTC up to the Orsett Cock roundabout, round the roundabout and then back westbound along the A13 to the M25. Or possibly try cutting up the A128 (or via local roads) to the A127 and onwards either back to the M25 or other routes. Or as traffic starts to build, which wouldn't take long, it may try to use the Stanford Detour rather than sitting waiting to get round the Orsett Cock roundabout.

### **When there's an incident on the LTC between the A13 and the A2/M2 (inc tunnels) – southbound**

If traffic has left the M25 onto the LTC southbound and then faces an incident on the LTC south of the A13, it would need to come off the LTC on the slip road to the A13 where via the connecting slip road it would have to go around the Orsett Cock roundabout, to head back west on the A13 to get back on the M25. Again when the traffic is queuing to get around the Orsett Cock roundabout, traffic is also likely to use the slip road from the LTC onto the A13 eastbound to take the Stanford Detour to turn around and head back westbound on the A13 to the M25, and/or use other local roads to cut through wherever they can to get to their destination.

### **Public transport connections**

If the LTC goes ahead, the lack of adequate connections would also mean that it would not be viable for bus companies to start bus routes across the LTC.

Without the adequate connectivity for buses, HE are simply encouraging more and more cars onto the roads to add to the congestion and pollution issues.

We feel that all new roads should have to take into account public transport access and be inclusive.

### **Conclusion on lack of adequate connections**

He have not given connections adequate consideration or care, and the results if LTC goes ahead would be horrendous.

The lack of connections that would force the use of the Stanford Detour under normal circumstances are bad enough, but when there are incidents the lack of adequate connections would be a nightmare.

You say that you don't have to take migration/incidents into account, yet any company worth it's salt would easily spot such problems and would step up and at very least point the severity of the issues out to those they work for and are presenting to about such a project.

Yet HE fail to identify it as a problem, and simply do not care or take enough pride in their own work or have any duty of care not only to road users, but also to tax payers whose money you would be spending on this not fit for purpose project.

We believe that it suits HE's own agenda to future proof your own jobs by creating and building in problems that will need fixing at a later date.

**We strongly oppose the LTC on the grounds it would not have adequate connections, which would result in more chaos, congestion and pollution. It is not fit for purpose**

# Traffic modelling concerns

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We have serious concerns about the traffic modelling used for LTC.

We do not feel it is acceptable that the very data that represents the problems that HE have been tasked with solving are removed from the traffic modelling data.

The data that is being used is out of date and doesn't give a true representation of the traffic.

We have serious concerns about whether HE are actually taking all the necessary aspects into account with future planned development for Local Plans in impacted and surrounding areas.

It is ludicrous that HE are not taking traffic data for the proposed London Resort theme park into account in their planning of the proposed LTC.

Such a huge project should be taken into account. The proposed theme park would be in between the Dartford Crossing and the LTC if it goes ahead. This area is already badly congested and polluted, so this would add to the problems and impact both the Dartford Crossing, and the LTC if it goes ahead.

The London Resort are proposing large numbers of vehicles and parking facilities both sides of the river.

The proposed theme park parking facility to the north of the river in the Tilbury area would be accessible to drivers via the A1089. We know that accessing the A1089 southbound as traffic for the theme park parking facilities would need to do, is not a straight forward move from the LTC or the Orsett/A128 junction on the A13.

The fact HE are not taking into account such a considerable traffic impact for such a huge project like the London Resort is unbelievable. This cannot be considered adequate, and we have serious concerns firstly about the implications of not including the associated traffic data. But also in the lack of sense and professional adequate behaviour from HE by the omission of this very relevant data.

**We strongly oppose the LTC on the grounds we do not feel that the traffic modelling is up to date or a realistic representation of the actual traffic and traffic related problems we experience on a daily basis**

# Safety concerns

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We have serious concerns about safety in regard to the proposed LTC.

We recognise that HE have chosen to refer to the LTC as an all-purpose trunk road, and not a motorway as you used to describe it. However, you are still proposing to build the LTC to 'smart' motorway standards with 'smart' technology, if LTC goes ahead.

We do not believe there is anything smart about 'smart' motorways and 'smart' motorway technology.

'Smart' motorways were introduced in the United Kingdom in 2006 with experiments on the M42. This led to then Transport Minister, Sir Mike Penning MP to sign off on the roll out of the 'smart' motorway programme in 2010. However, he has stated publicly, and notably on the BBCs 'Panorama – Britain's Killer Motorways' when it first aired in Jan 2020 that what he signed off on was not what Highways England delivered.

The distance between Emergency Refuge Areas at the time he signed it off was on average 600 metres, yet what was delivered was anything up to 2.5 miles apart. How have Highways England been allowed to get away with this?

We'd also like to point out that 'smart' motorways have been introduced under stealth. The public were not consulted on the introduction of 'smart' motorways until long after they had been introduced.

People do not feel safe on 'smart' motorways, and as a result are more likely to use other roads instead, so the traffic issues just get distributed onto other local roads. So in many instances the congestion issues are instead expanded to other local roads, as a means to avoid the dangers of 'smart' motorways.

Not only can the distance between Emergency Refuge Areas be too far, the actual ERAs can also be too short. For example 16 of the 20 ERAs installed as part of the M1 junctions 28-31 scheme measure less than 100m.<sup>4</sup>

We would also point out that ERAs are even harder to locate/identify if needed on unlit sections of 'smart' motorways, adding to the level of concern over accessibility of ERAs.

When an incident occurs it is not always possible to find a safe refuge area, barriers with walls behind, on bridges/viaducts etc, where there is nowhere to escape from the extreme levels of risk.

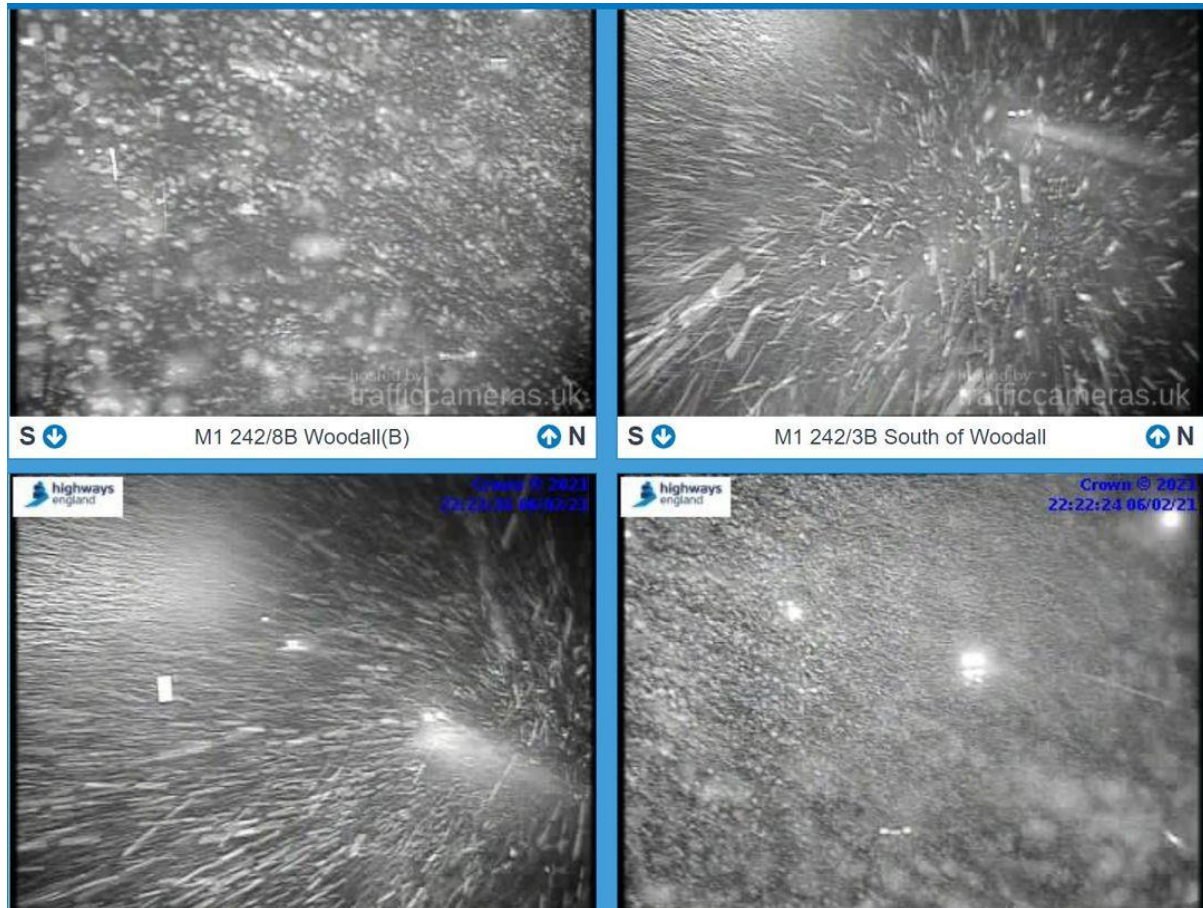
Road signage for 'smart' motorways is often unreliable, takes too long to be turned on. As a result it is not trusted by the public because it is so often wrong. It's like the boy who cried wolf, you can never trust whether the info being displayed is accurate or not, due to HE's failures.

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<sup>4</sup> <https://www.newcivilengineer.com/latest/majority-of-refuge-areas-on-stretch-of-m1-smart-motorway-shorter-than-advised-length-29-03-2021/>

Stop vehicle detection and safety cameras are often either not installed or not working. Even when working they are often not being monitored efficiently. Weather such as fog, snow, rain etc mean the views from the safety cameras make it impossible to see the road/breakdowns etc.

For example:



HE's own reports state that on average it takes 17 mins to spot vehicles in need of assistance, then 3 mins to activate the overhead signs to close the lane, and a further 17 mins to get to the vehicle to assist. In total an average of over 30 mins where the lives of those in the vehicle is at extreme risk.

Recovery companies including the AA state that 'smart' motorways are not fit for purpose. Indeed it is reported that they do not allow their recovery patrol to assist a vehicle on a 'smart' motorway, due to the extreme risk. Instead they wait for HE to recover the vehicle and bring it to them in a safer area to offer assistance.

Emergency services, including the police, have voiced serious concerns over how dangerous 'smart' motorways are too, and calling for them to be scrapped.<sup>5</sup>

<sup>5</sup> <https://www.lbc.co.uk/news/dangerous-smart-motorway-scrapped-serious-crash-police-boss/>

Electric Vehicles will only add to the problem and dangers, as they can breakdown/lose power suddenly, can need a flatbed rather than be towed. Roadside recovery has to take extra safety precautions when attending an EV as being electric there is a risk of the vehicles being live, ie electric shock. As well as the most obvious health and safety issues with this, it also means longer time at risk on the roadside during recovery.

Removing hard shoulders just spreads the congestion width ways instead of length ways along the motorway, with the added danger due to loss of safe refuge of the hard shoulder. Building roads and more lanes hardly ever solves the issue of congestion. More joined up thinking is needed to improve public transport (make it more reliable, affordable, safer etc), and putting more freight onto trains, and overall encouraging people to support local rather than everything being shipped around on roads all the time.

A lot of congestion on roads is also down to badly designed roads, junctions, and planning, and poorly maintained and managed roads, normally due to HE's inefficiencies. Incidents and accidents occurring due to potholes, bad road surface. Take the junction 1a on the M25 and the negative impacts that has on traffic flow both on the M25, the A282(Dartford Crossing section), and local roads. A junction too close to the Dartford Tunnel portals, issues of traffic lane changing, and a lot of traffic in the area. So a poorly designed junction by HE, with the added issues of permission being granted for development that generates yet more traffic in an area already suffering with severe congestion and pollution issues. During HE's work on developing the proposed Lower Thames Crossing at one point they were including a Rest/Service Area off the Tilbury junction that would have again been very close to the LTC tunnel portals, as if they've learnt nothing from the mistakes that have already been made at the Dartford Crossing.

'New and lane conversions to 'smart' motorways should not continue, especially whilst there are investigations going on. If any other business had a product or service that was being investigated due to fatalities of users they would not be allowed to continue with business as usual, the same should be compulsory with regard to 'smart' motorways. It is despicable that more isn't being done and quicker. Immediate action is needed, as more lives are being lost, and people being seriously injured while investigations and discussion take place.

On the topic of new and lane conversions of 'smart' motorways it should also be noted that environmental impacts such as carbon emissions are not being taken into account, proven at recent 'consultation' where HE seemed surprised by people asking for such info.

Highways England are being ignorant and arrogant with regard to 'smart' motorways. HE try to put the blame on drivers alone, and take no responsibility for their own actions and bad planning and handling of 'smart' motorways. Their latest 'smart' motorways advertising campaign being another prime example. It is horrendously insensitive to victims' loved ones. The way HE have attempted make light of such a serious topic is despicable. Some who have lost loved ones in tragic circumstances on 'smart' motorways know that their loved one experienced windscreen impact and are now faced with witnessing this advert with two bugs squashed on a windscreen, singing a song. How can this be deemed acceptable that a Government company behave in such an appalling way?



Aside from that very important aspect, what if you can't 'go left' as the ad suggests? It doesn't make it clear what to do when you can't 'go left' or there is no ERA. The ad again suggests it will be the driver's fault that they have an issue, which is not always the case. It shows the incident happening right near to an ERA with easy access, plenty of space and a good area to get behind a barrier after exiting the car. This is not a true representation of a 'smart' motorway and what people face in real life or death situations on 'smart' motorways. No mention of calling 999, despite the fact it is most definitely an emergency.

Coroners have ruled how dangerous 'smart' motorways are and called for the Crown Prosecution to consider Corporate Manslaughter charges. We like "Smart Motorways Kill" strongly believe that Highways England should be legally held accountable for 'smart' motorways on grounds of corporate manslaughter, and that legal action is needed.<sup>6</sup>

Coverage of the coroner's verdict in Feb 2021 quoted that representing Highways England, Nicholas Chapman said that on the issue of corporate manslaughter Highways England owes "no general common law duty to road users"<sup>78</sup>

Just a few months earlier in Nov 2020 another HE representative, Lower Thames Crossing Tunnels & Systems Director Keith Bowers was quoted (in relation to an article about the LTC) as saying: "This contract is unparalleled in its ambition, and we need the right partner to match that ambition." and "From our bidders we're looking for outstanding construction, health, safety and wellbeing performance. We have committed to need our contractors' design and delivery to meet that target for our road users and workers."<sup>9</sup>

We noted that this contradicts the amounts of predicted deaths and serious injuries on LTC that HE predict in the Appraisal Summary Table we recently obtained under FOI which states " There are forecast to be 2,147 additional accidents over 60 years, including 26 fatalities, 220 serious injuries and 3,122 slight injuries"<sup>10</sup>

This also highlights that Highways England pick and choose when and how they like to represent themselves in regards to duty of care to road users.

We are also very aware that Irwin Mitchell solicitors commissioned a report by transport planning specialists, Royal HaskoningDHV who found all lane running motorways had the "lowest level of intrinsic safety" when compared to any other form of motorway.<sup>11</sup>

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<sup>6</sup> <https://www.crowdjustice.com/case/smart-motorway-jr/>

<sup>7</sup> <https://smartmotorwayskill.co.uk/wp-content/uploads/2021/04/Independent-Review-of-All-Lane-Running.pdf>

<sup>8</sup> <https://www.newcivilengineer.com/latest/highways-england-referred-to-cps-for-manslaughter-11-02-2021/>

<sup>9</sup> <https://www.newcivilengineer.com/latest/exclusive-lower-thames-crossing-2bn-tunnelling-contract-goes-out-to-tender-11-11-2020/>

<sup>10</sup> [https://www.whatdotheyknow.com/request/lower\\_thames\\_crossing\\_appraisal#incoming-1724841](https://www.whatdotheyknow.com/request/lower_thames_crossing_appraisal#incoming-1724841)

<sup>11</sup> <https://www.itv.com/news/meridian/2021-04-06/highways-england-threatened-with-legal-action-over-smart-motorways>

In direct relation to the proposed Lower Thames Crossing, we have struggled to get information out of Highways England/Lower Thames Crossing regarding road safety and details of the 'smart' motorway aspects and ERAs of the LTC

We finally managed to get this response: "Please see a table below for the Emergency Area (EA) spacing on the LTC mainline. Emergency areas along LTC are spaced at a maximum of 1.6km, in line with current standards, this equates to 22 in total on the mainline. Slip roads with an EA are, A13 westbound to LTC southbound, LTC northbound to A13 eastbound, LTC southbound to A13 eastbound, and the A13 westbound to LTC northbound. The exact locations are subject to change during detailed design."

Northbound LTC EA locations		Notes Chainage 0 is within junction, mainline commences at 1+011 Tunnel is managed with technology  Through A13 Junction hard shoulder is provided
Center of EA chainage	Distance (m)	
1+565	554	
7+025	5460	
8+417	1392	
9+411	994	
10+220	809	
11+133	913	
12+700	1567	
15+420	2720	
16+748	1328	
17+849	1101	
19+132	1283	
20+480	1348	
Southbound LTC EA locations		Notes Chainage 0 is within junction, mainline commences at 1+011 Tunnel is managed with technology  Through A13 Junction hard shoulder is provided
Center of EA chainage	Distance (m)	
1+800	789	
7+435	5635	
8+934	1499	
10+424	1490	
11+460	1036	
15+390	3930	
16+740	1350	
17+851	1111	
19+170	1319	
20+600	1430	

When you consider the fact that Sir Mike Penning has publicly stated that the length between ERAs that was the basis for signing off on 'smart' motorways was an average of 600m to the lengths between the proposed ERA's for the LTC we hope it is more than obvious why we have such serious concerns over the 'smart' motorway aspect of the LTC.

We also draw your attention to the fact that the proposed LTC southbound between the M25 and A13 would be just 2 lanes (not 3 as along the rest of the proposed route) and that the majority of that 2 lane section being designed to 'smart' motorway standards doesn't have a hard shoulder. This section of the route passes over fenland with long sections of viaducts. This of course is also a matter of serious concern.

On top of that it should be considered that Highways England are not considering or planning how traffic would migrate between the two river crossings (if LTC goes ahead) when there are incidents,



and that there are not adequate connections. If for example the incident was at the QE2 bridge and traffic wishes to migrate to the LTC, it has two options.

The first to take the A13 Eastbound, but as there is no direct access onto the LTC it would have to go all the way down to the Stanford junction on the A13, up and around a traffic lighted roundabout, alongside DP World, Thames Gateway, and other traffic, then back down onto the Westbound A13 back until just past the Orsett/A128 junction to access the LTC via the new joint LTC/A0189(south) slip road, quite the detour.

Alternatively, traffic could access the LTC directly from the M25. However at this point the M25 would be 5 lanes of traffic, and the LTC south is just 2 lanes all the way until past the A13, with the majority of that being without hard shoulder. Imagine the chaos with all that traffic and the likelihood therefore of a further accident/incident on that section of 2 lanes of the LTC. Another example of HE's lack of adequate planning and design.

The proposed LTC would have large and complex junctions which would need a considerable amount of signage to direct people, and also to include the relevant signage to inform of the user charges. With so much signage in use and such complex junctions it would likely add to the likelihood of accidents and risk to users. Then as we all know when there is an accident/incident others usually follow because of the congestion and some drivers getting frustrated and impatient..

All these points should give a clear and definite picture of why we have such serious concerns over the 'smart' motorway aspect of the proposed Lower Thames Crossing, and of 'smart' motorways in general.

And yes we are purposely using speech marks throughout this paper around the word smart when referring to 'smart' motorways, as we in no way consider there to be anything smart about 'smart' motorways.

We do also have concerns about safety with regard to construction of the proposed LTC if it goes ahead, which we have detailed in the construction section of this response.

**We strongly oppose the LTC on safety grounds, and have serious concerns about just how dangerous it would be**

# Health impacts

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If the proposed LTC goes ahead the impacts to our health would be horrendous. In fact the impacts to our health from the LTC are already being felt at this stage. The stress levels from having to deal with the proposed LTC and Highways England are already very high.

## **Stress and well-being**

We do not believe that HE truly realise or care about the amount of pressure and stress they are putting on everyone. We as a group are doing our best to try and help those who are in some extremely stressful situations having to deal with HE and the threat of the proposed LTC.

As a group we too are under a huge amount of pressure and stress due to HE and the LTC. HE don't care that we sometimes find ourselves in unthinkable situations, such as being on the other end of a phone of someone who is literally suicidal, sitting with a knife in their hands on the kitchen floor telling us they don't know what they're doing.

Or trying to support families whose homes and businesses are at risk of being lost if the LTC goes ahead. Those living with the constant issues and reminder of the threat of LTC as they have LTC investigative works on or very near to their homes, including young children.

Those dealing with all the stress and inadequacies of LTC investigative works on a regular basis.

Or those that are struggling to deal with HE because of you lack of duty of care to us, trying to pick up the pieces and help get to the bottom of the mess HE make when sending letters to residents that are either stressful, have errors in, or have even been incorrectly sent.

The list goes on and on, but HE apparently don't care, you show no real acknowledgement of the problems and stress you are causing to us all.

## **Air pollution**

If the LTC goes ahead there is no doubt in our minds that evidence shows the air pollution would not magically improve as HE try to suggest.

It is unacceptable and a serious concern that HE have attempted to mislead people into believing that if the LTC goes ahead that air quality would improve across the region.

On the front page on your LTC consultation website stating things like that, when if you dig deeper in the detail you soon realise that this is not the case and that air quality would worsen in many areas.

Even in some of the areas HE suggest it would improve it is misleading. For example showing that air quality would improve at the Dartford Crossing, when your own data shows that the traffic levels would remain very similar to what they are now. If the traffic remains, the congestion remains, and the pollution remains.

You will not be considering or including the levels of pollution that we would suffer from all the traffic trying to migrate between the two crossings when there are incidents, if LTC goes ahead, due to the lack of adequate connections.

We cannot believe that you wouldn't have proper ventilation and filtration in the tunnels. To say that traffic will naturally push the air through the tunnels is unbelievable for a project of this size. There has been no clarity on when the fans mentioned at LTC Task Force would be switched on, as it would need to be before traffic became stationary.

You have the opportunity if LTC goes ahead to actually try to do something to improve air quality by putting some filtration in, yet you are choosing not to.

You also say that pollution would disperse. We would like to know how and where, because that is just like when people say they are throwing their rubbish away. There is no away, it has to go somewhere.

### **PM2.5**

Evidence shows that the whole LTC route would fail against World Health Organization standards for PM2.5.

HE fail to provide any detail at all on PM2.5 in the consultation materials, which is questionable since PM2.5 is so harmful.

We know that the Mayor of London has committed London to comply with WHO standards for PM2.5 by 2030. We bring to HE's attention again the fact that the northern section of the LTC would be in the London Borough of Havering.

We are also aware that the Lords have recently voted for the Environment Bill to include World Health Organization guidelines for PM2.5 to be met by 2030.

You estimate that if the LTC gets the go ahead that it would open in 2029/30, so it is extremely concerning that you seem to be burying your head in the sand on the matter of PM2.5.

This is a very serious issue as PM2.5 are tiny enough to get into the bloodstream and are very dangerous.

### **Electric vehicles**

EVs are not the panacea that HE and some like to believe and make out. There are many different reasons why we question EVs are being a solution, but we will stick to a few of the main factors for now in this response.

EVs still emit PM2.5, in fact some emit more because of the extra weight from the batteries, meaning more brake dust, tyre and road wear.

There is also the factor that EVs will not solve the issue of congestion. In fact if people believe that EVs are greener and cleaner they may be more inclined to use their vehicles even more, meaning more traffic on the roads and more congestion.

There is also the factor of breakdown issues when EVs break down as they have to be handled differently. Plus the added risk of EVs having issues on roads with no hard shoulder and 'smart' motorway standards. EVs can just stop suddenly without ability to get to safety. If an EV runs out of power there is no quick and easy way to top it up, like you can with a fuel container for a car that's

run out of fuel. These factors will again add to the congestion issues on roads, because it would take longer to deal with such incidents with EVs.

### **Noise Pollution**

We do not feel that the proposed noise barriers would be adequate, and we feel there are areas that would suffer from noise pollution that are not being identified. Sound would carry across the marshes and fens and open fields, and we do not feel that has been taken into account adequately.

We are also very worried that there is no clear indication of exactly how or what materials noise barriers would be made of. HE state that it would be up to contractors to decide, this leads to the question as to what is to stop them simply opting for the easiest and cheapest options to suit their own needs and benefits? We feel that more detail is needed and that safeguards should be put in place to ensure that adequate noise barriers would be put in, if the LTC goes ahead.

We have serious concerns about noise pollution both during construction and once operational if LTC goes ahead.

We note that in the Ward Impact Summaries it says that no essential mitigation is required for health though there are recognised health issues. This is totally unacceptable.

### **Light pollution**

We do not feel that adequate info has been shared regarding lighting for the LTC. The only detail that has been shared has been hidden away on general arrangement maps, with tiny dots that are hard to pick out and spot.

There has not been enough info and detail provided within the consultation materials, and there is no signposting that we have seen within the documents to even direct people to the right map/map layer to find the very limited info that is available on the maps.

We have concerns on the negative impact of LTC lighting, not only for the impacts to people, but also to wildlife.

We would point out that whilst HE are saying lighting should be limited to areas of the portals and junctions, having such a huge road project cutting through the countryside and greenbelt would bring light pollution from vehicles regardless of whether there is also street lighting or not. This would have a negative impact on wildlife and nature.

So much wildlife would be impacted and their habitat, homes, and territorial areas lost and impacted. Even whilst trying to survive with whatever they are left with, if LTC goes ahead, they would also have the added impacts of the light, noise, and air pollution to contend with too.

For humans it is known that light pollution can negatively impact sleep and circadian rhythm which in turn negatively impacts our health and well-being. There would also be impacts to stress levels of light drawing attention to the fact the LTC is being built during construction, emphasizing the stress of its impact to people's lives. There would be no escape for some with noise and works during the day and even if the works are not being carried out through the night, the security lights would be on, meaning no escape for residents nearby. Plus of course we know that the construction is not limited to daylight hours.

### **Pollution monitoring**

We are horrified and disgusted that HE have said that whilst air and noise pollution would be monitored during construction, they plan to remove air and noise monitors once construction is complete. We are seriously concerned that you would not be monitoring air and noise pollution ongoing once the road is open, if it goes ahead. This is unacceptable. If the road goes ahead it needs to be compulsory that air and noise pollution is monitored ongoing extensively along and surrounding the LTC route. Not only that, as well as monitoring those levels, we need confirmation of what safeguards would be in place to ensure that any necessary action could be taken if those levels are too high, and dealt with as matters of urgency.

### **Health and Equalities Impact Assessment**

Whilst we understand that HE do not have to do an HEqIA we appreciate that after pressure from all the impacted and surrounding Local Authorities and others you have agreed to produce one. However we have serious concerns that progress has been so slow. Our Local Authorities need, and we need to know that full and adequate assessment has taken place in regard to this kind of assessment. This is our lives and health we are talking about, it must be taken seriously. There is no doubt in our minds that the proposed LTC would have a huge negative impact to our lives and health. We need and deserve better.

### **Cost of health impacts**

We know that as well as the direct negative impact to our lives and health, there would also be associated costs for healthcare relating directly to illness caused or made worse by the pollution and stress caused by the LTC.

There would be associated costs in impacts to workers, businesses, and healthcare due to health impacts. There would be people who become too sick to work, need time off due to air pollution related illness etc. Evidence is coming out that those in high pollution areas also are more likely to suffer worse from COVID19. Again this adds to the risk and potential associated costs of pollution from LTC if it goes ahead.

In the Decarbonising Transport A Better, Greener Britain document with the Foreword from the Rt Hon Grant Shapps MP, Secretary of State for Transport he states:

*“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.”*

In the Summary of commitments in the same document it states that *“We will embed transport decarbonisation principles in spatial planning and across transport policymaking.”*

*“We have launched a new annual statistical release and guidance about transport’s impact on the environment and support its use by third parties”*

And,

***“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.”*** - Associations of long-term average concentrations of nitrogen dioxide with mortality. A report by the Committee on the Medical Effects of Air Pollutants (Dated 2018)

These figures are clearly high, but is not just the financial costs due to the negative health impacts. We know that people are paying the cost with their lives. We have seen the traffic cases of those who have lost their lives and loved ones. We do not want people in our communities to be the next to suffer such tragedy. The financial cost is bad enough, but the cost of lives lost is unacceptable, especially when there is so much evidence of the health risk when it comes to pollution.

### **Conclusion on health impacts**

We have very serious concerns over the health impacts of the proposed LTC. As we have stated above it is completely unacceptable to knowingly put more lives and people's health at risk, which is what would happen if LTC goes ahead.

We also express serious concern that HE are not planning on monitoring the air and noise pollution should the LTC go ahead. How will they and/or local authorities and residents be able to monitor these high risk levels to ensure that they are aware of the risks and take necessary actions, if there is no monitoring to be installed and carried out?

He speak of some forms of compensation relating to changes in conditions for residents within a year of the road opening, if it goes ahead, yet would not be monitoring the effects of the road, if it goes ahead to know how severe the impacts are.

People's lives and health would be at risk, communities, schools, workers, leisure opportunities, and also wildlife would all be put at risk when it comes to the health impacts of LTC.

We also stress that our concerns cover mental health and well-being as well as physical health.

Our comments and concerns about health impacts relate to LTC in regard to construction and operations, if the LTC goes ahead.

**We strongly oppose the LTC on the grounds it would have huge negative impacts on our lives and health, as well as the associated cost to healthcare**

# Environmental impacts

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## **Carbon Emissions**

In this day and age, with Climate Emergency being declared around the world, we find it totally unacceptable that information about estimated Carbon Emissions of the LTC has had to be obtained via a Freedom of Information request, and have not been readily available or included in the consultation materials.

We are disgusted and very seriously concerned that LTC Construction emissions are predicted to be 2 million tonnes, and Operational/user carbon over 60 years comes in at 3.2 million tonnes.

So in total the carbon emissions resulting from the construction and operation of the LTC project are estimated to be 5,272,562 tonnes of carbon dioxide equivalent.

In June 2019, the UK became the first major country to legislate for a net-zero target for carbon emissions by 2050.<sup>12</sup>

Then on 4 Dec 2020 the Prime Minister announced a new ambitious target to reduce the UK's emissions by at least 68% by 2030, compared to 1990 levels.<sup>13</sup>

Later this year the UK will host COP26, or the 26th UN Climate Change Conference of the Parties to be a bit more formal! The COP26 summit will bring parties together to accelerate action towards the goals of the Paris Agreement and the UN Framework Convention on Climate Change.

As hosts the UK needs to start backing up all their talk with some actions, and the recent Carbon Emissions data for LTC, alongside the rest of the £27bn road building scheme makes a mockery of the Government's promises.

In their report<sup>14</sup> in June 2021 the Climate Change Committee said:

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

Quite clearly the proposed LTC would create over 5 million tonnes of emissions, hence it should most definitely not be built.

We also raise the point that the estimated carbon emissions are not actually a realistic figure on the carbon emissions the LTC would create.

Firstly, as we mention when it comes to the false economy on a financial basis, the same theory relates to the carbon emissions. There are numerous other projects that would be needed as a direct result of the LTC, and so those associated carbon emissions should be included and taken into account when calculating the carbon emissions for the LTC. The Tilbury Link Rd, Rest and Service Area, Blue Bell Hill Improvements, Gallows Corner improvements and all projects that would be needed as a result of LTC if it goes ahead.

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<sup>12</sup> <https://www.gov.uk/government/news/uk-becomes-first-major-economy-to-pass-net-zero-emissions-law>

<sup>13</sup> <https://www.gov.uk/government/news/uk-sets-ambitious-new-climate-target-ahead-of-un-summit>

<sup>14</sup> <https://www.theccc.org.uk/publication/2021-progress-report-to-parliament/>

Not only that, but we also question the methodology HE have used to this carbon emissions estimate, and whether it includes Land Use emissions?

There would be considerable emissions from the destruction of trees, hedgerow, habitat, soil digging and removal etc

Now more than ever we need to be taking emissions seriously and HE show no respect for this fact with their plans for the LTC. Just another of many reasons we strongly oppose the LTC.

### **Loss of woodland**

We feel it unacceptable that to date HE have not disclosed how much woodland would be destroyed and impacted if the proposed LTC goes ahead. We would expect detailed information on this to have been included in the consultations, but HE continue to refuse to share this info.

Knowing this kind of information is vital for people to be able to make meaningful comment and response.

That said, we consider any loss of woodland to be unacceptable and even more so when it comes to ancient woodland.

Spending time in nature including woodland is proven to be beneficial for our health and well-being. Many have realised and appreciated this during pandemic even more than before, and it is vital that our woodlands are protected and taken care of.

Of course it is not just for our own benefit, we have concerns about the loss of woodland as habitat for flora and fauna too.

It is no good talking about replanting as adequate mitigation as that simply is not the case. I will make the analogy of if your own home were destroyed and you found yourself homeless. How would you feel and survive if you were then given half a dozen bricks and told that you could have a few more each year? The planting you are proposing is whips and saplings, and wildlife needs an amount of mature trees. The flora and fauna relies on a complete eco system that takes years to form and establish. The fungi network under the ground in woodlands particularly is an amazing eco system that so much else relies upon, it is all interconnected and vital for a healthy environment and habitat to survive and thrive.

There is also the aspect of the carbon emissions that would be released through destruction of woodlands, releasing all the carbon that the trees have stored over the years, back into the environment. It concerns us that HE most likely will not have included those emissions in the estimated emissions figures.

Ancient woodland cannot be replaced, it is unique habitat that has formed over hundreds of years and is irreplaceable.

Surveys in woodlands will not be adequate enough to properly record the realities of what forms these woodlands, and much could be missed and potentially lost forever.



We also question who will ensure that any new planting, if the LTC goes ahead, would be watered and cared for, and managed in the longer term? We are more than aware of other major projects where whips and saplings planted are just left to dry out and die, without water and care.

The Government are spending a fraction of the cost of LTC, let alone RIS2, on tree planting. Another reason why it is essential that we save and protect the woodlands and trees we do have.

### **The Wilderness**

We highlight The Wilderness in particular since HE refuse to acknowledge or carry out adequate research into it being an ancient woodland.

The Wilderness has been a part of Ockendon for hundreds of years.

It is home to many varieties of trees, plants, and wildlife, including mature elms, and at least 7 or 8 bat species, some of which are rare.

It is now under threat from the proposed Lower Thames Crossing.



The map above dates back to 1865, one of the first Ordnance Survey maps for the area.

Something to remember is that back then maps were not as common as they are now, and it was usually only wealthy landowners who could afford to commission a map of their land. They wouldn't have had opportunity to view their land from the air, with the exception of from a hot air balloon, again not a common occurrence.

Essex Record Office hold a map that dates back to 1767 that clearly shows The Wilderness. Unfortunately due to copyright photos of the map (*that were obtained on our behalf by Heather Hunter of Essex Gardens Trust, who has been kindly assisting us with research on The Wilderness*) are only for research purposes and cannot be shared publicly, but the evidence is there!

We have been told that HE carried out some research after us questioning the ancient woodland status of The Wilderness, and that they only found evidence dating back to 1839/40. Clearly our evidence shows that as we have now sadly come to expect HE are not capable of carrying out adequate research. This also gives us no confidence in any other research and surveys that HE and their contractors have and are carrying out.

We also point out that our evidence of a map dating back to 1776 shows The Wilderness. For a woodland to be named The Wilderness it shows that the woodland would have been established enough at that time to earn the name of The Wilderness, so would likely have been there for many many years at that time.

The owner of The Wilderness at the time of the 1767 map was the granddaughter of Sir Richard Saltonstall, the estate including The Wilderness was passed down through the Saltonstall family over the years. This too indicates a very strong case of The Wilderness being in existence for many years.

### **The Wilderness related history**

The Wilderness falls within the old Groves Manor estate, which was lived in by Sir Richard Saltonstall and his family in the 1500s.

A former gateway of the estate can also be found nearby and is listed as a Grade 2 listed building dating back to the 16th century, so around the time that Sir Richard was alive and living there.

Sir Richard was Lord Mayor of London in 1597-98.

He died in South Ockendon in 1601, and is interred at St Nicholas of Myra, South Ockendon. There is a monument to Sir Richard by his wife Suzanna, located on the north wall of the chapel. The monument is built of variegated marble. Between the columns are two arches forming alcoves for the principal figures of Sir Richard and his wife. Sir Richard can be seen wearing the insignia of the Lord Mayor of London. In the plinth are the figures of their sixteen children.



What on earth would Sir Richard have made of the proposed LTC?

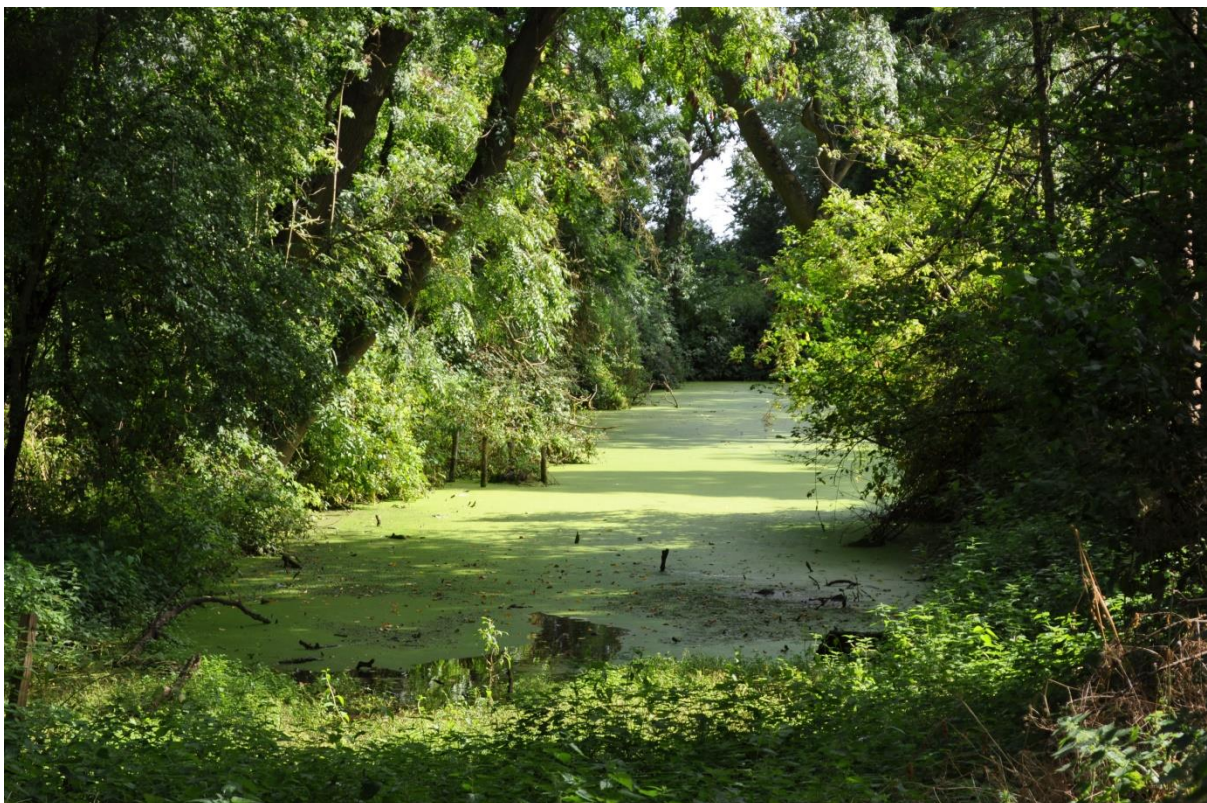
### Wilderness Conclusion

We know that HE have chosen to avoid the nearby landfill site, due to historic toxic content and instead moved the route into The Wilderness. There would be considerable additional work and cost involved in putting the route through the landfill, so we can see the reason why HE seem so keen to try and destroy an ancient woodland instead, but that is not ethical or acceptable.

The Wilderness should at very least be respected for its ancient status. Even if HE arrogantly fail to consider it's ancient woodland status, it should be identified that the woodland is extremely old and be given the chance to continue to thrive for years to come, and continue its ancient story long into the future. How are any woodlands ever expected to reach ancient woodland status with such hugely destructive projects like LTC and companies like HE who show no care in saving and protecting valued and valuable woodland like The Wilderness and other woodlands and trees?

We know there is a new woodland category coming in for woodlands to give our older woodland the chance to reach ancient woodland status, and HE should respect that too. We would be interested to know if HE are taking this new category into account with the LTC?

In conclusion The Wilderness should not be destroyed, it should be left to continue to thrive and be loved by those lucky enough to experience it.



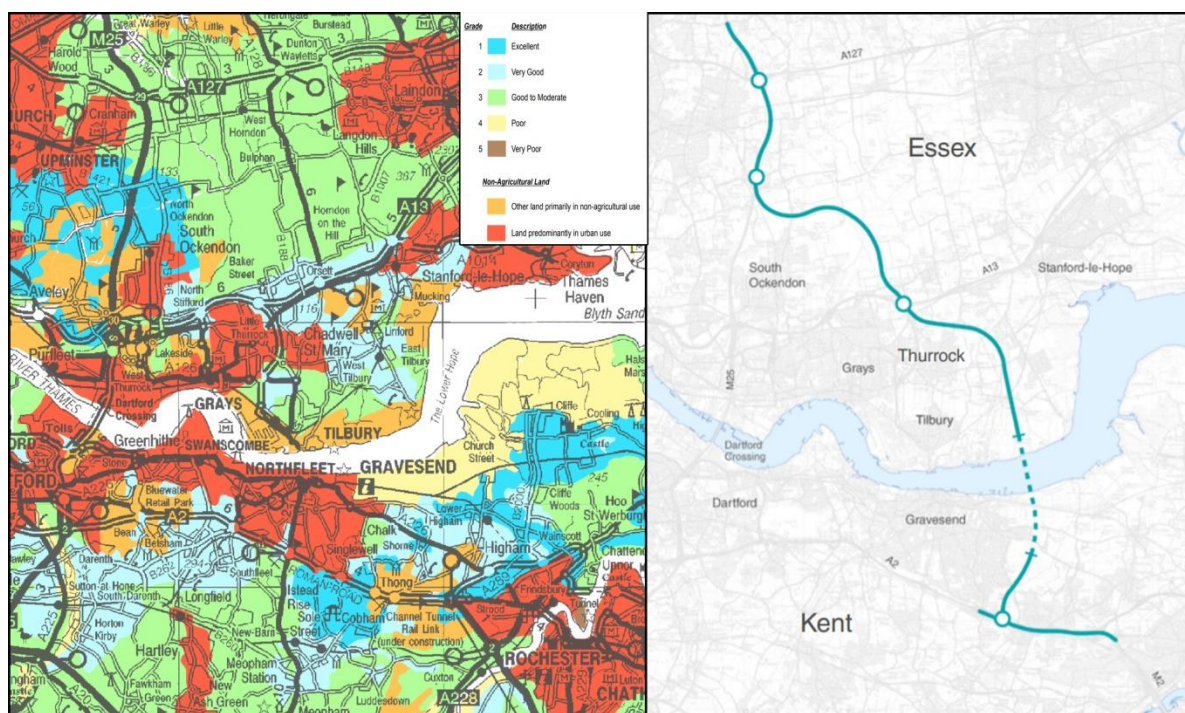


### Loss of agricultural land

We begin comment on this aspect by again pointing out that to date HE have not shared any information, despite numerous requests for further detail on how much agricultural land would be lost and impacted.

We know from our own research that the LTC impacts on farming would include the destruction of acres of agricultural land, including some that is Grade 1 agricultural land.

The map below that shows the Agricultural Grading of the areas that they proposed Lower Thames Crossing would destroy. This info has been gathered from the Government's own Natural England website.<sup>15</sup>



As you can see the proposed LTC route most definitely impacts on a wide range of agricultural land, including the highest grade, Grade 1.

Agricultural Land Classification (ALC) is graded from 1 to 5. Best and most versatile agricultural land is graded 1 to 3a. The highest grade goes to land that:

- gives the highest yield or output
- has the widest range and versatility of use
- produces the most consistent yield from a narrower range of crops
- requires less input

**Grade 1** – excellent quality agricultural land

**Grade 2** – very good quality agricultural land

**Grade 3** – good to moderate quality agricultural land

- **Subgrade 3a** – good quality agricultural land

- **Subgrade 3b** – moderate quality agricultural land

**Grade 4** – poor quality agricultural land

**Grade 5** – very poor quality agricultural land

<sup>15</sup> <http://publications.naturalengland.org.uk/category/5954148537204736>

Of course as well as destroying the land that would be taken by the proposed route there is also the question of the impact that pollution and water run off from the road would have on the surrounding agricultural (and other) land along the route, if it goes ahead.

Particulate matter including tiny tyre particles, brake dust, and pollution are dispersed and carried on the wind or rain into the surrounding environment, into the ground where the farmers are growing our food. Ultimately that will affect the quality of the soil, the grade classification, and end up in our bodies via the food we are eating. We need to be saving and protecting our agricultural land.

Not to mention the fact of if this land is lost where will our food come from? How many extra food miles would that involve, and what that impact would be to the environment.

### **Impacts on our local farmers**

There is the most obvious impact of the land that would be lost by local farmers along the entire route, but also the other impacts, such as some farmers land being cut off from their farms during construction, if LTC goes ahead.

Even currently the farmers are being impacted due to the invasive Ground Investigations, Archaeological Trial Trenching surveys, and Utility Trial Trenching surveys.

Highways England/LTC contractors who are carrying out these survey works are impacting the farmers crops already. HE have taken many of the farmers voices away from them by getting them to sign non-disclosure agreements.

We know that farmers are having issues with HE from articles such as the one in Farmers Weekly that highlights some of the issues and concerns.<sup>16</sup>

They also continue to cause much stress and many issues for the farmers.

Not having the decency to remove the rubber road matting and cones from one field for when the farmer wanted to harvest their crop. Blocking access points impacting farmers work and access.

Risk of soil contamination, when workers attempted to lay dirty matting that could have carried contaminants onto grade 1 listed agricultural land. Just highlighting their lack of duty of care to the farmer and also the environment.

Crops being destroyed and left to rot because of investigative works. The impacts of these investigative works for farmers putting their livelihood at risk, with fears and risks of contracts being lost with suppliers. Plastic cable ties being cut and left polluting agricultural land. The list goes on.

All this and more, and you haven't even managed to submit an acceptable Development Consent Order yet.

Some farms have been in families for generations, and the impact of LTC to them is huge.

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<sup>16</sup> <https://www.fwi.co.uk/business/thames-crossing-plans-lacking-detail-say-frustrated-farmers>

We note also that HE have chosen farmers busiest time of the year, during harvest, to hold the consultation. This means they just don't have the time to attend events and review all the consultation materials. For a Community Impacts Consultation HE have shown no sign of actually considering the impacts of LTC or the consultation.

Now more than ever we know the importance of our food supply and the importance of self-sufficiency as a country. It is ludicrous to be destroying so much agricultural land with the LTC, if it goes ahead.

We know the importance of considering the food miles of our food and drink, so again to destroy agricultural land goes against what is right and needed with regard to farming and getting our food and drink as sustainably as possible.

The impacts of the LTC would be completely unacceptable and are another reason why we strongly oppose the LTC.

### **Loss of solar farms**

We find it questionable that HE would be destroying a solar farm, yet detailing the area on the map as environmental mitigation!

If HE were to be believed electric vehicles are a solution to our problems because they are greener and cleaner. Not that we believe or buy into that narrative because there is evidence that shows otherwise. However, electric vehicles do need power and sources of greener cleaner energy will be needed in the move towards EVs. To be destroying Cranham Solar Farm and impacting plans of other solar farms just doesn't seem right.

We know Cranham Solar Farm generated enough solar energy to power 922 homes for a year. That energy supply would be lost if LTC goes ahead, and along with it the habitat in the area would also be impacted not only by the LTC parallel road, but also with the translocation of other wildlife being brought in from other impacted areas.

Whilst we support taking care of wildlife, we would prefer it be done by leaving it where it is now and stopping the LTC. We question the idea of simply being able to move wildlife from one area to another to suit the developers needs and wants. The areas you propose on moving impacted wildlife to will already have an existing eco system, and introducing more wildlife can be detrimental to the existing eco system. We do not trust HE with the task of translocation even if by means of using third parties. Anyone being paid to work for such a huge company as HE are going to do what is asked of them without question or thought because of the clout HE have.

### **Loss of habitat**

If the LTC goes ahead there would be a huge loss of habitat and also habitat that would be impacted as a result of LTC.

We do not know just how much greenbelt would be lost or impacted. We do not know how much hedgerow would be lost or impacted. We do not know how much woodland would be lost or impacted. We do not know how many watercourses and ponds would be lost or impacted. We could go on.

But when we make these statements we of course mean we don't know an actual figure because HE still refuse to share such important info with us. We have allegedly been consulted on the environmental impacts of LTC previously. Yet how are we supposed to give meaningful comment when such basic info has not been shared?

What we do know from our own local knowledge is that too much of all of the above would be lost and impacted.

We have serious concerns about the loss of, and impact to, habitats if the LTC goes ahead, and again this is just one of the many reasons why we are strongly opposed to LTC.

### **Impacts to wildlife**

The Government's Environmental Audit Committee (EAC) has published their '*Biodiversity in the UK: bloom or bust?*' report on 30th June 2021.<sup>17</sup>

The report states that the Government are spending far more on destroying the environment than protecting it. It also says that 'toothless' government policies are failing to halt the catastrophic loss of wildlife. The UK is the most nature depleted country out of all the G7 nations.

There was also comment about how The Treasury needs to move away from using GDP as the primary measure of economic activity, and include the costs to nature and biodiversity.

Another recommendation made by the EAC in this report is:

Tree planting should not occur on peat soils and floodplains would be better used for restoring floodplain meadows rather than afforestation projects.

In a similar vein we would suggest that the floodplains should also not have huge land forms created on them that not only impacts the flood plain for the purpose of flooding but also changes the habitat.

The report also states: "*The Government's £27 billion road-building programme is an example of the type of policy decision likely to conflict with goals on nature recovery.*"

Obviously LTC is part of that road-building programme and we have serious concerns that this would be the case, and it is just another reason amongst many that we are so strongly opposed to the LTC.

We also have very serious concerns about the wildlife surveys that have and are being carried out. As just one example we have very recently finally been given information about water vole surveys. We have seen water voles in an area that would be destroyed and impacted by the LTC, if it goes ahead, that is not detailed in the list we have been provided with.

Considering that water voles are in huge decline, they are under serious threat from habitat loss and predation by the American mink. We should be saving and protecting any water voles we can along with their habitat, not destroying it with projects like LTC.

Since HE refuse to share details of the wildlife surveys it is impossible for us to know whatever wildlife their surveys have missed, but it certainly doesn't give us any confidence in the surveys that

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<sup>17</sup> <https://committees.parliament.uk/publications/6498/documents/70656/default/>

have been carried out or the general handling and consideration that HE seem to be failing to provide when it comes to impacts on wildlife from the proposed LTC.

We also have concerns about translocation if LTC goes ahead. For example consultation materials say that trees would be chopped down in Winter to avoid nesting season for birds. Yet in many areas the trees will also be home to hibernating bats and other creatures.

We understand that here are procedures to follow, but we want it on record that we have very little faith or confidence, especially since we know that LTC workers were responsible for the death of a snake on private land, despite having been warned that it was a spot on a private road that the snakes like to sunbake. They ran it over by the look of it more than once as they used the road to access investigative works site.

### **Green bridges**

It is becoming more and more apparent to us that the proposed 'green' bridges are not likely to be what we consider green bridges should be.

The latest info we have been given at a consultation event was that due to visibility issues on the North Road green bridge no high planning would be allowed, such as hedgerows because it would put drivers at risk.

We have also been told that there is no real detail as to how the bridges will look or be built, since this is another thing that is left to the contractor to decide.

We again express our concern that a contractor is not going to do what is best for the wildlife and our community, but rather what is easiest and cheapest for them.

### **Flooding and watercourses and ponds**

Another area we have concerns about is the water pollution and impacts issues associated with LTC, if it goes ahead.

We are concerned about water pollution if LTC goes ahead. There would be run off from the roads and construction and compounds that would make its way into the local water courses.

Even the ponds that are being incorporated into the design would be at risk of pollutants, and they are being sold as places for wildlife and nature.

We have been told they would have reed filtration systems in them as well as membrane. How on earth, when you consider these ponds would be used as filtration systems, do you think this is suitable and adequate wildlife habitat.

Many of the PM2.5 pollutants as well as others would end up in the soil and water along and surrounding the proposed LTC route, if it goes ahead.

We are very concerned about this, especially when you also consider that HE are proposing a water vole habitat for example alongside the LTC.



There would also be a risk of pollutants running into agricultural land along the route, some of which is grade 1 agricultural land. Not that it is acceptable to be polluting any land or waterway.

The Mardyke is a main water way through the area that would be crossed by the LTC, and again this would see pollutants running off into the Mardyke where there is a wild variety of flora and fauna, including water voles and otters etc.

And of course the River Thames will have water being pumped into it during construction and once LTC is operational, if it goes ahead. We have concerns over the impact of this to the water and the wildlife in the river.

We also have concerns about contamination from changes to watercourses and flooding flowing into nearby landfill sites and then running off into other land, including agricultural land.

We think far more attention and consideration needs to be given to the risk of water pollution.

Not only pollution, but also the connectivity of watercourses. For instance the watercourse running near The Wilderness in South Ockendon would be diverted if LTC goes ahead. It is known that there are great crested newts in that area, and also some further south towards Hall Farm, and they are likely to use the watercourse that connects the two locations. Yet the LTC would destroy and disconnect that watercourse if it goes ahead. Near The Wilderness there is a large retaining wall being proposed that would literally create a humungous barrier blocking the way for the watercourse and the wildlife that uses it.

The Wilderness also has amazing watercourses and ponds in, that date back hundreds of years. One of the main ponds in there would be destroyed with the LTC cutting through it.

We also know there is a lake to the west of Linford that would be infilled if LTC goes ahead.

Things like this are not highlighted or detailed in the consultation materials. Yet again showing that HE are not sharing adequate information for us to be able to get a clear and informed picture of what is at risk.

## Flooding

We also have serious concerns about the flood risk and loss of flood plain if the LTC goes ahead.

The Government's very own 'Flood map for planning'<sup>18</sup> clearly shows areas at risk of flooding along the proposed LTC route, including around the tunnel portals.



HE seem to just think everything will be ok with regard to flood, but as residents we know our local area.

We are also aware of other areas in the region where they suffer with excessive flooding since large road projects were constructed in their area, so we are very aware that we cannot simply trust that a road project will not bring a risk of flooding.

It is not just the risk of flooding from the LTC effects, but also the impact LTC would have on the flood plains too. You cannot create huge landforms on marsh floodplains and not expect there to be repercussions. Particularly by the river as it is also flood plain for when the Thames Barrier is closed. If flood waters cannot flow into the floodplains then it has to go somewhere else and other areas will be at risk.

There would also be flood concerns for the fens and Mardyke Valley, where the LTC crosses.

And we found similar on maps from Climate Central<sup>19</sup> and in the Environment Agency's Thames Estuary 2100 Plan<sup>20</sup>.

<sup>18</sup> <https://flood-map-for-planning.service.gov.uk/>

<sup>19</sup> <https://coastal.climatecentral.org/mapview/11/0.4608/51.4678/5b0f33ee72d5b8da1eef7e4cca53c0546a25104b529fec93cb6af8aef97708c8>





THAMES CROSSING  
ACTION GROUP

# Mitigation

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We have serious concerns about the mitigation that is being proposed.

We note that the Ward Summaries actually say that no essential mitigation is required for health though there are recognised health issues.

This of course is of very serious concern to us all.

We think some of the proposed mitigation is actually HE attempting to greenwash the LTC project.

The Hole Farm Community Woodland is not even part of the LTC project and HE should not keep trying to associate it with the LTC.

The new 'parks' at Chalk Farm and Tilbury Fields, we do not consider to be adequate mitigation. We feel rather that they are convenient dumping grounds for the spoil from tunnelling as close to the tunnel portals as possible. We anticipate that HE are doing this in an attempt not only to greenwash with claims of new parks, but also in an effort to reduce the worryingly high carbon emissions estimate. But only for their benefit and not out of genuine concern for residents or the environment, more of a tick box exercise sadly.

We do not think that the planting mitigation is adequate, and we have concerns over whether the whips and saplings would even survive and have any hope of reaching maturity. Who would water them and take care of them? We know that with projects like this they are often just left to dry up and die.

We don't feel that the mitigation for wildlife is satisfactory or adequate. We cannot simply keep moving wildlife to new areas, progressively reducing the amount of habitat for wildlife in general. All this will end up being is tiny areas of habitat that are over populated with eco systems being pushed to the limits and not enough for wildlife and habitats to survive and thrive.

In conclusion we do not believe that the proposed mitigation is adequate and we have very serious concerns over the severity of the impacts of the LTC, if it goes ahead.

**We strongly oppose the LTC on the grounds it would not provide adequate mitigation for the damage and harm caused.**

# Revised development boundary

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We have serious concerns about the proposed development boundary, how much land is being proposed to be taken and where the land is being taken.

No land should be taken for the proposed LTC because the project is not fit for purpose

We do not consider that the proposed LTC has been consulted on adequately. Consulted on a lot, and caused consultation fatigue yes most definitely, but not adequately. The quality and adequacy of the proposed LTC consultations has been appalling.

Since we haven't had adequate consultation with clear and informative materials we do not believe that any land should be taken, as the project should not go ahead.

HE have and are putting people's homes, businesses and lives under threat and have already obtained some people's home and land.

We note that HE state that they are now taking less homes, but that some of those homes no longer needed are ones HE have already bought.

It must be very convenient for HE to help add to your every growing portfolio of properties around the country, which you have from when you obtain properties and then no longer need them for projects, must be a nice cash cow for HE.

We have not been informed by HE how much woodland, hedgerow, agricultural land, ponds and watercourses are within the development boundary. It is therefore very difficult to fully understand the true severity of exactly what you are proposing to take and destroy.

We know there are historic and graded properties that would be destroyed if the LTC goes ahead, and we are strongly opposed to this.

The LTC would be very close to the two forts, Coalhouse Fort and Tilbury Fort and we have concerns on the impact the road would have on them, both physically with vibrations and changes to the water levels etc. Also for the communities ability to enjoy the area surrounding and between the two forts, with a huge busy road running through.

This area is also where Queen Elizabeth the first made her famous great speech. We're not sure she would have much good to say about LTC!

As well as of course the fact that people's homes and businesses would be destroyed and impacted. Not only that but the poor handling by HE of said property and land owners. We know of the errors that have previously occurred. We have heard from those who have had terrible experiences dealing with HE.

**We strongly oppose the LTC on the grounds it would take, destroy and impact so much land**

# Changes since last consultation

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We have concerns about all changes since the last consultation.

We also note that some changes and additions have not been properly detailed and highlighted to the public.

As we have mentioned previously in our response, we are not convinced by the proposed new 'parks' for all the reasons previously highlighted.

We are concerned about the proposal of another lane being added to the slip roads between the A13 and the Orsett Cock.

This brings those lanes closer to the village of Orsett, especially at the Baker Street end.

We do not feel that HE took adequate time to prepare the information relating to this change into the consultation materials either. Maps had not been updated to reflect the change, and it was also labelled incorrectly on some maps too. Not to mention the fact the labelling for this covered and hid other detail on the interactive maps. There should have been an option to hide that text box so you could properly view other detail if you wanted, it is a real pain.

Whilst we can understand the reasons that the replacement land for the loss at the Orsett Showground has been removed. Most likely because the land you proposed replacing it with was land that is already used for the car park on Orsett Show day! So there was no real gain. We are concerned about the impact of the LTC to the Orsett Showground and by default the Orsett Show which is a very much loved event.

We do have to wonder about the fact you say you would take less land from Tarmac, but more vegetation and agricultural land for utilities in the Linford area.

There seems to us to be a pattern of avoiding landfill sites and the likes of Tarmac, whilst instead destroying and impacting woodland, habitat, and agricultural land.

If land has to be taken, then HE should be fair about it and not just dismiss the value and importance of nature because it is an easier target. We note that Tarmac seems to be getting avoided, yet nearby land including Rainbow Shaw Woods are hit, in a similar way to The Wilderness getting hit, but the landfill site being left alone. Not on HE, not on.

We have concerns about the reduction in size of some of the compensatory flood storage in the Mardyke area. We know the Mardyke is an area that is flood plain, so to reduce compensatory flood storage doesn't make sense.

We know there are issues with flooding along the Mardyke Valley in many areas, so if LTC does go ahead it is essential that everything that can possibly be done to ensure there is no greater flood risk needs to be done.

With changes in weather patterns happening and being predicted, especially heavy rain fall, it seems wise to be having adequate flood storage than reducing it.



We have also been asking for further details in regard to the flood storage and other ponds, and HE have not been able to provide us with much info, which makes it much harder to pass meaningful comments on topics like this.

To us it seems that some of the ponds are actually positioned higher up than the level the water would running off of, which makes no sense. We really do feel that not enough information has been shared about these kinds of aspects of LTC.

As mentioned elsewhere in this response, we have concerns about the water vole habitat in the Mardyke area. Firstly we believe there is existing water voles in the area, and they are territorial creatures. Also because we have concerns about pollutants from the run off from the road contaminating habitat for the water voles and other wildlife.

We asked the water voles and they said NO to LTC!



We have concerns about the proposed new electric substation on North Road, South Ockendon. Not only for the residents next to it, but also for the negative impact it would have on wildlife too, especially as it is positioned right next to the proposed 'green' bridge.

In the same area we are concerned that new emergency vehicle access has been added, which was only noted when viewing maps, and doesn't appear to have been highlighted in other consultation materials.

This is a concern for residents who are very close by. Concerns are about the impact having emergency vehicles rushing by the properties likely with sirens going. And also because if there is access for emergency vehicles which will draw attention to the fact there is an access route onto the LTC there, what would be to stop other motorist using it as a short cut to the LTC, and a cut through when there are traffic incidents etc. This is of particular relevance because North Road is used a lot currently when there are incidents on the M25 as a cut through.

We note it is stated that Arable fields to the north of Lower Higham Road. "We have included three arable fields in the Order Limits to the north of Chalk and to the south of the Thames and Medway Canal and Metropolitan Police firing range. Our proposed changes to how these fields are farmed



will improve the habitat for birds in adjacent land at a time when they may be disturbed by activity within our construction compounds”.

We are really not sure why HE think they are capable of farming land better than a farmer, or indeed how they will improve the habitat for birds in adjacent land. The best way to avoid disturbing the birds and all wildlife is to not build the LTC.

As you can see, we have concerns about the changes we have come across, and are also concerned that there be other changes hidden in the consultation materials and maps that we may not have picked up on yet, as there is so much to review and sometimes you literally have to figure it out for yourself whilst viewing maps, without any real detail of markers to draw your attention to changes.

**We strongly oppose the LTC on the grounds that the latest changes since the last consultation do nothing to improve the LTC proposals**

# Construction Impacts

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We of course have very serious concerns about the construction aspects of the proposed LTC.

We note that the new 24/7 working hours were not clearly and informatively shared within this consultation, despite it supposedly being a Community Impacts Consultation and the fact the construction of LTC, if it goes ahead, would be a huge impact to the community.

We note that we feel HE have tried to wriggle around these 24/7 working hours, and not adequately shared details with the public.

The legend on the interactive map clearly states it is 'new' yet there is no detailing of this in the changes section of the consultation guide that alerts people to this new information.

We do not buy into the fact that this new 24 working hours would be limited that much. We predict HE/contractors would use the 24/7 working to allow them to do things as quickly as possible and to suit their own needs and wants without due care and consideration of the community.

We thought the work hours were bad enough before, and now this has been added and kept quiet too, which is unacceptable.

We are very concerned about the locations and sizes of the compounds in general.

We are very concerned about the carbon emissions from construction.

We are very concerned about the pollution during construction, if LTC goes ahead.

We have not faith or confidence in HE or their contractors judgement on the experiences so far during investigative works.

We have concerns relating to the proposed access to the M25 compound from the M25. This would mean reduced speed limit and lane closure on the M25. This in turn would mean more congestion and incidents on the M25. We know from experience that when this happens traffic instead attempts to cut through on the local roads, which during construction would already be suffering.

Also in relation to the M25 compound, we are particularly concerned to see that HE are proposing to store soil in an area of the compound that is on top of a toxic historic landfill site. This soil would be coming off of grade 1 agricultural land in that area and it should not be stored on a toxic historic land fill site.

We also note that you did not detail this fact in the Ward Impact Summaries for these wards, and failed to mention the contaminated lands and your plans to store soil on top of it.

We understand this was an error on your part, which is a concern and doesn't give us a lot of confidence.

We are concerned about the proposed road closures, and do not feel that we have had adequate and clear and informative details on said closures. There has been much contradictory and confusing information on road closures in the consultation materials.

We give examples of Baker Street being listed as being closed for 16 months and also for 5 years. We have since quizzed HE on this, but we shouldn't have to, the information should be presented in a clear and informative way.

We worry about the impacts the road closures would cause, lack of or reduced access for people and businesses. Negative impacts to bus routes and services. Lack of access for PRow users. Long detours. All of which would have negative impacts not only on road users and PRow users, but also on communities as traffic takes detours etc.

In a similar vein we also have very serious concerns on the impacts road closures would have on the emergency services. It is essential that proper consideration and action is taken to ensure that emergency services have everything they need to ensure they can do their job efficiently and effectively as they are literally life savers.

We do not want to experience or hear of anyone else experiencing tragedy in a life or death situation because HE and their contractors stuffed up and stopped emergency services being able to do their thing. We have zero trust or confidence in HE based on previous experience so it is vital for our mental well-being that we stress this strongly in this response.

On the topic of emergencies, we also have serious concerns over the unexploded ordnance (UXO) that we know will be found all along the route including in the River Thames. We have expressed concerns previously about concerns of UXO during investigative works. We do not feel enough acknowledgement is given to residents' concerns on this topic. We know your workers accidentally hit a gas main during investigative works. We do not want similar to happen with UXOs. More needs to be done on this aspect if LTC goes ahead, and procedures and reassurances backed by satisfactory evidence need to be actioned to help lessen the stress for residents, if LTC goes ahead.

We are concerned about the amount of things that will be up to the contractors to decide upon if the LTC goes ahead. We have no confidence that they will choose to do things adequately and in the interest of the public, rather than taking the easiest and cheapest route for themselves.

We question where all the workers for LTC would come from. If there would be enough availability, since there are a number of other very large projects all being planned along similar timeframes.

On that note if workers are coming from further afield then we have concerns relating to where they will live. There are already housing shortages in the impacted areas, so extra pressure on housing due to the impact of LTC workers would not be welcomed or acceptable.

With such a long construction period we also have concerns about the extra pressures LTC workers would put on our infrastructure, like schools, health care etc as again those are already stretched.

**We strongly oppose the LTC on the grounds the construction would have a huge negative and destructive impact**

# New Parks

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Many of us are wise to the fact that these new 'parks' are a convenient way for HE and their contractors to dump huge amounts of spoil from the LTC tunnelling, if the LTC goes ahead.

HE had previously proposed a land form around the northern tunnel portal. The figure previously suggested for the height of this raised man made mound was 16.5m above the ordnance datum level (height of the mean sea level).

However now HE are proposing the add more land forms in this new 'park' and raise them up to 22.5 metres (that's over 73ft high). We checked the height of an average double decker bus, and it's 4.95 metres (16 ft 3 in) high. That means what HE are proposing for this land form is a high as approx 4.5 double decker buses stacked upon each other. This is of course above ordnance datum level, but HE fail to explain what the height would be in real terms that we can all understand as to exactly what to expect.

If you look at the before and with LTC images provided in the consultation materials. They do not give a clear impression of what is being proposed, especially Tilbury Fields.

We also point out that this land is currently agricultural land, it is also flood plain. If this land is built up with these large land forms where will the flood plain water go?

HE state Chalk Park would be on part of Southern Valley Golf Course, when you look at the map this park also appears to be proposed on what is currently **agricultural** land too. You say it would include areas of woodland and species rich grassland, a more diverse habitat than returning to farmland. But surely everywhere would have more diverse habitat and be healthier for us and nature without the LTC?!

HE admit that they would be using tunnel spoil to make these landforms, which would also conveniently make their carbon emissions figures better to suit their own needs to trying to push through a hugely destructive project. We really do not believe the 'parks' have been added for the benefit of the people, or is it to suit the needs of HE?

As the pollution is expected to be pushed out of the tunnels by the moving traffic the pollution will end up being emitted from the tunnels straight into the Tilbury Fields park and Chalk Park areas which is not very healthy.



How does the loss of agricultural land. not only impact farmers, but also the local food supply? How many more food miles and how much extra carbon would be generated due to the loss of the agricultural land?

Highways England included some info about Tilbury Fields in the July 2021 LTC Task Force meeting.

In the HE presentation (page 30/41) at the July meeting, which was to brief us on consultation, there was mention of potential for a coastal footpath in the vicinity of the northern tunnel portal. They said it would run along the River Thames from Tilbury Fort and the Thurrock Thameside Nature Discovery Park. The thing is we already know that route already exists, with the main section of it known as the 2 Forts Way between Tilbury Fort and Coalhouse Fort. Not the first time HE have attempted to suggest a 'new' path where one already exists, we've seen it when they've detailed Public Rights of Way in regard to the LTC.

In regard to HE asking in their consultation form about which of the two proposed heights for landform we prefer. We would prefer that the land level stay exactly as it is now, with no LTC, neither of the proposed land forms are wanted.

We feel this is yet another attempt by HE to greenwash the LTC. We also have serious concerns about the air quality in the park vicinity

**We strongly oppose the LTC on the grounds it would be so hugely destructive and harmful, and these new 'parks' are considered by us to be greenwashing and convenient dumping grounds for spoil**

# Hole Farm Community Woodland

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On the 2<sup>nd</sup> June 2021 Highways England announced a proposal of a new community woodland at Hole Farm, near Great Warley.

When this was announced HE attempted to claim it was part of the proposed LTC project. However, it did not fall into the development boundary for LTC. It would not be alongside the proposed LTC route, contrary to what HE portrayed; rather it would be alongside the M25. You stated that the community woodland would go ahead, regardless of whether the proposed LTC got permission and went ahead or not.

You cannot have it both ways, the Hole Farm Community Woodland is either part of the LTC project in which case it needs to be included in the development boundary, and can only go ahead if the DCO is granted for the LTC. Or if you are going to proceed with it regardless of whether LTC is granted or not, you need to stop trying to associate the woodland with the LTC project.

It is completely unacceptable, misleading, and disingenuous to pretend otherwise, because presumably you think that you can pull the wool over people's eyes.

Now in this consultation you are again trying to associate this community woodland with the LTC project again. Stating it would be the largest community woodland in the region, stating that it would be next to the proposed LTC route.

Again, the woodland would not be next to the LTC route, it would be next to the M25, you need to stop attempting to mislead people. Whilst the LTC development boundary for LTC may reach up to junction 28 of the M25, the actual proposed route ends further south, connecting to the M25 south of junction 29, with a new parallel road making an additional connection to junction 29. That parallel road is formed by slip roads from both the LTC and the M25.

It is also highly questionable the way HE claim the LTC runs between the A2/M2 and the M25 near South Ockendon (south of Junction 29) when it suits your needs and wants. Yet when you want to attempt to associate a community woodland to the north of junction 29 you state it is next to the LTC

Suggesting it would form part of biodiversity net gain in a way that to most of the general public who are not familiar enough with how things work and the process of DCO projects etc would wrongly assume that it relates to the bio diversity net gain of the LTC. Whereas the truth and reality is that it cannot be if you will be proceeding with it regardless of whether LTC is granted permission or not. You cannot legally proceed with the LTC project without permission, so this proves that the community woodland is not part of the LTC project. Yet you continue to attempt to mislead people in this despicable way.

Not only that the area that would be used for Hole Farm is agricultural land. Now more than ever we need to be as sustainable and self sufficient as possible as a country, not losing more agricultural land and further increasing our food miles, yet another negative impact on the environment.

Quit with these attempts to greenwash the LTC, we're not buying it.

Even if it were part of the proposed LTC project it would still be questionable. It is some distance from the areas that would be impacted. Mitigation is hardly mitigation if those negatively impacted do not directly benefit from said mitigation.

The location of the community woodland would also encourage more vehicle use, as it is in a more remote area, with no public transport. So your token rip off greenwash mitigation would actually increase traffic movements and associated pollution.

We also note that you are proposing to do this community woodland in partnership with Forestry England. The same Forestry England responsible for Thames Chase Community Forest, which would be negatively impacted by LTC if it goes ahead. Some would say a nice sweetener to another Government body to garner support for LTC despite the destruction it would cause to Thames Chase Community Woodland.

We know volunteers and visitors to Thames Chase are very much opposed to the LTC, yet we have not heard Forestry England make any real effort to speak up and show any concern about the impacts of LTC to Thames Chase. One can only assume this may have something to do with the fact they stand to benefit from this new community woodland.

On the topic of the loss of part of Thames Chase by LTC if it goes ahead. This is a community woodland that was planted because of the negative impacts of the M25 the forest was created 31 years ago. So just as some of those first trees planted are starting to actually become properly established, and others have not even reached that stage yet, along come HE with another destructive road project to destroy part of Thames Chase. This is totally unacceptable.

So in conclusion in regard to the Hole Farm community woodland, we are disgusted that HE have and are attempting to greenwash the LTC project in this way. We consider this to be yet another inadequacy of consultation to knowingly mislead people as you have attempted to do. Since the Hole Farm Community Woodland will proceed regardless of whether the proposed LTC is granted permission or not, it is clearly not part of the LTC project and therefore should not feature in the LTC consultation materials, or be 'sold' as such at any time.

**We strongly oppose the LTC on the grounds it would be hugely destructive and harmful, and that HE have mislead people and attempted to greenwash to the LTC by attempting to associate it with the Hole Farm Community Woodland**



# Non Motorised Users/Public transport

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We are very concerned that HE have no plans to incorporate facility for Non Motorised Users to be able to cross the river as part of the proposed new LTC crossing.

Instead HE constantly refer to how good they feel the Public Rights of Way offerings that they present in consultation are. Yet none actually are along the proposed route, rather in locations/communities in the surrounding areas.

There is evidence that the information shared on PRoW is not even a true representation anyway. HE have detailed some PRoW as 'new' when in reality they already exist.

For example HE state that there would be a new PRoW along the south end of Rectory Rd in Orsett, yet there is already a perfectly good footpath/cycle path along there that is already in use.

HE also gave a presentation to the LTC Task Force where they suggested they would be looking at work on a new coastal path between the two forts (Tilbury and Coalhouse) through to Stanford, all along the River Thames. Yet the route shown on the map is already there and in regular use by many.

There are just more examples of HE trying to mislead people, and is a further attempt of a tick box exercise to try and make their efforts look better than they truly are.

There has also been no clarification as to exactly what the proposed 'upgrades' would actually be.

There is no clear distinction in consultation materials either, with some detail being simply listed as 'path, without clarification if this is for pedestrians, cyclists, or horse riders, or some combination of all.

It is also very difficult to easily identify and follow routes on the interactive map. Often disappearing under other detail or being very similar in colour as other features marked.

HE have not given a firm commitment that the routes will meet the design standards laid out in LTN1/20. These kind of standards are there for a reason, and that reason is not just to be ignored by HE!

No clear and informative material has been shared with people as to exactly what is being proposed with these PRoW. There are concerns over shared paths. We have not been given detail on what surface would be used for instance. Different users would need and prefer different surface types. You are not going to want the same surface to ride your horse as you would to ride a bike. There is also the question of layout of these PRoW and how different users would interact whilst using them, due to layout, space, surfaces etc. How wide would they be? Would there be any form of segregation for the benefit and safety of all users?

What about barriers and crossings? There are concerns over how the potential for anti-social behaviour will be handled, for example what would be done to stop motorbikes and quadbikes being able to access areas they should be.

How would people be able to safely use the proposed PRoW? One example would be along North Rd, South Ockendon, where the PRoW would run along the east side of North Road, down to the proposed 'green' bridge which would allow user to cross the LTC below. Once across the bridge there would be options to head east or west, but not north to connect to North Ockendon which would be a helpful route for residents in the area. They have no shop in their close vicinity and have to get to South Ockendon for their nearest shop, yet HE's proposed paths go east and west not north to add connectivity for local communities.

Anyway, back to the two path options east or west. The path would be on the east side of North Road coming out of South Ockendon heading north. If you want to use the path to head west (which would be the only route residents wishing to get to North Ockendon could take ,which would be a considerable detour to reach North Ockendon from South Ockendon) you would have to cross the very busy and dangerous North Road. There is no mention of a safe road crossing being installed. The point you would be crossing North Road is in quite close proximity to bends in the road and the raised 'green' bridge, meaning limited visibility for both path users and road users.

Another instance of poor planning would be at the M25/A127 junction 29. Currently people cross this roundabout to the southern side of the roundabout. Yet HE are proposing the remove that option. Instead NMUs would have to cross the A127 at a distance to the west of the roundabout, take a route to the north of the roundabout to cross to the east side of the roundabout, and then again cross the A127 to get on the southern side of the A127 and continue their journey eastbound.

At NCN 177 from north of the A2 to south of the A2. Many different people use this route. Yet HE are proposing to force cyclist to dismount at the 'hare bridge' which is not acceptable if the route is to remain complete.

During construction there would be huge negative impacts to NMUs with PRoW closures, some of which could be 5 years. But HE do not make this clear or informative in the consultation materials yet again. They also don't explain how they will action some of the closures. For instance Baker Street in Orsett would be closed for 16 months for all access, but 5 years for pedestrians and PRoW access. How will HE prevent people from walking in the road if the footpath is closed?

5 years is a long time to be without that access, especially when the suggested detour is so long. There would also be a loss of public transport/buses whilst the complete closure is in place. And whilst the 5 year closure is in place it would stop people being able to walk down to the old A13 (A1013/Stanford Rd) to be able to catch the buses along that route too.

There would be similar issues with other road closures too, if the LTC goes ahead. Ockendon Road would see a 10km detour for all users, including bus services and access to the Crematorium and businesses like Manor Farm Shop and Stubbers etc.

Even when roads have traffic management, as opposed to road closure it would have an impact on traffic flow, bus routes etc, a definite impact on people's lives and businesses.

Now more than ever people want a need options for active travel. The initial reason for considering a new crossing was due to the congestion and pollution issues due to the Dartford Crossing. Active travel is a healthier and more environmentally friendly option, so something that should definitely be considered and incorporated into plans and design of any project that is supposed to be fixing the congestion and pollution problems. The Government's new Decarbonisation Plan includes enabling provision for people to use public transport, walk, cycle as one of its strategic priorities.

The proposed LTC would see increases in traffic, congestion, and pollution in many areas, this is not conducive to safe facility and rights of way for NMUs.

HE really so seem to be doing all they can to try and make their 'actions' in regard to active travel and the LTC better than they truly would be and are avoiding any attempts to incorporate what we consider to be very viable options.

To begin with HE said that NMUs would be exempt from using the LTC, since at that time it was being referred to as a motorway. Then when association of 'smart' motorway was made to LTC, HE suddenly dropped the motorway description and moved to all-purpose trunk road.

Yet they still suggest that it would have motorway restrictions because it would connect the M2 and M25.

However, technically the section of the M2/A2 where the LTC would connect would be the A2 (not a motorway) not the M2. There would be a junction with the A13 (not a motorway). To the north of the route there is a connection, the new parallel road that would connect to the A127 (not motorway).

In addition HE are also now proposing two new 'parks' either side of the river around the tunnel portals. Both 'parks' would be accessible to the public with paths to and around the parks. There would also be service roads at each of the portals. There would be safety/security fencing between the parks and portals/service roads.

Bearing all that in mind it would be relatively simple to install lockable gates in the safety/security fencing at each portal, between the 'parks' and the service roads. Signage could be displayed near to the gate in the 'parks' and advertised online etc with details on how to all for a cycle service similar to the one at Dartford Crossing. Users would call to request safe passage through the crossing to the other side. As happens at Dartford Crossing a patrol vehicle would arrive via the service road, HE driver unlocks gate and lets cyclists through gate with bikes. They would be safely carried to the other side of the crossing via the crossing and service road, driver would unlock gate and unload people and bikes, shutting and locking the gate once they are in the 'park'.

This would be a free service the same as is offered at the Dartford Crossing providing a much needed service for those wishing to cycle and get across the river. Increasing connectivity for cyclist and encouraging people to move to more sustainable and active travel options. This could reduce reliance on motorised vehicles, encourage healthier and more environmentally friendly active travel options, and connect communities.

In regard to horse riders and bridleways, we have real concerns about just how many stables, yards, and how much grazing would be lost and impacted by the proposed LTC if it goes ahead. If the loss and impacts result in lack of suitable places to keep horses, where are the horse riders going to keep their horse to be able to make use of the bridleways?

**We strongly oppose the LTC on the grounds it would not offer any connectivity to cross the river for NMUs and public transport**

# Impacts to leisure

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The proposed LTC would of course have impacts to leisure and we have concerns about all of them.

The loss of all the different leisure facilities, and the destruction and loss of outdoor space/nature for leisure purposes and enjoyment.

We note that the mitigation for the Orsett Showground has been removed. But we don't consider this to make any real positive impact either way as too much land at the Showground would be lost/impacted. The land you were proposing to 'give' the as mitigation was land that is already used for the Orsett Show for parking, so you weren't actually offering them anything. HE constantly seem to try and rob Peter to pay Paul with the way you just endlessly seem to keep taking land from people. Where does it all end? You keep taking land from one to mitigate a loss, but then you have taken the land that is on offer as mitigation off someone else and then they in turn need mitigation for their loss, it is a vicious and concerning cycle and way of working.

We find any comment by HE about new open space to be ludicrous also. You cannot take land that is already open and declare it as new open space, as it was there before! We consider this to be another attempt by HE to try and make things look better than they actually are in reality.

Loss of and impact to leisure facilities and options is totally unacceptable and is one of the many reasons we oppose the proposed LTC. We don't want LTC impacting our lives and leisure time.

Through the pandemic more and more of us have realised the value in our outdoor leisure time, we do not want LTC to destroy or impact our lives in this or any other way, especially since it is not for purpose and would not solve the problems we all suffer with due to the Dartford Crossing.

**We strongly oppose the LTC on the grounds it would negatively impact our leisure facility and opportunities**

# User Charges

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We do not feel that adequate info and detail has been provided in relation to the user charge that is being proposed for the LTC.

There was a very short section about LTC User Charges in the Design Refinement Consultation Guide on page 11.

“It remains our proposal to apply a user charge for the Lower Thames Crossing, with a local resident discount scheme for those living in Thurrock and Gravesham. The level of the charge and the charging regime would replicate the approach applied on the Dartford Crossing. Therefore, the need for a Lower Thames Crossing charging consultation forum as suggested at Statutory Consultation is not considered necessary.”

In response to this we would question how the Local Resident Discount Scheme (LRDS) will operate when there is an incident at either crossing, and traffic will need to try and migrate to the other crossing.

For instance:

If the LTC were closed meaning all traffic is forced to use the Dartford Crossing, then would a resident from Gravesham with LRDS be charged to use the Dartford Crossing?

Or if the Dartford Crossing were closed so all traffic is forced to use LTC, would a resident from Dartford with LRDS be charged to use the LTC?

What about residents in Havering (Cranham, Upminster etc) who will have to suffer the impacts of LTC why will they not be offered LRDS?

There have been calls for residents in Medway, Kent to be exempt from user charges too.

How does this distinction between LRDS for the two crossings assist in simplifying the decision making for the driver as to which crossing is easier for them to use? And how does this minimise the operational complexity between the two schemes (LTC and DartCharge)? These were both supposed benefits of the scheme according to the Supplementary Consultation just a few months ago. (Page 11 of the Supplementary Guide to Consultation)

Also since you are not planning or designing the LTC to consider how traffic will migrate between the two crossings when there is an incident, we all know it will certainly impact all local residents in the vicinity of and surrounding areas of both crossings for some distance just as we all suffer when there is an incident at the Dartford Crossing now, except this will be chaos on a far more widespread scale.

**We strongly oppose the LTC on the grounds that the associated user charges would discriminate against certain communities and add to the problems of congestion and pollution**

## Other Comments

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We do not consider the proposed LTC to be fit for purpose, and believe that the preferred route choice should be reviewed again.

The world has changed a lot since 2017 when the preferred route was announced. Not only the changes due to COVID, which has shown that many people have and can move towards more working from home, rather than needing to travel to work, which would lessen traffic on the roads.

We also have a shortage of HGV drivers in the country, and investment into rail improvements would help not only rail freight as an alternative, but in turn investing in rail freight could also improve rail facilities for public transport.

We know of proposals for rail improvements between Ashford, Kent and Reading for rail freight that would negate the need for the LTC.

And HE are failing miserably to incorporate adequate connections for public transport such as incorporating rail option, or even providing adequate connections to make a bus route viable. You refuse to incorporate a similar service for cyclists too, as mentioned elsewhere in this response.

We are still of the opinion that if a road project has to go ahead, rather than rail or other alternatives then Option A14 would be more effective than LTC.

The problems suffered due to the Dartford Crossing are because of congestion often caused by a number of things.

The traffic lights being turned red every 15-20 mins to stop the traffic whilst the hazardous vehicles are escorted through the tunnel. You would get congestion on any road that you purposely stopped the traffic on so frequently. Option A14 would solve this problem as it would be built to modern safety standards so hazardous vehicles could flow freely through without the need to be escorted.

On this topic I would also comment that if we are to believe HE's statements about how we are all going to be using electric vehicles, then it should also follow that the number of fuel tankers needing to be escorted through the Dartford Tunnels would reduce and traffic flow should improve naturally!

Not that we buy into that theory, as we do not believe EVs are the panacea that HE and other believe, as stated previously when commenting on environmental impacts. However, we do feel the need to point this fact out since HE seem to want it both ways, more EVs, but not identifying a drop in tankers being escorted which would improve traffic flow, thus reducing the congestion and associated pollution negating the need for LTC! Have HE even factored this aspect into their data? We very much doubt it as it seems that HE only take into account what suits their own wants, needs, and agenda sadly.

There are similar issues due to oversized/height vehicles needing to be corralled, which again stops the traffic flow.

Also the general traffic flow being impacted by the drop in speed limit through and leading up to the Dartford Crossing. Tied in with the poorly designed road junctions and layout creates yet more



issues that negatively impact the traffic flow and increase risk of incidents/accidents. This snowballs into yet more delays, lane and road closures etc that slow or stop the traffic flow.

It should then be questioned and reviewed as to whether incidents are handled efficiently and effectively by Highways England. Many have witnessed and experienced lane and road closures that were not needed, or take way too long to be reopened. We also note how this aspect seems to conveniently (for HE) worsen around the time of LTC consultations.

With Option A14 being a long tunnel the air could also be filtered, thus actually improving the air quality. Although that said, as noted elsewhere in this response, HE fail miserably when it comes to air (and other) pollution and are not even proposing to filter the air in the LTC if it goes ahead. Surely when there is opportunity to improve air quality and lessen negative impacts to our lives, health, and the environment they should be taken as a matter of course, not ignored, which seems to be HE's way of working sadly.

There is also the issue of development in areas that are already suffering with congestion and terrible air pollution. We should be considering what is truly acceptable when it comes to granting permission for development. Locally in Dartford there are ridiculous developments such as the Amazon Hub, development like this should never be granted permission. On an NSIP level the proposed London Resort theme park should never be granted permission because of the impacts it would have on the existing road and transport network, as well as the environmental destruction and impacts.

We need joined up thinking, and cannot just simply keep building more and more developments and more and more roads, that is not a solution and evidence shows that more developments and roads just mean more traffic, it has to stop now.

**We strongly oppose the LTC due to all the reasons detailed in this section of our response detailed above**

## Other Issues

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As part of our response, we wish to comment more generally about all the issues surrounding the investigative works for LTC as they reflect upon the project.

We have concerns about all the various issues we and others have reported to you in relation to these works. They give us an insight into what we might expect if the proposed LTC goes ahead, and that is a very serious concern.

Workers urinating in public in fields. Littering from workers including leaving plastic cable ties in farmers fields when breaking down compound fencing. Workers laughing at concerned and stressed members of the public. Workers blocking driveways. Workers parking on footpaths and cyclepaths blocking access for PRoW users, and creating a hazard. Misplaced and misdirected lighting causing glare and putting road users at risk. Bright lights impacting residents homes. Damage to property roads, verges and trees. Damage to gas mains. Snake being run over and killed. Contaminated matting attempted to be laid on prime agricultural land. Speeding issues. Driving wrong way around one way system. Working out of agreed working hours. Poorly placed and carried out traffic management which caused accidents and near misses. Dangerously positioned entrances to sites that could have been better dealt with. The list goes on.

We are aware that land and property owners have and are having issues with dealing HE, due to HE's unacceptable behaviour and attitude you can just do what you want and treat people badly, which is unacceptable.

We have had concerns over how LTC Facebook page have been censoring some of our and other people's posts. We feel that the page is used to present LTC in a biased manner, which we find highly unacceptable.

We also find some info that is shared online, social media by HE/LTC is misleading and there are also attempts to try to associate LTC with other things to try and put a positive spin on LTC and connect it to other things.

Two examples of this would be the Hole Farm Community Woodland as already highlighted elsewhere in this response, and posts about the new Freeports which are nothing to do with LTC. In fact they would be negatively impacted by LTC due to lack of adequate connections and the Stanford Detour.

HE/LTC seem to attempting to greenwash LTC in any way you can, which we find unacceptable too. We note that you always again present the environmental aspects of LTC in a completely biased way. We see posts about how many trees and hedgerows would be planted, How many new ponds etc. But where are the balanced posts about how much woodland and hedgerow would be lost and impacted? Or how many ponds and watercourse would be lost and impacted if LTC goes ahead?

We have had issues surrounding the cover up culture of HE and Freedom of Information issues. These are all totally unacceptable behaviours from HE.

We gain note the fact that HE/LTC refuse to share so much information and detail with us and others, instead saying we will have to wait until it is released when the DCO application is accepted.

We note that HE could choose to release the DCO application documents when the application was submitted or will be resubmitted to allow the most time possible for people to review what will be an extreme quantity of documentation. Yet HE refuse to do so. Instead preferring to limit our time to review the documentation as much as possible.

We would also take this opportunity to request and state that we feel the LTC project should be suspended whilst the roads policy is reviewed.

This policy is being reviewed because it is known to be out of date and not compliant with things that have since been enshrined into UK law, like Carbon Net Zero. By the same token as the policy is in need of reviewing so the road projects that the policy governs should be reviewed and/or the projects and policy be suspended whilst the policy review takes place.

**We strongly oppose the LTC on the grounds due to all the concerns and reasons in this section of our response detailed above**

# Previous consultation responses

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According to the 'You said, we did' document:

*"This document sets out some of the things we have done in response to your comments. We have included the 25 most common suggestions received for each consultation along with our response to these."*

The responses in all three previous consultations were not very informative and there were a lot of negative responses from Highways England.

Air Quality was an important topic and there were numerous worrying concerns about air quality and congestion, but the overall reply or "We did" was – We considered the feedback regarding air quality/congestion, but we did not make any changes to the proposals.

There were varied other topics that "You said" but the main answer was always the same – We considered the feedback regarding (various topics) but we did not make any changes to the proposals. No "We did" there either

Some of the "We did" responses were contradictory such as – You raised concerns about the project attracting new traffic to the area, and the impact increased traffic would have on local roads and air pollution and your "We did" response was yet again "we considered the feedback regarding congestion and pollution, but we did not make any changes to the proposals" even though elsewhere you state – "To the east of the A13/A1089 junction with the project, flows on the A13 are forecast to increase, resulting in a worsening in air quality".

This is confusing and very hard to comprehend how you can make such contradictory statements.

On page 258 – You suggested that the route for the project should be changed, either at certain locations or in its entirety. Some consultees said that the project should be moved closer to the Dartford Crossing, Purfleet, or further east to Canvey

Your "We did" - A structured process has been followed by the DfT and Highways England to identify and assess potential options for the project. Public consultations were undertaken in 2013 and 2016 to inform the development of route options. In 2017 the Secretary of State for Transport announced the preferred route Lower Thames Crossing on the current alignment.

But the 2016 consultation was supposed to be consulting on Option A and Option C but Highways England chose not to include Option A and centres on Option C which did not give the Secretary of State for Transport a true result of people's opinions.

The whole book was extremely repetitive and did not answer most questions that needed definitive answers. It seems as if the public asked lots of relevant questions that were concerning them but Highways England just copied and pasted their responses without actually DOING anything.

We question what was actually detailed as being popular responses and wonder on the validity of it, since grouping themes together would have been done by HE's instruction and decision, and could easily be presented in a biased manner as much of HE's opinions seem to be in our experience.

This again screams out to be another of HE's tick box exercises that are of no real value or benefit to the public, and give us no confidence that HE are really considering our responses properly, taking on board, or doing anything other than what suits you.

**We strongly oppose the LTC on the grounds HE have not provided adequate consultation or given due care and attention to our responses. The 'You said, we did' document would be more appropriately named 'You said, we did nothing'**

# Inadequacies of Consultation

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Our previous comments on the inadequacies of LTC Consultation still stand and are contained in our Inadequacies of LTC Consultations report.<sup>21</sup>

## **Community Impacts Consultation experiences**

As we have sadly now come to expect when it comes to LTC most people have serious concerns over the adequacy of the LTC consultations, and this consultation is no different.

To begin with the timing of the consultation was dubious since it was held predominantly during the Summer Holidays. With the children on school holidays, and people going away on holiday, this most definitely meant it was harder for people to have the time to review and consider the sizable consultation documentation, and respond to the consultation.

Due to the large volume of consultation materials we have found it very difficult in the time given to fully and properly review and consider all the documentation available. It also meant that we were unable to submit questions as early as we would have liked. As a result we have now found ourselves in a position that the responses from HE to our questions have largely only come back to us today within a few hours of the end of consultation. This has not left us long enough to be able to review the responses, and be able to submit follow up questions, or include further comment in this response due to time restrictions of the consultation ending.

We also have concerns and question why HE refused to extend the consultation for local authority due to them needing an extension to get their response completed and through governance due to it being Summer Holidays, but not allowing the public an extension due to the limitations Summer Holiday put on us too. We feel this is discrimination.

It is also questionable that HE chose to have the consultation during farmers busiest time of the year, especially when you consider the scale of the impact on agricultural land.

We and many others, including Local Authorities have called for an extension to the consultation to allow adequate time to respond, yet you have denied us that option.

We have learnt that at least one Local Authority has been granted an extension on the consultation to allow them time to get their response through governance during Summer Holidays. If it is deemed ok to give them an extension because of Summer Holiday impacting ability to submit response in time, then the same courtesy should have been extended to all and the consultation officially extended for all.

The HE email to tell people about the consultation had a dud link in that loaded the following:

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<sup>21</sup> <https://www.thamescrossingactiongroup.com/wp-content/uploads/2020/11/Inadequacies-of-the-Lower-Thames-Crossing-Consultation-Process.pdf>





We're sorry, this page cannot be found.

Email: [info@highwaysengland.co.uk](mailto:info@highwaysengland.co.uk)

General enquiries: **0300 123 5000**

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Leaflets advising of the consultation were only sent within 5km radius. This is not adequate. The reminder postcards have definitely not been reaching everyone they should. It seems that many don't feel that they have had adequate notification of the consultation with details of events and how to take part.

We have been told that emails about the consultation have been sent to all active DartCharge accounts/customers. However, many have stated that whilst they have accounts they did not receive the consultation email.

It is also very likely that many DartCharge users may not have been topping up their account due to COVID, and could possibly have missed out on being informed via DartCharge about the consultation. HE know that people's DartCharge usage would be different/affected due to COVID but it doesn't appear that this has been taken into account.

The events originally planned for the consultation did not include events in some key areas that would be greatly impacted, such as south of the A2, Chadwell St Mary, Stanford/Corringham, and the west of Thurrock.

For a Community Impacts Consultation all communities that would be impacted by the LTC if it goes ahead should have been provided with at least one consultation event.

It took pressure from LTC Task Force, Thurrock Council, community forums, TCAG and members of the public to put pressure on for the events that were eventually added and held for Chadwell St Mary and Stanford.

HE should also have prepared and published Ward Impact Summaries for all impacted areas, yet failed to publish Ward Impact Summaries for the Stanford/Corringham area wards.

It was announced from the beginning that printed consultation materials would not be available until at least a week after the consultation launched. HE should not have launched the consultation until all consultation materials were available in all formats for everyone.

There was a lack of inclusion of the Deaf Community in the public events, until such time as HE decided to have BSL interpreters along to the Chadwell event, which only took place due to pressure put on HE, else there would have been no public event for the Deaf Community with BSL interpreter.

There was very little promotion of the fact there would be a BSL interpreter at the Chadwell event.

Since Chadwell and Stanford events were added later after pressure, they too had little promotion, many were not even aware of events taking place in those locations.

There was also a lack of interpretation options for non English speaking members of the community.

Some of the events were also too close to the end of the consultation which didn't allow adequate time for people to be able to attend the events, ask questions, get answers (or possibly still I have to wait for answers to be emailed or phoned through) and then respond. Some events being within a week of consultation ending.

We have concerns that there was not sanitizing of the touch screens and maps at events.

Some have still not been in a position to be able to attend events in person due to COVID

People found the staff at events to generally not be very knowledgeable or helpful. They experienced the same problems as always with event staff not being able to answer questions. Instance of asking three different people the same question and getting three different answers.

People were being told wrong information at events, especially regarding the 24 hour working hours. People told it was just the tunnels, when clearly it is far more than that.

There was a lack of 'experts' in certain fields at many of the events, representatives from your Environmental team were most noticeable by their absence at way too many events.

When the consultation packs finally started arriving it was apparent very quickly the sheer volume of consultation materials that formed this consultation. 8 weeks was not long enough to be able to properly review, consider, and respond to so much documentation.

It was also ludicrous the way printed materials packs were being sent out. We did not need three copies of everything, just to be able to receive a copy of each of the Ward Impact Summaries.

The consultation documents were not clear and informative as they should be.

We note that you didn't make it clear that HGV movements need to be double to get a realistic figure, very misleading way to present such data.

There was a distinct lack of signposting as to where to locate information. Most of the time it was a case of just trying to hunt down the info you were looking for, if it was in there at all.

The webinars were not very helpful in general. So much pre-recorded content, but even though it had been pre-recorded there were still errors in those sections. Apparently HE couldn't be bothered to provide a professional pre-recorded presentation.

There were sound issues with bad mics that created nasty sound issues.

The webinar viewing window kept resizing itself through the webinar. One minute you'd be watching full screen, then it would minimise and you'd have to open it back up to full screen again.

There was not adequate opportunity to ask question and get answers in the webinars. Too little time was offered for answering questions.

Whilst the webinars were supposed to be detailed to particular areas of the route, HE just seemed to do what they wanted in them anyway.

In general HE just told people to go and hunt down the info they wanted in the consultation materials with little or no indication of where it may or may not have been found.

The content of the consultation materials has been quite technical at times. We feel that HE have likely taken sections of the first attempt to submit the DCO application and used it as consultation material.

We noted changes such as the development boundary now being referred to as the order limits, which definitely gives the suggestion that this is more technical DCO documentation/content.

We remind HE that public consultation should provide clear and informative materials. We most definitely do not consider the Community Impacts Consultation materials to be clear or informative.

The interactive map was very glitch and hit and miss as to whether it even loaded a lot of the time.

On some occasions we got messages requesting log in details be entered as though it was in some kind of admin mode. It was also completely down on other occasions too, as confirmed to us by HE.

At the beginning of consultation the interactive map would not allow us to zoom right into areas without the red development boundary disappearing. It is also noted that when you zoomed in on the two closest levels of zoom on the map certain layers disappeared.

We are aware that some booked phone calls with the HE team, and that they ran out of time with the member of the team, who had to excuse themselves to attend another appointment. Whilst we understand this may happen whereby discussion can take longer than anticipated, the member of the team did not even offer to arrange a follow on appointment, and instead seemed very keen to escape.

We note that there are numerous errors and mistakes in the consultation materials. Places wrongly labelled and mis-spelt. Some of these were still the same errors and inadequacies as reported in previous consultations.

When you consider some mistakes were wrong spellings and even wrongly labelled place names it is a concern as HE should have a better knowledge of our area than to be making such mistakes by now.

Stanford spelt Standford, and Stamford. Ockendon spelt Ockenden. Horndon on the Hill being spelt Hordon on the Hill (missing an n) Brentwood being labelled as Brentford. Stifford Clays being labelled Little Thurrock.

Ward summaries not accurate on public transport, for instance Orsett Ward has more rail stations than just West Horndon to consider.

HE have an obligation to consult us adequately, yet it seems even when we bring inadequacies to your attention you can't even be bothered to correct and improve them before presenting them to us again in the next consultation.

We also note that some online documents were updated during consultation apparently, as we noticed changes in file and URL names.

We have heard that a local community radio station has been trying to get someone from HE to come on their station for an interview, yet HE ignore the requests. We find this unacceptable, especially during a community impacts consultation.

HE say they want to interact and do all they can to get word out about the LTC and consultations, yet they have not taken an opportunity to connect with the community via a local community radio station when approached.

We were not impressed by the attempts to greenwash the LTC.

As previously we find that HE present information about the LTC in an extremely biased way, and with no focus on the negatives and realities of the project, always trying to put a spin on it.

Things such as the front page of the consultation website stating that LTC would improve air quality across the region is misleading and not a true representation, because once you dig deeper into the detail the evidence is there to show that many areas would see a worsening of air quality.

We found the Easy Read documents to be inadequate too.

### **Easy Read – You said, we did**

Very misleading right from the beginning.

What people said about the first set of plans. Most people agreed with the plans for the Lower Thames Crossing. But the first set of plans did not have Option A as an option. The first question in that consultation was "Do you agree that we need a new crossing?" and then just asked for opinions about Option C.

People said "Instead of building more roads there should be better trains and buses. We Said – If there were more trains, there would still be too much traffic wanting to cross the River Thames. We need another road tunnel.

The second set of plans – We reduced the number of lanes between the M25 and A13. This would use less land and be better for the environment. No mention of the chaos that would cause when traffic needs to use that part of the proposed road and cannot cope.

In general we found it very patronising and only outlining the so called "benefits" and did not touch on the disadvantages that a new road would bring to all of the areas along the route.

The fact that this was only available online is not acceptable as it does not reach the people for whom it is supposed to inform about all of the aspects of the proposed Lower Thames Crossing.

### **Easy Read – Ward Summaries**

This again was extremely patronising and only gave basic statements without actually telling people exactly what to expect which could really worry them.

Statements such as on Page 16 – Environment – We will give the land back when we have finished. Is totally insulting to anybody reading this.

There are lots of bus routes mentioned that will be impacted all along the route and people will worry if they do not understand what is going on and how to deal with things like that. Especially on page 67 – The 370 bus route would have to be changed,

There are glaring spelling mistakes – Page 58 - Ockendon as the title then – the new road will go round South Ockenden. It will then go between South Ockenden and North Ockenden. Then again on Page 62 – people will be able to see part of the road from South Ockenden. Page 63 – The new road will go around North Ockenden and join the M25 at a new junction between North Ockenden and Upminster. Then on the same page – we would expect delays on Ockendon Road. Then again on Page 66 – people will be able to see part of the road from North Ockenden. Some people will wonder if they are one and the same place and get very confused.

### **Easy Read – Guide to the Consultation**

We find the following statement extremely hard to understand – Page 21 – digging a smaller tunnel south of the Thames so we can strengthen the land??

The Easy Read Guides are all very patronising, worrying, only available online as far as we are aware, which means they will probably not reach the people for whom they are meant to inform about this project, which after reading all of them we presume is people with special needs. We really think there is no excuse for the spelling mistakes as anything like that really could confuse somebody with special needs.

We question how people that may have wanted to view these Easy Reads would have known about them, as we did not see any promotion of them being available. It appears to be another tick box exercise for HE to purely say you have done it, rather than making a real effort for people to be aware.

That said we do not feel they were adequate or fair representations anyway.

### **Conclusion on the Community Impacts Consultation**

Yet again we do not consider that the consultation has been adequate, provided clear and informative materials, and way too much information that we and others have been asking for is simply not available or HE are refusing to share with us.

**We strongly oppose the LTC on the grounds that HE have not carried out adequate consultation throughout the whole consultation process**



# Conclusion

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In conclusion we Thames Crossing Action Group and the thousands we represent remain strongly and most definitely opposed to the proposed Lower Thames Crossing.

We do not feel that we have been provided with adequate consultations.

We do not feel that HE give proper consideration to our responses and opinions.

In our opinion and from the evidence we have seen we do not believe the proposed LTC meets any of its objectives, would not be adequately mitigated if it goes ahead, and would not be value for money, or in actual fact fit for purpose in any shape or form.

We Thames Crossing Action Group always have been and remain very strongly opposed to the proposed Lower Thames Crossing.