

THAMES CROSSING
ACTION GROUP
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Sent via email from admin@thamescrossingactiongroup.com

3rd June 2022

Your ref: PO2022/09422/BG

Dear Lord Goldsmith

Thank you for your time and the response dated 27th May in response to our letter about the proposed Lower Thames Crossing (LTC).

However, we do feel the need to comment further in response to the points you raised.

Firstly, we are of course pleased about Government's plans for tree planting, nature, carbon net zero etc. However, how can the Government warrant spending billions of pounds, £8.2bn on the proposed LTC alone, on hugely destructive and harmful projects? Why is it deemed acceptable to be spending so much more destroying our natural environment than saving, protecting, and improving our natural habitat?

You mention about Government opportunities for farmers and landowners, yet the proposed LTC would destroy and impact thousands of acres of agricultural land. What about our country's food security, which is a major issue?

Of course, we welcome all protections for ancient woodland, but again destructive and harmful projects like the proposed LTC are being considered more valuable than our irreplaceable ancient woodlands. We would be interested to hear how the proposed LTC is deemed to be a wholly exceptional reason to destroy and impact ancient woodland? Especially when the original remit was for a new crossing to solve the congestion and pollution problems associated with the Dartford Crossing. National Highways own data proves that the Dartford Crossing would still remain over capacity, even if the LTC goes ahead. How can this warrant the destruction?

You mention suitable compensation. How can you compensate for the destruction and loss of woodlands that date back centuries? As you will be aware trees communicate below ground through mycelium, so where even part of an ancient woodland is lost or impacted it will have further impacts on the rest of the woodland.

Again, we are pleased about the additional proposed protections by means of updates through the Environment Bill. But will these changes be too late for the ancient woodland, trees, and hedgerows that the proposed LTC would destroy and impact if it goes ahead?

Updating the Ancient Tree Inventory is, as highlighted above, much needed. But how long will such things take? We submitted our woodland for ancient woodland status consideration mid 2021 and we are still waiting for a decision now. We are aware that such delays are because Natural England's resources are already stretched so much, this needs to be addressed if Government mean what they say about saving, protecting, and improving our natural environment.

Similarly, we welcome the new category of Long Established Woodland. However, yet again the question has to be what about the loss of such woodland in the meantime? The woodland we are seeking ancient

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woodland status for would most definitely fall into this category if for any reason Natural England were not able to award Ancient Woodland.

With respect in response to your comments specifically on the LTC, National Highways own data proves that the Dartford Crossing would still be over capacity even if the LTC goes ahead. The design capacity for the Dartford Crossing is 135,000 vehicles per day, yet it is regularly operating at 180,000 vehicles per day. You would need to take 25% of traffic away to bring it back to the top of the design capacity.

I am not sure who has advised you that the LTC is predicted to take 22% of traffic from the Dartford Crossing, I can only assume it comes from the 2018 statutory consultation. However, National Highways have now said it would be around 20% dropping to 14% by 2044 (estimated opening of LTC is 2030). This is not enough to bring the traffic below design capacity.

Also, Thurrock Council have recently published their concerns that using traffic modelling data provided to them by National Highways, the Dartford Crossing would see a traffic reduction as low as 4% in the am peak and 11% in the pm peak¹.

We also feel that the almost doubling capacity across the river statement that National Highways use is misleading and questionable to say the least. They refuse to provide the design capacity figure for the proposed LTC.

They are not considering or planning for how traffic would migrate between the two crossings when there are incidents (currently more than 300 incidents per year at the Dartford Crossing which is unlikely to reduce with it remaining over capacity even if the LTC goes ahead). There would not be adequate connections for traffic to migrate, the results would be chaotic, with more congestion and pollution².

In regard to National Highways assessments of the proposed LTC, they admit in this current consultation that surveys and assessment in regard to environmental impacts are still being carried out, and they will present them in the Environment Statement when they attempt to resubmit the Development Consent Order (DCO). This means that we the public are not being given adequate information to give meaningful response to the consultation as we have not been provided with such information. Not only that, and also moving on to cover your comments regarding their engagement with stakeholders, they are not providing adequate information to host Local Authorities and major NGOs etc, and any engagement is far from meaningful³.

Having attended the LTC Road to Net Zero industry summit that National Highways held, I still express our serious concerns on over 5 million tonnes of carbon emissions for the proposed LTC. There was a lot of talk at the summit, but very little if any solutions as to how such a huge amount of carbon emissions could be reduced, and there is no way it would ever be net zero. Not to mention the additional cost that reducing the carbon emissions would add to the already huge budget. Intentions and labels such as 'pathfinder project' do not guarantee any reduction in carbon emissions or environmental impacts. Others in the industry have also questioned National Highways intentions on carbon emissions⁴.

¹ <https://lowerthamescrossingthurrock.co.uk/wider-debate-is-needed-on-the-merits-of-ltc-creating-a-new-m25-outer-orbital-route>

² <https://www.thamescrossingactiongroup.com/incidents-ltc-dartford-crossing/>

³ <https://lowerthamescrossingthurrock.co.uk/independent-review-raises-serious-concerns-about-adequacy-of-consultation-on-ltc>

⁴ <https://edition.pagesuite.com/html5/reader/production/default.aspx?pubname=&edid=52e59c5b-3242-4a25-8731-e4ba97136a35&pnum=38>

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And last but by no means least in response to your comments, the factor of PM2.5 in regard to the proposed LTC. As you will be aware Government will be enshrining new air pollution levels in to UK law by the end of October this year. Whilst acknowledging WHO guidelines are not legally binding in the UK, I would draw attention to the fact that the WHO-10 levels that I mentioned are indeed in line with the levels that are being proposed to be enshrined into UK law later this year. There is evidence that the whole proposed LTC route would fail against these new legal levels.

I hope that the additional clarification and points shared above help to reiterate why we have such serious concerns about the proposed LTC. We would again ask how £8.2bn of taxpayers' money, as well as the huge cost to our environment, health and well-being can seriously be considered value for money?

Thank you for your time, we hope to hear from you soon.

Kind regards

Laura Blake
Chair – Thames Crossing Action Group
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