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The Rt. Hon Simon Clarke MP
House of Commons
London
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Dear Mr Clarke,

Re: Concerns Regarding the Outline Business Case for the Proposed Lower Thames Crossing

I write to express Thurrock Council's significant concerns on the proposed Lower Thames Crossing. The Council believes the current project is no longer achieving its stated aims and that the basis for the project needs to be re-examined. This is due to significant and exceptional domestic and international challenges and events over the preceding 3 years. The Council's concerns are exacerbated by poor engagement by National Highways, especially in relation to sharing key information about local impacts.

The Council believes that the project in its current form would underdeliver on benefits, overrun on costs and fails to take advantage of the significant potential of a project of this nature. The Council therefore requests prior to approval of the Outline Business Case, that the scheme be referred back for serious and substantial discussions between the National Infrastructure Commission, National Highways and stakeholders.

National Highways are shortly proposing to seek approval from the Chief Secretary to the Treasury for their promoted scheme, the Lower Thames Crossing. National Highways suggest that the technical work they have carried out is sufficiently thorough and reliable to justify this approval, and only minor details remain to be refined before submitting the scheme for Examination under the Planning Act (2008) process.

Despite continuous engagement between Thurrock Council and National Highways on the Lower Thames Crossing scheme for over 6 years, starting before the Route Consultation in early 2016, the Council remains apprehensive about the scale of the impacts of the scheme on Thurrock's residents and businesses.

The Council contests that insufficient evidence has been presented to demonstrate that there are scheme benefits that outweigh these impacts, or that alternatives could not be identified that would deliver a better balance between local impact and strategic benefit.

There is substantial and growing evidence to suggest that the current scheme is at risk as it will fail to provide value for money in accordance with Government requirements. Significantly more work is required to develop the Outline Business Case, particularly with regard to the strategic case and the economic case.

A more robust strategic analysis of the benefits and risks is required to ensure that the scheme design and its alternatives have been tested against the need to align with national and regional economic and social priorities, along with growth and development strategies. In addition, detailed analysis is needed of both the economic and social benefits and disbenefits attributing to the scheme. These should take fully into account the likely negative impacts of the scheme on growth in Thurrock, on air quality, health and its impact on greenhouse gas emissions.

In demonstrating the need for the Lower Thames Crossing, alternative options need to be examined which would be better integrated with local plans for sustainable growth, and which would support more sustainable transport options and carbon reduction. This work has not been completed, and there are no guarantees that Lower Thames Crossing will deliver the connectivity required by the Thames Freeport to support either its growth objectives, or its goals for innovation and carbon reduction. Without this evidence, the Council is concerned that the rationale for the preferred option and value for money for Government has yet to be proved.

There are major issues of principle, inconsistencies with international obligations and Government policy, inadequacy of scheme assessment and consideration of alternative design options, absence of integration with local plans for growth and mitigation of local effects, that are yet to be resolved or agreed. An appendix to this letter is included, to set out some of these issues in more detail, under the following headings:

- Progress in sharing important underpinning data: despite extensive engagement, over 400 important issues remain outstanding between National Highways and the Council. This includes the Outline Business Case, as well as some of the key underpinning data, including traffic forecasts and options appraisal.
- Topics unresolved because of ambiguous or incomplete data provided by National Highways: Many pertinent questions about the Outline Business Case and its underpinning analysis, so far remain unanswered, and which could have a significant bearing on the outcomes of the strategic and economic case.
- Aspects where National Highways' approach is inconsistent with Government principles, policy, or practice, including the National Networks National Policy Statement, the Decarbonisation Strategy, and changes to appraisal in the Treasury Green Book.

- Problematic treatment of traffic forecasts; the assumptions used to assess future changes in traffic demand and CO₂, appear to underplay the importance of key related factors, such as induced traffic and the role of public transport, and there are inconsistencies in the consideration of predicted changes to the vehicle fleet.
- Problems of consultation: There is an opportunity for the Council and NH to engage more fully and constructively about the options for the Lower Thames Crossing, and to refine the scheme to be better aligned with national policies and priorities, local growth, and Thames Freeport ambitions.

Despite a considerable number of meetings, engagement has not yet led to meaningful sharing of data and evidence, or resolution of key issues. Given the continued lack of meaningful engagement the Council is concerned that there is high risk that the current scheme will fail the test of acceptance by the Planning Inspectorate, and that ultimately it would likely fail to secure consent.

This would add further time to the process of promoting this project, delays in delivering its intended objectives, and put at risk the significant investment in the project thus far. There is an opportunity however to engage constructively about how this scheme might be developed to better support national and local priorities and improve its value for money.

Key issues with the current Lower Thames Crossing scheme proposed include but are not limited to:

- The appraisal of different options to the proposed highway scheme has not assessed the strategic transport alternatives. It does not consider alternative ways of catering for future regional accessibility requirements.
- There are no guarantees of access to the Thames Freeport, or those connections needed to facilitate local growth. There is also no agreement about how the major severance of existing routes is going to be overcome and provision made for sustainable access. This puts at risk both local economic growth as well as local strategies to address climate change.
- The proposed scheme has a significant impact on local roads. Significant work remains outstanding to demonstrate the ability of the proposed scheme to work in conjunction with key local road junctions.
- The use of local roads as part of the Lower Thames Crossing scheme will significantly reduce capacity for future local growth and create a substantial additional financial burden on the Council for future maintenance.
- No plans have been developed to address the requirement to support and benefit public transport or future low carbon transport options as part of this new cross-river transport opportunity, thus reinforcing car dependence making it increasingly difficult to meet legally binding carbon targets.

Collectively, these factors need to be addressed and an alternative design option for key elements of the scheme should be given due consideration, to demonstrate that it offers best value for money. National Highways are currently promoting a scheme that they have not yet proved is able to work effectively nor achieve its objectives.

A key example of the misalignment between Lower Thames Crossing and important national and local priorities is illustrated by its interaction with Thames Freeport. The Full Business Case (FBC) for Thames Freeport sets out how it will deliver national, regional, and local policy objectives, bring substantial benefits to local businesses and residents and how it will become a key component in implementing the UK's international trade and economic recovery and growth policies by accelerating greater trade and investment through the Thames Estuary. The Thames Freeport will deliver levelling up in left-behind communities through investment in skills, innovation, and physical and social infrastructure including transport infrastructure such as sustainable travel initiatives, road, rail and river multi-modal travel solutions.

The Thames Freeport's ambitions also include the opportunity for piloting of electric and autonomous vehicles, reducing congestion, emissions and pollution. However, there is a risk that the current Lower Thames Crossing scheme could significantly restrict the ability of the Thames Freeport to realise this opportunity for economic growth and innovation. A disruptive period of construction activity will significantly increase local traffic congestion and in doing so restrict port access. Despite significant engagement and the promotion of a new junction at Tilbury, there is yet no agreement about how the connection to Tilbury will be delivered, or how it will connect to the wider highway network providing essential connections for employees and goods once Lower Thames Crossing is operational.

It is of significant concern that there will be a lack of road capacity to cope with significantly increased traffic caused by Lower Thames Crossing and compounded by inadequate provision of necessary requirements for port access.

There is a serious likelihood that, until these issues are properly discussed and resolved, the Outline Business Case will not be technically robust; nor will it support important Government objectives. The scheme cannot therefore be justified in economic or environmental terms.

The Council's view is that the Lower Thames Crossing scheme in its current form will not deliver the wider economic benefits predicted. Conversely, it will have substantial negative impacts on an already deprived area, fail to support longer term economic growth, and therefore act against the important strategy of levelling up.

Furthermore, the scheme will significantly increase cross river traffic. This will undermine the benefits of the anticipated transition of the vehicle fleet to alternative low carbon fuels, thus widening the gap between the UK's existing carbon trajectory, and the achievement of its legally binding carbon targets and pathway.

The Council continues to seek to engage positively with National Highways. However, the Council recently and reluctantly considered it necessary to submit a Freedom of Information request to gain sight of the Outline Business Case to help provide a better understanding of these issues. The Council's request was refused. The justification

provided by National Highways stated that this work is so incomplete that it should not be revealed to stakeholders; whilst at the same time making the case that the appraisal and assessment of the scheme is sufficiently complete for it to be ready to be submitted for Treasury approval and onward into planning.

The Council has subsequently and recently requested of National Highways that they undertake an internal review of that decision to refuse access to the Outline Business Case. This is because, in the Council's view, the public interest in maintaining the exemption does not outweigh the public interest in disclosing information and does not allow the public generally, and the Council in particular, to comment on the Outline Business Case prior to any Development Consent Order approval being granted. The Council considers that its role as a representative of those residents who will be most impacted by the project is key to understanding the true cost and benefits of the project, particularly environmental, climate and health issues.

Approval of the Outline Business Case for this Lower Thames Crossing scheme would force the Council to commit to a very long, complex, time-consuming and expensive argument through the public examination, and the potential need for subsequent challenge should key issues not be resolved. Yet, there is an opportunity to devise a better scheme that delivers against national and local priorities. Whilst this may lead to a short-term delay, the long-term benefits of this course of action are compelling.

The Council proposes that, prior to approval of the Outline Business Case from Treasury, the scheme is referred back for serious and substantial discussions between the National Infrastructure Commission, National Highways and stakeholders.

The legislative and political priorities of the UK have developed significantly over the last decade since the decision was made to pursue the Lower Thames Crossing. For example, in the past 3 years the UK has introduced a legally binding target for net zero emissions by 2050 and significantly altered our trade patterns through leaving the European Union. The world economic situation has also dramatically changed due to the impact of the pandemic and war in Ukraine. Considering the unprecedented changes in the last 3 years, it is appropriate to consider, not only design, but also need, alternatives, and objectives, aiming to deliver a better scheme that delivers greater strategic benefit and lower local impacts, and accompanied by appraisal which is fully compliant with both evidence and principles.

Yours sincerely,



Cllr Rob Gledhill
Leader of Thurrock Council

CC:

Baroness de Vere, DfT

Michael Gove, DLUHC
George Eustice, DEFRA
Kwasi Kwarteng, DBEIS
Nick Harris CEO National Highways
LTC Executive Director Matthew Palmer, National Highways
Leader, London Borough of Havering
Leader, Gravesham Borough Council
Jackie Doyle-Price MP
Stephen Metcalfe MP

Encl: appendix

Appendix

1. The main topics of difficulty are summarised below. Each can be supported by detailed citation of Government documents, research evidence, technical argument, and legal advice, which we are currently preparing.

Progress in sharing essential underpinning data

2. The Council has engaged with National Highways on a long list of disputed topics, of which at least 300 remain unresolved at the time of writing.
3. High amongst these issues is the Outline Business Case, which the Council has been seeking further information about. In the absence of satisfactory answers, a Freedom of Information request was submitted, but National Highways has rejected this on the basis that:
“... the Outline Business Case is incomplete and hasn't been approved by the Chief Secretary of Treasury. The information is therefore being withheld as it falls under the exception in Regulation 12(4)(d) material in the course of completion, unfinished documents and incomplete data. “
4. A further difficulty is that National Highways has provided the Council with some sample outputs of their traffic forecasts, but in a strictly limited form which does not include the whole modelled area. The Council has only been allowed to see figures for the modelled cordon around its boundaries. The Council understands that National Highways has given similar data to other neighbouring authorities, but on condition that local authorities cannot not talk to each other to seek to develop an understanding of the modelled region. This seriously limits the ability of each Council to check whether the assumed base, and projected forecasts correspond with local knowledge of actual trends in recent years, or likely future trends. Analysis of the data by the Council has found significant indications of discrepancies, so it does not have the assurance that the forecasts are sensible, which is material given the comments below.

Topics unresolved because of ambiguous or incomplete data provided by National Highways

5. It is not clear if the latest versions of software change the findings of the Economic Appraisal? i.e. TUBA (version 1.9.17 instead of 1.9.13), COBALT (2.2 instead of version 2013.2, as COBALT v2.2 was released around 7 March 2022) and WITA (version 2.2 instead of WITA2 Beta).
6. A weak economic case has been presented and it is not clear that this has been updated? Please explain the justification of the scheme given its weak economic case.
7. It is not clear whether the TUBA/COBALT warning messages been checked and found to be acceptable?
8. The Council has requested that the spatial distribution of the benefits attributed to Thurrock be provided. The Council notes that it appears to be ranked 1st for

Average User Benefits per Head (£) and also has the highest % share of average user benefits at 21% (Table A.34).

9. Only interim construction disbenefits have been reported and it is unclear if the construction impacts have now been refined. The Council has requested details on how the disbenefits are calculated.
10. The Council requests evidence on how and whether the economic appraisal outputs are consistent with the case for change, including whether scheme objectives and need for the scheme are consistent with the economic appraisal outputs. It is not clear if the 7 scheme objectives have been met when reviewed against the economic case?
11. It is acknowledged that there is significant uncertainty about how the transport system will evolve in the future, particularly with the potential for emerging trends in behaviour and technology to drive significant change over time (reference: Uncertainty Toolkit TAG Supplementary Guidance). Core, Low and High growth scenarios have been tested within National Highways' LTAM traffic model, simply based upon TAG M4. There has been little consideration, regarding the effects of entirely possible mobility futures, particularly in relation to the business case, impacts on the local road network including junction operation, air quality and carbon emissions. It is important that the scheme is designed to be resilient to future change and able to help achieve desirable outcomes. How has it been demonstrated that the assessment of uncertainty influenced the scheme, configuration, components, and design?
12. Can discussion or sensitivity testing consider the potential impacts on the scheme value for money of increased participation of activities via digital means?
13. Can the air quality impacts including greenhouse gases (GHG), be explicitly assessed for scenarios likely to have worse impacts than those of Core (such as the High Growth scenario) or better (such as the low growth scenario) instead of assuming them to be equal to those of the Core scenario as has been done? (Though note below our comment on these scenarios).
14. National Highways has not undertaken options testing to evaluate the relative benefits of a junction at Tilbury providing Port access and eliminating the need for Lower Thames Crossing connectivity with the A1089 via a highly complex and expensive junction arrangement. National Highways has agreed to do the technical work to assess this scenario, but this work is not likely to be completed in time to enable consideration of the outcomes of this work before DCO submission. National Highways remains steadfast that it will not change its design regardless of any potential to reduce costs or improve local connectivity. This is analogous to the position adopted by National Highways with respect to Tilbury Fields. Despite robust engagement, the importance of integration between Lower Thames Crossing and the Thames Freeport was not fully grasped by National Highways, resulting in delay to the scheme in order to redesign the area around the tunnel portals and ensure the Thames Freeport could progress unencumbered. This entirely avoidable position appears to be being repeated in relation to its integration with important national and local

priorities, which unless addressed will create future delays to project implementation.

15. In this Lower Thames Crossing scheme, National Highways proposes to disconnect the existing strategic road network (SRN) port link between the A13 west-bound and the A1089 south-bound and instead divert this traffic via local authority roads. It also proposes to provide some links to LTC with the A1089 via local authority roads, whilst other links are provided via a direct SRN connection for which National Highways will be responsible. Local authority assets are being used to reduce the costs of the scheme and this is not being reflected in the cost envelope for Lower Thames Crossing. In addition, the Lower Thames Crossing scheme absorbs capacity on the local highway network, including the A13 which has recently been widened at a cost of over £130M. The use of local highways to reduce the costs of Lower Thames Crossing distorts the real cost of the scheme. Through its approach National Highways has necessitated substantial further costs to be incurred by the Council to re-create planned capacity to accommodate both Local Plan growth comprising over 30,000 homes, and the substantial growth in employment generated by the Thames Freeport designation of the local ports.
16. National Highways has not provided details of the cost of traffic delays and congestion that will be caused to local motorists over a construction period of 7 years. Strategic modelling to calculate this will underestimate the negative scheme cost impact, and good practice approaches to calculate journey time disbenefits using operational modelling have clearly not been adopted. National Highways has also not set out any practical proposals to reduce the cost of congestion on local residents, as they are aware is commonplace as part of other major road schemes and have been repeatedly encouraged to adopt by its regulator the Office of Road and Rail. Thurrock Council is hamstrung in attempts to work with the Department for Levelling Up, Housing and Communities on its Levelling Up strategy for the Borough by the repeated refusal of National Highways to provide details of the additional social costs anticipated to be borne by the Borough as a result of its Lower Thames Crossing scheme.
17. National Highways has repeatedly refused to undertake sensitivity tests to consider how its proposed Lower Thames Crossing scheme functions in relation to high-wind closures and incidents at the Dartford crossing. A key benefit of the scheme is claimed to be to address the fact that “over 300 times a year the Dartford Crossing is partially or fully closed for around 27 minutes on average, due to incidents”. It is noted that Transport for London has deemed it important to run scenarios as part of the Silvertown Tunnel DCO. In contrast, despite this being a central justification for the Lower Thames Crossing scheme, National Highways has repeatedly refused to make a commitment to demonstrate how the scheme will improve the ability of the network to perform more reliably.

Aspects where National Highways’ approach is inconsistent with Government principles, policy, or practice

18. The proposed Lower Thames Crossing scheme appears incompatible with the National Networks National Policy Statement (2014) requirement to consider

'successor documents' consistently, and to carry out proper appraisal of alternatives, as reinforced by Department for Transport's Transport Analysis Guidance. It appears that National Highways considers that consideration of alternatives are not necessary, because of its Road Investment Strategy 2 designation, but that does not apply in this case because of the nature and scale of the scheme and the changes in strategic priorities resulting from the Treasury Review of the Green Book.

19. Policy and context changes since 2014 are fundamental, especially: Declaration of Climate Emergency, the 6th Carbon Budget, the advice of the Climate Change Committee, the Government's Decarbonisation Strategy, the UK's Nationally Determined Contribution as part of the Paris Agreement, introduction of a UK Emissions Trading Scheme in January 2021. It seems that National Highways is relying on an assumption (in advance of demonstrating it) that the carbon effects of the scheme are below the level of 1% of all other emissions from all other sources, that they have arbitrarily decided to treat as a threshold level for considering carbon as material. But the scheme is unusually large, the 1% level cannot be assumed as relevant (as confirmed in recent decisions by the Secretary of State for Transport). The presumption that the Lower Thames Crossing scheme impacts can be easily compensated by other initiatives conflicts with the current Department for Transport decarbonisation trajectories.
20. Important appraisal changes have been made since 2019, especially Green Book and Department for Environment, Food and Rural Affairs' recommendations on climate scenarios of 2°C and 4°C average worldwide temperature change (which would be directly and drastically relevant to living, working and travel conditions in the whole Thames Corridor); Department for Business, Energy and Industrial Strategy; and Department for Transport's advice on carbon values for appraisal, and Department for Transport's Transport Analysis Guidance advice on scenarios, uncertainty, risk, baseline definition, and appraisal of alternatives.

Problematic treatment of traffic forecasts

21. The intended outcome of the Department for Transport's decarbonisation strategy: include, as well as uptake of electric vehicles, many initiatives, now committed as formal Government policy, which are designed to reduce traffic growth, especially in all urban areas with shifts to walking, cycling and public transport, and also on longer distance journeys (including shifts to improved rail and longer distance coach services, and significant increases in average car occupancy). The most recent Department for Transport calculation of carbon trajectories shows that these demand changes are a necessary part of achieving the targets. All of these will have a material effect on traffic forecasts in the baseline, whether or not the Lower Thames Crossing scheme is implemented. It would clearly be inconsistent to assume that these policies have zero effect on traffic forecasts, while assuming, at the same time, that they are entirely successful in reducing carbon outputs.
22. Department for Transport's treatment of scenarios for forecasting traffic allow for uncertainty, scenarios including both upwards and downwards pressure on traffic

trends, risk registers, and the interaction of electrification of vehicles, congestion, and fuel costs. The National Highways' traffic model tests are not scenarios in the sense used by Department for Transport's Transport Analysis Guidance guidelines (i.e. corresponding with specific stated conditions of changes in incomes, fuel prices, population estimates, continuation or otherwise of specific trends observed in recent years before the forecasts, and level of uptake of electric vehicles). Rather, they are simple sensitivity tests of a narrow arbitrary range of traffic growth, not allowing for internal consistency with other modelling assumptions. The 'low growth' test does not include any recognition of downward pressure on traffic due to the decarbonisation strategy, trends of traffic in London, post (or continuing) Covid trends on working from home and internet shopping with home delivery, or the outcome of Brexit changes on freight traffic to and from Dover. The 'high growth' test does not account for significant local growth at the recently designated Thames Freeports of Tilbury and DP World/London Gateway, nor through the Local Plan. While the Local Plan is not yet advanced sufficiently to be included in the baseline forecasts, the reality is that significant growth is planned which is likely to have a significant effect on the forecasts.

23. In this context, the National Highways' assumption of fixed land use as between 'with' and 'without' forecasts, while being a common simplifying assumption for many schemes, seems inappropriate with a scheme which is likely to have a 'transformative' effect on cross-river movement, and therefore the desired location of homes or workplaces or both. This is likely to underestimate the induced traffic resulting from the scheme, especially in the longer run, and therefore materially underestimate the congestion and carbon emissions in the 'with' case.
24. There appears to be selective 'cherry picking' of assumptions about base line and 'with project' projections to frame the project in an unrealistically good light. This includes ambiguous and inconsistent treatment of baseline trends, which appear to assume simultaneously no impact of government decarbonisation policies on traffic growth, but 100% success of those policies in justifying ignoring carbon impacts.
25. There is potentially inconsistent adjustment of journey length distributions in response to changing travel generalised costs, especially affecting shifts of traffic between strategic and local networks, close and more distant destinations, active travel and vehicle travel. This means that the scheme and its effects cannot be properly assessed in relation to other Government and local policy priorities.
26. No impact is discussed, even in principle, of the effect on demand forecasts of critically important projected rail and other public transport policies, arising out of the imminent opening of the Elizabeth Line, its extension by tram or other means to the Lower Thames, and resulting potential for improving public transport both North and South of the Thames. These ideas might represent a serious alternative to the Lower Thames Crossing, or an enhancement of it, or a competition with it. There is not yet a firm view of which of these three relationships might apply, but any of them would have significant effects on the demand for the Lower Thames Crossing, and therefore its justification.

27. Work is currently under way on National Networks National Policy Statement Strategic Environmental Assessment in which indications have already been given of the direction of travel, including questioning the doctrine of 'de minimis' in relation to carbon impacts of road schemes.
28. The sensitivity tests for higher and lower traffic growth do not correspond with either the method or the numbers with the Department for Transport's treatment of scenarios for the national forecasts.
29. There is no consideration of the effects on demand or the resilience of infrastructure of more radical changes to the climate beyond that projected in the latest set of climate projects, as required in National Networks National Policy Statement and specifically recommended by the Department for Environment and Rural Affairs in baseline tests for 2°C and 4°C increases in global average temperature. As discussed by the Office for Budget Responsibility, these are likely to have very serious economic, social and political effects overall. The whole Thames corridor is particularly vulnerable to the effects of any changes in the risk register for flooding, whether by storms, tidal incursion, or run-off from the surrounding countryside, and it appears that any consideration of such risk has used out-dated and over-optimistic assumptions. For obvious reasons, such risks have both direct effects on travel in emergency situations, and longer lasting impacts on settlement patterns, land use, nature and location of employment, and effects on real incomes.
30. There is lack of clarity about the realistic effects of the proposed toll arrangements on traffic levels and financial viability, especially in the context of changes in the costs of travel further upstream.
31. Project costs have increased but have not been amended in the outline business case, either due to general inflation of construction costs, or specific requirements which were not envisaged when the scheme was designed some years ago.
32. There appears to be a presumption that there are no issues of urgency and timing in the near future which will affect either needs, or demand responses. This is the opposite assumption to that underpinning the Department for Transport's projections of greenhouse gas emissions from domestic transport which demonstrate clearly that for the trajectory to be consistent with the 6th carbon budget, there will need substantial travel mode shift by 2025.
33. The treatment of sustainability is cursory and superficial. National Highways states that Lower Thames Crossing is to be its greenest road scheme and a pathfinder project, yet there is little evidence that this has had any substantial effect on the design of the scheme or the effect that would have on the business case and options appraisal. National Highways claims to be enhancing measures for walking and cycling appear to be little more than reconnecting severed corridors. The proposals do nothing for public transport, especially to facilitate cross river public transport – to the extent that cross river bus travel would be entirely unviable. Inclusion of the Tilbury Link Road could make it

viable. National Highways is now including an operational junction (albeit untested for traffic demand and currently for emergency access only), but there are no guarantees that the link road (required to provide necessary port access to Tilbury for public transport and freight vehicles) will be delivered. The scheme fails to take the opportunity to make such improvements and the appraisal ignores the serious policies and programmes of improvement that Government and local authorities are committed to, and their effects on demand for short and longer distance travel. There is no evidence of how the project responds to futureproofing for the changes in vehicles, and which include not just electrification but hydrogen options for freight and platooning; and 5G resilience. There is little information in the outline appraisal of how the business case will treat the costs of sustainable construction – such as how the business case handles marine, and rail use for transporting materials or the potential for incentivising the use of alternative fuelled construction vehicles and automation. If this is all to be left to the Main Works Contractors to come up with zero cost proposals, then there are serious questions of how tender specifications will handle value for money or risk.

Problems of consultation

34. An earlier initiative by National Highways to seek approval for its Lower Thames Crossing DCO was not supported by the Planning Inspectorate due to the very inadequate consultation that had been carried out. Although the Council welcomes assurance that this will be corrected, it cannot be sufficient to improve the technical forms of consultation without any change to its terms of reference or scope. The Council are firmly of the view that the issues raised in this note are vital to the residents, businesses authorities and stakeholders in the Lower Thames corridor, as well as movements passing through in all directions.
35. There is an opportunity for the Council and NH to engage more fully and constructively about the options for the Lower Thames Crossing, and to refine the scheme to be better aligned with national policies and priorities, local growth and Thames Freeport ambitions. Given the very long-term nature and importance of this investment, taking the opportunity to review the scheme to ensure it is delivering optimum value would seem to be the logical and rational thing to do.