

**LOWER THAMES
CROSSING LOCAL
REFINEMENT
CONSULTATION
RESPONSE**



Introduction

Thames Crossing Action Group represents thousands of people who are opposed to the proposed Lower Thames Crossing.

We are strongly opposed to the proposed Lower Thames Crossing because it would not fulfil the project objectives. It would be hugely destructive and harmful, is not fit for purpose and would be a complete waste of taxpayers' money.

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 Consultation¹, Supplementary Consultation², Design Refinement Consultation³, and the Community Impacts Consultation⁴.

We wish to put on record that we yet again consider this consultation to be inadequate, and we have no shame in saying is the hardest consultation to participate in yet. Much of the information we have requested you have refused, saying it will be made available within the Development Consent Order. You have not yet completed some of the important surveys such as air and noise pollution, including the nitrogen deposition surveys. The consultation materials are inadequate, confusing, contradictory, misleading, and can by no means be considered clear or informative.

From the information we do have we remain completely and strongly opposed to the proposed £8.2bn+ hugely destructive and harmful, not fit for purpose Lower Thames Crossing.

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¹ [TCAG Response to LTC Statutory Consultation](#)

² [TCAG response to LTC Supplementary Consultation](#)

³ [TCAG response to LTC Design Refinement Consultation](#)

⁴ [TCAG response to LTC Community Impacts Consultation](#)

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LTC Objectives

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

National Highways own data proves that the proposed LTC would not take enough traffic away from the Dartford Crossing or approach roads.

Thurrock Council's own assessment of NH traffic modelling data concludes that the LTC would take as little as 4% of traffic away in the am peak, and 11% in the pm peak.

Even if you take NH own claims at face value they would still not be enough to bring the Dartford Crossing back below design capacity and to enable free flowing traffic.

The LTC would also result in a 50% increase in cross river traffic, induced demand that would create yet more congestion and pollution.

There is no evidence that the proposed LTC would relieve the congested Dartford Crossing and approach roads to enable free flowing traffic.

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

As well as not reducing traffic enough to enable free flowing traffic at the Dartford Crossing, National Highways are also not considering or planning how traffic would migrate between the two crossings when there are incidents, and there would not be adequate connections.

This would soon result in chaos, congestion and pollution throughout the region. Far from providing any improved resilience of the Thames Crossing and the major road network, the LTC would worsen resilience on the Thames Crossing and major and local roads network.

There is no evidence that the proposed LTC would improve resilience of the Thames Crossing and major road network.

To improve safety

We go into this in more detail further on in this response, but since the proposed LTC is being designed to 'smart' motorway standards, and there is forecast to be 2,147 additional accidents over

60 years, including 26 fatalities, 220 serious injuries and 3,122 slight injuries as a result of the LTC going ahead, there is clearly no evidence that the proposed LTC would improve safety.

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

Local Authorities, residents, and businesses have voiced serious concerns about the negative impacts to the local economy and development plans. They also have serious concerns over the environmental impacts of the LTC if it goes ahead.

National Highways refuse to disclose a current estimate of the economic benefits of the LTC, and a project that is so hugely destructive and harmful, emitting over 5 million tonnes of carbon, can in no way shape or form be considered sustainable.

There is no evidence that the LTC would support sustainable local development and regional or national economic growth and benefits at all.

To be affordable to Government and users

To achieve value for money

With the cost of the proposed LTC now up to £8.2bn there is no way it can or should be considered affordable to Government or users, since it is our money being used to fund the project.

There are also concerns from some areas that would be impacted by the LTC if it goes ahead, and their residents not being entitled to Local Residents Discount.

There is also the issue that the user charges would not be interchangeable between crossings to encourage users, especially Local Residents Discount user to use the route most appropriate, since Dartford Local Resident Discount users would not be entitled to LRD for LTC, and likewise Gravesham residents would not be entitled to LRD for the Dartford Crossing.

Havering and other areas that would be greatly impacted as a result of construction and operation of the LTC, if it goes ahead, would not be entitled to LRD at either crossing.

Since the cost is ever rising and there is no evidence that the proposed LTC would either solve the congestion and pollution issues at the Dartford Crossing, or create economic benefit it can in no way be considered affordable to Government or users, or value for money.

To minimize adverse impacts on health and the environment

Evidence shows that the proposed LTC would be hugely destructive and harmful to both our health and the environment.

The whole proposed LTC route would fail against the newly proposed air pollution levels that are due to be enshrined into UK law in Oct this year.

The project would emit over 5 million tonnes of carbon, which fails against the Government's legal obligation of Carbon Net Zero.

There is no evidence that the proposed LTC would minimize adverse impacts on health and the environment, only that it would make them worse.

Conclusion

The proposed Lower Thames Crossing fails to meet any of the project objectives, and should be stopped NOW!

Changes since last consultation

We wish to begin by commenting that the consultation materials are inadequate, confusing, misleading, contradictory, and time consuming to review because of the poor layout of the information.

We found ourselves forever going back and forth between pages trying to put together the pieces of information provided. Even then due to the lack of adequate info it has not been easy to consider the changes.

Changes south of the river

The A2/M2 corridor

We strongly oppose the proposed changes to the section of the route: the A2/M2 corridor.

We do not believe that NH/LTC have shared enough information in regard to impacts to woodlands for us to know whether what is being proposed is sufficient or not. Our opinion from the info we have managed to ascertain is that it is not good enough.

Rather than proposing mitigation and compensation land it would be better to not destroy and impact the woodlands, including irreplaceable ancient woodlands in the first place.

South of Gravesend (A2/Cyclopark)

We strongly oppose the proposed changes to the section of the route: south of Gravesend (A2/Cyclopark).

Similarly, not enough info has been provided in regard to walking, cycling, horse riding proposals.

NH/LTC refuse to share the information we need and want to be able to properly and fully understand what is being proposed. This is unacceptable.

As for changes to proposed utilities in this area, we can see no real value to anyone other than NH/LTC and the utility companies. In fact far from being beneficial it appears these works would negatively impact residents whilst the works are carried out, and would result in the loss of vegetation alongside the road.

South of the River Thames/southern tunnel entrance

We strongly oppose the proposed changes to the section of the route: south of the River Thames/southern tunnel entrance.

We have concerns about the loss of agricultural land and the golf club in the vicinity of the southern portal.

We are also concerned that since the area surrounding the northern portal is considered to be likely to experience significant effects of nitrogen deposition, the likelihood for the area around the southern portal to be affected would be similar.

Whilst this area around the southern portal may not be considered a designated site for nitrogen deposition assessment, the amount of nitrogen deposition would be similar. This is because the same vehicles emitting nitrogen at the northern portal will also use the southern portal.

Our concern is the impact the nitrogen would have on those using the 'park', as well as the habitat of the land too. We do not care whether NH/LTC consider it to be a designated nitrogen deposition site, we care about the impacts to our health and wellbeing.

As for suggestions of extensions of open space, open space is open space please stop trying to make out you are creating open space!

Changes north of the river

The Tilbury area

We strongly oppose the proposed changes to the section of the route: the Tilbury area.

The changes to Tilbury Fields see a reduction in the amount of land proposed for the new 'park'. We also note that the 'park' is now closer in proximity to the tunnel portals.

We have serious concerns that this area is also a Nitrogen Deposition Designated Site that would likely experience significant effects.

We believe that this would also impact our health, as well as the land/site. If the whole site is deemed to be affected by nitrogen deposition it also further brings in to question your claims that air pollution disperses within 200m, which we have never agreed with or believed anyway.

Basically you appear to be proposing that we should be pleased that you are providing us with a new 'park', when the reality is that it would be a spoil dumping ground that would have serious nitrogen deposition effects that would impact our health and the land. This is completely unacceptable and of serious concern to us.

We are concerned about the impact to the flood plains the land forms would have. We believe that without the area of land that is currently a flood plain other areas will become susceptible to flooding that may not currently due to the existence of the flood plain on the marshes.

We also believe that with climate change and increased flood risks there is every likelihood that the tunnel portals would experience flooding. Research we have done highlighted a high flood risk in the vicinity of the proposed tunnel portals. We do not consider this to be future proofed planning.

In the same vicinity we have concerns over the proposed Operations and Emergency Access Point that we have detailed further below.

We have concerns that you have extended the order limits to accommodate the construction compound near Tilbury. We do not feel that adequate info is being provided on this.

A13/A1089 junction

We strongly oppose the proposed changes to the section of the route: A13/A1089 junction.

We have concerns about the extra cost to Thurrock Council due to the impacts of so much extra traffic using our local roads in the vicinity of the Orsett Cock roundabout because of the newly proposed connection.

In regard to the proposed extra landscaping around the A13/LTC/Baker St area, we have concerns about the amount of spoil that would be dumped, how high the landscaping would be, and also how steep the bunds would be, and whether landscaping would actually survive and thrive in such instances.

We also have concerns that whilst the proposed landscaping near Whitecroft care home may offer some screening, it would also close their view right in, compared to the views and open space they have around there currently. They would be surrounded by roads on three sides, and the landscaping would isolate and close in around them further. Those in a care home do not deserve to have this road inflicted upon them in their twilight years.

We comment further on the addition of an Orsett Cock to A1089 south connection separately further on in our response.

There also appear to be a number of changes to utilities proposals again in this area. We again state that these are for the benefit of NH/LTC and the utility companies and nobody else. We don't want the LTC, and if the LTC doesn't happen we wouldn't have to endure the inconvenience, disruption, and harm caused by all the utility works.

We have particular concern in regard to the temporary closure of the southern end of the layby on the A128 near the Orsett Cock roundabout. There is a local café located in this layby that is much loved by locals and others alike. The closure of one end of the layby would greatly impact this business. To add insult to injury NH/LTC have not even discussed these plans with the business owner directly. This is completely unacceptable, and needs to be addressed.

We also have concerns that the utility works in Fen Lane, Orsett could still greatly impact the veteran tree. Trees of that age will have considerable roots underground. To be proposing gas works underground so close to a veteran tree like this is unacceptable.

We also note that there is an ancient tree on the bend to the north of the veteran tree that is right alongside the proposed development boundary. It is essential that all trees are saved and protected, especially ancient, veteran, and notable trees.

Mardyke Valley/North Road

We strongly oppose the proposed changes to the section of the route: Mardyke Valley/North Road

Raising the LTC within the cutting in the vicinity of the North Road 'Green' Bridge is a big concern. It would negatively impact air, noise, light pollution in the area.

In your information about nitrogen deposition you state that one form of potential mitigation would be 9m barriers, yet in this section you are now proposing to raise the level of the road, bringing the associated pollution closer to the local communities and natural environment.

The Wilderness in South Ockendon is an ancient woodland that deserves to be saved and protected, not destroyed and impacted by the proposed LTC.

There is a reason you originally chose the depths within the cutting that you did, we're sure you didn't pick it randomly, so we question why you are proposing changing it now.

Public perception is that you are attempting to shave off as many carbon emissions as possible to help try to push your hugely destructive and harmful project through. Whilst we support reduction of carbon emissions it cannot simply be done as a risk cutting option for your project, without due regard to the impacts that would result due to this change.

If it is as you say to reduce carbon emissions then why have you not produced new carbon emission data to reflect this change?

We have also identified that through this section the proposed LTC route would have a gradient on it. It would come uphill coming from the east towards the M25, peak, and then drop off again to go down and under the M25.

This again would have negative impacts on local communities and the natural environment due to various pollutions associated with traffic going up and down gradients.

When questioned you have said this is to do with drainage, but we do not feel this would actually stop drainage issues, but rather create them in different areas, after all water runs downhill.

We have concerns that some residential properties in close proximity to this area would have realigned watercourses running very close to them, and we feel your proposals would increase the risk of flooding for them.

Properties in North Road would also be at risk of flooding issues due to the height of the proposed North Road 'Green' Bridge which would be raised over the LTC, meaning water would run off in each direction of the peak of the bridge, and down into residential properties.

M25 junction 29

We strongly oppose the proposed changes to the section of the route:M25 junction 29

We have concerns about the proposed changes to electricity pylons due to the inclusion of much higher pylons being used. Many of the pylons across this area are more discrete wooden pylons, so by proposing higher pylons they will become blots on the landscape which is unacceptable.

It appears that yet again these utility works are for the benefit of nobody other than NH/LTC and the utility companies, and no real consideration is being given to the landowners or community as to the impacts of these proposed changes.

Nitrogen deposition

We strongly oppose your proposed methodology for addressing the potential impacts of nitrogen.

Adequate surveys have not been completed for anyone to know whether what is being proposed would be sufficient for the harm the LTC associate nitrogen deposition would cause.

We are also concerned that Natural England and others do not agree with the assessments carried out so far.

We question and have serious concerns about the sites that have been designated for assessment. There are sites such as Swanscombe Peninsula SSSI that we feel should definitely be assessed, as it would be impacted by nitrogen deposition associated with the LTC, especially when traffic is attempting to migrate between the two crossing when there are incidents, if LTC goes ahead, as there would not be adequate connections, which would lead to rat running, chaos, congestion and pollution.

As detailed in our Inadequacies of Consultation section we do not feel that the maps showing the designated sites was of a high enough resolution to be able to zoom in and see enough detail to be able to identify the sites adequately, to be able to make fully considered comment. We find it unacceptable that NH/LTC refused to provide a more detailed map. We also have concerns that the LTC interactive map is not displaying the information about Nitrogen Deposition Designated Sites

Blue Bell Hill

We strongly oppose your initial proposals for compensation area: M2 corridor and Blue Bell Hill.

We strongly oppose the loss of any agricultural land. Now more than ever our food security is a serious issue that needs to be addressed urgently.

We seriously question why you are considering speed enforcement on the M2 between junctions 3 and 4. The information provided makes it sound like speeding on this section is possibly already an issue, so not related to the LTC project.

It also has to be asked why you are proposing speed enforcement in this section, since more LTC traffic would come from the M20 to the M2 via the A229 Blue Bell Hill, than likely use junctions 3-4

on the M2. The route most likely used from the M20 to the M2 does not include traffic using the M2 between junctions 3 and 4.

Public perception is also that speed enforcement like this would be more about raising monies from fines than to do with genuinely caring about nitrogen deposition impacts. If you truly cared about nitrogen deposition or any other pollution and environmental harm you would not be looking to build the proposed LTC.

In regard to assessments of designated sites in this area we have to question why it is considered some land would experience significant effects and others would not. How can land on one side of the M2 be predicted to experience significant effects, yet land on the opposite side would not?

Since you are also proposing to join up the impacted site with new compensation land it also leads us to question why you are proposing to plant more habitat in areas you know would be impacted by nitrogen deposition? Why are you not considering the impacts of nitrogen deposition on the compensation sites?

In this particular location we also have to raise the point that you ruled out Option C Variant as not being needed. If the connection between the M20 and M2 via Blue Bell Hill is not needed then why are the predicted nitrogen deposition levels due to LTC traffic such an issue?

We have known and said for years that the A229 Blue Bell Hill would be negatively impacted if the LTC goes ahead. Why has it taken you so long to recognise this?

This latest change just enforces our belief that further assessment on whether the proposed route is still the best option, and whether there are better alternatives out there.

We question the fact that the surveys have not yet been completed, so it is impossible to adequately assess the predicted impacts.

It also concerns us that Natural England and others do not agree with your assessments to date.

Gravesham/Shorne Woods

We strongly oppose your initial proposals for compensation area: Gravesham and Shorne Woods.

We strongly oppose the loss of any agricultural land. Now more than ever our food security is a serious issue that needs to be addressed urgently.

We also question and have concerns of just how much land would experience significant effects of nitrogen deposition, and how little in comparison is being proposed by means of compensation land in this area.

We again question the fact that the surveys have not yet been completed, so it is impossible to adequately assess the predicted impacts.

It also concerns us that Natural England and others do not agree with your assessments to date.

Thurrock

We strongly oppose your initial proposals for compensation area: Southfields, Thurrock.

We strongly oppose the loss of any agricultural land. Now more than ever our food security is a serious issue that needs to be addressed urgently.

We seriously question the proposal to use the land off Buckingham Hill Road, as research we have carried out shows that this land should be subject to landscaping as a condition of the landfill site planning application.

This means that the site should be landscaped and planted accordingly regardless of the LTC, so this should not be considered compensation land, as the land should already be planted/landscaped due to other conditions. It should not also be counted as compensation land for LTC nitrogen deposition effects.

Hole Farm

We strongly oppose your initial proposals for compensation area: Hole Farm, Brentwood.

We strongly oppose the loss of any agricultural land. Now more than ever our food security is a serious issue that needs to be addressed urgently.

We find it completely unethical that you say, *“Hole Farm Community Woodland is progressing independently of the Lower Thames Crossing and the masterplan for the site is the subject of a separate planning application and we are hosting a period of community engagement on our plans. National Highways has committed to delivering the Hole Farm Community Woodland masterplan subject to the associated facilities receiving planning permission from Brentwood Council”*, whilst also attempting to include it as compensation land for LTC.

Compensation should be a reward to compensate for a loss. Since you are progressing Hole Farm regardless of whether LTC goes ahead or not, it can in no way be considered compensation for the LTC.

Not only have you previously declared publicly that Hole Farm Community Woodland will be progressed regardless of what happens with the LTC, you have also stated publicly that you bought it to improve biodiversity along your major routes, in this instance the M25.

Your proposals for Hole Farm Community Woodland, a project you admit will be progressed regardless of whether LTC goes ahead or not, clearly show full use of the site.

Firstly, we question the fact that you claimed it was to improve biodiversity before you have even completed ecology surveys to know the current condition of biodiversity at the location.

Secondly, if you aim to use the site to improve biodiversity along your major routes, in this instance the M25, and progress it as a community woodland regardless you cannot also then count it as a form of compensation for LTC, as that would be at least double counting the environmental value of such land if biodiversity can be improved upon at the location. We consider your attempts to claim multiple mitigation and compensation claims for the site to be unethical and unacceptable creative accounting.

We also question your proposal to use Hole Farm Community Woodland as a tree nursery for trees for the proposed LTC. You say that you would begin planting later this year, 2022, and then later dig up and move the trees to locations along the proposed LTC, if it goes ahead.

This would not be conducive to creating a community woodland for the benefit of the community, nor would it support creating a woodland as compensation or mitigation for the LTC if the trees being planted are to be moved to different locations.

We also question and have concerns that the area of land that would experience significant effects from nitrogen deposition is considerably less than the area of land that is being proposed as compensation.

It is clear to us that this is because it is convenient for NH/LTC to try and incorporate the land you already own, Hole Farm.

We do not find this acceptable use for land that you already own and are progressing as a community woodland in its own right regardless of whether LTC goes ahead or not.

Other areas that have larger areas of land that would experience significant effects are proposed to have smaller parcels of compensation land.

Whilst we believe all land is important, and the effects unacceptable, if the LTC were to go ahead then fair and reasonable compensations need to be made, not just convenient gestures that suit NH/LTC needs and wants, as is the case here.

You didn't like us calling you out on attempting to Greenwash the LTC with Hole Farm, so you've attempted to find a way to include it in the LTC project. But this doesn't wash with us, and we will call you out on this, just as we have done on other inadequacies, misleading info, and greenwashing attempts.

Additional comments

Since previous compensation land and planting, such as Thames Chase Community Woodland which was a form of compensation for the M25 is now under threat from the proposed LTC, we asked you whether any protection for the compensation land would be given.

We are concerned that your response was, "... this enhancement is as a result of national and local planning policies which protect the green belt from inappropriate development that would negatively impacts its characteristics. The Hole Farm site will be subject to the same protection".

Our concern is because clearly national and local planning policies are not offering any real level of protection for the land under threat from the proposed LTC, so we take your answer to mean, no any compensation land would not be afforded any real level of protection.

We also note, and are frustrated that yet again we are being told that we will have to wait until DCO to learn what you are proposing in regard to compensation funding which you are proposing.

In addition, we also have concerns that you have not provided adequate detail on the Nitrogen Deposition Designated Sites, and the relevant layers have not been displayed on the LTC interactive map.

For instance, the land proposed for Tilbury Fields is detailed as a Nitrogen Deposition Designated Site that would experience significant effects. Yet there is no compensation land being proposed in this area.

In fact what you are proposing is to create a 'park' for the community to use. In doing so you are actually creating a 'park' that you admit would experience significant effects of nitrogen deposition.

This also contradicts your theory that pollution disperses within 200m.

We find it concerning and unacceptable that you are proposing to create a 'park' in an area you know would subject those visiting the park to high levels of pollution.

We question why NH/LTC refuse to acknowledge the true extent of the effects of nitrogen deposition, and the extent of the traffic impacts of the proposed LTC, when it would impact areas as far afield as Epping Forest Special Area of Conservation.

We also believe that people in the vicinity of Epping Forest should be made aware of this threat, and that they should be made aware of the consultation so they too can have their say.

The same goes for those who are near and use the M25 between junctions 27 and 26.

Changes to the Order Limits

We strongly oppose the changes to the proposed area of land that would be needed to build the Lower Thames Crossing.

Any increase to the order limits is unacceptable, in fact having order limits at all is unacceptable, this project should not be progressed, period.

Too much greenbelt, agricultural land (including grade 1 listed land), woodland (including ancient woodland) and trees/hedgerows, fens, marshes, wildlife and habitats, homes, businesses, lives and health, communities and so much more would be lost and impacted.

Such a hugely destructive and harmful project should not be progressed.

Special category land

We strongly oppose the changes proposed regarding special category land.

The name gives away our reason for opposing, it is special category and should be awarded special consideration. No special category land should be destroyed or impacted.

We also take exception to the fact you have included Hole Farm in the Special category land section. Whilst it is important and special in its own right, this is clearly another attempt for you to try and promote Hole Farm Community Woodland in way to try and make LTC look better than it is.

You bought Hole Farm for 'improving' biodiversity along your major routes, in this instance the M25. LTC Exec Director, Matt Palmer has publicly admitted that it is in the wrong location. Please stop trying to use Hole Farm in such underhanded ways.

Private recreational facilities

We strongly oppose the changes proposed regarding private recreational facilities

Whilst you state that you are working closely with those impacted in these facilities, we know some of them and know that engagement is not particularly great, and the ones we know would much rather the LTC did not go ahead. It is infuriating the way you try to portray it as though everyone supports your plans, and that everything is fine and dandy. It is not.

Utilities

We strongly oppose changes to utilities.

Not only is much of the information on utilities in this consultation confusing, these changes are for nobody other than NH/LTC and the Utility companies benefit.

The utility works are as a direct result of the proposed LTC, and ultimately, we want our communities and countryside left as it is, not a hugely destructive and harmful road.

We found the proposed changes to Muckingford Road utility works confusing. What happens to the loop of underground cables to the north of that section? It is presumably there for a reason but then vanishes in the latest proposal.

We also have concerns that the sheer scale of the proposed utility works equates to them needing their own NSIPs. We do not feel that adequate info has been shared to represent the full scale of what is being proposed in regard to utilities.

We have concerns that you are proposing to bring the development boundary and utilities works off Mill Lane in Orsett closer to residential properties.

Whilst we acknowledge the importance of the ancient scheduled monument, this is just another example that what you are proposing with the LTC is in completely the wrong location.

We have concerns about the impact of the changes to the gas works on the western side of Fen Lane in Orsett. The proposed gas line change appears to go through an area marked as a site for the translocation of protected species.

Firstly, if you are carrying out utility works here then the site would have been disturbed and is unlikely to be settled after the works to be ready to accommodate protected species.

Secondly, why on earth are you proposing to translocate protected species to a location you know is likely to experience disturbances moving forward where the ground would need to be dug up for works on the gas pipe?

It is despicable that you are knowingly proposing to put protected species at future risk, and the onus on the utility company moving forward to be aware that you have purposely translocated protected species onto a site you are also diverting a gas pipe through.

The clue is in the description, they are protected species, not dig up their habitat to repair gas pipes species. Please ensure all sites that you propose translocating protected (and other) species to are not going to knowingly put the species at risk in the future, like in this instance.

We also point out again, as we did via email, there is an existing water course on the western side of Fen Lane in this vicinity near the junction with Green Lane. You are proposing a hedgerow along there, but it would be in or have to go alongside the water course.

We have attempted to show the watercourse in this screen capture from street view on Google maps, but the reality is that you should already be aware of this. If you don't believe us take a visit along Fen Lane and take a look!



LTC v National Grid East Anglia GREEN

We are aware that National Grid East Anglia GREEN proposal and the proposed LTC overlap with their proposals.

We have not been provided any information to give us any confidence that there wouldn't be a risk that National Highways would come along and carry out utility works in regard to the proposed LTC, and then National Grid would come along and need to carry out further works on what National Highways have spent taxpayers' money on for the LTC works.

Construction

We are strongly opposed to how the proposed LTC would be constructed if it goes ahead.

We have serious concerns about the fact it would take at least 6-7 years to construct, and include a lot of 24/7 work.

We have concerns about the construction routes that have been proposed. We also have no confidence that our local roads would not be used for construction routes in excess of what we have been told about so far.

We can see gaps in the haul road routes, for instance in the areas between the northern portal area connecting to the north where the Tilbury Loop Railway line creates a barrier for a haul road, at very least until such time as a bridge is built into the haul road, which we expect would take some time.

With the latest change to the M25 compound we have learnt at an event that the inclusion of a roundabout or traffic lights may be considered to control traffic entering and leaving the site from North Road. We request that this possibility is given serious reconsideration, as North Road is not suited for either option. In fact it is simply not suited as an access point for a construction site at all. None of our local roads are.

We have concerns about the locations of the proposed construction compounds.

We are very concerned that not only are you moving at least two of the proposed compounds you are attempting to do so without consulting the public. You have not provided adequate detail, such as the site layouts as you did previously for the compounds.

The relocation of the M25 compound brings it right alongside North Ockendon Conservation Area, which is concerning for the residents and the historic buildings within the conservation area such as the Grade 1 listed Church of St Mary Magdalene, and also the angling club that use the fishing lake there too.

We are also concerned that whilst the reason being given for moving the compound is due to the environmental status of the land that was previously proposed, it is still being proposed to take a chunk of said land for additional access space for the entrance/exit route for the compound access route from North Rd.

We are concerned not only because of the environmental status of the site, but also because we are aware that this site is an extremely contaminated site that should not be disturbed in any way under any circumstances.

We recently asked a variety of questions about different aspects of the construction and compounds. The responses provided were far from adequate, mainly avoiding answering the questions and instead signposting us to various documents from previous consultations and other documents, as well as telling us other info would only be available during the Development Consent Order (DCO) process.

Cost and value for money

We have serious concerns about the estimated cost of the proposed LTC, and are strongly opposed to taxpayers' money being spent on such a hugely destructive and not fit for purpose project.

The cost of the proposed LTC is now up to £8.2bn, meaning it is more expensive per mile than the highly controversial HS2.

We consider this to be a relevant comparison, because it is the comparison of how much of our money is being spent on government projects.

Evidence shows that the Building Cost Information Service (BCIS) Material Cost Index is now forecasted to reach 17.5% by the end of 2022. This will therefore mean an increase in the cost of the proposed LTC.

NH/LTC are also claiming that the proposed LTC would be the greenest road ever built in the UK. Not only do we disagree that this would be possible from such a hugely destructive and harmful project, but we also recognise that even if you attempt to make it cleaner and greener it would result in a considerable cost increase also.

At the LTC Road to Net Zero industry summit we heard industry spokespeople stating that greener cleaner construction equipment/machinery costs more than three times as much as fossil fuel construction equipment/machinery.

Then there is of course the latest addition of yet more land within the order limits which would also push the ever rising cost even higher.

We have recently asked you for the updated estimated cost of the proposed LTC, and you refused to provide us with such info, instead stating yet again that the requested info would become available during the DCO process.

This is concerning, frustrating, and unacceptable. This is public money, taxpayers' money that you are proposing wasting on the proposed LTC, we deserve the right to know just how much of it you are now proposing on spending.

You also regularly claim that the proposed LTC would bring economic growth and benefits, yet when we ask you for an estimate of how much economic benefit, you again refuse to provide such a figure to back up your claims.

Our assumption is that the estimate cannot be that good, else you'd be shouting it from the rooftops.

We also believe that many aspects of the proposed LTC are a false economy. For instance all the other associated works that would be needed as a direct result of the proposed LTC, which are not being included in the LTC project. Blue Bell Hill improvements, Tilbury Link Road, the Rest and Service Area, all of which are being progressed as separate stand alone projects, but should really be included in the LTC project and budget.

We do not believe the proposed LTC would be good value for money, and expect the Benefit Cost Ratio to have dropped to an even lower level.

After all the project has ever rising costs, and would fail to meet any of the project objectives.

We believe there is a serious issue here, and call for the Treasury to carry out a full review into the LTC.

It is not just the financial cost either, there is the cost to our natural environment to take into account. More importance and value needs to be given to such important issues.

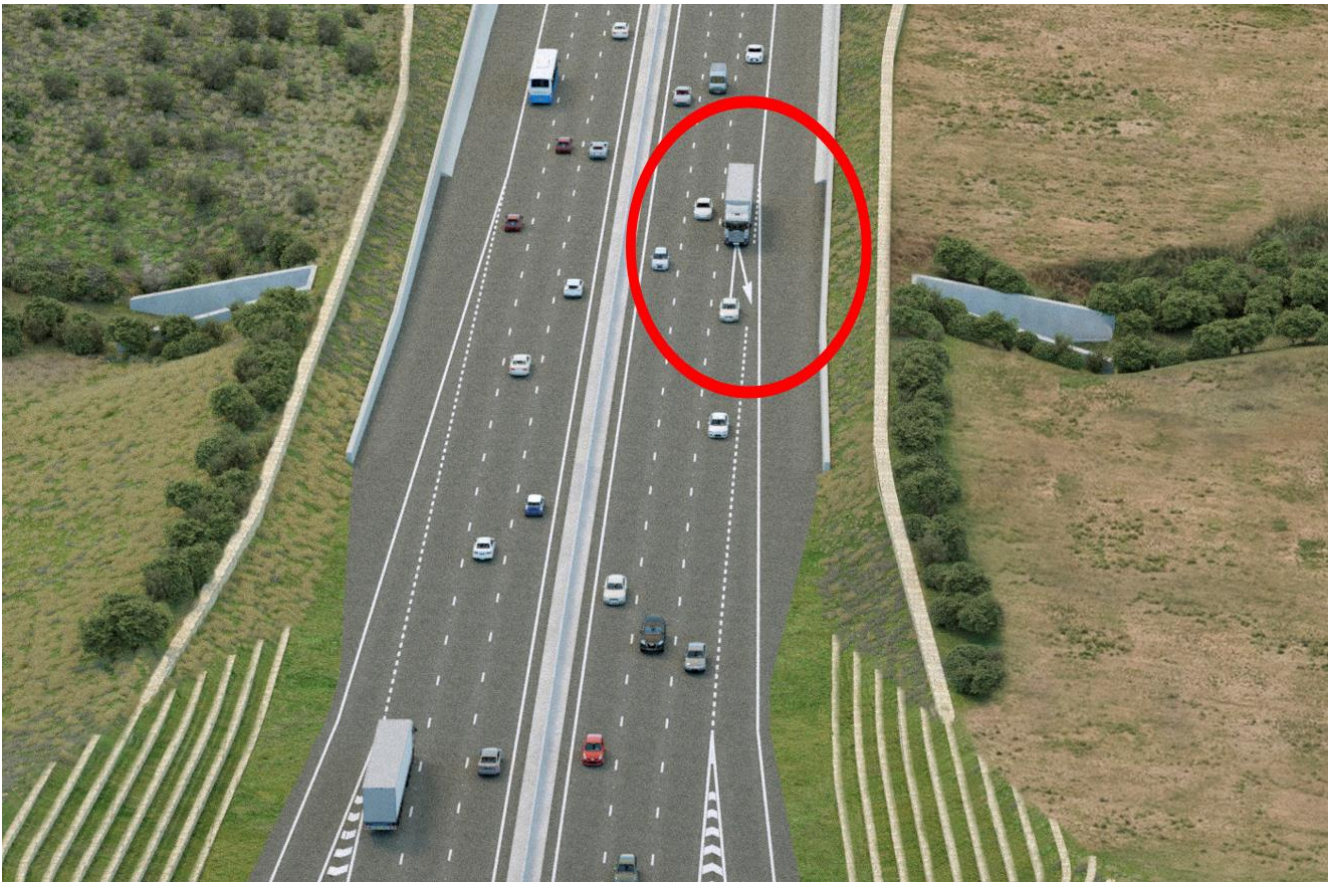
Operations and Emergency Access

We have serious concerns over the addition of the Operations and Emergency Access Point.

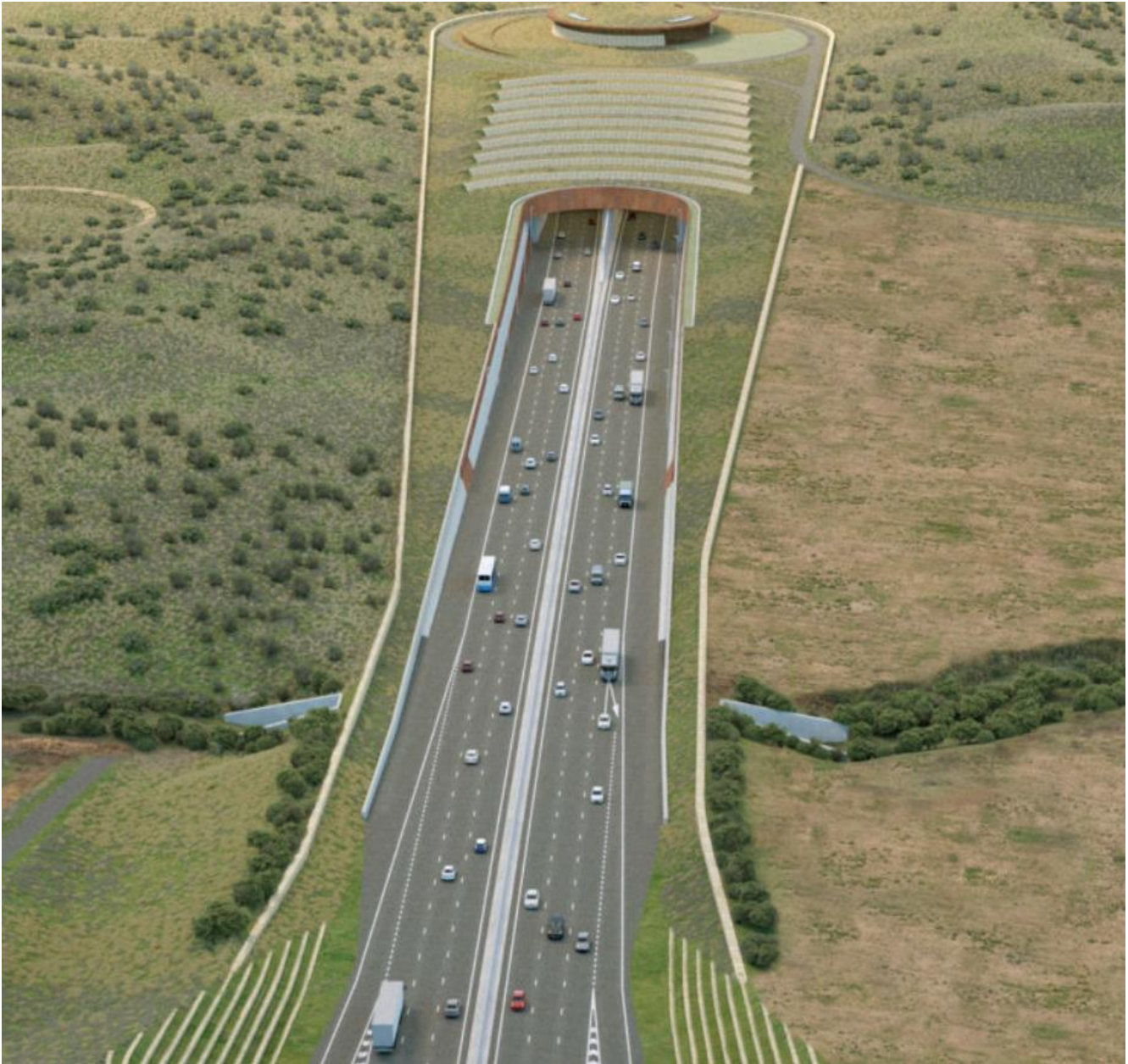
Page 48 of the Consultation Guide states, "*The operational access could potentially accommodate further development in the future*". This concerns us since the location of the junctions for this access point are extremely close to the Northern Portal of the LTC tunnels.

To us this appears to be the same problem that is suffered with junctions too close to the tunnel portals at the Dartford Crossing being replicated at the proposed LTC. Why does NH not learn from previous mistakes?

It is not helped by the fact that the image used for this area in the consultation materials also shows a left filter lane arrow in front of an HGV. An error by your own admission.



The image also shows how close to the portals the slip road for this junction is. We have measured the distance on your LTC map and on Google Maps for the Dartford Crossing and the distance is very similar, and both are way too close for traffic to flow freely.



This is of particular concern when you consider that the most likely future junction/connection to be made at this location would be the addition of the Tilbury Link Road.

The Tilbury Link Road would be predominantly used by HGVs going to and from the Freeport and Amazon etc. Does this really look like a junction that would be easily and safely manoeuvred by large amounts of HGVs?



We have concerns over traffic using these loops and roundabouts, and feel it would just create a problem and incident hotspot that would result in many issues in the future.

There is also no clear indication of if or how traffic would be stopped from accessing the Operations and Emergency Access Point from the LTC in the meantime.

The image does not include the perimeter fence/barrier that would be installed, and no details are provided on what we might expect in height, style etc, and in a location like this the choice of such fencing/barriers could have a significant impact.

We feel this is something that should have been included in the consultation so we can have our say on it, and also so as to alert people to the fact that a considerably lengthy and high fence/barrier is being proposed in this area.

We also note that there is a strange dead-end road to the east of the Operations and Emergency Access Point.

We have been told that it would be for access to the watercourse and culvert that would run underneath the LTC, for maintenance. We are concerned that we have been told it would not necessarily be fenced. This is right on the boundary of Tilbury Fields, an area you propose to be a public space.



We have also been told that the culverts would not have grates over them, and all would be accessible for mammal migration.

Whilst we are happy that there would be no barriers for the wildlife, as it is important that provision is made for them, we do have concerns about antisocial behaviour in this area.

A culvert under a major road like the LTC could become a target for terrorism or antisocial behaviour. And the bridge going over the road could also sadly become a significant suicide spot. Plus the bridge could become an antisocial behaviour hotspot too.

The location could also see issues with it becoming an ideal spot for illegal immigrants. There are already issues with this at the Dartford Crossing. This location in such close proximity to the 'park' would create the perfect spot to try and slip away.

Safety

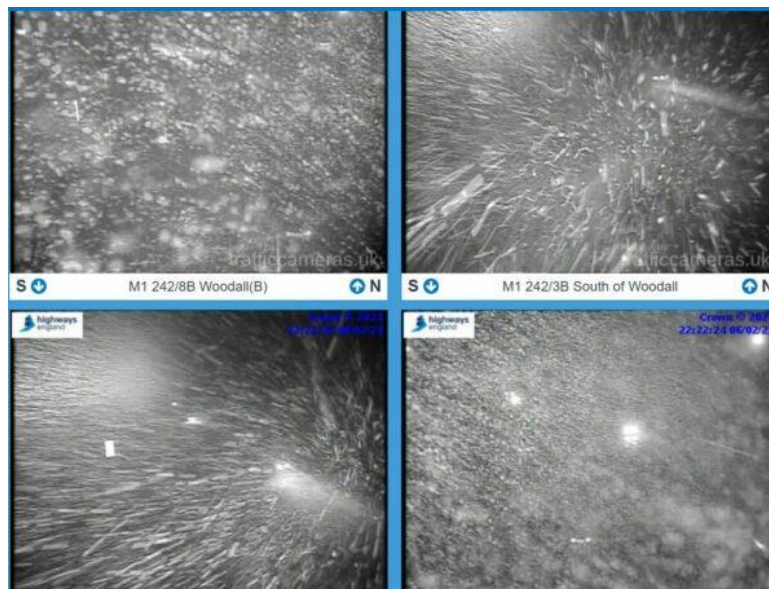
When it comes to the proposed LTC we most definitely have serious concerns in regard to safety. Not only the safety of those using the road, if it goes ahead, but also the safety of those living and working in its vicinity, and the safety of wildlife and the natural environment too.

We have said for years now that one of our many concerns is the fact that the LTC is being designed to 'smart' motorway standards. With no hard shoulder, being designed to 'smart' motorway standards, and using 'smart' technology, and the fact we've been told that only vehicles that can use a motorway could use the LTC, it would be a 'smart' motorway in everything but name. It would be a 'smart' motorway by stealth.

Please also see our 'Smart' LTC Appendix for further evidence and comments.

We also have concerns that your proposed 'smart' tech would suffer similar issues as these screen captured NH views of your road network during bad weather (below).

It concerns us further that when we recently questioned NH/LTC on this aspect of LTC the response we received was "As with the wider Strategic Road Network systems that are installed to monitor the network are designed to operate in all foreseeable conditions".



Clearly what you are already using is not adequate or safe. We therefore have no confidence at all in what is being proposed in regards to so called 'smart' tech in regard to road safety.

On page 48 of the Consultation Guide you state *"we have modified our proposals to include operational access roads so that maintenance and emergency vehicles can access the LTC. This will improve the safety of the new road once it is in operation"*.

Yet when we requested evidence to back up this claim you said, *"Operational / emergency access roads enhance the ability for maintenance and emergency vehicles to access the LTC during incident management thereby improving response times and network resilience. Response times and routes are subject of ongoing engagement with the emergency services"*.

This does not answer the question and provides no evidence that what you are proposing will improve the safety of the new road once it is in operation. You state nothing that proves it would improve safety to prevent accidents happening.

We have concerns that there are forecast to be 2,147 additional accidents over 60 years, including 26 fatalities, 220 serious injuries and 3,122 slight injuries as a result of the proposed LTC going ahead. Since those figures come from the Oct 2020 Appraisal Summary Table and significant changes have happened since our concern is that these numbers are likely greater with the latest changes too.

We find it unacceptable that NH have declared publicly that you have committed to targets that mean by 2040 nobody will be killed or seriously injured on your roads and motorways. Clearly this is misleading and untrue based on the figures provided by your own AST for the LTC.

We have concerns in regard to electric vehicle fires on the LTC, especially within the tunnels. Evidence shows that electric vehicles fires require special training to deal with them, and that risks are higher because there is not always adequately trained people dealing with them in case of emergency. Electric vehicle fires are harder to put out, and they can reignite even after the fire brigade has put them out.

We have concerns in particular about electric vehicle fires in the tunnels since we have been told that when traffic is stationary in the tunnels the fans would be switched on. As we all know oxygen will fan a fire and feed it. Since a vehicle fire would cause other traffic to become stationary, we have concerns this would trigger fans and exacerbate the situation. We have little or no faith in your 'smart' technology identifying what is happening quick enough for the fans not to feed a vehicle fire.

We still have concerns about emergency access to and from the LTC and A1089 for emergency vehicles. The emergency access points are often awkwardly positioned for large emergency service vehicles to access.

We also have concerns about emergency access routes being used by other road users. Plus concerns about how close to some residential properties the emergency access roads would be, which could have an impact on vehicle and siren noise for those close by.

Plus with increased traffic and a prediction of more accidents we question the impact the LTC would have on our emergency services. We have concerns about whether they will have the resources to attend so many more incidents. Also how they will access incidents with congested roads that will occur very quickly in cases of incidents at either crossing.

We have concerns over response times to emergencies not on the LTC too, ones in our communities. How will the LTC impact emergency services ability to attend emergencies in our communities with the LTC stretching their resources?

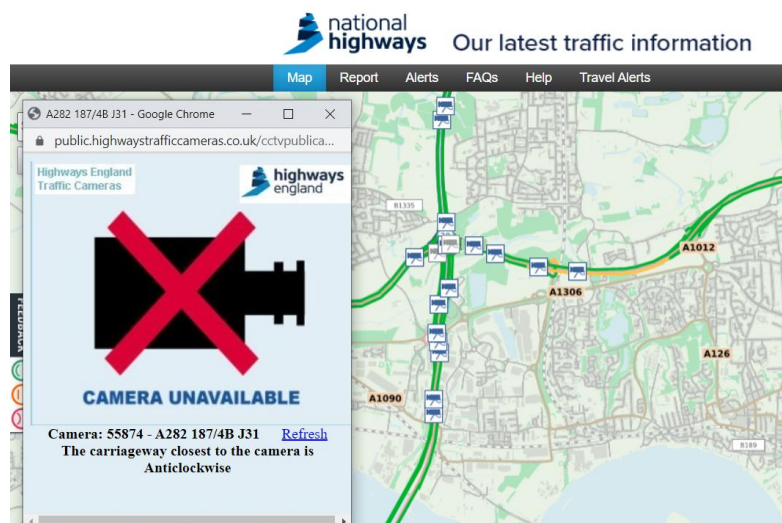
It concerns us after seeing undercover recordings of your Regional Operations Centre the major issues in regard to 'smart' motorways and their monitoring, or lack of, and issues with out of date poorly functioning technology.

It concerns us that when we have asked recently what percentage of the day/night would CCTV be monitored in the control room we have been told, *"CCTV will play an important role in monitoring and managing the LTC and will be available for use 24/7. We would use the cameras, alongside other technology, to proactively monitor the network and help with incident detection, response and management"*.

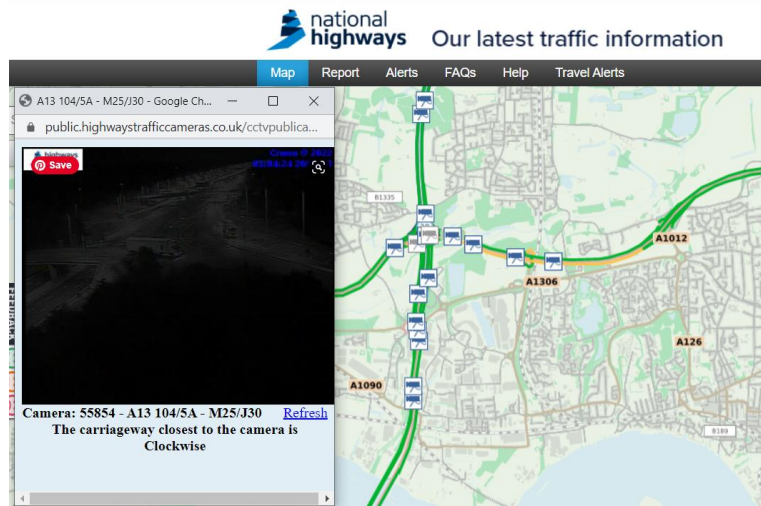
CCTV being available for use 24/7 does not mean it would be used. Not only did you fail to answer our question, you also increased our concerns by the fact that you refuse to commit to any indication of how adequate the monitoring of the CCTV would be.

Just because it would be "available 24/7" doesn't mean there are any guarantees it would be monitored at all.

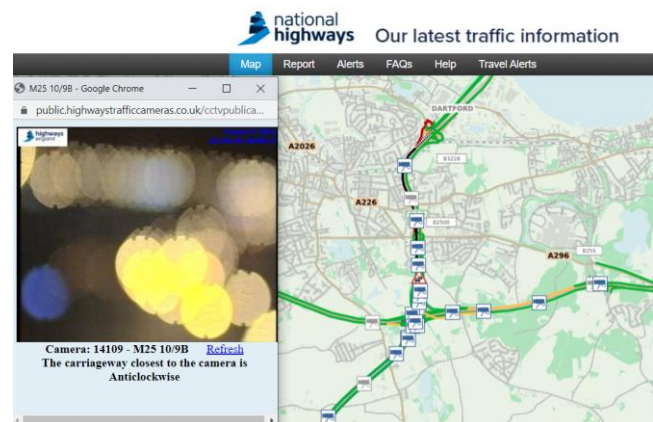
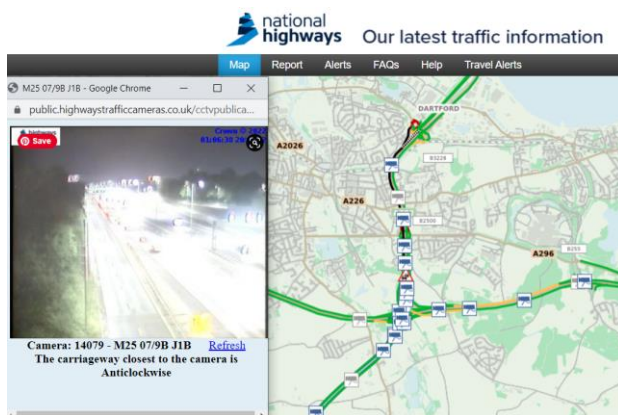
We have no confidence that the CCTV would even work. For instance take a look at the image below captured from the NH website. This was not the only one we spotted not working.



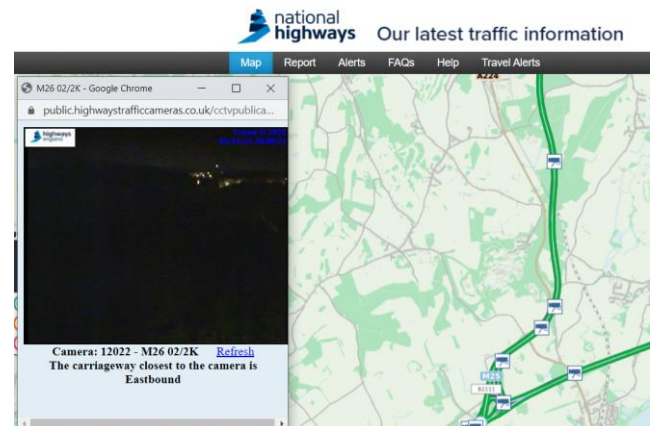
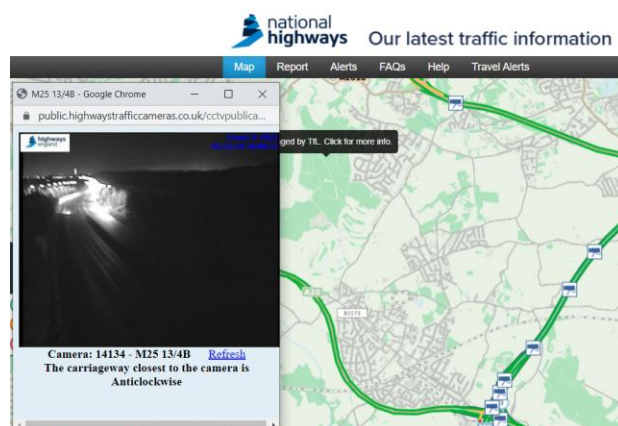
Or this one, again we know it's not alone too.



There are many examples of how badly your CCTV operates, or doesn't operate. What can anybody really observe in imagery such as these?

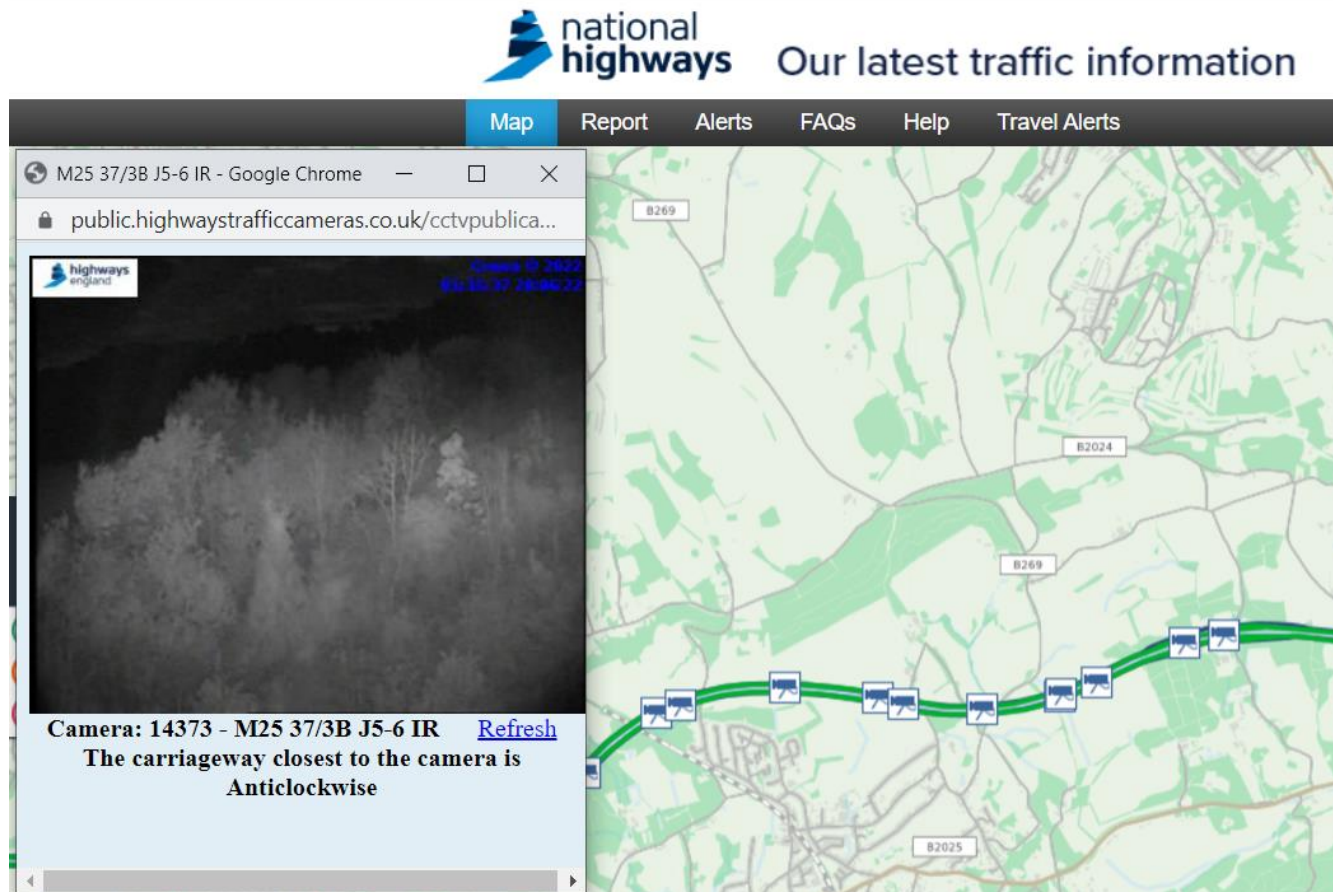


Or in the dark sections of the LTC that would look similar to this. We have concerns that a vehicle that lost power and become stationary in a live lane after dark would be completely invisible to both the CCTV and other road users before it is too late.



We recently asked you what provision there would be to ensure cameras are checked and repositioned when needed. You said, *"Cameras will have pre-defined primary focal positions that they will return to when not being used for specific reasons"*.

Does this look like it is positioned correctly to monitor traffic?



These are just some of the reasons we have serious concerns about 'smart' technology in regard to the proposed LTC. With the exception of the snow images further above, all these images have been captured from the NH website as we prepare this response. Scarily it didn't take long at all, and they are all relatively close to the area proposed for the LTC.

We have heard horror accounts of 'smart' motorways where there are fences/barriers so close to the edge of the road you wouldn't be able to get out of the passenger side door if you managed to pull into the left lane.

When we recently asked you how far back any fences/barriers would be for LTC your replied, *"Barriers are located at an appropriate set-back based on the safety performance / specification of the barrier and the infrastructure that is being protected. Barriers will be set-back as far away from the traffic lane as possible"*.

This response gives us no confidence. “as far away from the traffic lane as possible” could mean it is literally right on the edge of the traffic lane if you feel that is all that is possible or design restrictions force it.

We’re not talking about making changes to an existing road here, as is often the case with ‘smart’ motorways, this would be a brand new road that could be designed to the highest safety levels possible. But your response gives no indication that such things are considered a priority.

We also asked what would happen if a vehicle breaks down on one of the bridge/viaducts. Your response, *“In line with National Highways general advice for the wider strategic road network, where a vehicle stops unexpectedly and it is not safe to get out, the occupants should keep their seatbelts fastened switch on their hazards light and call 999”*.

Impacts to stationary vehicles in live lanes can happen super fast. We have serious concerns that your advice is to sit tight and hope for the best until emergency services reach you.

The lack of hard shoulder is a really serious concern. Consider how dangerous it would be when there are incidents along the southbound section of the LTC between the M25 until just past the A13 where there would be just 2 lanes and no hard shoulder. Not only for stationary vehicles being impacted, but also in regard to the impacts to a severely blocked section of road with emergency services trying to reach the scene of the incident.

We asked how electric vehicles would be moved from a live lane if they became stranded. You replied, *“Where any EV is stricken in a live lane, undamaged and wheels are free rolling, our Traffic Officers are permitted to clear it to the nearest place of relative safety within circa 50m and at walking pace circa 4mph and will either manually push or drag the vehicle where permissible using the Traffic Officer Vehicle. Where the EV is damaged or cannot be moved (wheels are not free rolling) or there is no place of relative safety within 50m then it will be removed using a vehicle recovery vehicle. The LTC tunnels will have a 24/7 365 days free vehicle recovery service”*.

This certainly doesn’t sound safe for anyone, the traffic officer included.

And what about when roads become congested and come to a standstill due to incidents and electric vehicles start running out of power. How long would it take to remove them all, on top of the safety concerns about doing so.

We asked you how long on average it would take to recover a broken down electric vehicle. You said, *“All vehicles are treated the same with regard to clearing live lane incidents. National Highways current target is 86% of live lane incidents to be cleared within 1 hour”*.

From the research we have done it is apparent that recovering an electric vehicle often takes longer than others, if for no other reason than you have to ensure there is no shock risk.

That aside your response doesn't provide an actual average time, it provides your target. We have no reason to believe that you are meeting this target. But even if we did, an hour is a long time for a vehicle to be stranded and there is no indication how long it would be for those in such a vehicle to make it to a safe refuge.

We question the info we have been provided at an event, when we asked about hazardous vehicles needing to be escorted through the tunnel section of the LTC. We were told there would likely be some hazardous vehicles such as hydrogen tankers and possibly others that would not be able to travel through the tunnels. This has since been denied via email, but we still have concerns due to having no idea which information provided would be correct, and safety is a huge concern.

We also have concerns that concrete barriers would be used in the central reservation of the LTC if it goes ahead.

The amount of signage that would be needed to communicate who would and wouldn't be able to use different sections and routes on the LTC is also an area of concern in regards to safety.

We know that excessive signage can cause safety issues, incidents, congestion etc. Due to the designation of the LTC as an all purpose trunk road there would definitely be issues of who would and wouldn't be able to use which parts of the LTC, especially since you have said that only vehicles that can use a motorway would be able to use it.

To finish up on the aspect of safety, we again draw your attention to the fact that whilst we do not want the addition of a Rest and Service Area, you did state when you introduced it that it was due to health and safety guidelines.

Since the Rest and Service Area has been removed from the project we have to question how the removal would impact the health and safety of road users if the LTC goes ahead.

Orsett Cock – A1089 south

We are strongly opposed to the newly proposed Orsett Cock – A1089 south connection.

The addition of the new Orsett Cock to A1089 south connection is of serious concern to us.

It is unacceptable for NH/LTC to be proposing to use the local road network in this way.

You state that this is being added to reduce traffic on some local roads, but what about the other roads that would be more impacted as a result of this addition?

It is also apparent to us that the underlying issue here is that you cannot squeeze in adequate connection in this area because there is simply not the space to accommodate all the necessary connections for a junction to truly be viable in this location.

There is the issue of the additional cost this would bring in regard to management and maintenance of our local roads due to the increased amount of traffic directly related to the LTC.

Then there is the serious issue of the extra traffic and pollution it would bring to our roads and communities.

You are predicting more than 40% increase in traffic on roads like Conways Road and Rectory Road in Orsett. It is unclear why you predict this increase. Especially when you also predict a drop in traffic on the A128 between Conways Road and the Orsett Cock.

You have been unable to provide any explanation as to why you feel traffic would turn off the A128 right into Conways Road, up through onto Rectory Road all the way up to the A1013/Stanford Road/Old A13, where it would turn left to access the A13 westbound slip road off the Orsett Cock through a hairpin bend manoeuvre, before taking the new connection off the slip road onto the connecting road through to the A1089 south.

You have tried to play down the impacts of traffic through Orsett, but we simply do not buy into your prediction that Orsett would have seen a reduction in traffic due to the LTC, and that now this huge increase won't be noticeable.

There is no logical reason to believe that the LTC would reduce traffic through Orsett. We therefore consider this more than 40% increase to be a large increase of traffic through the village.

We are aware that NH/LTC have not shared micro simulation with Thurrock Council for this

connection. We find this to be unacceptable and inadequate, especially since we understand if the council came to NH for anything to do with the SRN the council would be expected to provide micro simulation.

We are also concerned that NH/LTC have not completed air and noise assessments, so have been unable to share such information in this consultation.

We find it despicable that you have continued to make claims that there would be no significant changes to air and noise pollution compared to what was being proposed at the last consultation. There is no way you should be making such claims before you have completed the assessments.

It is infuriating the amount of times NH/LTC make claims in regard to the LTC project without having any evidence to back up your claims. It's not on.

We do not agree with your assessment that some roads would see a reduction in traffic because of this new connection, because it wouldn't take long for the Orsett Cock to become congested, and then traffic will find other routes to the A1089 using any means possible and impacting other local roads and communities.

The consultation materials on this addition are also extremely inadequate and confusing for many.

The colour coding on the traffic predictions do not make sense. How can you have so many huge variations in traffic all within such a relatively small space. The roundabout appears to almost have ever possible colour detailed in it.

In some figures, such as Figure 4-24 the colours are also not layered correctly so they give the impression of things like other roads going over the top of the Rectory Road bridge, which is not an accurate representation. Inadequacies like this just add to the confusion.

There is so much controversy over this connection. You originally garnered support for Route C from the Port of Tilbury by adding the Tilbury Link Rd to the LTC project, since they said they would only support the route if they got their own access/junction. You then removed the link road, which has resulted in a serious issue of lack of connection to the A1089 south.

You are now proposing using our local roads and impacting our communities to provide provision for large amounts of traffic to access the A1089 south. This is despicable behaviour and totally unacceptable. And to present this in a consultation before you have even completed adequate traffic modelling or air and noise pollution assessments is completely inadequate, and does not meet your obligation to provide clear and informative materials.

We also still have reason to be concerned over the impacts of traffic still needing to use the Stanford Detour. Again, this would impact the existing and local road network, as well as local communities. It is just another example of the poor design of the proposed LTC, and the fact that it is the wrong crossing in the wrong location.

Walking, cycling, horse riding

We strongly oppose the proposed changes to your plans for walking, cycling and horse riding routes.

We do not feel that NH/LTC have provided or are willing to provide enough information on the aspects of walking, cycling, horse riding in regard to the proposed LTC.

It is impossible to fully consider what is being proposed without such details as widths and surfaces etc.

Whilst we encourage active travel and recreation there are very real concerns about shared use paths.

Would the widths be sufficient for different users? Will widths be wide enough to allow walkers and cyclists safe passage past horses that can easily get spooked?

What surface would be used to ensure it is safe for all users? A horse can badly injure it's legs on hard surfaces, whereas walkers and cyclists need harder more solid surfaces.

We also take issue on the fact that NH/LTC are claiming many existing paths that we can use now, as 'new' paths.

We believe this may in some instance be because you are claiming 'new' paths when you are proposing realignment of roads and bridges. This is completely unacceptable.

There is no provision for active travel options to cross the river. At a time when modal shift is being encouraged better provisions need to be put in place.

Many of the proposals appear to be just a tick box to say you have added some routes for walkers, cyclers, horse riders, rather than them having any real benefits for users.

You are proposing routes in the South and North Ockendon area. Yet you are not proposing a crossing to enable people to use the paths safely. North Road is an extremely busy road, and that would not change if LTC goes ahead.

If you are proposing adding paths, then firstly they should actually be routes people need and want, and secondly should be safe to use.

We also note that the active travel options to cross the A127/J29 roundabout junction to the southern side of the roundabout that many use is still severed.

Why are you proposing to make people have to take a longer route whereby they have to cross from the south side of the A127 to the north side, travel along, and then come back from the north side to the south?

We believe this is purely because it is easier for you, and not to benefit the local community.

We note that the walking, cycling, horse riding maps for Thurrock are outdated, and do not show the latest changes. More on this in the inadequacies section.

It is also of concern to us that whilst we support all walkers, cyclist, and horse riders, we note that apparently bridleways come under the Countryside Act and therefore would not fall under highways remit for maintenance and upkeep. Who would maintain these bridleways, and who would be left to cover the associated costs?

It seems to us that NH/LTC would be destroying and impacting way too many stables, yards and grazing areas, thus making it harder for people to keep their horses in the area, and potentially reducing the possibility for many to stay in the area with their horses. But then you are proposing lots of new bridleways that because of that status you would then not need to be responsible for the ongoing maintenance.

We do not believe that the proposed walking, cycling, horse riding paths are sufficient to encourage modal shifts in many cases either, they are more paths to suit your needs to tick the active travel box.

Health impacts

Air pollution

It is estimated there are around 36,000 deaths per year from air pollution, and it is estimated that poor air quality costs the UK economy £9-19bn per year⁵.

We are already suffering from illegally high levels of air pollution.

Evidence shows that the Dartford Crossing would still be over capacity even if LTC goes ahead, and that we would see a 50% increase in cross river traffic if LTC goes ahead.

This would only worsen the air quality throughout the region. Contrary to what NH/LTC claim electric vehicles do not stop air pollution, as they still emit deadly PM2.5.

There are particles of things like brake dust, tyre and road wear that are so tiny they get into our organs via our bloodstream.

We have serious concerns about the air pollution impacts to our health and the natural environment. We seriously question why NH/LTC are not proposing filtering the pollution from the tunnel section of the LTC. You have the opportunity to filter and improve air quality but instead choose to just let the pollution flow out into our communities and lives, impacting our health and wellbeing.

You say that air pollution disperses within 200m, but we do not believe this to be true. There is evidence that air pollution impacts wildlife such as birds within 700m of busy roads.

We also argue that the sand in air pollution that travels to this country from the Sahara is most definitely travelling more than 200m.

Where do you believe the pollution magically disappears to?

We have serious concerns also that you have not even completed the assessments on air and noise pollution in regard to the latest changes to the project, yet are making claims that there would be no change. This is dangerously misleading and completely unprovable, as you have not completed the assessments. We need evidence not your guesstimate and wishful thinking of what may or may not be the case.

⁵ [Conservative Environment Network - Clean Air Briefing](#)

This is our lives and health we are talking about, we need and deserve better. We also deserve the right to have access to completed assessments and factual evidence during consultation. It is impossible for us and our Local Authorities to be able to respond in an informed manner as you have chosen to hold the consultation at a time when you are unable to provide us with completed assessment information.

You have not provided anyone with integrated and cumulative assessments, nor projections for health and wellbeing for future populations.

You have not provided updated air and noise pollution information in regard to the changes in location of the moved construction compounds.

To tell us that the information will be available during the DCO process is unacceptable.

We all deserve the right to breathe cleaner air, and the proposed LTC goes completely against that right. The proposed LTC would create a toxic triangle.

New UK law

In October 2022 new air pollution levels will be enshrined into UK law.

Defra has proposed 10 micrograms per cubic metre of air ($\mu\text{g}/\text{m}^3$) the same levels as WHO-10 (the previous World Health Organization (WHO) levels before they updated them to be even lower).

Professor Karen Lucas has stated publicly that there is evidence that the whole proposed LTC route would fail against this level. At the time she commented on this WHO levels were not enshrined in UK law, but by the end of Oct new air pollution levels, including for PM2.5, will be enshrined into UK law.

It is ludicrous with a project of this scale that you are attempting to hide behind claims that you are only assessing the proposed route in accordance with current legislation. You, like we, know that there is new legislation on the way in Oct, and we assume that like us you are aware that the whole proposed route would fail against the new legal levels for air pollution.

It would be a complete waste of taxpayers' money to progress a project such as the LTC knowing that it would fail against the new legal levels for air pollution. It needs to be stopped now.

ULEZ extension

With the proposal to expand the ULEZ to cover the whole of London, we question how the proposed LTC and connecting roads would sit within the London Borough of Havering.

The London Borough of Havering is in the top 4 London Boroughs for the highest number of deaths linked to poor Air Quality.

We know the LTC would fail on the new air pollution levels, and we know the Mayor of London has committed to comply with WHO-10 levels by 2030.

If the ULEZ is expanded to cover the whole of the London, including the London Borough of Havering, why should local residents have to pay to use their vehicles for essential journeys, whilst thousands of vehicles would be passing through their communities using the LTC and connecting roads pumping out pollution at no cost?

Noise pollution

You have not provided anyone with integrated and cumulative assessments, nor projections for health and wellbeing for future populations.

You have not provided updated air and noise pollution information in regard to the changes in location of the moved construction compounds.

Light pollution

We have concerns about light pollution too.

We have already experienced issues of light pollution from your misplaced lighting associated to the investigative works. This gives us no confidence in regard to light pollution during construction.

We have concerns over light pollution once the road is operational, if it goes ahead, too.

We know there are many nocturnal creatures that would be negatively impacted by light pollution.

Evidence shows that light pollution has negative impacts on our health and wellbeing, as well as negatively impacting the natural environment.

Loss of nature impacts to health and wellbeing

Evidence shows that nature has a positive impact on our lives, health and wellbeing.

The cost to our health and wellbeing as a result of the destruction, loss, and impacts to our natural environment needs to be taken into account.

The impact to our health and wellbeing whilst having to deal with the LTC proposals should also be recognised. Your proposal is having a negative impact on people's mental health and wellbeing too. Sadly literally to the stage of some becoming suicidal because the stress is so overwhelming.

There are also the impacts to mental health and wellbeing over concerns about climate change and the destruction of our natural environment, which is an ever increasing issue. This needs to be taken into account as you attempt to push ahead with your hugely destructive and harmful project that would emit over 5 million tonnes of carbon.

As does the health and wellbeing of the flora and fauna the LTC would destroy and impact too. Pollution related illness and wellbeing does not just impact humans. There is evidence that creatures such as birds are being impacted by pollution within 700m of roads.

Costs

Estimated harmful emissions in the UK could cost the NHS and Social Care £10.4Billion over the next 30 years, and this does not factor in the additional devastation the LTC will be directly responsible for.

We have asked what the estimated cost in regard to healthcare associated with the LTC would be, and yet again you decline to provide this info, again hiding behind telling us it will be made available during the DCO process. Again, completely unacceptable.

Environment

We strongly oppose the proposed LTC on environmental grounds.

Climate

We are living in a time of climate change it is therefore disgusting and despicable to be proposing such a hugely destructive and harmful road project as the proposed LTC.

The proposed LTC would emit over 5 million tonnes of carbon. This is not acceptable and is in no way compliant with the Government's legal obligation on Net Zero. Nor would it be in keeping with the Government's transport decarbonisation plans.

This is not something that we can sit back and hope for the best on. It is not something that we can afford to take chances on.

We hear a lot of talk from Government, NH/LTC and others, but now is the time for actions and evidence to back up claims being made.

We also have to question the lack of information and constant changing of figures when NH/LTC are discussing carbon emissions. It seems the info changes depending on who they are talking to, and possibly which way the wind is blowing that day! Claims of reductions often do not match the actual figures being provided. There is no consistency in the information being presented and the claims being made.

If it wasn't so serious we'd be laughing at the claims of LTC being the greenest road every built in the UK. What a joke.

We attended the LTC Road to Net Zero industry summit, and witnessed first hand the fact that there are no definite actions that can back up the claims of greenest road.

Not only that, even if any ways to make things cleaner and greener did come along it is more than apparent that there would be a considerable price tag associated with it.

Attendees of the industry summit were briefed on how cleaner green options cost around 3 times as much as what is largely being used now. This would only add to the already ever increasing cost of the proposed LTC.

The claims being made have no substance to back them up, and we have absolutely no confidence that NH/LTC genuinely care about the environment, it just all feels like lip service to try and make a hugely destructive and harmful project look better than it truly is.

We also object to the attempts to greenwash the LTC project, please stop it. The reality is that the proposed LTC can in no way be considered sustainable or good for the environment, that is a fact.

The only way we can see LTC becoming the greenest road ever built in the UK (and let's face it the bar isn't set very high), is if NH/LTC intend to paint the whole thing green! Please advise us when the consultation to choose the shade of green is!



Flood risk

As we have stated in previous consultation, we believe the risk of flooding in regard to the proposed LTC is a serious issue.

We have concerns about flooding in many different areas along the proposed route.

One that is a large concern is at and around the tunnel portal area. Having researched flood risk for the portal area we believe there is risk of this area flooding, especially in light of climate change. This would mean that the use of the tunnels/LTC would be greatly compromised when it floods.

Also in the same vicinity we have concerns about the proposed land forms in Tilbury Fields changing the lay of the land. Currently this land is all flood plain, and with the proposed land forms the flood plain would be removed. We have concerns about where the water from flooding from inland would have to go to reach the river. And also how the river would flood if it can't reach the flood plains. We have concerns that other areas along the river would flood instead.

Nature

Our country is one of the most nature depleted countries in the world. Now is the time to be restoring nature, not destroying and harming it. There is no doubt that the proposed LTC would destroy and impact our natural environment on a huge scale.

In this particular consultation you mention changes to the proposed water vole habitat, yet fail to provide any details of the changes. When details were requested we were told we'd have to wait until DCO. This is not clear and informative consultation materials/information.

This has been a common theme during the consultation with many requests for information, including much on the environmental impacts, have been avoided and instead we are being told we will have to wait until DCO. This is inadequate consultation and unacceptable.

Of course, it is not just water voles we are concerned about, as much as they are cute little critters.



We have serious concerns about the impacts of the proposed LTC on our natural environment, as also detailed in our previous responses.

Woodland and trees

We have serious concerns about the loss and impacts to woodlands (including ancient woodland), trees, and hedgerows.

We again comment on the fact that NH/LTC refuse to share details of how much woodland (including ancient woodland), and hedgerows, and how many trees would be destroyed and impacted if the LTC goes ahead.

We know that however much it would be is too much.

Now more than ever we need to planting more trees, not destroying them and negatively impacting them.

Trees and woodlands have networks of mycelium connecting them, and when even part of a woodland is destroyed or impacted the effects are carried throughout the woodland through this network.

Ancient woodlands that have existed for hundreds if not thousands of years would be destroyed, and they are irreplaceable.

We have concerns that NH/LTC are not adequately assessing the woodland and trees too. We are sure that more veteran and notable trees would be impacted than NH suggest if LTC goes ahead.

As we have commented previously we also believe there are woodlands that warrant ancient woodland status, like The Wilderness in South Ockendon. We have previously provided evidence to back up our claims and reasons for concerns, yet NH/LTC still fail to recognise The Wilderness as you should.

We have maps referencing The Wilderness dating back to the 1700s, and if it was known as The Wilderness in the 1700s then it very likely wouldn't have been a newly planted woodland back then, rather it would have been a wilderness that had been in existence for many years.

We have evidence of the same family owning The Wilderness dating back to the 1500s when Sir Richard Saltonstall, the Lord Mayor of London between 1597-98 lived there. The property and land was passed down the generations.

There are also numerous ancient woodland indicator species at The Wilderness, including Limes, Bluebells, Red Campion, and Spindle. It is also home to many varieties of bat (some rare), great crested newts, water voles, woodpeckers, red kites, rare fungi, and more.

We are also aware of other ancient, veteran and notable trees, and ancient hedgerows that would be destroyed and impacted if LTC goes ahead. Some of which we do not believe NH/LTC are recognising or detailing.

We have seen no mention of the ancient tree in Fen Lane, Orsett for instance that sits alongside the proposed development boundary, and could be at risk from construction traffic and utility works.

We are sure there are many others like that, and we have no confidence in NH/LTC to identify them or protect them.

Too much info is being withheld to allow people to adequately consider the true impacts of the LTC if it goes ahead.

Alternatives

National Highways CEO, Nick Harris is on public record as recently saying, in regard to road building, “Building Nothing is the Best Solution”

National Highways clearly recognise the impacts of road building and what the best approach should be, so why do you continue to try and progress such hugely destructive and harmful not fit for purpose projects like the proposed LTC?

There are alternatives too, which you have not given adequate consideration to.

Road

Option A14 or a variant as an alternative road project was never given proper consideration. You say not enough traffic would use it, because your traffic modelling data said so, yet you fail to recognise it would if designed correctly actually finally complete the M25 as a true motorway orbital.

It would bypass the current problem areas underground in a tunnel, meaning air pollution could also be improved through filtration to clean the air.

There would be no need to reduce the speed limit, or have to stop traffic every 15-20 mins to escort hazardous vehicles through as it would be designed to modern safety standards.

It would have less of an impact to the natural environment, and would take all the national traffic away from the current crossing, a better road solution than what is being proposed.

Rail

Rail options were also not adequately considered. Only rail options crossing the river and adding to the already overloaded London centric rail system were considered.

Rail improvements between Ashford and Reading would negate the need for the LTC. And at an estimated cost of £3-4bn would also be cheaper.

A single freight train takes around 60 HGVs off the road. And rail is a more sustainable option. Improving rail freight should also mean improvements for passenger rail too, again providing another option for people to travel more sustainably.

This option should at least be considered, which as far as we know it hasn't been to date.

Tram

The Kenex Tram proposals are estimated to cost around £800m, and they too would help reduce traffic at the Dartford Crossing, as it is predicted trams would take around 10% of traffic away.

When you consider that the proposed LTC, would take as little as 4% of traffic away, there is definitely a case to be considering all possible alternatives, including tram.

Other options and considerations

There is evidence to suggest that there is cause to re-open RIS2 because of how significantly things have changed.

National Highways license states:

“Major variations, which would affect the Licence holder’s overall funding, have a material effect on the integrity of the RIS or otherwise compromise the Licence holder’s ability to comply with the RIS, would require the RIS to be re-opened”.

When you start reviewing the many different aspects, it becomes clear that there have been major variations as described in the Licence.

- The RIS2 budget was reduced hugely by £3.4bn in the 2021 Spending Review.
- The 18 month delay to the proposed LTC (which is £8.2bn out of the £14.7bn RIS2 capital enhancements budget).
- Failure to progress the LTC was defined as an “existential threat” to National Highways in their Annual Report 2021.
- ‘Smart’ Motorways make up a large section of RIS2 and have been paused whilst 5 years of safety data is collected and analysed.
- The National Policy Statement that governs the RIS2 projects decision making process is being reviewed, and is not compliant with UK climate law.
- The increasing importance of UK Food Security and RIS2 would destroy so much agricultural land.
- New legal levels on air pollution are due to be enshrined into UK law by the end of Oct this year.

We therefore call for both RIS2 and the NPS NN (National Policy Statement for National Networks) be paused immediately, whilst the NPS NN is reviewed, and RIS2 re-opened.

There is also the serious issue and concerns that the routes option of the consultation process was extremely inadequate and should be reviewed and reassessed.

Government asked NH (or HE as they were called back then) to consult the public in 2016 on the route options for a new crossing in locations A and C. Yet NH instead presented a consultation biased in favour of options in Location C, with no mention of Location A. This resulted in a biased outcome since not all options that should have been were consulted on.

At route option stage there was also an Option C Variant which included a connection between the M20 and M2 via the A229 Blue Bell Hill. This was ruled out as unnecessary.

Yet here we are in 2022 and NH are talking about the need for Nitrogen Deposition mitigation and compensation in the A229 Blue Bell Hill area, due to the direct impacts of traffic cutting through from the M20 to the M2 to use the LTC, if it goes ahead.

Whilst we do not support this option either, we feel it important to flag up the fact that adequate consideration has not been given in the route selection stage, again showing just how inadequate the proposed LTC and National Highways are.

Active Travel and Public Transport

We again voice concerns that there is no viable option for a bus route to cross the Thames using the LTC, due to the lack of adequate connections.

Also, that there is no provision for active travel across the river as part of the proposed new crossing.

At a time of climate change, and when our Government is supposed to be encouraging modal shift, we find this completely unacceptable.

Alternatives Conclusion

In conclusion we do not feel that proper and adequate consideration has been given to all options to address the problems at the Dartford Crossing.

Evidence shows that what is being proposed is not fit for purpose.

We therefore call for you to reassess the LTC against other alternative options to assess which is now the best option, and share your findings and evidence.

Other comments

We again stress concerns that NH/LTC have to date refused to provide up to date predictions of how many vehicles would use the proposed LTC per day (or in fact in any time frame), if it goes ahead.

We get pointed to various traffic modelling predictions for am, inter, and pm peak traffic, but where is the information about the total predicted traffic movements?

NH/LTC also refuse to share details of what the design capacity is for the proposed LTC. When so quick to use the design capacity of the Dartford Crossing within their reasoning for a new crossing, why are you avoiding sharing the design capacity of the LTC with us?

We also have concerns that you are using traffic modelling for the years 2029, 2044, and 2051. The LTC, if it goes ahead would not be operational until 2030 at the earliest, so the 2029 traffic modelling would be outdated to consider operational traffic.

Also there is a considerable time frame between those years, and from them it is impossible to ascertain at which point within them traffic patterns change and to what extent year to year.

This means that your predictions on traffic modelling are based on unknown data, that would change considerably but you have no idea at what point.

For instance, your claim that the LTC would reduce the traffic at the Dartford Crossing by 21% (or around 20% if we listen to LTC Exec Director, Matt Palmer), dropping to just 14% by 2044.

This drop could happen any time between opening year and 2044, so you are not providing us with any clear and informative data of how much traffic would be removed and over what time frame.

We have more reason to trust and believe Thurrock Council's conclusion that traffic reduction at the Dartford Crossing could be as low as 4% in the am peak and 11% in the pm peak.

These figures are based on their assessments of your official traffic modelling data.

We note that your traffic modelling data does not include things like the newly appointed Thames Freeport traffic predictions.

We have serious concerns in regard to the lane drops on roads like the A2, A13, and M25, and the impacts it would have on congestion and pollution, other local roads, and our communities.

Our concerns are heightened even more when contemplating the chaos that would ensue when there are incidents at either crossing, and traffic is trying to migrate between the two crossings without adequate connections.

We are concerned over which road users could and couldn't use the LTC, and how the restrictions would be communicated to road users.

We believe it would take considerable signposting to communicate the various connection options and who would and wouldn't be able to use which sections and routes. This increases the safety risk, and would also cause incidents and congestion as people try to figure it all out.

On page 44 of the Consultation Guide you state that Thames Freeport would be much better connected to the rest of the country if the LTC is constructed. We asked you to explain how.

Your response was, *"At the A13 junction it will be possible for vehicles travelling north from the Tilbury area of the Thames Freeport along the A1089 to connect onto the Lower Thames Crossing northbound onto the M25. This will reduce the amount of traffic needing to travel via the A13 and M25 junction 30, leading to faster journey times connecting this area of the Thames Freeport to the wider Strategic Road network. Similarly, traffic from the London Gateway area of the Thames Freeport will have direct connectivity for the A13 eastbound onto the Lower Thames Crossing northbound onto the M25, and onto the Lower Thames Crossing southbound, providing connectivity across the River Thames"*.

This response does not answer the question of how it would be much better connected, and does not take into account the fact the LTC would sever the A13 westbound connection to the A1089 south and replace it with a new connection that would create traffic flow issues not only for port traffic but also for other road users and the local community.

It also doesn't consider the negative impacts to the lane drops on the A13, which was recently widened to better service the Freeport and improve traffic flow. And indeed, how this would impact the Freeport at both Tilbury and Stanford.

Inadequacies of consultation

We rate the information being presented clearly as very poor.

We rate the website easy to navigate as very poor.

We rate the information videos on usefulness for understanding the latest proposals as very poor.

We rate the quality of the physical events as very poor.

We rate the choice of locations of the physical events as very poor.

We rate the promotion of the consultation and whether it was promoted to the right people as very poor.

Consultation timing

We would like to draw attention to the fact that NH/LTC only postponed their planned consultation which was due to take place earlier in the year, due to the level of opposition to their plans by Local Authorities.

Whilst we acknowledge that the consultation was postponed until May 12th through to June 20th, it should not have taken serious opposition and concerns from Local Authorities to have made this happen. NH/LTC are well aware that the timing they had proposed clashed with purdah for elections in Thurrock and Havering, as well as Easter Holidays, and was being proposed for a shorter duration, they should never have proposed such timing in the first place.

As noted below in regard to the consultation events, we are disgusted that NH/LTC lied to us and others about their further discussions with Local Authorities over the newly planned consultation details. Local Authorities were not consulted further on the new plans once the original feedback was offered on the original plans. The updated Statement of Community Consultation (SoCC) was only issued to them just before consultation began.

Whilst the consultation was postponed the timing has still had issues for us and our supporters due to it still clashing with the time councils have been reforming after elections. It takes time for Local Authorities to reform and issue emails and contact details for new councillors for example, thus limiting options for the public to be able to reach out to their councillors if they needed/wished for help and support in regard to the LTC consultation.

The timing also meant that Thurrock Council's LTC Task Force committee did not get the usual attendance to one of our meetings during consultation because of the timing in regard to elections and council still reforming. This meant that the committee missed out on chances to not only have NH/LTC in attendance at one of our meetings, but we also missed out on the opportunity to have a meeting within consultation to discuss the consultation concerns and issues.

There have also been bank holidays within the consultation period which has impacted the time people have had to respond to the consultation.

In general the length of the consultation, which was extended compared to the first proposed consultation, has still not been long enough to be able to fully understand the proposals. It doesn't help that if you spend some time reading the consultation materials from the beginning of the consultation and then submit your questions via email, it then takes up to 15 working days to receive a response. We have found that the responses we have received have avoided answering many of the questions we've had, and/or needed further questions to be asked to seek further clarification, as in some instances the responses just added to the confusion and generated more questions. Since many of the responses to our questions came in on Thurs 16th and Fri 17th June it has left us with inadequate time to be able to read them, respond and expect a response with time to consider any info that may have been provided, and get a response to the consultation in before it ends. We have therefore responded as best we can with the info we have and what we have gathered from the confusing, contradictory and inadequate consultation materials.

As we finalise this response we are still receiving replies from NH/LTC in response to the questions we have submitted. One of the emails we sent on the 5th of June and it has taken until 9pm on the 20th June, just a few hours before consultation is due to end, for a reply to be sent. This is again inadequate, and again highlights that the consultation was not long enough to give opportunity for materials to be reviewed, questions to be submitted, and responses be received with adequate time to be reviewed and considered before responding to the consultation, and indeed leaving no time to send follow on questions if needed, which is often the case when dealing with NH/LTC.

We also seriously question the timing of this consultation considering that the nitrogen deposition surveys, and updated air and noise pollution surveys and assessments have not yet even been completed so could not be shared with us or Local Authorities. Such important information should be complete and presented to us for consultation.

We believe that NH/LTC have rushed to have this consultation as time is ticking away, and they need to attempt to resubmit their Development Consent Order (DCO) application as soon as possible. So rather than taking the time to consult us with completed adequate info they have instead just pushed ahead and rushed into yet another inadequate consultation.

Consultation promotion

We heard from people who did not receive a leaflet advising of the consultation, they only knew it was taking place because we had alerted them.

The promotion of the consultation was yet again carried out in a very biased way that did not ensure fair representation of the proposals. The interviews/articles that we heard and read presented the project in a very biased way in favour of the crossing, with misleading information to try and garner and keep support. It is not right for the LTC Project Director to be attempting to give the impression in interviews things like electric vehicles will sort air pollution issues, when the reality is that electric vehicles still emit deadly PM2.5. Or that he doesn't know where Thurrock Council came up with the 4% reduction at Dartford Crossing figure, when the council had approached NH/LTC prior to going public with the info and NH/LTC didn't comment on it until it was in the public domain. We also question how you can issue a Non Statutory Statement of Community Consultation (SoCC) as an addendum, that when we questioned you we were advised is an addendum to the original SoCC. How can a non statutory document be an addendum to a statutory document?

The Cambridge Dictionary defines addendum as - *something that has been added to a book, speech, or document.*

This therefore suggests that an addendum of a statutory document would be statutory by association, as it forms part of/has been added to the document.

We therefore also question your claims that this is not a statutory consultation.

We also highlight that since you also still have the obligation to consult those who have recently become statutory consultees, the information presented in this consultation is far from adequate, especially the lack of key layers on the interactive map and similar.

We also have concerns that you did not feel it important or relevant to list details of the consultation events within the Consultation Guide, instead putting the onus on the reader to email or phone for details of events. We again do not consider this to be clear and informative communication or promotion of the consultation.

Consultation events

Yet again we have serious concerns about the lack of and timing of the consultation events.

Despite us and others, including at least one Local Authority, voicing concerns that there were no events in certain areas, you only added one more additional event in East Tilbury.

Why an event in East Tilbury was not included in the first place is completely incomprehensible considering the huge impacts the proposed LTC would have on the area. Not only that, but the fact that the changes in this consultation related to things like Tilbury Fields and the Operations and Emergency Access Point that directly impact East Tilbury area.

Whilst an event did end up being added, it was not listed on the consultation leaflet, and so many would not have been aware that there was even an event in East Tilbury to attend. This is simply not good enough.

Other areas like Chadwell St Mary and South Ockendon should also have warranted consultation events, but you failed to provide them.

Again changes in the consultation were relevant to both these areas, so there is no reason or excuse not to have provided events.

The photo point used for the image of the proposals to change the landscaping around the A13/A1089/Baker St area of the LTC was added as a photo point to the interactive map in a location within Chadwell St Mary. The addition of the Orsett Cock to A1089 south connection would also impact Chadwell St Mary since one of their major access routes in and out is via the Orsett Cock, which would see a large increase in traffic movements as a result of this addition.

There were changes to the level of the LTC within the cutting in South Ockendon, changes to landscaping around the LTC, and changes to utilities including newly proposed larger electricity pylons that would be visible across the fields from South Ockendon and impact the local area and views.

We also have serious concerns that NH/LTC were attempting to tell us and others that the events had been decided after discussions with Local Authorities.

We are aware that this is a complete lie, since NH/LTC did not further consult with or seek feedback from Local Authorities for the newly proposed consultation. We know that Local Authorities did not receive the updated Statement of Community Consultation (SoCC) until just before the consultation launched. They certainly were not consulted on the newly proposed consultation.

We find this to be completely unacceptable and arrogant behaviour to blatantly lie to people, including councillors by saying that the events were decided upon after discussions with the Local Authorities. This just shows the level of contempt NH/LTC for our Local Authorities and our communities, as well as their complete lack of respect by trying to additionally lie to us. We consider this to be disgraceful behaviour.

All the events took place between 2pm and 8pm on weekdays. There were no weekend events, and the timings mean that anyone who works shifts would not be able to attend.

The feedback we got from those that attended was that the events were as always a lot of propaganda, with different answers to questions and levels of knowledge and understanding depending on who you spoke to at the event. There were reports that the relevant LTC team member for certain areas were not available at some events, which resulted in there being nobody present at some events to answer questions on some aspects.

In general people are fed up and fatigued by the consultations and events, and have little or no confidence in NH/LTC to provide adequate information, instead feeling that NH/LTC are simply on a propaganda mission with no real interest in those that have serious concerns.

Whilst we welcome the inclusion of British Sign Language interpreters at two of the consultation events, we are frustrated that firstly this was not arranged prior to the consultation so that this could be included without promotion of the consultation. And secondly, that British Sign Language interpreters were not available for the Deaf Community at all the consultation events.

Consultation materials

NH/LTC have a legal obligation to provide us with clear and informative materials and an adequate consultation. Yet the materials presented in this consultation are anything but clear, informative, and adequate.

We also get the impression that it may be an attempt to create materials that are as confusing, misleading, contradictory, and inadequate as possible in the hope that along with consultation fatigue it would put people off of responding to the consultation. We know that NH/LTC have to be seen to log, read, and analyse all responses, and we are aware that the more responses there are the longer this will take (or be seen to be taking), which goes against the aim to resubmit the DCO as soon as possible. It is public perception that the consultation materials have been designed to put people off taking part.

There is so much info that contradicts itself in this consultation. You can literally read one thing in one sentence and then read something in the next that completely contradicts it.

In the Community Impacts Consultation NH/LTC provided images of the proposed Chalk Park⁶ that shows land forms in the design. Yet in the Local Refinement Consultation Guide on page 40 (page 37 pdf numbering) National Highways state, "*The existing ground level would be maintained...*".

⁶ [Image of proposed Chalk Farm \(Community Impacts Consultation\)](#)

When we questioned NH/LTC we were told, *“Chalk Park will be created using spoil volume taken from the Gravesend cutting (the tunnel spoil will be going to the Tilbury side only). The total volume of spoil used to create Chalk Park will be **2,000,080m³** for the current design. The proposed height will be approximately 15m above existing ground level”*. Just one of many examples that show how misleading and inadequate their consultation materials are.

In February 2022 NH/LTC held info events, at the time they released new walking, cycling, horse riding maps. They originally uploaded and linked to maps for Thurrock that showed some of the changes that have been revealed in the Local Refinements Consultation, such as the Operations and Emergency Access Point, and newly arranged Tilbury Fields. After realising the error, and since they did not want to reveal these new details the map was changed to one that did not highlight the changes.

However, now that the changes have been revealed as part of the latest consultation the maps have not been updated. Therefore, the maps for Thurrock on the LTC website⁷ do not show the latest changes like the Operations and Emergency Access Point.

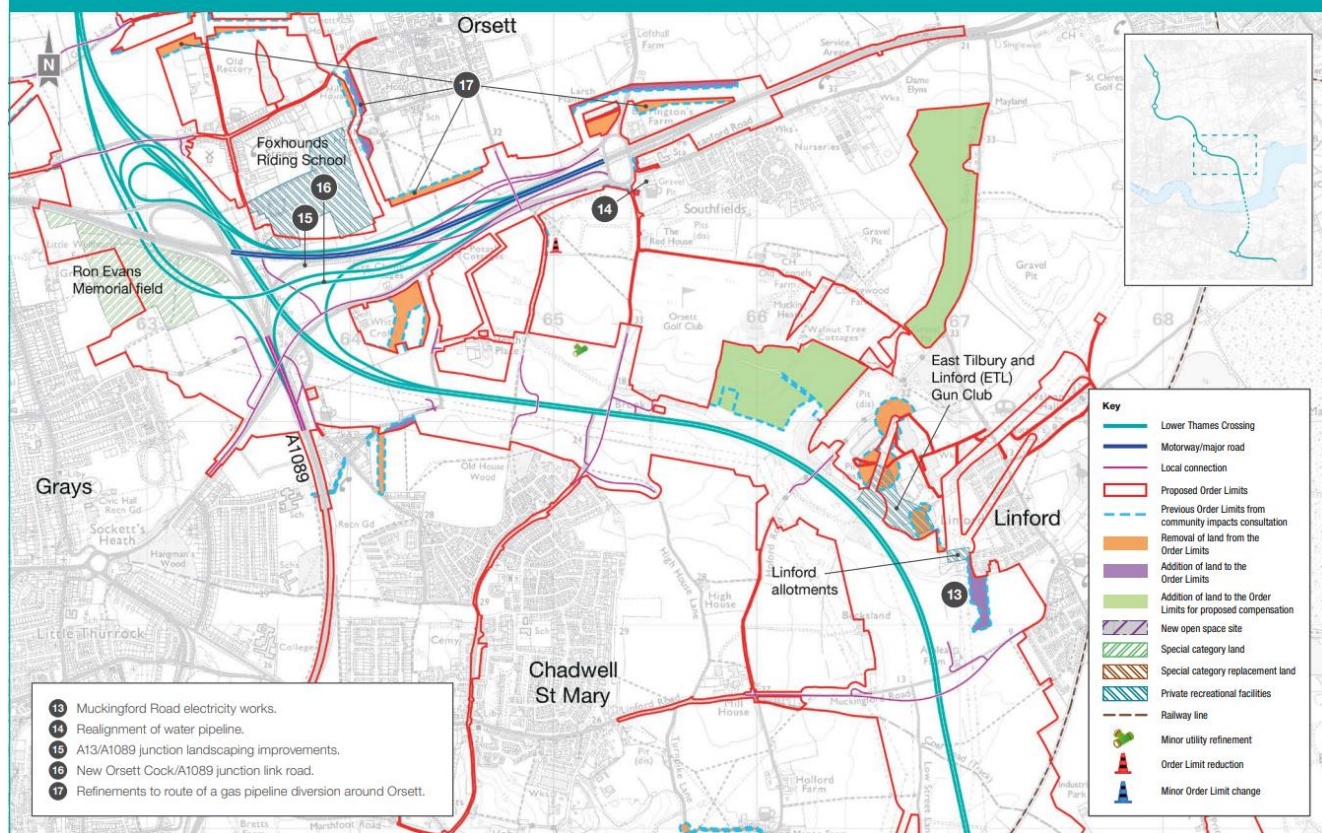
There is also the inadequacy that NH/LTC are trying to claim ‘new’ paths when the reality is that the routes exist and are being used now in many instances. Just because you need to realign a bridge or road doesn’t mean the path that it currently includes can be claimed a new when it is realigned. This kind of misleading info is totally unacceptable. We can only assume this is being done to try and manipulate the active travel count in an attempt to make the project look better than it truly is.

In the Consultation Guide on pages 58/59 (page 54/197 pdf numbering) the map shows the labelling for Point 14 pointing outside of the development boundary. This is confusing and misleading.

Chapter 5 in the Consultation Guide was largely repeated in the Nitrogen Deposition Appendix (AP1). This is not only a waste of pages at additional cost that could have been saved, as well as having additional environmental impacts, it was frustrating and time consuming as we had to try and pick out what additional information there may or may not be within the Appendix.

⁷ <https://nationalhighways.co.uk/our-work/lower-thames-crossing/walkers-cyclists-and-horse-riders/>

Figure 4-14: A13/A1089 junction



There are still errors in the Map Books, many which we have commented on time and time again in our consultation responses. We take it that NH/LTC are either not adequately reviewing the consultation responses and taking them into account, or just simply don't care that there are errors.

For instance, Stifford Clays is being labelled as Little Thurrock in Map Books 1 and 2 on sheet 27. Stanford-le-Hope is still being labelled as Standford-le-Hope on sheet 28, there is no d in the middle of Stanford. Sheet 33 points south to Little Thurrock, when it should read Stifford Clays.

In Map Book 1 on sheet 40 South Ockendon is labelled pointing eastwards, which is incorrect. Yet the same sheet in Map Book 2 points to the South when labelling the direction for South Ockendon.

In Map Book 2 on sheet 50 both Gravesend Road and Green Farm Lane are labelled, yet on the same sheet in Map Book 1 there is no identifying labelling at all.

In Map Book 3 sheet 13 the LTC connection to A13 eastbound and Orsett Cock junction is labelled as 2 lanes, when in fact it is now proposed to be 3 lanes.

Again, does anyone check anything?

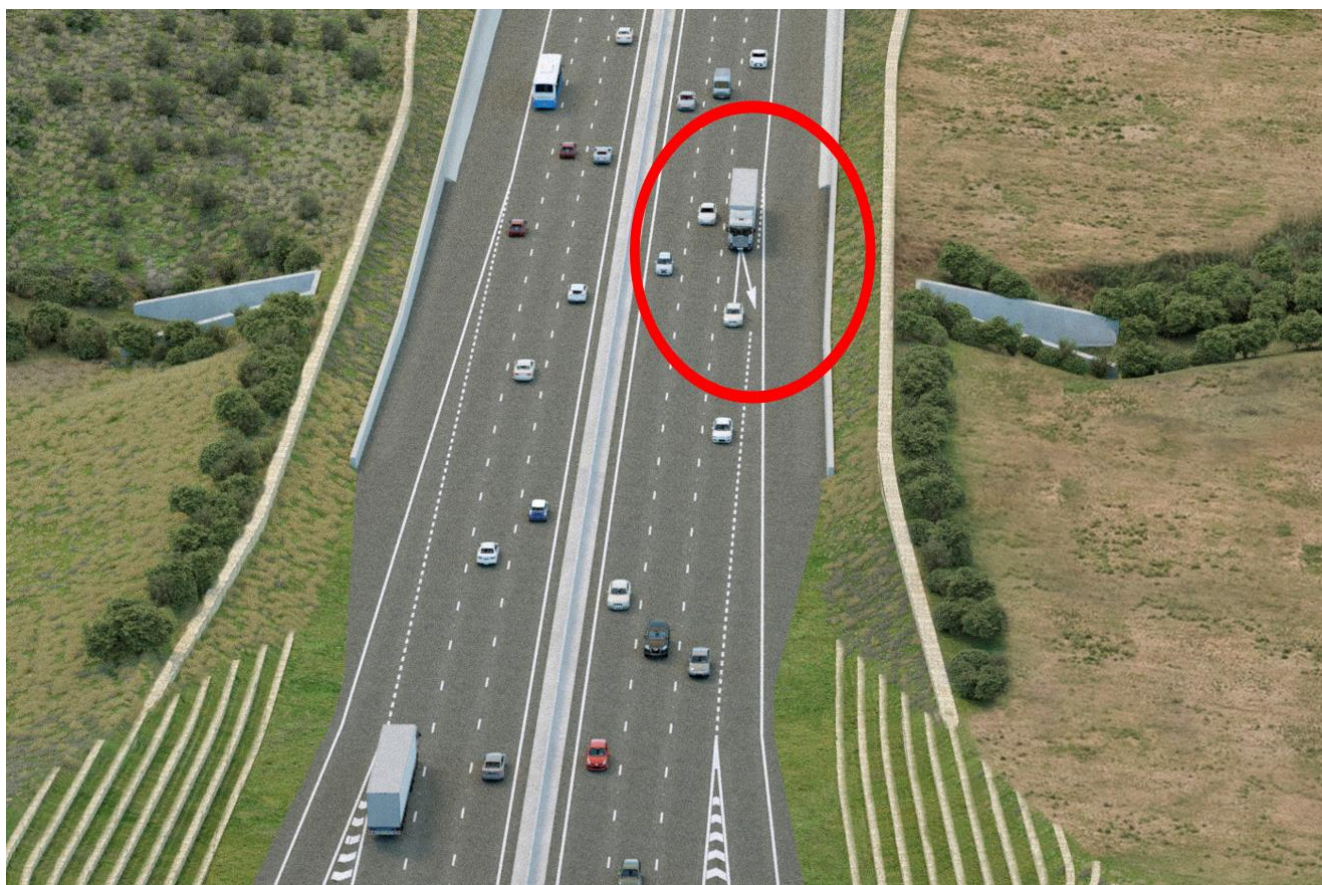
We would also highlight the fact that we needed to request physical copies of the Map Books as the online versions are now so large they are slow loading and glitchy. We also experienced an intermittent 503 Service Unavailable message prior to receiving the physical copies of the Map Books.

503 Service Unavailable

Sorry, the service you requested is not available at this time.

Whilst we were in a position to refer to the physical Map Books once they were received, others would not have been in the same position, so would have been struggling with accessing the Map Books online, which as previously mentioned are large size and therefore slow and glitchy.

The images provided are also misleading, such as the new image of the northern tunnel portal and surrounding Tilbury Fields proposal. Despite NH/LTC telling us the operations and emergency access point would be purely for operational and emergency vehicles the image shows a left filter lane arrow.



This arrow representation is an error by your own admission. It again highlights how little care and attention you give to the information you are sharing.

The same image also lacks any representation of the perimeter fence that would surround the portal and access point, which is misleading as it is representing the area as open when the reality would be some kind of high security fencing barriers.

We have not been provided with updated info/data for traffic modelling to reflect the predicted Thames Freeport traffic.

Neither have we been provided with the latest air and noise pollution information, because the assessments haven't even been completed.

Consultation videos

For a time the consultation video for Thurrock, Essex and Havering (Part 2 of 2) was actually one of the Kent videos that had presumably been uploaded in error.

You can see now that the Thurrock, Essex and Havering videos are presented by a male presenter and the Kent ones by a female presenter. Also if you check the time on the image below and then check the video as it is now it is clear the video has been changed.



Consultation letters

We are aware that some residents did not receive their letters from the LTC Land & Property Team until days after the consultation began. We acknowledge that further letters were sent apologising

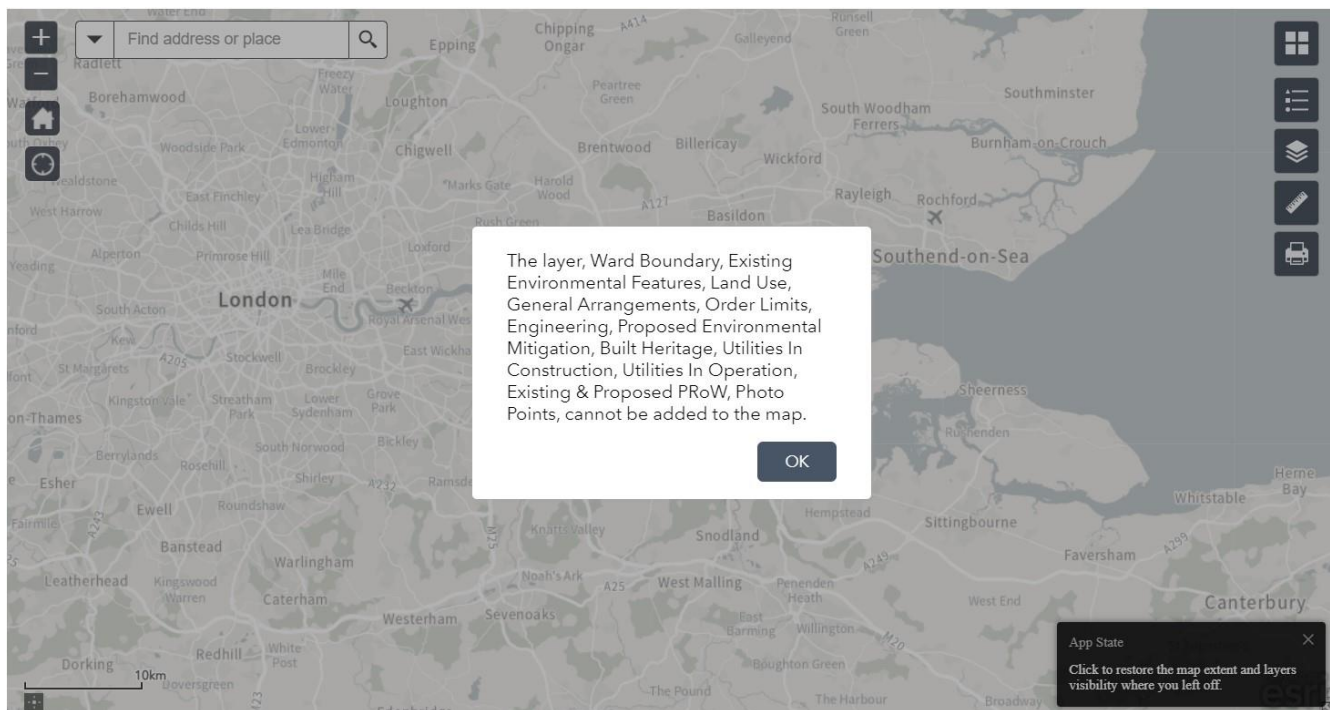
and offering a 2 day extension to respond. However, this is not the first time such delays/errors have occurred at consultation, and it is clear to us that lessons have clearly not be learnt, or safe guards put in place by NH to ensure this kind of thing does not keep happening.

We also add that the apology letters arrived more than 2 days late. Residents in a position to be receiving letters from the LTC Land & Property Team are highly likely to be stressed enough with the threat of LTC on their lives, property, land, they do not need this additional stress and inconvenience of having to contact NH to request longer to respond. It also shows a lack of duty of care to people that NH keep allowing these mistakes to happen consultation after consultation.

Interactive map issues

Errors

We have had to report many issues with the LTC interactive map. It has ranged from glitchy issues to the map being completely inaccessible and displaying error messages. We have reported at least two different instances of this, and since it has happened at all we can only assume others will likely have also experienced such inadequacies at other times also.



Missing Layers

The interactive map does not show:

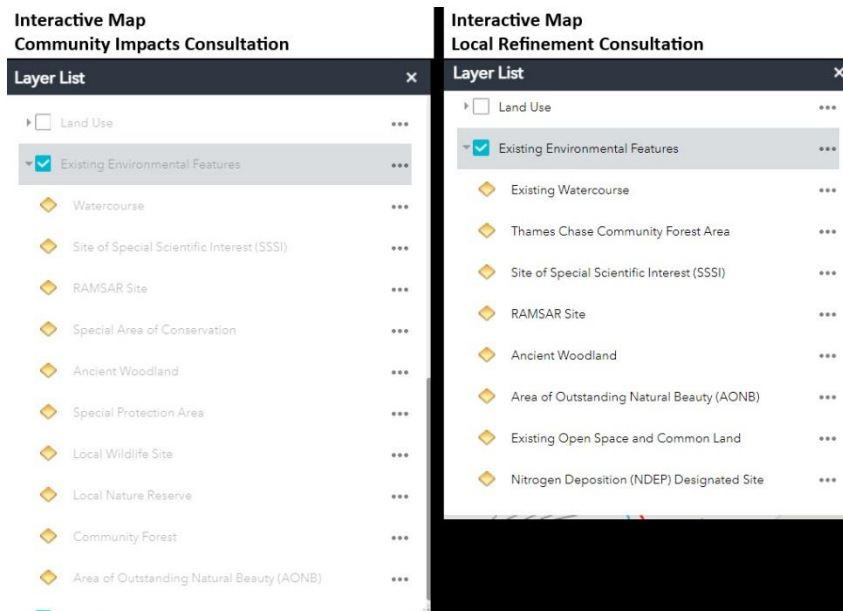
- the construction layers, ie compounds etc.
- the location of veteran and ancient trees
- the traffic layers

- air quality layers
- noise and vibration layers
- the geology and soils layers

When we asked about the missing layers we were told that some layers were not present, and we were provided with links to both the current and the previous version of the interactive map. We do not consider it adequate that we are told to review two different versions of the interactive map to try and gain an overall image of what is being proposed. Why were all the layers not displayed in the latest version of the interactive map?

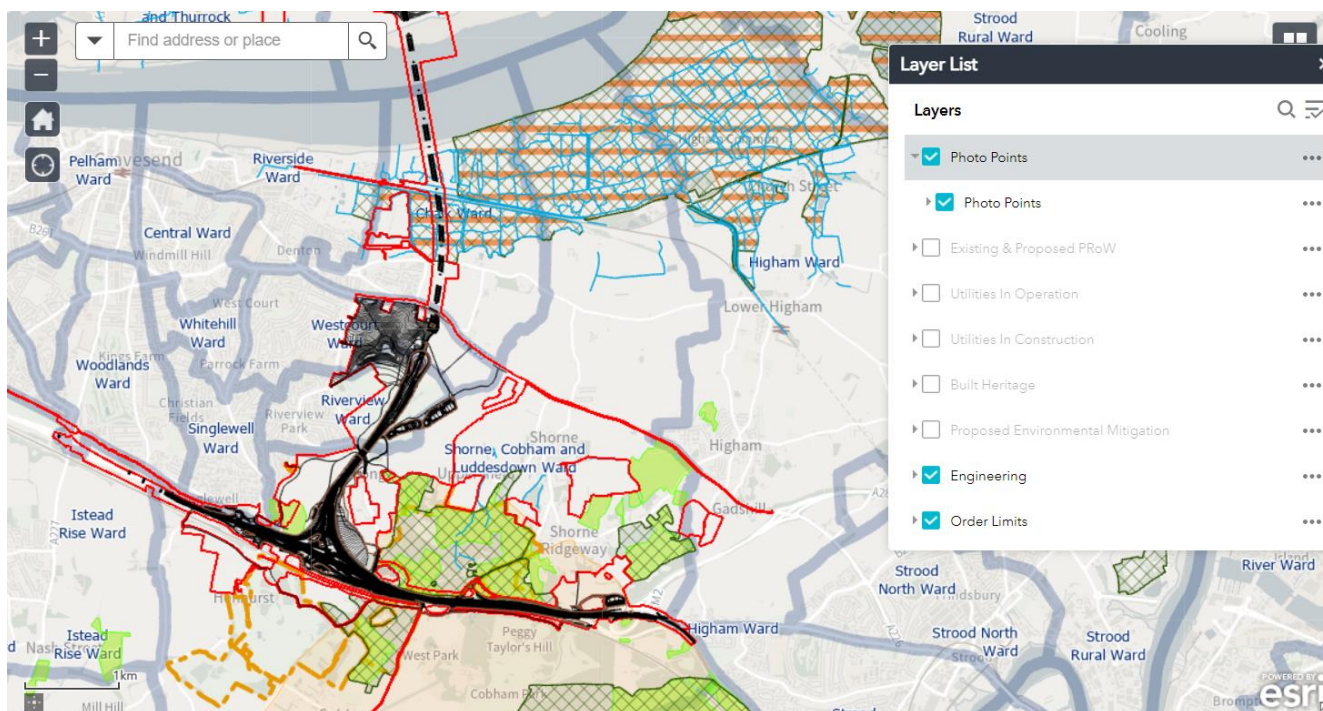
In addition to this we were told that the interactive map layers for Environment were the same. As can be seen in the image below showing screen captures of the Existing Environmental Features layers in each of the consultations they are not the same.

Why were layers such as ‘Special Area of Conservation’, ‘Special Protection Area’, ‘Local Wildlife Site’, ‘Local Nature Reserve’ not detailed on the latest interactive map?



Missing content

Why did the latest version of the interactive map not show any photo points south of the river? We again state that the interactive map should provide a clear and informative presentation of what is being proposed. The lack of images south of the river is not helpful when trying to better understand what is being proposed.



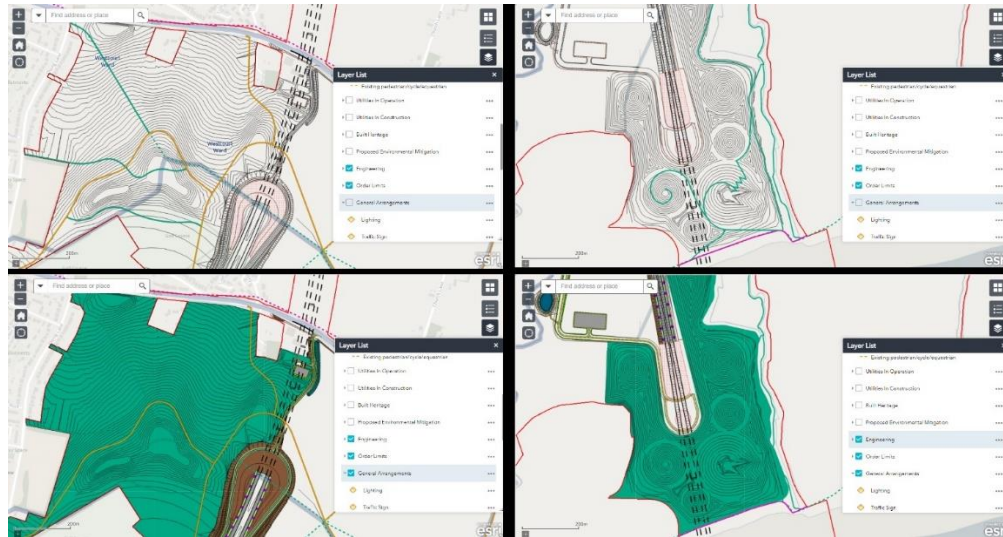
Legend colour confusion

We certainly do not consider the interactive map a clear and informative resource for consultation when the same colour is being used for the Proposed Pedestrian Footpath in the Existing and Proposed PRoW layer of the map as Proposed Earthwork Landscaping in the General Arrangements tab.

The images below highlight the issue this causes when trying to view locations such as Chalk Park and Tilbury Fields. Both have proposed pedestrian footpaths running through the proposed earthworks landscaping areas.

If for any reason you turn off the Engineering layer the issues are even more obvious as the two layers simply blend into each other.

This is not clear or informative.

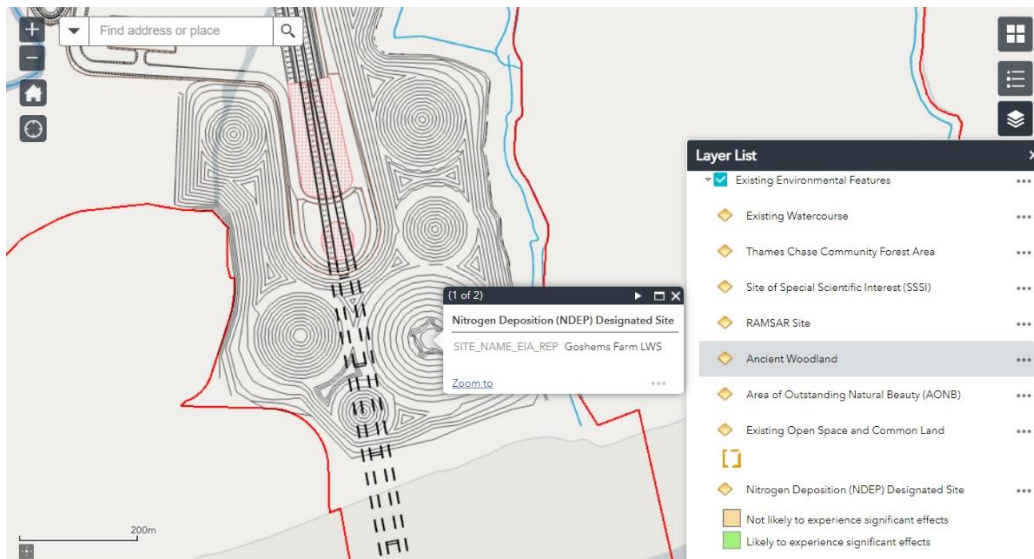


There are instances on the interactive map when the Existing Environmental Features tab is selected whereby you click on a certain area, such as Goshems Farm within the proposed Tilbury Fields area and it is labelled as a Nitrogen Deposition Designated Site. Yet it is not shaded as either 'Not likely to experience significant effects' or 'Likely to experience significant effects'. (See image below). The fact this is not colour coded in line with the map legend is misleading and adds to the confusion.

If you refer to 'Figure 5-1 Locations of designated sites likely and unlikely to experience significant effects' in the Consultation Guide or on the Consultation website it appears to show this location detailed as an area that would experience significant effects.

We say appear since the map provided in both instances, in the guide and on the consultation website, are not a high enough resolution to be able to zoom in to see enough detail. This adds to the issue that the layer is not displaying correctly on the interactive map.

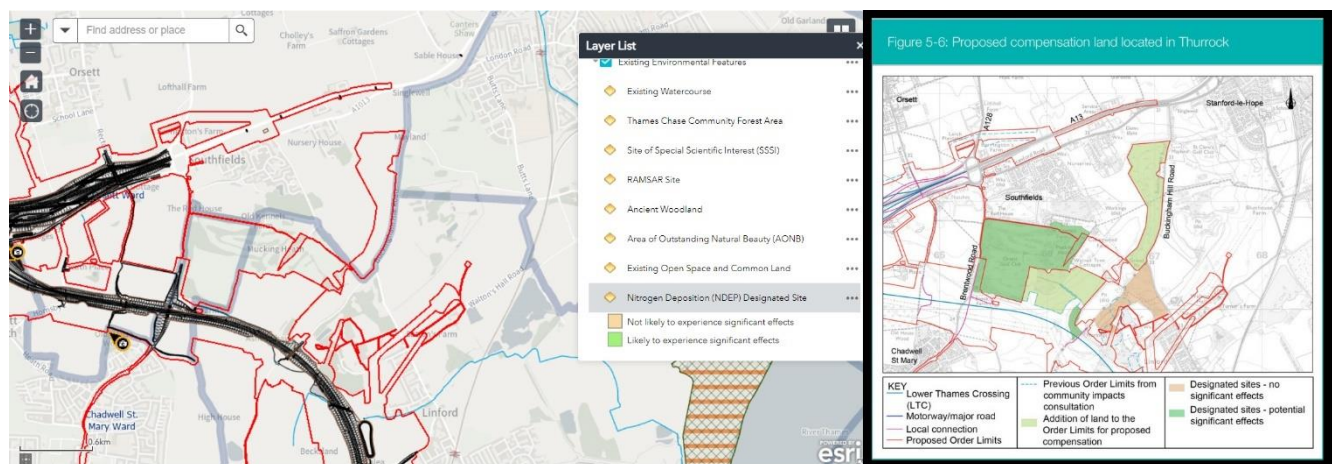
We did ask for a higher resolution version of the maps that show the nitrogen deposition designated sites, but we were told the only maps available in this consultation were in the guide and on the website. We find it unacceptable and inadequate that National Highways are unwilling to provide this information to us at a quality that is adequate to view properly.



As far as we can see the colour shading to represent whether Nitrogen Deposition Designated Sites is likely or unlikely to experience significant effects is missing from the interactive map.

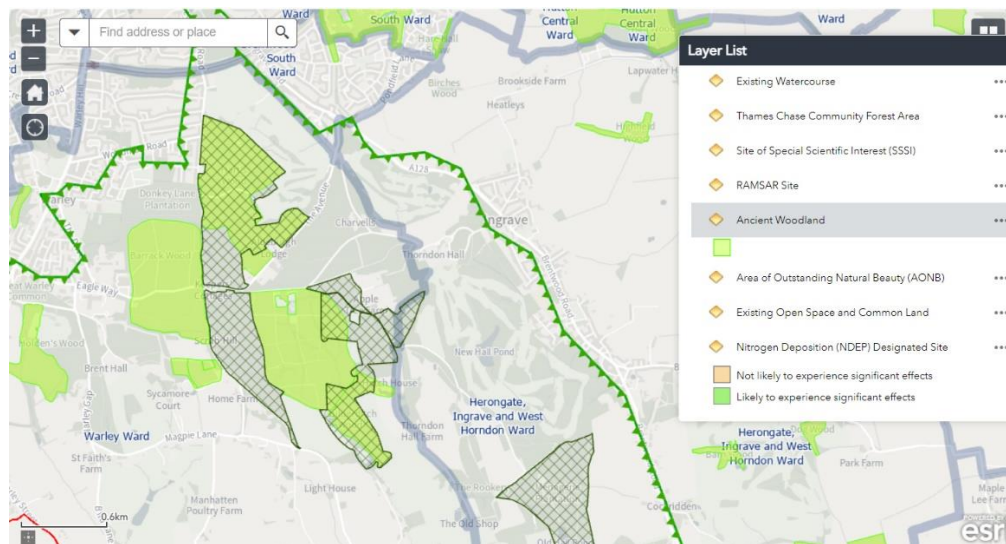
For instance, compare the image below. The interactive map is shown on the left, and 'Figure 5-6 Proposed compensation land located in Thurrock' from the Consultation Guide and consultation website is shown on the right.

The image to the right shows that two areas are marked in the darker green depicting 'Designated sites – potential significant effects'. Yet with the Existing Environmental Features layer on the interactive map the same areas that would experience significant effects from nitrogen deposition are not highlighted in the green colour as they should be.



It gets even more confusing when you try to view the same info for other areas, because not only are they not colour shaded as above instances, but some are also ancient woodland which uses a very similar shared of green for the legend.

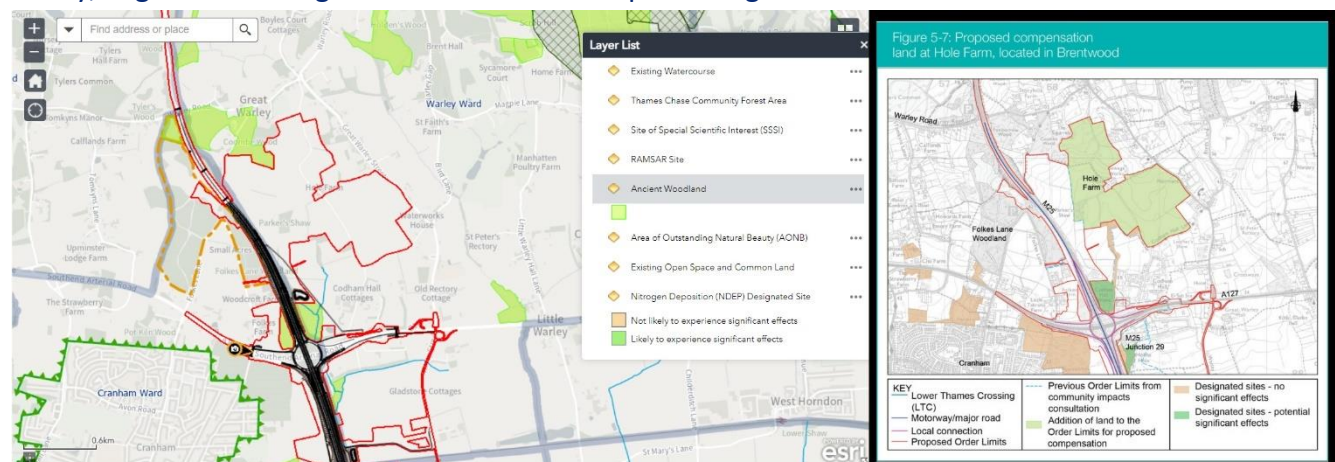
This is particularly an issue when there are other shadings for other details overlaid. For instance with the hatching over this section of green, which we believe to be the same shade of green the shade of green has the illusion of being different.



But when you consider that some Nitrogen Deposition Designated Sites are both 'Ancient woodland' and 'Likely to experience significant effects' for nitrogen deposition, it gets even more confusing, especially when it appears that the 'Likely to experience significant effects' layer of shading doesn't appear to actually be active on the map even when the layer is selected.

See the images below which shows other Nitrogen Deposition Designated Sites that are both ancient woodland and likely to experience significant effects of nitrogen deposition.

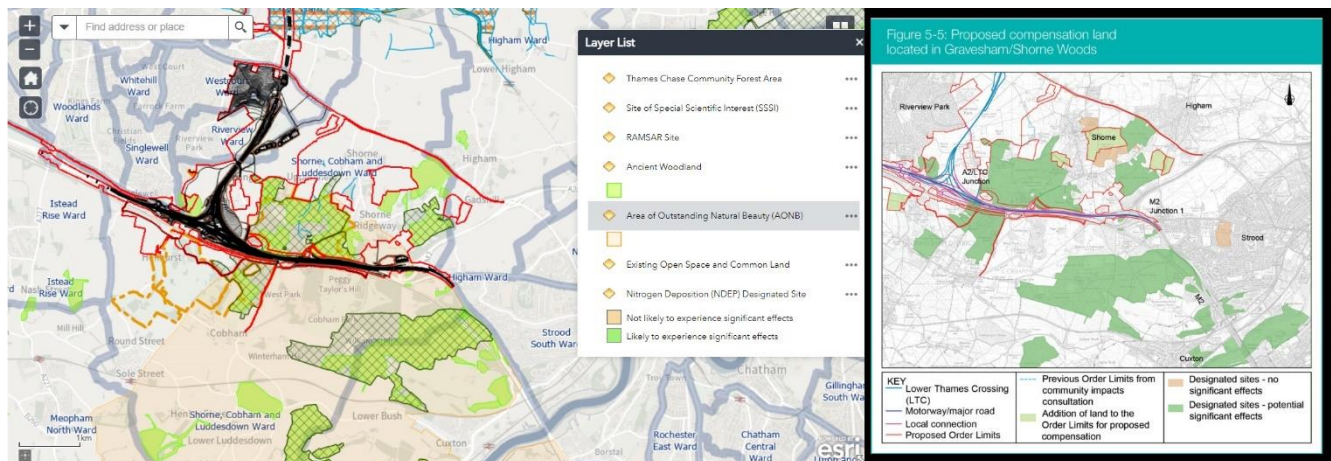
Firstly, 'Figure 5-7' alongside the interactive map showing the Hole Farm area.



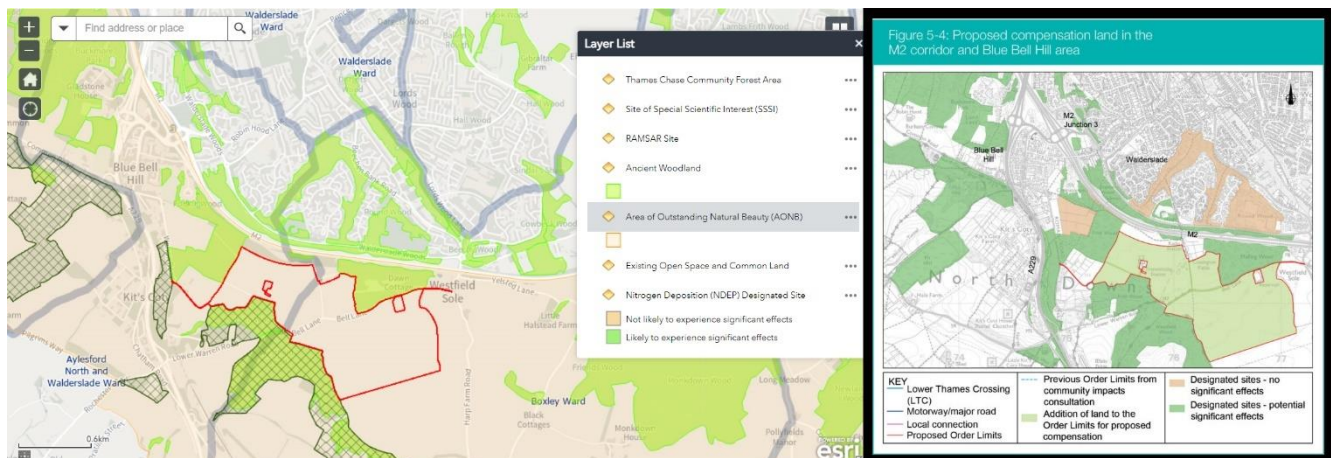
Not only that but when you move south of the river it becomes apparent that the colours used to represent 'Area of Outstanding Natural Beauty (AONB)' and 'Nitrogen Deposition Designated Sites unlikely to experience effects' are also extremely close in shade.

For instance, see the images below that show both these categories in the same vicinity and see how confusing it gets. This is magnified even further since some areas that should be colour shaded to represent 'Nitrogen Deposition Designated Sites not likely to experience effects' are also 'Ancient woodland' which as above is confusingly shaded in a similar green to 'Nitrogen Deposition Designated Sites likely to experience significant effects'.

This is the case in the Gravesham/Shorne Woods area, see below. 'Figure 5-5' alongside the interactive map for the Gravesham/Shorne Woods area. Starmore Wood is shaded green on the interactive map to represent ancient woodland. But that green is also very similar to the green to depict that a designated site that would likely experience significant effects of nitrogen deposition. When if you refer to Figure 5-5 this site should actually be shaded to represent a designated site that would not likely experience effects.



There are similar instances in Figure 5-4 around Blue Bell Hill area, as seen in the image below.

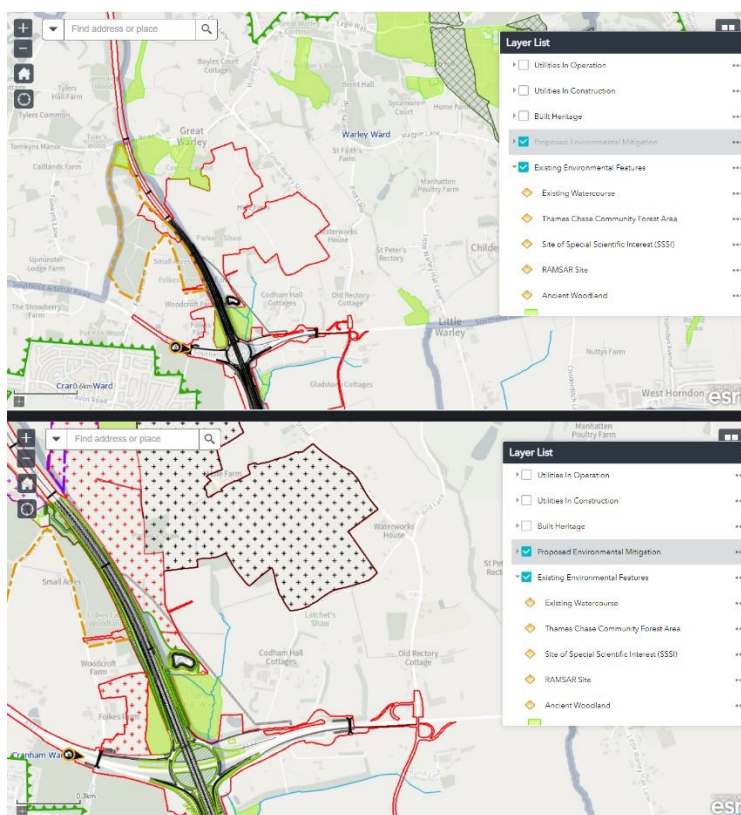


We'd like to say that the above clearly shows the problems, but we appreciate that it is not easy to actually explain it easily in words even with the screen captures, because of just how confusing and misleading it all is with the similar shading and missing layers.

This can in no way, or form be considered clear, informative, or adequate.

We also note that there is no stability in what is shown with layers selected depending on how far in or out you are zoomed. As shown below both the Proposed and Existing Environmental layers are selected. In the top capture the 'Existing' layer displays but not the 'Proposed' layers. If you click to zoom in once more both layers are then displayed.

We have found this to be an issue during consultation since the interactive map was introduced, some layers seem to vanish and appear depending on how far zoomed in or out you are with no apparent standard.



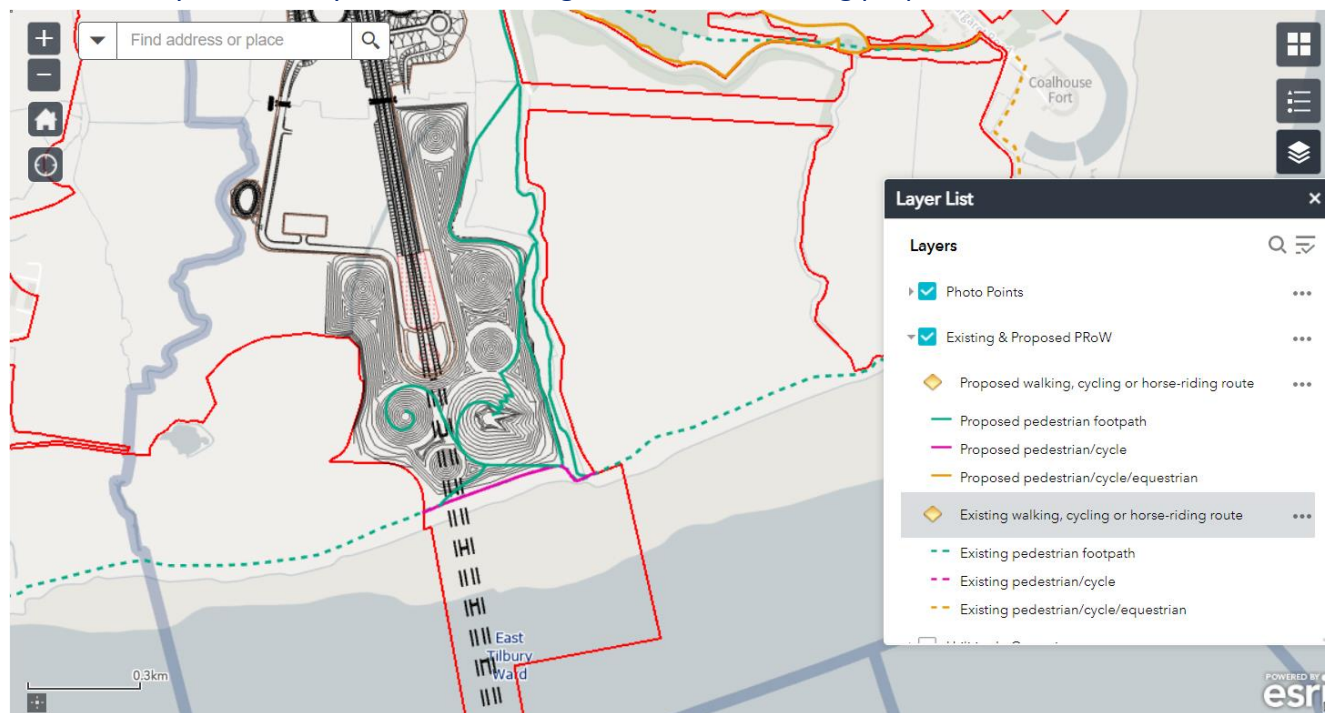
Incorrect info

There is a section on the interactive map along Two Forts Way that is detailed as a new cycle route. Firstly, this would not be new as there is currently a path there, it just needs repairing.

Secondly, the interactive map is showing the path either side of the section marked as a proposed cycle route is detailed as existing footpath, not cycle way. The information represented on the

interactive map does not match the info provided in the Walking, Cycling, Horse Riding maps on the LTC website⁸.

This is misleading and confusing, and even if it were a true representation it would lead to the question of how people get their bicycle to that short section of cycle path. It has to make you wonder if anyone actually bothers checking this info as it is being prepared.



Interactive map conclusion

We have come to the conclusion that the interactive map in the Local Refinement Consultation is confusing, misleading, and inadequate. It can in no way be considered clear or informative. There are likely other inadequacies and errors too that we haven't yet come across as we are still reviewing info. We have no confidence that there will not be other errors and inadequacies that we discover.

Since many people like to use the interactive map to focus on specific areas, and try to get a better overall understanding of the project and its impacts, we find it totally unacceptable that there are so many issues that make it impossible to get a clear and informative view of the proposed LTC using the interactive map.

⁸ [Walking, Cycling, Horse Riding maps on LTC website](#)

Avoidance tactics

There are many aspects of the proposed LTC that we have been asking questions about for years now and NH simply refuse to share the information being requested.

Much of the time the response is that the information will be available within the Development Consent Order (DCO) documents.

We are aware that the DCO documents will total tens of thousands of pages, that everyone will have limited time to review and respond to. We believe NH are purposely avoiding sharing key information with us and others as they know we will be overwhelmed by the sheer volume and complexity of the DCO documents.

The information we are seeking would allow us to better understand what is being proposed and to be able to make more considered responses to the consultation.

Examples of such information that we are being refused:

- How much greenbelt land would be lost/impacted
- How much agricultural land would be lost/impacted, and what grade land is in each category
- How much woodland and how many trees would be lost and impacted, and how much of that would be ancient woodland, and how many ancient and veteran trees
- How much hedgerow, ancient hedgerow would be lost and impacted, and how much of that is protected and species rich
- How many waterways would be lost and impacted
- How much marshland and fenland would be lost and impacted
- What SSSI would be lost and impacted
- How many homes and businesses would be lost and impacted
- Details of habitats and species that would be lost and impacted
- Up to date air and noise pollution details
- Projections for impacts to health and wellbeing
- The estimated cost of the project
- The estimated economic growth/benefits of the project

It is mentioned in the consultation that you have made changes to the proposed water vole habitat. Yet when we asked for details, and we couldn't find any in the consultation materials we have been told that it is minor and that we will again have to wait until DCO documents are released as part of the DCO process.

We also asked NH/LTC to list the 50 bridges and viaducts that are claimed on the LTC website and elsewhere, with adequate detail for us to be able to identify them. The response we got was that

“the structures are all indicated within the latest mapbooks and interactive map on the consultation website”.

This again is avoidance tactics, and hardly meaningful engagement when being asked a genuine question, as we are having trouble locating them all.

National Highways seem to have very little ability to back up the claims you are making on many different things.

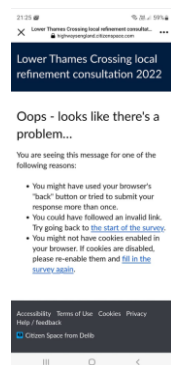
Lack of consultation

We have discovered that National Highways have moved at least two construction compounds since the Community Impacts Consultation. Yet when we have questioned them on them during the Local Refinement Consultation we have been told that they are not consulting on them in this consultation. They consider the changes to be minor and local. Moving construction compounds, especially when they are being moved closer to homes and alongside a Conservation Area is not what we deem to be minor or local. Plus this consultation is the Local Refinement Consultation, so local refinements should be consulted on.

There are other aspects we have asked questions on during the Local Refinement Consultation, only to receive a response from National Highways that they are not consulting on that aspect in this consultation. We again find this completely inadequate and unacceptable. We also draw attention to the fact that National Highways provide space in the consultation response form for ‘Other’ comments.

Website issues

We are also concerned that we have had reports of issues with submitting responses to the consultation. It's like you don't want us responding to the consultation.



Previous inadequacies

The above is in addition to the many inadequacies we experienced in all the previous consultations.

Conclusion

We are and remain completely and strongly opposed to the proposed Lower Thames Crossing.

It would not meet the project objectives.

It would be hugely destructive and harmful, both to us and the natural environment.

It would not solve the problems at the Dartford Crossing, and is not fit for purpose.

There are better alternatives.

It would be a huge waste of £8.2bn+ of taxpayers' money.

We strongly oppose everything that is proposed in this consultation, and the Lower Thames Crossing as a whole.

We call for the proposed Lower Thames Crossing to be stopped NOW. We need and deserve better.

‘Smart’ LTC Appendix

TCAG call for ‘Smart’ LTC to be paused

Introduction

Thames Crossing Action Group represent thousands of people who are strongly opposed to the proposed Lower Thames Crossing (LTC). The £8.2bn LTC would be hugely destructive and harmful; it would not meet the project objectives, and is not fit for purpose.

This document contains evidence that proves our claims that we have been told by National Highways (or Highways England as they were formerly known)/LTC that the proposed Lower Thames Crossing is being designed to Smart Motorway standards, using Smart technology, and would only be able to be used by vehicles that can legally use motorways.

It not only highlights the info that we have received via email from HE/NH/LTC, but also references various consultation materials and other documents, all of which we believe provide evidence to back up our claims and the need for answers to the following:

Why is different information being shared with different parties in regard to the proposed LTC?

What standard is the proposed LTC being designed to?

Why are National Highways responsible for setting their own standards with the DMRB? Do they not have a vested interest in controlling the standards?

Why has the proposed LTC designation changed from a motorway to APTR?

In regards to safety how is the proposed LTC any different from the paused Smart Motorways?

Will the Government pause the proposed LTC in line with the pause of Smart Motorways?

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Questions to be answered

Q1. Is the proposed LTC being designed as a smart motorway?

What TCAG have been told by National Highways/LTC?

TCAG as members of the public have been told that the proposed LTC would be an all-purpose trunk road, designed to Smart Motorway standards, using smart technology, and that only vehicles that can legally use a motorway would be able to use it. Also that the only difference the road user would notice between it being a motorway or all-purpose trunk road would be the colour of the signs, either blue for motorway or green for an all-purpose trunk road.

We have highlighted the relevant sections of the email here for ease of reference, but also attached the original emails and proof of evidence.

10 March 2020 email titled - Outstanding questions

In this email it is clearly stated “***It will however be designed to Smart Motorway standards including the provision of emergency refuge areas a minimum of 1.6km apart and lane detection technology. The design also provides Stopped Vehicle Detection systems, incident detection and automatic signals, in line with Government regulations***”.

LTC Smart Motorway/Hard Shoulder/Emergency Refuge Areas

We are designing the Lower Thames Crossing to the highest safety standards and in accordance with Government safety design regulations. The LTC is not currently designed as a motorway, but as an All Purpose Trunk Road such as an A Road. It will however be designed to Smart Motorway standards including the provision of emergency refuge areas a minimum of 1.6km apart and lane detection technology. The design also provides Stopped Vehicle Detection systems, incident detection and automatic signals, in line with Government regulations.

The route will not have a hard shoulder along the majority of the route. Should a vehicle need to stop before it reaches a refuge area, technology used along the route will detect the stopped vehicle and change the over-lane signals to indicate that the affected lane is closed to traffic.

17th March 2020 email titled - Highways England response - Your enquiry about the Lower Thames Crossing - ref 01921-Z4R4Y5

In this email it is again stated “It will however be designed to Smart Motorway standards including the provision of emergency refuge areas and lane detection technology”.

The designation of the road will be submitted as part of our Development Consent Order application. It is not currently designed as a motorway, but as an All-Purpose Trunk Road such as an A Road. It will however be designed to Smart Motorway standards including the provision of emergency refuge areas and lane detection technology.

1 April 2020 email titled - Highways England response - Your enquiry about the Lower Thames Crossing

In this email it is stated that there is no material change to the design between either motorway or A-road, other than the colour of the signs.

Road Designation

The scheme is being designed to latest standards and the current design would be appropriate for motorway or A-Road designation. From a customer's point of view the key difference will be the sign colour of blue for motorway or green for A road and the vehicle types which can use the road. Although if the route is an A-Road, there would be vehicle prohibition on the tunnel section similar to motorways.

The designation of the road is currently under review and will be agreed with the Department for Transport and presented in the DCO submission documentation. There is no material change to the design between either motorway or A-Road, other than the signage. We are however also in the process of reviewing the government's 'Evidence Stocktake and Action Plan' for Smart Motorways published in March 2020.

9 April 2020 email titled - Outstanding questions

This email states that safety measures for the LTC would include technology provision such as “variable mandatory speed limits, stopped vehicle detection, message signs, advance motorway indicators, CCTV, enforcement cameras”, which is all in keeping with smart motorway technology.

LTC Smart Motorway/Hard Shoulder/Emergency Refuge Areas

Had been hoping for more precise info the amount of ERAs (northbound and southbound), distances between ERAs, and distances of connecting roads, including locations of ERAs! Can one of you also please send me details of where I can find the most recent data on predictions of accidents for LTC and anything relating to safety of LTC. Also please can someone clarify what safety measures will be put in place specifically on stretches of viaduct on the LTC.

As regards safety measures for LTC these will include technology provision such as variable mandatory speed limits, stopped vehicle detection, message signs, advance motorway indicators, CCTV, enforcement cameras, increased traffic officer patrols, off-network access & limiting assets such as signs, gantries and lights within the verges.

What are the DfT being told by National Highways/LTC?

It appears that Baroness Vere of Norbiton and the DfT are being told something very different to what we as members of the public have been told as to how the proposed LTC is being designed.

In Baroness Vere of Norbiton's letter dated 1st Feb 2022 (see attached) it is stated: *"National Highways has confirmed that the LTC is being designed as an All-Purpose Trunk Road in line with the principles set out in the Design Manual for Roads and Bridges (DMRB), specifically the 'Requirements for new and upgraded all-purpose trunk roads (expressways), GD300. As set out in the DMRB, an expressway is a high-speed dual carriageway that has at least two lanes in each direction, grade separated junctions, and uses technology to support operational regimes. The LTC has not been designed to the DMRB design requirements for smart motorways, GD301."*

In document *DMRB-GD300*⁹, smart motorways are referenced numerous times. For example:

E/2.14 – E/2.16 Note states that the resource requirements, service level, procedures, work instructions and processes for traffic officers on APTR expressways are expected to be similar to those for **smart motorway** all lane running schemes.

E/4.8 Note states that **smart motorway** criteria and methodology would apply to expressways.

E/7.2 –E/7.3 Note states the measurement of emergency area set-back for expressways aligns with **smart motorway** requirements.

⁹ DMRB – GD300 - <https://www.standardsforhighways.co.uk/prod/attachments/1223f3d1-5dd8-4afd-a2e8-0367f70b8652?inline=true>

E/8.1 Note 1 states that requirements and advice for places of relative safety for **smart motorways** also applies to expressways.

E/9.9 – E/9.10 Note states that **smart motorway** requirements and advice for no hard shoulder info signs also applies to expressways.

E/9.11 Note states that **smart motorway** requirements and advice for emergency area surfacing, road marking and signing also applies to expressways.

E/9.12 Note states that **smart motorway** requirements and advice for variable speed limit and enforcement camera signing also applies to expressways.

E/10.5 states that control signals and VMS shall be provided in accordance with **smart motorway** control signal requirements

E/10.5 Note states that **smart motorway** requirements and advice for control signals and VMS also applies to expressways.

E/10.7 Note states **smart motorway** requirements and advice for entry slip signals apply to expressways.

E/D2 states that the approach being used for expressways is built upon experience gained through **smart motorways**.

E/D2 also states that it should be clear to road users when they enter and exit expressways. **How will LTC define that it is an expressway and that only vehicles that can use motorways can use it?**

E/D7.3 states that expressways are subject to the same requirements for calibration and ongoing optimisation as **smart motorways**.

Table E/F.20 Clause E/2.17 again makes association between expressway and **smart motorway** agreements.

Table E/F.63 Clause E/10.5 states that control signals and VMS shall be provided in accordance with **smart motorway** control signal requirements.

What standard do the Local Authorities think LTC is being designed to?

We actually approached Thurrock Council to ask if they could advise us which design level within *GD300* they believed the proposed LTC fell into. We felt this would help us better understand *GD300* since different parts are applicable to the different design levels.

However, Thurrock Council have advised us that their understanding is that the proposed LTC is being designed to *CD109 (Highway Link Design)*¹⁰ as an all-purpose trunk road, and not as an Expressway as Baroness Vere has been told.

¹⁰ DMRB CD109 - <https://www.standardsforhighways.co.uk/prod/attachments/c27c55b7-2dfc-4597-923a-4d1b4bd6c9fa?inline=true>

Q2. Why are NH responsible for setting their own standards with the DMRB?

In an October 2019 update ¹¹ it is stated that Highways England (now obviously known as National Highways) are leading the transformation of the DMRB. It goes on to say that refreshing the DMRB by March 2020 was a requirement of Highways England's Licence and Protocol Agreement.

Surely it should be considered that they have a vested interest in setting the DMRB standards to suit their own wants/needs?

Especially in light of all the issues and serious concerns over road standards, particularly Smart Motorways.

The update also goes on to state *"The new documents have been written in a style that clearly states what shall be done, following drafting rules that have been developed from internationally leading research on excellence in standards development. They are much easier to read and understand, and vague or ambiguous phrasing is not permitted."*

We feel this is very relevant to the fact that clearly there is much vagueness and ambiguity over exactly what standards the proposed LTC is being designed to. Also the content of DMRB documents is vague and ambiguous.

Just one example of this would be 'GD300 - Requirements for new and upgraded all-purpose trunk roads (expressways)', where a document that refers to requirements for all-purpose trunk roads includes a level that covers all-purpose trunk roads that have motorway designation!

Please see from page 52/108 (*pdf numbering*) of GD300¹² for outlines of the 4 delivery levels.

How can that be deemed anything other ambiguous? Is it an all-purpose trunk road, and expressway, or a motorway?

We understand these are considered technical documents. However, when sections of the DMRB are being referred to in response to public consultation questioning,

¹¹ DMRB Oct 2019 Update - <https://nationalhighways.co.uk/industry/design-manual-for-roads-and-bridges-dmr/abou-the-new-design-manual-for-roads-and-bridges-dmr-and-what-s-new/>

¹² DMRB GD300 - <https://www.standardsforhighways.co.uk/prod/attachments/1223f3d1-5dd8-4afd-a2e8-0367f70b8652?inline=true>

things need to be a lot less ambiguous and technical and clear and informative materials shared with the public.

We find it shocking that the very standards that National Highways have to work to with all their work is actually set by them. We would ask why this is deemed acceptable and whether it would be wiser that standards be set independently rather than those who are governed by them?

Q3. Why has the proposed LTC designation changed from a motorway to an APTR?

April 2017

In April 2017 at the time of the Preferred Route Announcement HE had assumed the LTC would be an All-Purpose Trunk Road (APTR) although it was acknowledged in the Post-Consultation SAR that the Project could be designed to emerging 'expressway' standards (introduced in the Road Investment Strategy). This is referenced in 10.1.7 and 12.1.1 in the *Approach to Design, Construction and Operation*¹³

Following on from the PRA three road standards were considered, APTR, Expressway, and Conventional/Smart Motorway. In Dec 2017 HE proposed that expressways could be classified as motorways, creating a new type of motorway standard for new motorways or upgraded A roads.

December 2017

In the Dec 2017 Highways England document *Strategic Road Network Initial Report Evidence*¹⁴, (page 82/108 pdf numbering) - 5.3.6 Developing Expressways closing statement clearly states that **expressway operational and safety standards would be consistent with smart and conventional motorways.**

2018

In 2018 at the time of the Statutory Consultation HE decided that the LTC should be designed to this new type of motorway standard, as per 12.1.4 of the *Approach to Design, Construction and Operation* document within the consultation materials. It clarified "As an official standard has not yet been issued for this, it means that the Project will be designed to conventional motorway standards but with departures from standard for the **omission of the hard shoulder, the provision of emergency areas and the provision of traffic control technology like that used on smart**

¹³ Approach to Design, Construction and Operation (2018) - https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/LTC%203_4%20Design%20Consultation%20and%20Operations.pdf

¹⁴ Strategic Road Network Initial Report Evidence (2017) - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/666884/Highways_England_Strategic_Road_Network_Initial_Report_-_WEB.pdf

motorways including lane signals and variable mandatory speed limits (VMsLs)”.

It was even stated in point C of 12.1.5 of the same document that **HE considered this to be a more appropriate solution than an APTR.**

Plus in the same document 21.4.1 states *“The provision of emergency areas will follow our latest design guidance (IAN 161/15) and be sited no more than 1,500m apart on the approach roads.”*

IAN 161/15¹⁵ was titled Smart Motorways, and whilst now withdrawn was superseded by GD301 - Smart Motorways. We note that we can find no evidence in LTC documentation that superseded the *Approach to Design, Construction and Operation* (including the 2021 *Operations Update*) that clarifies any change to the original statement that emergency areas will follow IAN 165/15. Since that document was superseded with GD301¹⁶ then it must therefore be assumed, in the absence of any other update that LTC emergency areas are being designed to GD301 – *Smart Motorways*.

With that in mind we would also express concerns in light of reports of the risk relating to Smart Motorway emergency areas due to the slip risks associated with the orange painted emergency areas.

Also just to point out that there are various references to the LTC being a motorway in the *Approach to Design, Construction and Operations* document. For example 1.1.1 , 1.2.1, and 20.3.1.

It also highlights the timeline of the thought and decision process up that point.

Throughout the Statutory Consultation the LTC was referred to as a motorway. The *Consultation Guide*¹⁷ stated the **LTC would have no hard shoulders in common with smart motorways**. It also had an info point stating *“Did you know? A smart motorway uses technology to manage traffic flow”*.

¹⁵ DMRB IAN 161/15 - <https://www.standardsforhighways.co.uk/dmrB/search/3b8dd1ea-fa40-41ec-b53a-dc5136387aa6>

¹⁶ DMRB GD301 - <https://www.standardsforhighways.co.uk/dmrB/search/d908f9c2-cd47-4e96-b015-97b51e24c588>

¹⁷ LTC Statutory Consultation Guide -

https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/LTC%20%20Consultation%20Brochure.pdf

Just a couple of examples of motorway references, there are more to be found throughout the Statutory Consultation materials. In the *Consultation Guide* on page 8/144 (pdf numbering) it states that the proposed **LTC would be a motorway**. It is again stated on page 28/144 that the LTC would be a **motorway**. Furthermore it goes on to state that it will have **no hard shoulders in common with smart motorways**.

Page 5/38 pdf of the *Case for the Project* ¹⁸ again states that the **LTC would be a motorway**.

Page 109/389 pdf *Traffic Forecasting Report* ¹⁹ states the LTC mainline is coded as a **3-lane motorway**.

Jan 2020

On Jan 27th 2020 *Panorama 'Britain's Killer Motorways'* first aired and coverage of the dangers of Smart Motorways escalated and become more prominent in the public domain.

In Jan 2020 at the LTC Supplementary Consultation²⁰ the references to Smart Motorways had all gone. The LTC was being referred to as a road in consultation materials. However, there was no clear and informative detail that the road was no longer a motorway, and neither was it detailed as an All-Purpose Trunk Road.

March 2020

In March 2020 the *Road Investment Strategy 2 – 2020-2025*²¹ was released. In the

¹⁸

https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/LTC%20The%20Case%20for%20the%20Project.pdf

¹⁹

https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/Traffic%20Forecasting%20Report.pdf

²⁰ LTC Supplementary Consultation - https://highwaysengland.citizenspace.com/ltc/consultation-2020/supporting_documents/Guide%20to%20Consultation%20digital%20version.pdf

²¹ Road Investment Strategy 2 – 2020-2025 -

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/951100/road-investment-strategy-2-2020-2025.pdf

Road Standards section on page 42/131 of the document it states *“There are two principal road standards operated by Highways England: motorway and all-purpose trunk road (APTR). It is important that drivers remain clear and confident about the rules that apply on the roads that they use. Consequently, we do not intend to create additional standards with separate branding, signs or rules that have the potential to confuse or overload drivers.*

Within these two standards, Highways England has defined specific sub-products with their own technical definitions. These include smart motorways and expressways(GD300). Defining products in this way is helpful for decision-makers, procurers and suppliers, but it is not necessary for road users. As more roads are upgraded to improved standards more users will simply experience the benefits they bring in an easy and intuitive way.”

There certainly seems to be a lot of confusion in regard to the standards of the proposed LTC. We are being told the LTC would be an All-Purpose Trunk Road designed to Smart Motorway standards, using smart technology, and that only those who can legally use a motorway would be able to use it. Along with Baroness Vere advising us National Highways have confirmed to her that it is being designed as an All-Purpose Trunk Road (Expressway), and we’ve seen that the design level on those in GD300 can include motorway designation.

March/April 2020 emails

Also see the 2020 emails TCAG received regarding there being no real difference to road users other than the colour of the road signs. What would there be to differentiate between say the A2 heading coast bound from the M25 that uses green signs going on to the LTC/A122 which would be green signs to alert non-motorway users that they would not be able to use the LTC? Similarly from the A13 onto the LTC if users wanted to use LTC to connect to the A2 westbound or A127 (via the new parallel road)?

July 2020

In July 2020 at the LTC Design Refinement Consultation the LTC is now referred to as an All-Purpose Trunk Road. But there would be a restriction **so only vehicles allowed**

on motorways would be able to use the LTC. They said it was because it connects into existing roads on the strategic road network that can only be used by motorway traffic. However, that is not technically true as it could be accessed via the A2 in the south, the A13 is not restricted to motorway vehicles, and to the north access can be gained to the A127 via the new parallel road without the need to go on any motorways. How would it be identified to users that motorway restrictions apply on an A road? With yet more signs on routes/junctions that would already be overloaded with signs about directions, speeds, user charges etc?

In this consultation it was also stated that “*The route would be designed to the latest standards and use smart technology and signalling to help manage traffic*”.

July 2021

In July 2021 at the Community Impacts Consultation, the *Consultation Guide*²² states “*It would use technology for incident detection, lane control and variable speed limits*” (page 58/96) This is ‘smart’ technology. In the description of the LTC it again refers to it as a road and tunnel the A122.

In the *Operations Update*²³ that is another document from the consultation materials, page 14/206 states:

- The LTC would not have a hard shoulder
- It would feature technology including stopped vehicle and incident detection, lane control, variable speed limits and electronic signage and signalling.
- The design includes emergency areas spaced at intervals between 800 metres and 1.6km (less than one mile).
- The Lower Thames Crossing would be defined as an ‘all-purpose trunk road’ with green signs.

²² Community Impacts Consultation Guide (July 2021) - https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting_documents/LTC%20Summary%20Guide_3.pdf

²³ LTC Operations Update (July 2021) - https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting_documents/Operations%20update.pdf

- It would also have additional restrictions so only vehicles allowed on motorways would be able to use it.

All features that are associated with Smart Motorways, except the mention of APTR and green signs neither of which make the road any safer.

In the *You Said, We Did*²⁴ document that was also part of this consultation one of the key feedback themes identified from the previous consultation was concerns over safety and the use of smart motorway technology. This is a document where NH are supposed to provide feedback on their response to our concerns/feedback. Yet in response to the various mentions of smart motorway technology NH response in no way denied that smart motorway technology would be used.

It stated *"The new road's safety features would include vehicle detection, emergency areas, variable mandatory speed limits and lane closure signals in the event of an incident, such as a vehicle breakdown or collision. Control measures across the route, including in the tunnel, would identify vehicles stopping in a live lane and allow for rapid changes of traffic management to avert danger. Vehicle recovery would also be provided in the tunnel for any stopped vehicles to escort them to a place of safety."* So again confirming that smart technology would be used. You can find these references on pages 175/403, 197/403, and 245/403.

In addition and referring back to previous comments on RIS2 (March 2020) and the statement in it that NH *"do not intend to create additional standards with separate branding, signs or rules that have the potential to confuse or overload drivers"*. We draw attention to page 84/403 of the 2021 You Said, We Did document which states *"As with motorways, the new road would include a restriction on HGVs using lane three."* We again question how this would not lead to further confusion and overload drivers with info and signs needed to alert road users to this fact. It also leads to the question on whether HGVs would be allowed to use the right hand lane on the long southbound section between the M25 until just past the A13 on the LTC that is only

²⁴ You Said, We Did (July 2021) - https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting_documents/You%20said%20we%20did.pdf

two lanes? Either way it would lead to congestion issues of all HGVs being stuck in lane 1, or HGVs trying to overtake using both lanes and causing general congestion. Congestion also leads to an increased likelihood of incidents occurring, and the associated safety risks especially with no hard shoulder meaning the LTC southbound on that 2 lane section could also easily be reduced to just one single lane if there is an incident resulting in lane closure.

Again we point out that it would be possible to use the LTC without having to use a motorway, and with the road identity being the A122 how would traffic know of the motorway restrictions on the LTC without additional signage on sections of road that would already have a considerable amount of road signage in regards the many various complex junctions, user charges info, speed limits etc.

Conclusion

As you can see from the above, we have gone from the proposed LTC being designed as and referred to as an All-Purpose Trunk Road, an Expressway, a Motorway, and back to an All-Purpose Trunk Road designed to Smart Motorway standards with smart technology and that can only be used by vehicles that can use motorways. Why has the proposed LTC been changed so many times, and what reason is there for it now being considered an All-Purpose Trunk Road rather than being designated a Motorway?

Can someone please explain why the proposed LTC is now being referred to as an APTR? Why was this change made? Where is the data to back up the decision?

Q4. What is the difference safety wise between LTC and the paused Smart Motorways?

A smart motorway has no hard shoulder, neither would the proposed LTC

A smart motorway uses smart technology to identify stopped vehicles, close lanes, change speed limits etc, so would the proposed LTC.

A smart motorway has emergency refuge areas, so would the proposed LTC.

A smart motorway is designed to smart motorway standards, so would the proposed LTC.

A smart motorway can only be used by motorway traffic, so would the proposed LTC.

Road sign colour

The only difference we can see, and have been told of between a smart motorway and the proposed LTC is the colour of the road signs. Blue signs on Motorways, green signs on All-Purpose Trunk Roads.

(See attached 1 April email titled - Highways England response - Your enquiry about the Lower Thames Crossing or Evidence-1.3 below in the Supporting Evidence section of this document, or page 14/206 in the *Operations Update*²⁵ for references to colour of road signs on the LTC.)

Are we really supposed to believe that the signs being green rather than blue makes them safer for road users?

Can someone therefore please explain how the safety risks of the proposed LTC are any different from those of the smart motorways that have been paused whilst the 5 years of safety data is collected and analysed?

We again call for the proposed LTC to be paused in line with the pause of smart motorways.

²⁵ LTC Operations Update (July2021) - https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting_documents/Operations%20update.pdf

Conclusion

The evidence in this document shows that different parties have been told different information and given different understanding as to which standards are being used in the design of the proposed Lower Thames Crossing.

Ultimately it is vital that National Highways shares adequate information with all parties in a clear and informative manner.

We all have the right to fully understand the design of the proposed Lower Thames Crossing to allow us to take part in the consultation and Development Consent Order (DCO) process in a meaningful way. As is apparent from the information provided in this document this clearly has not been the case, since all three parties have different understandings based on the information that National Highways has shared with them.

We therefore call on the Office of Rail & Road and Transport Select Committee and respectfully ask you to kindly investigate this matter please. Firstly, so answers can be obtained, and secondly to ensure that this misleading behaviour from National Highways is not allowed to continue.

We consider initial questions that need answering are:

Why is different information being shared with different parties in regard to the proposed LTC?

What standard is the proposed LTC being designed to?

Why are National Highways responsible for setting their own standards with the DMRB? Do they not have a vested interest in controlling the standards?

Why has the proposed LTC designation changed from a motorway to APTR?

In regards to safety how is the proposed LTC any different from the paused Smart Motorways?

Will the Government pause the proposed LTC in line with the pause of Smart Motorways?

We thank you for your time and look forward to receiving your comments and answers to the points and questioned raised. Should you need any further clarification of the information in this document please do not hesitate to contact us.