

THAMES CROSSING
ACTION GROUP
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30th August 2022

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Dear Kit Malthouse

We are writing to you in your position as Cabinet Office Minister, after reading of your concerns about the large 'Killer whale' projects and associated risks for the new Prime Ministerⁱ.

You are quoted as saying, *"These are the big projects that sit out there below the surface, waiting to breach above the waves and rip your arm off. Big projects with big money involved, that often take quite a lot of sophisticated leadership and management."*

"And we need to just make sure that we've got the risk assessed properly on that for a new prime minister."

We most definitely agree with that these huge projects should be risk assessed, which is why we felt the need to contact you regarding the proposed Lower Thames Crossing.

The Department for Transport started studies into the need for a new Thames crossing more than 13 years ago in April 2009ⁱⁱ.

There were ongoing studies and consultation leading to a route options consultation in early 2016. During this consultation period National Highways (or Highways England as they were back then) were asked to assess and consult on the economic, traffic, environmental and community impacts for locations A and C. Yet they only presented 3 options at location C in the consultation, none at location A. This inadequate consultation was the start of what has been a series of inadequate consultations.

In April 2017, then Secretary for Transport Chris Grayling MP announced Option C3 as the preferred route. The Statutory Consultation was held in 2018.

As we know a lot has happened since the route of a new crossing was considered and chosen, and even in the years since the Statutory Consultation.

The project was originally part of RIS1, it then moved to RIS2. Due to many delays, including the first attempt to submit the Development Consent Order (DCO) application when National Highways withdrew the application as the Planning Inspectorate (PINS) were due to refuse it. Submitted in Oct 2020, withdrawn in Nov 2020, and at that time National Highways stated they would resubmit

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the application in early 2021. Since then there have been a further two public consultations, and we believe their current aim is to attempt to resubmit the DCO application later this year 2022. Local Authorities still have concerns about the inadequacy of the consultations and lack of meaningful engagement now.

The majority of the project now sits in the RIS3 time frame. The cost has risen considerably and although the project is now up to £8.2bn it is expected to rise again in light of the delays, rising construction costs, and the associated costs of it now being an environmental pathfinder project. The average cost of greener cleaner construction equipment is around three times more than traditional fossil fuel equipment.

Further assessment of the true financial cost should be considered too. If the proposed LTC goes ahead other associated works would also need to be funded. For instance, the Tilbury Link Road and Blue Bell Hill improvements have both at one time been part of possible LTC routes, yet are both now being progressed as stand-alone projects. The Port of Dover have publicly called for the A2 near Dover to be dualled to accommodate traffic using the LTC too. There are other roads that various representatives have also declared would need upgrading as a direct result of the LTC if it goes ahead, including Gallows Corner. The way it is now designed results in local road networks being utilized as part of the LTC design, and will result in further funding being needed to cover the increased usage of these local road networks. To avoid including these associated costs would be a false economy.

The original reason for a new crossing was due to the problems suffered at the current Dartford Crossing. It has a design capacity of 135,000 vehicles per day, yet regularly sees 180,000 per day. That means we'd need to see a reduction of more than 25% to bring it back below capacity.

Yet the proposed LTC would take as little as 4% in the am peak and 11% in the pm peak, and also result in around 50% increase in cross river traffic if it goes aheadⁱⁱⁱ. Clearly not enough to bring the current crossing back below capacity.

Not only that National Highways are not considering or planning how traffic would migrate between the two crossings when there are incidents, and there would not be adequate connections, which would result in yet more chaos, congestion and pollution throughout the regions both sides of the Thames.

There are less expensive and more sustainable alternatives, such as rail improvements between Ashford and Reading (cost around £4bn) that would take large amounts of freight off the roads and onto more sustainable rail, as well as improving rail for passengers. The Kenex Tram project between Kent and Thurrock/Essex (cost £800m) that would take at least 10% of traffic away from the Dartford Crossing and provide a new cross river public transport option. Currently public

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transport and active travel options to cross the river at this end of the Thames are extremely limited. The proposed LTC would not be viable for public transport due to lack of adequate connections, and there is no cross river active travel option within the plans.

The proposed LTC would be hugely destructive and harmful, as well as not meeting any of the scheme objectives and being unfit for purpose. The carbon emissions of the project are estimated to be over 7 million tonnes. The whole route fails on WHO-10 levels for PM2.5 (air pollution) which has been proposed to be enshrined into UK law by the end of Oct 2022. There are also serious concerns that it is being designed to 'smart' motorway standards.

It would destroy and impact homes, lives, health and well-being, greenbelt, thousands of acres of agricultural land (inc grade 1 listed) at a time of serious food security issues, woodland (inc ancient woodland), wildlife and habitat, solar farms, businesses, communities and more.

National Highways themselves have admitted in their own report that failure to deliver the LTC is Extreme and likely and as an existential threat^{iv}. We urge you to please ensure that the proposed Lower Thames Crossing is risk assessed as a matter of urgency, as like the HS2 project mentioned in the article, it too is a large project lurking below the waves ready to strike.

Thank you for your time, we are happy to discuss further, and look forward to hearing from you soon.

Kind regards

Laura Blake

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cc. Stephen Metcalfe MP, Jackie Doyle Price MP, Adam Holloway MP, Louis French MP, Julia Lopez MP, Thurrock Council, Gravesham Borough Council, London Borough of Havering

ⁱ <https://www.theguardian.com/uk-news/2022/jul/24/hs2-killer-whale-next-prime-minister-malthouse-sunak-truss>

ⁱⁱ <https://webarchive.nationalarchives.gov.uk/ukgwa/20100513123749/http://www.dft.gov.uk/about/strategy/capacityrequirements/dartfordrivercrossing/>

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

^{iv} https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1002845/Highways_AR21_Interactive.pdf (pages 48 and 54)