

The Rt Hon Mark Harper MP
Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

29th October 2022

Dear Mr Harper,

Re: National Highways' Lower Thames Crossing scheme

We are writing to you as a collective of environmental, transportation and nature-based organisations that share concerns around the way in which the Lower Thames Crossing scheme is being progressed by National Highways. We are troubled both by the impacts of the scheme, the huge cost and low economic benefits, and by a consultative approach taken thus far that has been far from transparent. We would ask that you look in to these concerns and would welcome meeting with you or one of your ministers to discuss these issues.

Over the past few years, the UK Government has made wide-ranging efforts to address the ongoing climate and nature crises by introducing legislative and other commitments, something which we welcome. This includes the target set in the Environment Act 2021 to halt the decline in species abundance by 2030, the commitment to reach net zero greenhouse gas emissions by 2050¹ (2019), including a pathway that requires 78% reduction in emissions by 2035², and our Nationally Determined Contribution (NDC) commitment under the Paris Agreement to reduce emissions by 68% by 2030.

In order to achieve these important ambitions, it is crucial that all government departments and agencies work together in a collaborative and targeted way to deliver. Unfortunately, we believe that National Highways' current plans for the Lower Thames Crossing scheme are significantly out of step with the Government's stated ambitions. Indeed, early estimates have shown that the scheme is likely to emit more carbon than any other road planned to be built in England.

To date, despite holding public consultations since 2016, National Highways has failed to provide the public and interested organisations with the level of detail or transparency required to appropriately understand the environmental and climate impact of the scheme. This has exacerbated the considerable opposition to the scheme from many of the UK's largest conservation and environmentally-focused NGOs, as well as tens of thousands of members of the public.

Very little detail has been provided around how the range of natural habitats and landscapes in Kent and Essex would be affected, such as ancient woodland, the Kent Downs Area of Outstanding Natural Beauty and the mosaic of open habitats in the Thames Estuary Important Invertebrate Area. Instead, our organisations and the public have had to make our own estimations of impact, something far from ideal when responding to official consultations conducted by a government agency. In addition, National Highways has only reluctantly released information regarding the huge carbon footprint associated with the scheme in response to Freedom of Information requests.

¹ [UK becomes first major economy to pass net zero emissions law - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/uk-becomes-first-major-economy-to-pass-net-zero-emissions-law)

² [net-zero-strategy 2021 .pdf \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/101211/net-zero-strategy-2021.pdf)

National Highways has set out that it hopes to make the new crossing the ‘greenest road ever built in the UK’³. This stands in stark contrast to estimates made by National Highways which indicate that under current plans, when construction and operational carbon emissions are taken as a whole, the project is likely to be the most polluting scheme funded through the Road Investment Strategy 2 (RIS2). These environmental claims also wash over the scheme’s massive impact on a variety of natural habitats (as estimated by our various organisations) that will only contribute further to the nature and climate crisis.

With public consultation considered to be complete and the Development Consent Order application due to be submitted to the Planning Inspectorate for examination in the coming weeks, we consider the paucity of detail to be entirely unacceptable at this stage of the process. Without providing adequate information, we fear that National Highways has failed in its duty to ensure meaningful public engagement and consultation on this scheme.

This part of Kent and Essex is a mosaic of vital habitat that is truly representative of the beautiful British countryside and home to many of our most iconic and threatened species. To destroy some of these habitats and cause the long-term deterioration of others through harmful emissions and direct damage is deeply troubling.

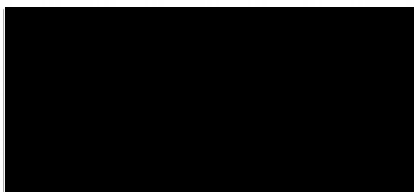
The Lower Thames Crossing cannot be justified on economic grounds either. In its withdrawn DCO application in 2020, the Benefit Cost Ratio (BCR) was only 0.68, and when wider economic benefits were added, the adjusted BCR was only 1.44⁴ which is classed as “Low” value for money in the DfT’s value for money framework⁵. In RIS2, the Lower Thames Crossing was costed at up to £8.2 billion, yet with construction inflation the outturn cost of the scheme is more likely to be in excess of £10 billion.

Allowing this scheme to go forward for examination in its current form would undo much of the Government’s good work to date and contradict its vision and ambitions to address the joint climate and nature crises. It would also place an unacceptable burden on public finances.

We’d be very keen to engage further with you on this, and our organisations are asking that you commit to an immediate review of National Highways’ Lower Thames Crossing scheme on the basis of cost, environmental and climate impacts.

Yours sincerely,

This letter has been co-signed by the following organisations and persons:



³ [Lower Thames Crossing - Latest news - LTC a ‘pathfinder’ in move toward carbon neutral construction - Highways England \(nationalhighways.co.uk\)](#)

⁴ [Combined Modelling and Appraisal Report, para 7.5.4 National Highways, October 2020](#)

⁵ [Value for Money Framework](#) (Box 5.1), DfT, 2015

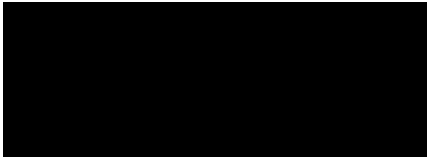
Jenny Scholfield
Regional Director – South East
Woodland Trust

Chris Todd
Director
Transport Action Network

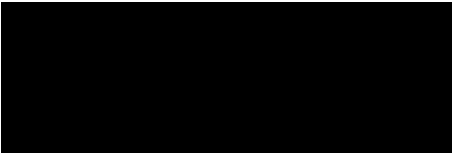
Laura Blake
Chair
Thames Crossing Action Group



Craig Macadam
Conservation Director
Buglife



Paul Hadaway
Director of Conservation
Kent Wildlife Trust



Dr Hilary Newport
Director
CPRE Kent

Rosie Pearson
Chairman
Community Planning Alliance

Sue Schwar
Charity Founder
South Essex Wildlife Hospital

Darren Parker
Vice Chair
Essex Badger Protection Group

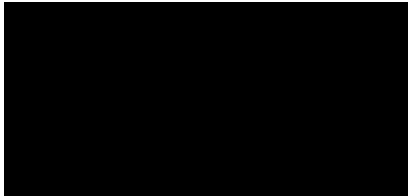
Andrew Patrick
Cycling Advocacy Network Local Area Representative
Cycling UK

Alex Hills
Gravesham Committee member
West Kent Badger Group



Bryan Sweetland
Member for Gravesham Rural
Kent County Council

Kathy Wormald
Chief Executive Officer
The Froglife Trust



Jeremy Dagley MCIEEM
Director of Conservation
Essex Wildlife Trust

Copied to: LTC Planning Inspectorate - LowerThamesCrossing@planninginspectorate.gov.uk