

THAMES CROSSING ACTION GROUP

www.thamescrossingactiongroup.com

Spring Budget 2024 Representation

Introduction

Thames Crossing Action Group (TCAG) represent thousands of people who are opposed to the hugely destructive and harmful, not fit for purpose £10bn+++ proposed Lower Thames Crossing (LTC). More info on us and our concerns and issues with the proposed LTC can be found on our website www.thamescrossingactiongroup.com.

This representation was prepared and submitted by Laura Blake, Chair of TCAG on behalf of the group in response to the call for suggestions for the Spring Budget 2024¹. TCAG can be contacted via email – admin@thamescrossingactiongroup.com.

Representation

As we have previously presented, and still stand by, most recently last year in our Spring Budget Representation 2023², there is growing evidence of serious concerns and issues regarding the proposed Lower Thames Crossing, and increasing amounts of evidence as to why at very least it should be paused and reviewed, and ultimately should be cancelled.

Here we highlight some of that evidence and reasoning, but we would of course be more than happy to discuss and provide additional evidence upon request.

Effectiveness and Value for Money

We have continually presented evidence that shows that the proposed Lower Thames Crossing would not be fit for purpose. Our evidence and findings have only grown and strengthened as we have gone through the LTC Development Consent Order (DCO) examination. It is not just as a community action group who have voiced these concerns and issues, but also Local Authorities and major stakeholders, as well as the Examiners themselves identifying the issues and questioning National Highways on these aspects.

Put simply, the idea that the proposed LTC would solve the problems suffered due to the Dartford Crossing is ludicrous. National Highways have publicly admitted themselves over the years that the proposed LTC would not solve the problems.

The data proves this too. The Dartford Crossing has a design capacity for 135,000 vehicles per day, yet regularly sees 180,000 per day. This means that we'd need to see a reduction of more than 25% to bring it back below design capacity. Yet independent assessment of the official NH data by a host Local Authority showed that the proposed LTC would take as little as 4% in the am peak hour and 11% in the pm peak hour.

¹ <https://www.gov.uk/government/publications/spring-budget-2024-representations>

² <https://www.thamescrossingactiongroup.com/wp-content/uploads/2023/01/Thames-Crossing-Action-Group-Spring-Budget-2023-Representation.pdf>

THAMES CROSSING ACTION GROUP

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The official National Highways prediction in 2022/23 is that the proposed LTC would take around 19% of traffic away from the Dartford Crossing, dropping to 13% by 2045. This is based on data prior to the Government announcement of the 2 year rephasing. This is relevant since historically every year the project has been delayed the percentage has dropped by around 1%. In 2018 they said it would take 22% of traffic away. By 2021 there were delays and that had dropped to around 21%. This dropped further to around 20% in 2022, and as we say finally to 19% in late 2022/23. With the 2 year rephasing, and any other delays this would just keep dropping.

Major concerns have been voiced during the LTC DCO examination about the way the proposed LTC utilises the existing road network in order for it to be able to operate, particularly the Orsett Cock junction.

National Highways are failing to plan for how traffic would migrate between the two crossings when there are incidents, and there would not be adequate connections.

As we write this representation our country is being battered by storms, and the QE2 Bridge at the Dartford Crossing is being closed due to the high winds. A reminder that when the bridge was proposed it was deemed that wind proofing would not be needed, and was not included to reduce the cost. Now the bridge has to be closed when there are high winds, which is happening an increasing amount and is only liken to increase further due to climate change.

If the LTC goes ahead, when there are incidents at the QE2 bridge and it is closed (for whatever reason) National Highways are still proposing on closing one of the Dartford Tunnels to allow southbound traffic a route at the Dartford Crossing. This was confirmed in the LTC DCO Examination in paragraph B.6.5 of NH Deadline 4 submission³.

B.6.5 In the event of an incident on the QEII bridge which results in its closure, an incident response plan would be instigated which would include use of the Dartford Crossing east tunnel for southbound traffic. This would maintain two lanes in each direction at the Dartford Crossing, meaning that not all traffic would be required to divert to an alternate route. Traffic on approach to the crossing and further afield would be informed of the restrictions and advised of alternative route information, which could include joining the A122 LTC south of M25 J29.

³ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-004183-National%20Highways%20-%20Other-%209.83%20Post-event%20submissions,%20including%20written%20submission%20of%20oral%20comments,%20for%20IS%20H3.pdf>

THAMES CROSSING ACTION GROUP

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This hardly offers resilience to the road network, or serves to solve the problems that are currently suffered.

Additionally, and as is further detailed in our 'Incidents' update⁴, when there is an incident at the QE2 bridge traffic that came off the M25 onto the A13 eastbound to get to the LTC as an alternative route would have to travel all the way down to the Stanford A1014 junction, up around a traffic lighted roundabout, alongside DP World/London Gateway/Thames Enterprise Park etc traffic, back down onto the A13 westbound to access the LTC slip road that would be just past, but not accessible from the Orsett Cock/A128 junction. If instead it came off the M25 directly onto the LTC, the M25 at this point would be 5 lanes going onto 2 lanes southbound on the LTC until just past the A13.

And it would be no better if the incident were at the Dartford Tunnels, as traffic would come off the M25 onto the A2 coastbound, only to find there would be just one single lane from the A2 onto the LTC. The results in all scenarios of incidents at either crossing would be more congestion, pollution and chaos.

At a time when we are supposed to be working towards a sustainable future, the proposed LTC offers no cross river active travel provision. Neither would it be viable for public transport/buses due to the lack of adequate connections.

The cost of the project has risen from £4.1bn and is now up to £9bn as at August 2020. The adjusted Benefit Cost Ratio has dropped from 3.1 down to 1.22, again as at August 2020.

It is quite apparent that the cost would be much higher than what is being estimated as at August 2020, and therefore as the cost rises the BCR would drop further.

This is a project that would be hugely destructive and harmful, and is not fit for purpose. There would be no benefit to the nation to outweigh the adverse impacts, so it would not be in the nation's best interest or for the public good to progress the proposed LTC.

Revenue implications for the Exchequer

With the proposed LTC being hugely destructive and harmful, and not fit for purpose, the cost is also ever rising as outlined above.

The 'current' estimated cost is actually as at August 2020, so already years out of date. With a decision on whether to grant the LTC DCO or not, due in June, it wouldn't actually be far off being 4 years out of date.

Not to mention a lot has changed and happened since August 2020. Costs have risen considerably. Government have announced the 2 year rephasing of the proposed LTC, if it is granted permission. It has been announced that RIS3 will focus on maintenance and

⁴ <http://www.thamescrossingactiongroup.com/incidents-ltc-dartford-crossing>

THAMES CROSSING ACTION GROUP

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repairs instead of new roads. More and more evidence is coming out about aspects such as climate change, air pollution, health and wellbeing etc.

In the LTC DCO Examination Issue Specific Hearing 1 (continuation hearing) ⁵ one of the Planning Inspectorate questioned National Highways on what rate of inflation had been used for assessments. When NH stated as an example that the inflation rate used for the year 2022 in the assessment was 4.10%, the Examiner commented that this seemed to be very much underestimated and wildly out of touch.

So, we have an outdated estimated cost, based on underestimated and wildly out of touch data, as well as an outdated Outline Business Case for a project that even local MPs and Local Authorities will end up over budget, and likely running to £10bn+++.

There has been mention about Independent reviews of the proposed LTC cost. Yet our own research showed that the LTC Independent Commercial Review only had one tender, and the company that was got the contract had staff at director level that have previously worked on the proposed LTC project⁶, so hardly independent.

Since Government do not require a Full Business Case until after the decision is made on the DCO there is a very real danger that the Exchequer will end up with a hugely destructive and harmful project, that is not fit for purpose, and will run way over budget. More must be done to ensure this doesn't happen. We need more scrutiny and consideration of what the cost of such huge infrastructure projects will be before it is too late. Everyone questions how these huge projects end up running so wildly over budget, but when you look at the evidence it is quite easy to see how and why it happens.

We believe Ministers and others are being misled about the estimated cost of these huge infrastructure projects. Also, that too much trust is being put into National Highways, at a time when there is growing evidence of NH misleading people. Anytime we write to Government about concerns and issues about the proposed LTC all that it appears happens is that whomever we are contacting goes to NH and whatever NH say goes without any apparent and adequate investigation and scrutiny. This is a dangerous and risky practice considering that failure to deliver the proposed LTC successfully is (as outlined in their own annual review report) an existential threat to NH as an organisation.

We urge you to ensure better measures and reviews are put in place to review all of this, before more and more public money is wasted. Because additionally, and as long as Government continue to keep trying to make decisions without adequate consideration,

⁵ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-002346-1541748%20National%20Highways%20England%20Planning%20Inspectorate%20Issue-Specific%20Hearing%2023.06.23.pdf>

⁶ <https://www.thamescrossingactiongroup.com/how-independent-is-the-ltc-independent-commercial-review/>

THAMES CROSSING ACTION GROUP

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and push ahead with these projects that are not fit for purpose and fail to meet legal requirements etc there will be legal challenges, which in turn result in increased cost. Those bringing legal challenges don't do so because we want to, we do it because there is a need. Evidence is growing that shows we simply cannot continue to keep doing things as they have always been done, because it doesn't work. In fact far from it, continuing to do things as they've always been done is making things worse. With a distinct lack of transparency and adequate scrutiny of what is happening, particularly (but not limited to) National Highways we the people are having to do our own research and challenge what is not right. It is time for Government to recognise this fact and back all the talk of changes for a sustainable future with actions.

Growth

Something that came up in the LTC DCO Examination was the fact that there is a contradiction with growth actually creating yet more traffic, which goes against the fact the proposed LTC is supposed to be about improving congestion and traffic flow.

There is plenty of evidence about induced demand, and it is clear that the proposed LTC would create a lot more traffic. This is in a region that already experiences a much higher than average amount of HGVs on the roads too. Yet National Highways are not including HGVs and LGVs in their assessments, as they deem it is not required and can be complex to calculate. However, they have been very quick over the years to, time and time again, promote how beneficial the proposed LTC would be for economic growth and expansion of companies that predominantly use HGVs and LGVs, thus confirming there would be HGV and LGV induced demand, if the project goes ahead. The fact that they are not including this growth in the traffic modelling and assessments is again misleading and should be assessed in regard to just how economically beneficial the LTC would be, or if the induced demand would, as we and others believe, outweigh any predicted benefits particularly relating to traffic flow and environmental impacts.

Also, have as we have previously stated such a huge investment, into a project in the South East does not show good spending of public money in a way that attempts to equally balance spending throughout the country.

This is particularly frustrating and concerning when there are better and more sustainable alternatives, like rail improvements, that would not only serve to improve traffic flow in this region (by getting more freight off roads and onto more sustainable rail), but also be beneficial to a wider and more national rail freight network.

Rail improvements between Ashford and Reading⁷, would also serve Gatwick for example. Why, in this day and age where we need to be moving to a more sustainable future is the Port of Dover, for example, not connected by rail?

⁷ <https://www.thamescrossingactiongroup.com/rail-and-tram-alternatives/>

THAMES CROSSING ACTION GROUP

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70% of goods in and out of the Port of Dover alone cross the Dartford Crossing. 42% of vehicles using the Dartford Crossing are goods vehicles. Why have such rail improvements not been adequately considered as a better and more sustainable alternative?

Government have stated that the high levels of traffic on the roads in the South East is an issue in regard to plans for freight interchange plans. Since rail improvements would reduce traffic on the roads by getting freight off roads and onto more sustainable rail, such an alternative would also assist in this government ambition for interchanges.

However, the focus should not purely be on serving imports to our country, we need to look for local sustainable growth, which would also reduce traffic and environmental impact.

Projects like the proposed LTC would adversely impact businesses and the economy, including our farmers. With food security such an issue, we need to be ensuring support for a sustainable farming future, not destroying and negatively impacting our agricultural land and farmers. Investment in local sustainable farming offers employment opportunities, and would help to better safeguard our food security within our own country.

The more agricultural land we lose to major infrastructure and development the more reliant we become on importing food, worsening our food security and our carbon and environmental impacts, as well as adding more traffic and congestion on the roads.

Another avenue for more sustainable growth is investment into active and public transport.

Roads are always promoted as improving journey times, but bus and public transport cuts are doing the reverse, so why are Government not investing in public transport to reduce traffic, encourage modal shift, and ensure those using public transport can continue to do so, and benefit from improved service?

This would provide more sustainable growth, employment, health and wellbeing benefits, reduce traffic, and if done properly could offer much more sustainable and affordable ways to travel within our country. Many people don't have cars because they want them, it is more a case that there is no other option because public transport is simply not affordable and reliable. The RAC recently reported that 55% of drivers would drive less if public transport was better.

Wider macroeconomic implications

National Highways promote how many people would be employed as a result of the proposed LTC. However, the majority of those jobs would be temporary work. Whereas, if a more sustainable alternative, such a rail improvements were instead progressed, not only would there be temporary jobs for the improvements works, but it would also open up a lot of permanent jobs in the rail industry, as the infrastructure would need more ongoing staffing than the proposed LTC.

THAMES CROSSING ACTION GROUP

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On a local level Local Authorities and major stake holders have voiced concerns over the impact of the proposed LTC on the local and wider economy, if it goes ahead, and that includes the Ports. How can the ports, part of the new Thames Freeport, be reassured of economic stability when the proposed LTC would cause so much uncertainty on traffic flow, due to the poorly designed proposal? The Port of Tilbury voiced concerns about access and traffic flow for port traffic. They only initially supported the proposed LTC, on condition that they would get a direct link to it, which was temporarily added to the LTC design only to be later removed. Whilst it is being progressed as the Tilbury Link Road, as a separate stand-alone project, how can this been deemed anything other than a false economy for it not to be included in the cost of the proposed LTC? After all you can't have a link road if there is nothing to link to, so should form part of the project and be calculated within the costing for the LTC, which would only push the cost up further and bring the already low Benefit Cost Ratio down further.

Blue Bell Hill is another example of false economy, as it is quite apparent that it would need to be utilised by traffic coming from the ports up the M20 needing to connect to the M2/A2 to get to the LTC, if it goes ahead. Blue Bell Hill improvements were originally included in Variant C at the route stage of the process, but was ruled out, due to it not being deemed essential for a new crossing and due to the additional cost both financially and environmentally. Now we are in a position whereby Blue Bell Hill improvements are not part of the proposed LTC project, but are being progressed as a separate stand-alone project.

It is obvious that traffic will use the Blue Bell Hill route as a direct result of the proposed LTC, and environmental compensation, for nitrogen deposition associated with such traffic has now been added to the LTC project, yet the actual improvements have not been included. This is a false economy, and also would add to the major issues of the LTC, if it goes ahead, particularly if funding for the Blue Bell Hill improvements are not available, as the LTC traffic would still use Blue Bell Hill, and therefore congestion and pollution would worsen. We have to question how viable the route would be with increasing LTC traffic regardless, because more roads simply generate more traffic, induced demand.

Environment

The proposed LTC would be hugely destructive and harmful, if it goes ahead. It is estimated it would emit 6.6 million tonnes of carbon emissions. As came out in the LTC DCO Examination, whilst National Highways say that they are incentivising a reduction in emissions, firstly it would still not be enough, and secondly there is nothing in place to ensure the estimated and speculative reductions can or will be met, or that there would be any consequences or solutions to resolve any unmet reductions.

NH have said failure to meet the estimated reductions in emissions would be dealt with the same as any other failure to meet requirements, but that doesn't help the very serious and urgent climate emergency that is happening.

THAMES CROSSING ACTION GROUP

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The Climate Change Committee have stated that new roads should only go ahead if they will not increase carbon emissions. Since this would not be the case with the proposed LTC, or other road projects, Government need to urgently stop and review all road projects, and instead look to better and more sustainable alternatives.

Our country is still one of the most nature depleted in the world. On one hand Government are talking the talk about rewilding, saving, protecting and enhancing our natural environment. But at the same time, Government are attempting to push ahead with hugely destructive and harmful projects, like the proposed LTC. Not only is this contradictory and counter intuitive, but it is also hugely wasteful of resources and funding. Just one example would be the work and cost in tree planting, and new protective status like Long Established Woodland, and updating Ancient and Long Established Woodland Inventories. Whilst at the same time spending money on projects like the proposed LTC, and other road projects, that would destroy and impact trees, including Ancient and Long Established Woodland.

National Highways should not be trusted on their environmental surveys either, this was apparent on numerous occasions during the LTC DCO Examination. As just one example, NH stated that their ecology surveys showed no signs at all that a particularly woodland, The Wilderness, was Ancient Woodland. Yet as a local community group we presented evidence that it was ancient woodland to Natural England who confirmed and awarded official Ancient Woodland status to The Wilderness.

More and more evidence is coming out about the dangers of air pollution, and it is also known that a lack of access to the natural environment impacts our health and wellbeing. The proposed LTC would destroy and adversely impact people's ability to access and enjoy the natural environment.

It would also worsen air quality, Professor Karen Lucas actually stated that the whole proposed route would fail against WHO-10 air pollution targets, which are now the levels used for UK air pollution targets, as part of the Environment Act.

Not only is there the actual adverse impacts to our health and wellbeing to take into account, but also the associated cost to the NHS. This aspect is not considered within benefit cost ratio assessments, as really needs to be as air pollution related illness is worsening and adding pressure and cost to our health service.

Conclusion

The proposed Lower Thames Crossing would be hugely destructive and harmful, and would not be fit for purpose. It would create more congestion, pollution and chaos, as well as having a hugely significant adverse impact environmentally. It would not be in keeping with Net Zero commitments, and goes against Government ambitions for better air quality and enhancing the natural environment.

THAMES CROSSING ACTION GROUP

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The cost of the project is ever rising and the benefit cost ratio just keeps dropping. Data that has been used for assessments and that is being presented to Government is misleading and out of date.

There is a very real and serious danger that if granted permission the cost of the proposed LTC would be proven to rise even further, but that this would only become apparent when after permission has been granted, if granted.

We all upon Government to at very least pause the proposed Lower Thames Crossing, and carry out a full and truly independent review immediately, before more and more public money is wasted. We need and deserve better, and there are better and more sustainable alternatives that would be much more affordable.

Please don't wait until this huge project gets to a similar stage and mess as the highly controversial HS2 to make a decision and announcement. The proposed LTC is more expensive per mile than HS2 by the way⁸. Please use the Spring Budget 2024 as an opportunity to announce a full review, as requested above, or even better announce that the proposed Lower Thames Crossing is being cancelled.

We thank you for this opportunity to make representation for the Spring Budget 2024. We would be happy to provide further info if requested.

⁸ <https://www.thamescrossingactiongroup.com/cost-of-the-proposed-ltc/>