

THAMES CROSSING ACTION GROUP

www.thamescrossingactiongroup.com

5th March 2024

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Sent to Mr Sam Richards, Britain Remade Campaign Director and CEO via email -
communications@britainremade.co.uk

Dear Mr Richards

Thames Crossing Action Group is a community action group that represents those who are opposed to the proposed £10bn+ Lower Thames Crossing (LTC). We are aware of your campaign to support the proposed LTC, so wanted to contact you.

We note on your [website](#) that you say Britain Remade think that many of today's problems can be solved by listening to the people affected by them, so we hope that you will listen to us! We feel this particularly important since according to your [website](#) the East and South East both appear to be areas that you are yet to launch into.

Firstly, we wish to highlight that we recognize the problems suffered due to the Dartford Crossing, as it impacts many of us in one way or another.

The Dartford Crossing has a design capacity of 135,000 vehicles per day, and regularly sees 180,000 vehicles per day. This means that we'd need to see more than 25% reduction to bring it back below design capacity. National Highways (NH) say that the proposed LTC would take 19% of traffic away, dropping to 13% by 2045. Historically the percentage has dropped each time there has been a delay, and these latest figures from NH do not take the Government's 2 year rephasing of the project into account.

Independent assessment of the official NH concluded that the proposed LTC would take as little as 4% of traffic away in the am peak hour, and 11% in the pm peak hour. Also, that the Dartford Crossing would be back to today's levels within 5 years of the LTC opening, if it goes ahead.

Does this really sound like a solution that is worth £10bn+++?

On the topic of the cost, contrary to your press release the cost has actually risen from £4.1bn up to £9bn as at August 2020. This does not take into account things like the considerable rises in construction costs since then, the 2 year Government rephasing, the increase in the costs for carbon emissions. The adjusted Benefit Cost Ratio (BCR) has dropped from 3.1 to 1.22, again this is as at August 2020.

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During the LTC Development Consent Order (DCO) examination, the examiners questioned NH on what rate of inflation was used for assessments, and were shocked to learn how out of date and out of touch the rates used are.

To be clear the Full Business Case for the LTC would not be provided until after permission is granted, if it is granted, so Ministers are making decisions about spending these huge amounts of money on out of date, incomplete information.

Your press release also made comparison to other tunnels elsewhere, but these tunnels are not a good like for like comparison. For example, the Laerdal Tunnel in Norway has an average of only 1000 vehicles per day, nothing like the 8000 vehicles per hour that are predicted to use the proposed LTC if it goes ahead.

Your press release also comments on the size and cost of the LTC planning application is 2383 documents. We are not sure where you have come up with this figure as the Planning Inspectorate LTC webpage detail there are 554 documents in the LTC Developers Application. There are additional pre-examination and examination documents on the PINS website. However, even then some of the NH documents amongst those are simply two variations of documents, a tracked and a clean version as the extra documents were submitted during the examination, as well as documents from other Interested Parties.

Ben Hopkinson has been stating that *"The mammoth application requires a large diversion of civil servants and planning lawyers away from designing future projects that could spur growth and towards filling out and refilling out hundreds of thousands of pages of paperwork."* We are unclear as to what he believes civil servants have been doing to that extent as the planning application is prepared and submitted by NH/LTC contractors.

We would suggest that rather than focusing on the number of documents and pages, time could be better spent actually reviewing some of the documents, and assessing the evidence, which shows that the proposed LTC would not only be hugely destructive and harmful, but also fails to meet scheme objectives (including solving the problems at the Dartford Crossing), and is simply not fit for purpose.

It is not just us as a campaign group that are opposed to LTC and raising serious concerns, it is also Local Authorities, MPs, major stakeholders (including ports), and many others.

It was Government who announced the two year rephasing of LTC in March 2023. Delays are not down to the size of the DCO application. National Highways withdrew their first attempt to submit the LTC DCO in 2020, not because of the size of it, but because it was due to be refused for examination by the Planning Inspectorate as it was not adequate. NH also failed to identify the Port of Tilbury's plans to expand (as part of the Freeport Plans) which led to issues and further

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consultation and delays. It has been due to NH inadequacies that there has needed to be so many consultations. Consultations are not held because the public call for more, it is because any time NH make a significant change to the proposals they are required to consult again. The reason we've had so many LTC consultations is because NH kept getting it so wrong. It is a National Highways issue that needs to be addressed, maybe that is part of the reason why the Office of Rail and Road are currently investigating their performance.

We have included some highlights of some of the major concerns in an appendix below, but would welcome your comments, and would appreciate the opportunity to meet with you to discuss further.

Thanks and kind regards

Laura Blake

Chair – Thames Crossing Action Group

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Appendix

Cost and BCR

Over the years since 2016 the cost of the proposed LTC has risen from £4.1bn up to £9bn (as at Aug 2020). And is predicted by many, including MPs¹ to end up being £10bn+++.

Since 2016 the adjusted Benefit Cost Ratio (BCR) has dropped from 3.1 to 1.22 (as at Aug 2020).

But these figures are as at August 2020. This is evidenced in the fact that Figure 8 of the National Audit Office Road enhancements: progress with the second road investment strategy (2020 to 2025) Report – 25 Nov 2022 stated that the current estimated cost was between £5.3 billion and £9 billion as at August 2020.

Additionally, it states that there had been a cost increase since March 2020 of c.£1.9 billion. This suggests that the cost between March 2020 and August 2020 was around £1.9bn.

The cost according to RIS2 announced at the Spring Budget on 11th March 2020 was £6.4-£8.2bn.

If you add £1.9bn onto that it would be £8.3-£10.1bn.

Yet clearly in August 2020 (the point that the cost has increased by c£1.9bn) the lower end of the cost bracket alone is £5.27bn so had actually dropped compared to the lower end of £6.4bn that was stated in March 2020.

These numbers simply do not add up, and we feel are misleading to say the least.

Not only that but if the cost rose c£1.9 between March 2020 and August 2020 then how much must the estimated cost have risen following around a two year delay in the resubmission of the DCO application, and the 2 year rephasing that was announced by Government in March 2023?

This is also despite the LTC Development Director being quoted in Jan 2020 as saying that he was “confident” that changes would not result in the project going over £6.8bn². This clearly isn’t the case with the upper end of the cost bracket now up to £9bn, and the ORR since reporting an estimated cost of £8.3bn.

How are we supposed to believe it would still be within the estimated bracketed cost?

In fact, during the Issue Specific Hearing 1 Continuation Hearing³ of the LTC DCO Examination, one of the examiners actually quizzed National Highways on what rate of inflation was used for assessments, and concluded that she found the rate used seemed to be very much underestimated and wildly out of touch!

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When and where	Cost	BCR	Adjusted BCR
2016 Consultation Summary Business Case ⁴	£4.1-£5.7bn	2.1-1.5	3.1-2.2
2017 Preferred Route Announcement ⁵	Not detailed		Not detailed
2018 Statutory Consultation Case for the Project ⁶	£5.3-£6.8bn	1.5-2	
2020 Prior to Spring Budget	£5.4-£6.8bn		
2020 Spring Budget – RIS2 ⁷	£6.4-£8.2bn		
2020 DCO v1 Outline Business Case (Aug 2020) ⁸	£5.27-£9bn*		1.46*
2022 DCO v2 (Oct 2022)	£5.2-£9bn ⁹		1.22 ¹⁰
2022 National Audit Office Report (25 Nov 2022) ¹¹	£5.3-£9bn*		
2022 Accounting Officer Assessment ¹² (Dec 2022)	£5.27-£9bn*		1.46*
2023 ORR Annual Assessment (18 July) ¹³	£8.3 bn**		

*as at August 2020

** reporting year detailed as 2021-22

The table above highlights the estimated cost and BCR at key points in the process.

This clearly highlights that prior to the Secretary of State for Transport's Preferred Route Announcement the estimated cost was between £4.1bn-£5.7bn, and is now up to £5.27-£9bn. The adjusted BCR has dropped from 3.1 to 1.22. As previously stated these figures are as at August 2020, and that bearing in mind the previous details above, even that is questionable, and is predicted by many (including MPs) to rise above £10bn, which would of course then lead to the already low BCR dropping even further.

Clearly the LTC DCO application is using out of date estimated costs as at August 2020. The Secretary of State will therefore be making a decision on whether to grant the DCO for the proposed LTC based on outdated information, as the Full Business Case won't be made available until after a DCO is made. How can this not be considered anything other than a huge risk, particularly when we are talking about a project with such a huge and complex expensive project?

Fails scheme objectives

The proposed LTC scheme objectives as laid out in the LTC DCO Application Need for the Project document¹⁴ are:

1. To relieve the congested Dartford Crossing and approach roads and improve their performance by providing free-flowing north-south capacity.
2. To improve the resilience of the Thames crossing and the major road network
3. To improve safety
4. To minimise adverse impacts on health and the environment
5. To support sustainable local development and regional economic growth in the medium to long term
6. To be affordable to government and users

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7. To achieve value for money

Points 1 and 2 - FAIL

The Dartford Crossing has a design capacity of 135,000 vehicles per day, yet regularly has 180,000 per day. That means we'd need to see a reduction of more than 25% to bring it back below design capacity. Design capacity is the point up to which it should be free-flowing.

Yet according to National Highways the proposed LTC would take around 19% of traffic away from the Dartford Crossing, dropping to 13% by 2045.

Independent analysis of official NH traffic modelling by a local authority concluded that it would be as low as 4% in the am peak hour, and 11% in the pm peak hour. Also, that the Dartford Crossing would be back to today's traffic levels within 5 years of the proposed LTC opening, if it goes ahead.

There are currently more than 3000 incidents at the Dartford Crossing per year. With traffic expected to stay above design capacity high numbers of incidents are likely to remain. However, National Highways have not planned for how traffic would migrate between the two crossings when there are incidents, if LTC goes ahead, and there wouldn't be adequate connections¹⁵. This would result in more congestion, pollution, and chaos.

Point 3 - FAIL

National Highways forecast 2,147 additional accidents over 60 years, including 26 fatalities, 220 serious injuries and 3,122 slight injuries if the LTC goes ahead¹⁶.

The proposed LTC would also be a 'smart' motorway by stealth¹⁷, despite government cancelling all new 'smart' motorways. It would not have a hard shoulder, it would use 'smart' technology, and is being designed to motorway standards. It would therefore be a 'smart' motorway by stealth.

Point 4 - FAIL

The proposed LTC would create a toxic triangle¹⁸. There is evidence that the whole proposed LTC route would fail against the newly set legally targets for air pollution inc PM2.5¹⁹ that form part of the Environment Act.

It is also estimated to emit around 6.6 million tonnes of carbon²⁰, which is again not compliant with the Government's legal commitment to Carbon Net Zero.

It would destroy greenbelt²¹, wildlife and habitat²², woodlands²³ including ancient woodland, agricultural land²⁴ including grade 1 list land, solar farms²⁵, communities, homes, businesses, lives, health²⁶ and so much more.

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Points 5,6, and 7 – FAIL

Local authorities and major stakeholders, including the ports voiced serious concern about the impact of the proposed LTC would have on the local and regional economy during the LTC DCO Examination.

The proposed LTC is far from being sustainable, and there are better and more sustainable alternatives, such as rail improvements²⁷ between Ashford and Reading that would negate the need for the proposed LTC.

User charges and poor design of the proposed LTC would mean that it would not be affordable for users²⁸. The adverse impacts to health would also have an associated cost to the NHS, which we do not believe is calculated as a disbenefit within the BCR.

As already detailed the proposed LTC most definitely would not be affordable or value for money. And that doesn't even take into account all the other associated costs that have been distanced from the LTC project to separate standalone projects, despite them being as a direct result of the proposed LTC. This is a false economy²⁹.

We fail to see how it can be in the nation's or public interest to grant a DCO on a project that fails to meet scheme objectives.

National Highways and LTC Inadequacies

Over the years, National Highways have failed to carry out adequate consultations, and withheld and avoided sharing information until the DCO examination, and even then the Planning Inspectorate had to request further information where it was lacking. They have failed to hold meaningful engagement with many including Local Authorities, NGOs, residents, and major stakeholders.

National Highways had to withdraw their first attempt of submitting the LTC DCO application, as the Planning Inspectorate were due to refuse the application because of inadequacies. They failed to identify the Port of Tilbury expansion plans, which further delayed the process.

Their ecology surveys have already proven to be inadequate. For example, throughout consultations and the DCO examination they categorically stated that their surveys showed no sign of a particular woodland, The Wilderness, being Ancient Woodland. Our evidence to Natural England proved otherwise when NE awarded The Wilderness Ancient Woodland status. A section of the same woodland is also amongst the first in the country to be added to the brand new Long Established Woodland Inventory, a new category added by Government to protect important mature woodlands. Other surveys are already years out of date and being questioned by experts.

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The proposed LTC passes through areas with similar chalky grounds to those where HS2 continues to have serious issues with sink holes and other issues.

There have been numerous attempts to greenwash the proposed LTC, including National Highways attempts to associate Hole Farm Community Woodland with the project as environmental mitigation/compensation, despite the fact that Hole Farm Community Woodland is being progressed regardless of whether LTC is granted permission or not.

The proposed LTC is not in keeping with Government's own 25 Year Environment Plan (25YEP)³⁰. We also believe that it would fail against some aspects of the new Environment Act, including in regard to air quality.

Our country is one of the most nature depleted in the world, and whilst the new Biodiversity Net Gain (BNG) requirements for NSIPs do not come in until Nov 2025, we find it questionable and concerning if Government were to push ahead with the proposed LTC (which would not meet the new BNG requirements) knowing that construction is not planned to begin until after Nov 2025.

There were still many outstanding issues at the end of the LTC DCO examination, and when the recommendation report reaches the Secretary of State for Transport it is highly anticipated that there will be need for further post event consultations.

The National Audit Office have voiced concerns about the proposed LTC in regard to value for money.

The Transport Select Committee published their damning report of RIS2³¹ (which includes LTC) saying that it is time to reconsider expensive complex enhancement projects, and road projects don't come more expensive or complex than the proposed LTC.

The Climate Change Committee not only said that new roads should only go ahead if they can be proven not to increase carbon emissions, but have also called for an urgent roads review.

The current legal challenges by Client Earth, Good Law Project, and Friends of the Earth in relation to Government's Carbon Budget Delivery Plan (CBDP), the country's economy-wide decarbonisation plan, has included powerful evidence from Lord Deben³². This is relevant to the proposed LTC since National Highways claims of carbon emission reductions are based on speculation and assumptions. During the DCO examination they had no details of what would happen if contractors failed to meet their carbon emission targets.

There have already been discussions as to the likelihood of legal challenges, should the proposed LTC be granted.

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We believe National Highways continue to spread propaganda and misleading information to try and put a positive spin on this hugely destructive, not fit for purpose project because failure to deliver it successfully is an existential threat to the organisation. This is why truly independent scrutiny is needed, along with a full and urgent review of the proposed LTC, before more public money is wasted. As a country we cannot afford another failing huge and complex project as has happened with HS2.

Footnotes

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- ¹ <https://youtu.be/shDXT6p6l1k>
 - ² <https://www.newcivilengineer.com/latest/lower-thames-crossing-boss-confident-changes-wont-add-to-6-8bn-cost-29-01-2020/>
 - ³ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-002349-ISH1%20Part2.html>
 - ⁴ https://highwaysengland.citizenspace.com/ltc/lower-thames-crossing-consultation/user_uploads/lower-thames-crossing-consultation-summary-business-case.pdf
 - ⁵ <https://www.gov.uk/government/news/new-lower-thames-crossings-to-cut-congestion-and-create-thousands-of-jobs>
 - ⁶ https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/LTC%20The%20Case%20for%20the%20Project.pdf
 - ⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/871978/road-investment-strategy-2-2020-2025.pdf?fbclid=IwAR1zVjsJCNRM824tsmPU5poQUem2hpMmoQ9OtoDsrj_U6Uvj3J2qD5P_Qls
 - ⁸ https://nationalhighways.co.uk/media/w3rlnoz/ltc-obc-2022-foi-3385-ic-182335-r3f3_redacted.pdf
 - ⁹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001251-4.3%20Funding%20Statement.pdf>
 - ¹⁰ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001321-7.7%20Combined%20Modelling%20and%20Appraisal%20Report.pdf>
 - ¹¹ <https://www.nao.org.uk/wp-content/uploads/2022/11/Report-Progress-with-the-second-road-investment-strategy-2020-to-2025.pdf>
 - ¹² <https://www.gov.uk/government/publications/government-major-projects-portfolio-accounting-officer-assessments/lower-thames-crossing-accounting-officer-assessment-december-2022#regularity>
 - ¹³ <https://www.orr.gov.uk/sites/default/files/2023-07/annual-assessment-of-national-highways-performance-2023-web.pdf>
 - ¹⁴ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001291-7.1%20Need%20for%20the%20Project.pdf>
 - ¹⁵ <http://www.thamescrossingactiongroup.com/incidents-ltc-dartford-crossing>
 - ¹⁶ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001321-7.7%20Combined%20Modelling%20and%20Appraisal%20Report.pdf>
 - ¹⁷ <https://www.thamescrossingactiongroup.com/ltc-smart-motorway-by-stealth/>
 - ¹⁸ <https://www.thamescrossingactiongroup.com/ltc-toxic-triangle/>
 - ¹⁹ <https://www.thamescrossingactiongroup.com/lower-thames-crossing-pm2-5/>
 - ²⁰ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001587-6.1%20Environmental%20Statement%20Chapter%2015%20-%20Climate.pdf>
 - ²¹ <https://www.thamescrossingactiongroup.com/ltc-greenbelt-destruction/>
 - ²² <http://www.thamescrossingactiongroup.com/ltc-impacts-on-wildlife>
 - ²³ <https://www.thamescrossingactiongroup.com/impacts-of-ltc-on-forests-and-woodlands/>
 - ²⁴ <https://www.thamescrossingactiongroup.com/ltc-impacts-on-farming/>
 - ²⁵ <https://www.thamescrossingactiongroup.com/ltc-impacts-to-solar-farms/>
 - ²⁶ <https://www.thamescrossingactiongroup.com/ltc-health-impacts/>
 - ²⁷ <https://www.thamescrossingactiongroup.com/rail-and-tram-alternatives/>
 - ²⁸ <https://www.thamescrossingactiongroup.com/ltc-user-charges/>
 - ²⁹ <https://www.thamescrossingactiongroup.com/cost-of-the-proposed-ltc/>
 - ³⁰ <https://www.gov.uk/government/publications/25-year-environment-plan>
 - ³¹ <https://committees.parliament.uk/publications/41071/documents/199999/default/>
 - ³² <https://friendsoftheearth.uk/climate/lord-deben-intervenes-climate-high-court-legal-challenge>