

THAMES CROSSING ACTION GROUP

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6th May 2024

Ref: LTC-DC-LORDSDEBATE-290424

Dear Lord Colgrain, Lord Davies of Gower, Lord Stoneham of Droxford, Lord Haselhurst, Lord Liddle, Lord Naseby, Lord Stansgate, Lord McLoughlin, Lady Watkins of Tavistock, Lord Grocott, Lord Harries of Pentregarth, Lord Davies of Brixton, Lady Wheatcroft, Lord Watts

We write to you all following the Lower Thames Crossing: Development Consent Debate on Monday 29th April 2024¹.

We begin by noting that during the debate Lord Colgrain stated that there is “approval from all seven Kent and Essex MPs whose constituencies are affected”.

We would ask which MPs Lord Colgrain has spoken to, since the MP of the constituencies most impacted, Gravesham (Adam Holloway MP), Thurrock (Dame Jackie Doyle-Price MP), and Basildon South & East Thurrock (Stephen Meltcalfe MP) have all stated publicly and in Parliament that they oppose and have concerns about the proposed Lower Thames Crossing (LTC).

We would also appreciate Lord Colgrain kindly explaining where the £40 billion contribution to GDP over the next 60 years comes from, since the official current estimated cost of the proposed LTC according to National Highways (NH) is £8.3 billion, the basic Benefit Cost Ratio (BCR) is 0.48, and even the adjusted BCR is only 1.22.

Indeed the current Dartford Crossing is over its design capacity of 135,000 vehicles per day, as it regularly sees 180,000 vehicles per day. However, this means that we’d need to see a reduction of more than 25% to bring it back below design capacity. Yet according to official data the proposed LTC would take around 19% of traffic away in the opening year, dropping to just 13% by 2045.

This is according to data prepared and presented by NH before Government announced the 2 year rephasing of the proposed LTC. Historically every time the proposed opening year has been pushed back, the estimated amount of traffic the proposed LTC would take away from the Dartford Crossing has dropped.

Independent analysis of NH data, by expert consultants employed by Thurrock Council, concluded that the proposed Dartford Crossing would be back to today’s traffic levels within 5 years of the LTC opening, if it goes ahead.

The Dartford Crossing currently experiences more than 3000 incidents per year², and many are as a result of the area being so congested where the crossing is over design capacity. Since the Dartford

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Crossing would remain over design capacity, the point at which it is expected to flow freely, we can expect there to still be a high number of incidents.

We would go on to highlight that NH are not planning for how traffic would migrate between the two crossings, if the LTC goes ahead, and there would not be adequate connections.

For example, if there was an incident at the Dartford Tunnels traffic would come off the M25 onto the A2 coastbound, only to find there would be just 1 single lane from the A2 onto the LTC.

If there was an incident at the QE2 Bridge traffic would come off the M25 onto the A13 eastbound, only to find there is no direct access to the LTC. Instead they would need to travel to the A1014 Stanford junction on the A13, go up around an already busy traffic lighted roundabout (alongside DPWorld, London Gateway, Thames Enterprise Park and other traffic), back down onto the A13 westbound to the new LTC slip road that would be just past (but not accessible) from the Orsett/A128 junction.

If instead traffic came off the M25 directly onto the LTC, the M25 would be 5 lanes of traffic at this point, going onto just 2 lanes (with no hard shoulder) southbound on the LTC.

How long before the M25 backs up and traffic tries to cut off from junction 29 (the A127) or junction 28 (the A12) hoping to reach the LTC via the A128? As already highlighted there is no access to the LTC from the A128 at the A13, all traffic would need to take the Stanford Detour.

On top of this, National Highways have confirmed that if the QE2 bridge is closed they would still be closing one of the Dartford Tunnels to continue to allow two-way traffic at the Dartford Crossing, even if the LTC goes ahead.

With one of the Dartford Tunnels closed traffic would again attempt to migrate to the LTC via the A2 coastbound, again getting caught in a single lane bottleneck.

These are just a few of the many issues that would occur in various scenarios if the proposed LTC goes ahead. The results are more chaos, congestion and pollution. Put simply the proposed LTC is not fit for purpose³.

The proposed LTC fails to meet any of the scheme objectives⁴. The Dartford Crossing would still be over design capacity. The proposed LTC would not improve resilience of the Thames Crossings and the major road network. It would not improve safety, it is actually forecast to increase the number of accidents, if it goes ahead. It would not support sustainable local development and regional economic growth. It most certainly is not affordable to Government and users. It would not achieve value for money. With an estimated 6.6 million tonnes of carbon emissions, and being a hugely destructive and harmful project with significant adverse impacts, it would by no stretch of the imagination minimise adverse impacts on health and the environment.

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There are better, more sustainable, and more affordable alternatives that have not been adequately considered, such as rail improvements between Ashford in Kent and Reading in Berks⁵.

In this day and age, why isn't the Port of Dover (for example) connected by rail? 70% of goods in and out of the Port of Dover alone use the Dartford Crossing. 42% of vehicles using the Dartford Crossing are goods vehicles.

After years of dealing with National Highways in regard to the proposed LTC we are pleased to know that the Office of Rail & Road (ORR) are currently investigating NH.

In regard to the time it has taken so far we highlight that NH failed to listen when we drew their attention to inadequacies of consultation and major issues, yet they still pushed ahead with their first DCO application, which they withdrew because it was due to be refused by the Planning Inspectorate due to a lack of adequate information. It took the best part of two years for them to resubmit the DCO application. The current further consultations by the Secretary of State for Transport are due to the amount of outstanding issues at the end of the 6 month examination, which shows the level of inadequacies and concerns with the project.

The estimated cost of the proposed LTC has risen from £4.1bn up to £9bn, with many estimating it would end up being £10bn+. The basic BCR is now just 0.48, and even the adjusted BCR is only 1.22, which would drop further as the cost rises. The Full Business Case would not be presented to Government until after the DCO decision is announced, which in our opinion is akin to signing a blank cheque.

All the current estimated costs of the proposed LTC are as at August 2020, and also prior to Government announcing a 2 year rephasing. In the DCO Examination one of the examiners concluded that the inflation rates used in the assessments for LTC were very much underestimated and wildly out of touch.

In light of the ORR investigation and conclusions of various Transport Select Committee and Climate Change Committee inquiries, we most definitely believe that the proposed LTC should be scrapped, or at very least paused whilst it is reviewed. We would welcome your comments.

Yours sincerely

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cc. Stephen Metcalfe MP, Dame Jackie Doyle-Price MP, Adam Holloway MP, Lord Berkeley, Lord Deben

¹ <https://hansard.parliament.uk/Lords/2024-04-29/debates/0B0DEC62-2918-4BBB-AF44-6811030DD8C0/LowerThamesCrossingDevelopmentConsent>

² <http://www.thamescrossingactiongroup.com/incidents-ltc-dartford-crossing>

³ <https://www.thamescrossingactiongroup.com/ltc-not-fit-for-purpose/>

⁴ <https://www.thamescrossingactiongroup.com/ltc-project-objectives/>

⁵ <https://www.thamescrossingactiongroup.com/rail-and-tram-alternatives/>