

THAMES CROSSING ACTION GROUP

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Lower Thames Crossing TR010032

Response to Secretary of State Consultation Letter of 19th April 2024

Thames Crossing Action Group

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Introduction

1. Thames Crossing Action Group (TCAG) is a community action group who represent those that are opposed to the proposed Lower Thames Crossing (LTC).
2. We have and continue to present evidence that shows that the proposed LTC would be hugely destructive and harmful, fails to meet scheme objectives, is not fit for purpose, and would be a waste of taxpayers' money.
3. We acknowledge the Secretary of State's further post examination consultation letters.
4. We remain strongly and completely opposed to the proposed £10bn+ Lower Thames Crossing.
5. Please accept this and the accompanying Appendices as Thames Crossing Action Group's official response for the 2nd May 2024 deadline.

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Comments on 11th April deadline submissions

LURA duty

6. TCAG's response in regard to the LURA duty has been prepared for us by Anne Robinson, and can be found in the Appendices that we have submitted.

Additional comments on 11th April deadline submissions

7. We are concerned to read about the lack of meaningful engagement, or indeed in some cases no engagement between National Highways and other parties.
8. We are particularly concerned that National Highways are taking decisions to disregard guidance and cease engagement with interested parties on the basis that engagement is not a "good use of public funds". Like the Port of London Authority, we question whether NH should be allowed to override any requirements to engage with third parties solely with the justification that, in its view, such engagement is not a "good" use of public funds?
9. In regard to "good" use of public funds evidence shows that the proposed £10bn+ LTC fails to meet scheme objectives, and is not good value for money, so the whole project should be scrapped.
10. With respect we are also concerned that to date, in regard to Secretary of State consultation, there has been no request for further information in regard to the outstanding issues between the Emergency Services and Partners Steering Group and National Highways, since there were a number of outstanding matters of concern in REP9A-080¹ at Deadline 9A. Surely this must be of particular importance, not only because it is in relation to safety, but also since one of the scheme objectives is to 'improve safety', something which clearly isn't the case anyway due to the forecast increase of 2,147 additional accidents over 60 years, including 26 fatalities, 220 serious injuries and 3,122 slight injuries if the LTC goes ahead.

New Evidence

11. The info below has come to light since the LTC DCO Examination ended, but we feel it relevant for it to be considered during the decision-making process.

Government target of 75% growth for rail freight by 2050

12. On the 20th December 2023 (the day the LTC DCO examination ended) it was announced that Government had set a target to grow rail freight by at least 75% by 2050².

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13. It has been stated that this will boost economic growth and lead to significant environmental benefits by taking lorries off our roads, cutting emissions and congestion in the process.
14. 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. Why in this day and age, at a time of climate emergency is the Port of Dover not connected by rail?
15. We have long been saying that rail improvements would be a better, more affordable, and more sustainable alternative to the proposed LTC³.
16. Such rail improvements would not only serve the ports in the South East, but could also serve a much larger area, thus reducing road freight on a much greater scale, and also improving passenger rail at the same time.
17. The £10bn+ that the proposed LTC would cost, if it is granted permission, would be far better invested in rail improvements.

Additional road associated costs

18. We have learnt that National Highways have agreed to pay Cambridgeshire County Council almost £25m towards the old A14 detrunking associated costs for management/maintenance⁴.
19. Yet throughout the LTC DCO Examination there was discussion about the additional funding that would be needed to cover the cost of impacts to the existing road network as a direct result of the proposed LTC, particularly where the existing road network was being utilized in order for the LTC project to operate. National Highways stated that highways authorities would need to go to Government for such additional funding. In ours and others opinions this funding should be part of the LTC project as it would be to deal with direct impacts of the LTC, if it goes ahead. It should also be taken into account in the Benefit Cost Ratio assessments, which would further reduce the already low adjusted BCR.
20. The increase in traffic using the existing road network due to the induced demand from the LTC would also have an impact at a time when highways authorities are already struggling to fund and repair an already ageing road network.
21. The Annual Local Authority Road Maintenance (Alarm) survey report that was published on 19th March puts the cost of tackling the backlog of carriageway repairs and bringing the road network up to a standard from which it can be maintained efficiently and cost effectively at £16.3bn⁵.

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22. Also, that 53% of roads in England and Wales have less than 15 years' structural life remaining. This is local authority/highways roads, not the Strategic Road Network, which is also in need of maintenance.
23. Whilst £8.2bn over 11 years has been announced from the Network North funding (which was supposed to be being spent in the North) in England, that is only enough to resurface 2.5% of the network. With 11% of local roads already in poor condition and likely to require maintenance in the next 12 months alone.
24. The proposed LTC is about creating another route from the ports in the South East through to the Midlands and beyond, meaning that a great number of roads managed and maintained by local highways authorities, as well as NH, would be impacted by the additional traffic created by the proposed LTC.
25. Much of the port traffic is heavy HGVs, but other traffic of course creates wear and tear on our roads. With cars getting larger and heavier this will only worsen.
26. Rather than investing in projects that create more traffic leading to the need for more funding for maintenance, and with our nation's roads in such bad shape now, it is time to look at instead investing in better, more sustainable, more affordable alternatives such as rail improvements that would negate the need for the LTC, and free up funds that could be invested in road repairs and/or public transport.

Questionable cost and BCR

27. We have previously raised concerns that the estimated cost for the proposed LTC is not an accurate and up to date reflection of the true cost, should the project go ahead.
28. A leading industry publication has recently reported⁶ that in regard to the M25 junction 10 NH scheme the formal appraisal significantly understated the impact and cost of delays during construction. We would question, if standard practice is carried out on these matters by NH across all schemes, whether they have similarly understated in regard to the proposed LTC.
29. In February 2024 the Infrastructure and Projects Authority published their Analysis of the National Infrastructure and Construction Pipeline 2023 report⁷, which highlights that construction material prices are over 40% higher than in January 2020. Since the current estimated cost for the proposed LTC is as at August 2020, this suggests that the estimates are likely to be inaccurate.
30. It also shows how right the LTC DCO Examiner was in the Issue Specific Hearing 1 continuation hearing⁸ was when she stated that the 4.10% inflation rate for 2022 that had been used by NH in their assessments was very much underestimated and wildly

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out of touch.

31. That is of course on top of the fact that such an estimate was also working on an estimated start date of 2024, which has been rephased by 2 years following the Government announcement in March 2023. Not only does this affect the estimated cost, but also the already low BCR.

Tilbury – Gravesend Ferry ceased service / Active Travel / Public transport

32. On numerous occasions over the years National Highways have stated that there is no need to attempt to incorporate active/public transport into the proposed LTC in an adequate manner. When questioned about provision for cyclists to use the proposed LTC we have been told that they can cross on the Tilbury to Gravesend Ferry. The ferry ceased service at the end of March 2024⁹, so there is no such service now.
33. Sustrans the UK-based walking, wheeling and cycling charity who are also the custodian of the National Cycle Network have reported that their recent survey showed 56% of people support shifting investment from road-building schemes to more sustainable alternatives, such as funding walking, wheeling (using wheeled mobility aids), cycling and public transport, with just 17% opposing the shift.
34. This again highlights the need for further consideration of the better, more affordable, and more sustainable alternatives to the proposed LTC.
35. Recent research and surveys¹⁰ have shown that people want to use public transport more, and that 56% want money for building roads to be shifted to options for walking, cycling and public transport.

Food security priorities

36. On the 25th March 2024 Government announced new measures to limit the amount of land farmers can take out of productive actions under the Sustainable Farming Incentive (SFI).
37. This is one measure government have put in place to protect food security and ensure we continue to produce at least 60% of the food we consume here in the UK.
38. We agree there is an urgent and important need for food security, and in the same way as Government is limiting the amount of food production land that is lost under the SFI, food production land should be protected from being lost and adversely impacted by projects like the proposed LTC.
39. It is not just the obvious loss of land due to the proposed LTC road, but also for the associated environmental mitigation and compensation. Not to mention the

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severance of land parcels from other land and the impacts that has on our farmers and their ability to continue farming, and staying in business due to such pressures.

40. Additionally, the adverse impacts the proposed LTC would bring in regard to pollution of air, water and soil that is used in food production.
41. Sustainable farming to ensure our food security now and in the future for our nation, with a healthier more sustainable future, is most definitely in the public interest and essential for our existence, the proposed LTC is not.

Flooding and resilience

42. We have commented on our concerns about the risk of flooding both on and off the proposed LTC, if it goes ahead. The proposed route passes under the river and through areas of marsh, fens, and flood plains.
43. It has been reported¹¹ in April 2024 that workers have had to pump more than 50 million litres of rainwater off a section of the A14 that has been continually flooded during the last couple of months, and has been causing much disruption.
44. We believe this goes to show how the risk of flooding is very real, and that flood and other resilience needs to be better considered in regard to any proposed project. It is not a case of if climate change is going to happen, it is happening now, and what is currently being described as unprecedented is likely to become more and more frequent, unless we start taking climate change seriously.
45. In the instance on the A14 the flooding occurred in a dip in the landscape, with the LTC being proposed to run at a low level, and going through a tunnel and under other roads, through marshes, fens and flood plains this is something that needs to be better considered than it has been to date.
46. Adding to this concern is the fact that the Public Accounts Committee's Resilience to flooding report¹², following on from the National Audit Office's report in December concluded that there is no effective strategy in place to make the UK resilient against extreme weather.
47. Climate change is real and it is here now. It is not purely a case of creating resilience, but also in actions to ensure climate change is sustainably reversed, or at very least not worsened. Hugely destructive and harmful projects like the proposed LTC would only worsen things.
48. It wouldn't be just the road that is at risk from such flooding either, but also agricultural land, at a time when flooding is already causing issues with our food supply, as well as homes, businesses, and our natural environment.

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Toxic road runoff

49. Additionally, on the topic of water and soil pollution from roads, there is new information coming out about toxic road runoff. Water pollution is clearly a serious issue already in our country, and this is water that we drink and that waters the soil we grow our food in, not to mention hydrates the natural environment as a whole.
50. Recent evidence highlights that there is not adequate monitoring of toxic road runoff¹³, which offers no reassurance that such pollution would be reduced or monitored if the proposed LTC goes ahead. This is clearly not a problem that NH are taking seriously which is a real concern when it is such a serious risk to our health and that of the natural environment. The proposed LTC runs near and through watercourses and agricultural land (including grade 1 listed land), we cannot afford the level of pollution the proposed LTC would create.

Tunneling Risks

51. In Feb 2024 LTC tunnels technical director Keith Bowers was quoted in New Civil Engineer¹⁴ as saying, *"There's rough ground and a number of historic landfill sites which create lots of issues around that which we don't know with certainty what's in it. It's a potential pollution source right where our portable structures will be."*
52. The risk of pollution from the toxic historic landfill sites is something that we have raised serious concerns about over the years, which NH have always attempted to play down to us.
53. Not only is it a concern in regard to what they disturb during construction, if LTC goes ahead, but also the fact that the proposed Tilbury Fields 'park' is in this same area. It is not just construction which increases the risk, but also the proposed change to the land in this area with tunneling and land forms that would change the natural current flow of flood waters and ground water that could release further pollution via the waterways and natural environment, as risk to both humans and nature.

Sink Hole Risks

54. We have previously voiced concerns of the risk of sink holes should the proposed LTC go ahead. We wish to reiterate those concerns in light of more evidence of further sink holes in regard to the tunneling for HS2, which came to light in February 2024¹⁵.
55. We feel this particularly relevant since HS2 tunnels through chalky areas similar to the areas that the proposed LTC would pass. It is apparent that HS2 did not adequately assess and predict the sink hole issues they have experienced, and that does nothing to reassure us that National Highways have assessed the risk any better than HS2, nor that they say they are learning from HS2¹⁶.

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Importance of trees

56. In light of new laser scanning techniques¹⁷, we question how NH have assessed carbon sequestration from the trees that would be destroyed if the proposed LTC goes ahead.
57. With this new technique revealing that old forests weigh about twice as much as previously calculated – meaning they lock away approximately double the already prodigious volumes of carbon estimated, this is something that needs to be adequately assessed in regard to the proposed LTC.
58. There is also new and growing consensus in healthcare of the importance of trees and the natural environment to our health and wellbeing, and how it can reduce financial burden to the NHS¹⁸. Destroying and impacting our existing woodlands, trees, and natural environment is not beneficial to our health and wellbeing, the economy, or a sustainable future for us all.

Hedgerows

59. We also note about new hedgerow protections¹⁹ and question whether it is right that hedgerows on agricultural land would be lost and adversely impacted if the proposed LTC goes ahead, but that Government are proposing new hedgerow protections. Hedgerows are an important part of our natural environment, many have been around for a very long time. More importance should therefore also be placed on the value of and protections needed for all hedgerows in our country, including those under threat from the proposed LTC.

Government Environmental Ambitions

60. In January 2024 the Office of Environmental Protection (OEP) published their annual progress report²⁰, which stated that Government remains largely off track to meet its environmental ambitions and must speed up and scale up its efforts in order to achieve them.
61. As we have stated for years, evidence shows that the proposed LTC would be hugely destructive and harmful, and is not in keeping with Government ambitions in regard to the Environment. This is just further evidence that the proposed LTC should not go ahead.

'Smart' motorway by stealth

62. In April 2024 the Sunday Times reported that deaths on 'smart' motorways have hit a record high. According to data from the national road accidents database, there were 24 deaths on smart motorways during 2022 - the last year for which full figures are available. There were also 12 deaths in the first half of last year according to the

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provisional data. This compares with 15 deaths on smart motorways in 2021, based on figures from National Highways.

63. Panorama reported that, according to data obtained under Freedom of Information laws, there were 397 incidents between June 2022 and Feb 2024 when 'smart' motorways lost power. It was also reported that in 2022, there were 2331 faults on stopped vehicle detection radar systems, for an average of more than 5 days.
64. A National Highways traffic officer who works on 'smart' motorways told the programme that he no longer trusts the radar because he has seen it fail too often.
65. One in four stopped vehicle detection (SVD) installations on smart motorways still failed to meet National Highways' core performance requirements when re-tested in 2023²¹. National Highways have also refused to disclose 'smart' motorway Stopped Vehicle Detection status²². Reports appear to have been manipulated to make the results better, with failure for SVD to identify a stopped vehicle not being included within the data that represents whether SVD identified a stopped vehicle within 20 seconds.
66. These are yet more extremely worrying examples of the failures and dangers of 'smart' motorways.
67. We still believe that evidence shows that the proposed LTC would be a 'smart' motorway. It would predominantly carry motorway traffic as it connects at either end to motorways. It would not have a hard shoulder, and would use 'smart' technology. Regardless of whether you agree with the proposed LTC being a 'smart' motorway by stealth or not, it would still be using the 'smart' technology that is failing, thus increasing the risks to users. This also adds to the evidence that it would fail against the scheme objective to improve safety.

Climate, carbon, and EVs

68. It has been suggested that EVs would lead to a reduction in emissions. We have already detailed in our examination representations that EVs are not zero emissions, but in regard to tail pipe emissions, we now raise the new analysis from the RAC that suggests the Government has not hit its target of having six or more rapid or ultra-rapid electric vehicle chargers at every motorway service area in England by the end of 2023²³.
69. With this in mind we highlight that it should not be assumed that there will be the uptake of EVs that have been predicted in the time frame predicted, nor that there will be facilities and enough clean green energy to supply any EVs.
70. Also, that during the consultation period NH made a big deal over the need for a Rest and Service Area within the LTC route on safety grounds as per industry guidelines. The Rest and Service Area was removed from the project, so yet again this does not support the scheme objective of improving safety. The fact that the last we heard it

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was still being progressed as a standalone project also highlights a false economy in it not being part of the LTC scheme cost, despite NH's previous claims that it was needed for safety.

71. In February 2024 former chair of the Climate Change Committee, Lord Deben gave evidence²⁴ at the High Court in support of Friends of the Earth's legal challenge against the government's climate strategy.
72. He said, *"The Government is relying on everything going to plan with no delays or unforeseen circumstances, and on technologies which have either not been tested or indeed on which testing has not even started. From what I have seen of the evidence provided to the court, the Secretary of State was not given enough detail on the level of risk associated with the policies in the plan. This meant that he could not see how many of them were likely to fail to achieve their end. When you see that evidence, to me it's clear that the present programme does not provide the necessary assurance that we can meet our statutory duty to reach net zero by 2050, I know of no other government policy which is premised on everything going exactly right."*
73. As we have commented on during the LTC DCO Examination some of NH claims of carbon emission reductions have been purely speculative and based on technology that has not been tested or is not there. With such claims about LTC carbon emissions being made, how can government be sure that such reductions would be met? What do government propose could/would be done if such reductions were not attained, should permission for LTC be granted? NH failed to provide details of what the penalty would be for such failure. If such reductions are not attained, carbon emissions cannot just be quickly and easily dealt with, at that point it is too late, and any financial penalties to contractors would not assist in such an important and harmful situation.
74. Green Alliance's 'Net zero policy tracker: March 2024 update' it was highlighted that transport accounts for 70% (97MtCO₂e) of the overall policy gap. They state that "Managing road mileage through measures like reviewing road building, redirecting spending into public transport and reducing emissions from HGVs would help to close the policy gap in transport". We have to agree and add that modal shift from road freight to rail freight would also be another way to close the policy gap, again highlighting the importance of rail improvements as a better, more sustainable, and more affordable alternative to the proposed LTC.

Staffing shortage

75. We have voiced concerns about whether there would be enough trained and experienced staff to meet the staffing needed for such a huge project as the proposed LTC. It has recently been reported that construction, property and engineering recruitment company Randstad UK have warned that construction skills shortages are about to get worse. This would not only be an impact on the proposed LTC, but also if LTC were to go ahead it would increase the pressure on other construction projects too. This could result in adverse impacts on productivity and

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cost, and thus also BCR. NH stating that the proposed LTC would result in so many jobs should not automatically be considered a pro, if ultimately there are not the staff to carry out the work.

Failings

76. In January 2024 it was reported²⁵ that residents near the £78 million M6 junction 10 roundabout in Walsall have voiced concerns that the works had made no difference and that the outcome is not what residents were promised.
77. We have continually voiced concerns and provided evidence that the proposed £10bn+ LTC would not meet scheme objectives, would not solve the problems associated with the Dartford Crossing, it would be hugely destructive and harmful. There are better, more sustainable, more affordable alternatives, such as rail improvements to support modal shift from road freight to more sustainable rail. It is not in the public interest to keep spending money on a project that is simply not fit for purpose and would be a waste of taxpayers' money.
78. Another major concern is that a Full Business Case is not produced until after the decision on whether to grant the DCO or not has been made. This is akin to signing a blank cheque for a project. Government should learn from projects like HS2, and ensure that a full and adequate costing has been carried out prior to any decision being made. You wouldn't give the go ahead to a developer to do work on your house based on a rough ball park figure, you'd want a proper and accurate quote, why should huge projects like the proposed LTC be any different? So much has changed since the current estimated cost bracket for LTC, including the two year rephasing, but there is no evidence of any assessment of the cost implications, of this and other aspects that would see the cost rise further, and by default the BCR drop further.
79. It has been reported in the Financial Times²⁶ that Juliano Denicol, director of the major infrastructure delivery MBS programme at University College London has said that 6007 academic studies were reviewed on why megaprojects around the world exceeded deadline and budgets. He found the UK model resulted in work being pushed further down the supply chain to contractors, subcontractors and sub-sub-contractors, some of which were on low margins. This constrained investment in innovation and management, sometimes leading to higher costs later.
80. Throughout the process to date NH have stated time and time again about various aspects that would be left for contractors and sub-contractors to decide. This has given us no confidence, left us feeling that too much is being left to chance; and concerned that decisions would be made to progress things in a way that would lead to the highest profit for those companies rather than what is best for the impacted communities and project.
81. Based the conclusions of Denicol's review it also shows that there is potential for it to result in higher costs to the project.

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82. This is also a problem with the construction carbon plan (CEMP) for LTC. Financially constrained companies at the end of the supply chain are unlikely to prioritise meeting carbon targets.

Transport Select Committee NNNPS Inquiry

83. In March 2024 the Department for Transport (DfT) responded to the Transport Select Committee's National Networks National Policy Statement (NNNPS) inquiry.

84. We note that one of the recommendations the DfT accepted from the Transport Select Committee was the clause, "*The secretary of state should ensure that the applicant's proposals to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest, are acceptable*". We would ask that the secretary of state to take note of the strong evidence presented by many that the level of destruction and harm caused by the proposed LTC, if it goes ahead, is not in the public interest, and is not in keeping with Government ambitions in regard to the environment and nature.

85. We would call on Government to reconsider the decision not to review road building in England. This was an important recommendation from the Climate Change Committee (CCC), and in light of legal challenges in regard to the Government's failing in regard to climate change, and the investigation by the ORR into National Highways it most definitely would be in the public interest to review road building. This would be beneficial not only in regard to environmental targets, but also in regard to ensuring projects are fit for purpose and value for money.

86. We were also very concerned that the debate in Parliament on the NNNPS was rushed as a final debate before Easter break. Also that Caroline Lucas was treated the way she was in the debate, with no response to the points she raised, and that the Minister did not give way to her for further question/comment, despite there being plenty of the time allocated for the debate to be heard remaining.

87. The NNNPS is clearly outdated and not fit for purpose, rushing a new policy statement through that is no better than the one it would replace is unacceptable. We also believe that there should be a pause in decision making on all project judged against the NNNPS until such time as an adequate review and update has been made. Particularly with projects as huge, complex, and costly as the proposed LTC, to keep pushing ahead is not in the public interest.

Transport Select Committee Strategic Transport Objectives Inquiry

88. The Transport Select Committee's Strategic Transport Objectives Inquiry, which is inquiring into how the Government sets its strategic objectives and how these objectives do – or should – influence investment in, and cross-government planning of, services, networks and infrastructure is still ongoing.

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89. We are concerned that in March 2024 the Transport Select Committee reported that the Government rejected their calls for more transparency over how it decides whether to proceed with major rail and road projects. We most definitely believe that there needs to be more transparency, and that it is in the public interest, particularly as public money is being used to fund these huge complex projects.
90. The latest oral evidence hearing that took place on 1st May 2024 clearly shows that at very least there should be a pause on decision making on projects like the proposed LTC, until this inquiry has concluded.

ORR investigation of National Highways

91. In Feb 2024 it was announced that the Office of Rail & Road are investigating National Highways' performance.²⁷ Surely with such an investigation happening any decisions regarding National Highways projects should be paused whilst the investigation is completed. Additionally, and as already highlighted above, we would suggest that all National Highways projects should be reviewed too. We also believe that it would be beneficial for there to be an investigation into National Highways where others, aside from the ORR, can present evidence, as we and many others have serious concerns and much evidence to show their failings.

Conclusion

92. We still very much believe there is extensive evidence from ourselves and others as to why the proposed Lower Thames Crossing should not be granted permission. It would be hugely destructive and harmful, fails to meet scheme objectives, would not solve the problems at the Dartford Crossing, is not fit for purpose and would be a waste of public money. It is not in the public interest to grant the proposed LTC permission. There are better, more sustainable, more affordable alternatives. We need and deserve better.

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End Notes

- ¹ [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-006118-National%20Highways%20-%20Other%209.28%20SoCG%20between%20\(1\)%20National%20Highways%20and%20\(2\)%20Emergency%20Services%20and%20Safety%20Partnership%20Steering%20Group%20\(ESSP%20SG\)_v3.0_clean.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-006118-National%20Highways%20-%20Other%209.28%20SoCG%20between%20(1)%20National%20Highways%20and%20(2)%20Emergency%20Services%20and%20Safety%20Partnership%20Steering%20Group%20(ESSP%20SG)_v3.0_clean.pdf)
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- ¹¹ <https://highways-news.com/newmarket-fifty-million-litres-of-water-pumped-off-a14>
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- ¹³ <https://www.bbc.co.uk/news/science-environment-68130715>
- ¹⁴ <https://archive.ph/1PyvH#selection-1371.178-1375.80>
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