



Mr Gareth Davies
The Comptroller and Auditor General
National Audit Office
157-197 Buckingham Palace Road
Victoria
London
SW1W 9SP

By email to:

26 June, 2026

Dear Mr Davies,

Lower Thames Crossing ‘smart’ motorway risks and lack of financial controls

We write further to our letter of 11 March 2026¹ outlining multiple financial irregularities with the Lower Thames Crossing (LTC) and the reply of 2 April 2026 from Jonny Mood. We would like to request a reconsideration of the NAO’s decision not to investigate the LTC, and to present new information to assist the NAO in this reconsideration. We believe similar mistakes are being made with the LTC as with HS2, and that lessons are not being learned.

Our initial letter outlined many concerns regarding the financial governance of the LTC, including but not limited to:

- 1) Lack of a Full Business Case prior to construction
- 2) Missing information in the Accounting Officer Assessment
- 3) Loss of user charge revenues from Dartford Crossings (and impact on public accounts, and LTC business case)
- 4) Future funding obligations and risks not disclosed

The reply from Mr Mood thanked us and outlined the NAO’s function, but did not really engage with any of the substantive matters in our letter. He also declined to investigate the LTC further without giving the reasoning. However, he did say that NAO “will keep this topic in mind as we are developing our programme of future work, and in our regular engagements with the Department for Transport.”

¹ [Transport Action Network letter to National Audit Office](#), 11 March 2026

In response, we would like to present new information which we hope will assist the NAO to reconsider the decision on whether to include an investigation of the LTC in your future work.

Additional public funds for LTC with no announcement or scrutiny

At the Autumn Budget (26 November 2025) the Chancellor announced² £891 million of additional public funding for the LTC in what was described as the “*final tranche of government support to enable the private sector to take forward construction and long-term operation*”. This was to cover the period 2027-29. This was after the Chancellor announced £590 million of public funds for the LTC for the period 2026-27 as part of the Spending Review³. This gives a combined total of £1.481 billion public funding from 2026-2029.

However, in the third Road Investment Strategy (RIS3) published in 26 March 2026⁴, the government announced that £1.655 billion of public funds would be spent on the LTC up to 2031. This is £174 million more than the £1.481 billion previously announced.

We asked the DfT whether this was additional, unannounced funding for the LTC, and they confirmed that it was and that it would be “met from existing Departmental budgets”. However, the DfT has not revealed where this money would be taken from and which projects would now not be funded, and why this new money for LTC had not been publicly announced as additional funding. This new funding was confirmed to the *Guardian* newspaper who covered this on 8 June 2026⁵.

We are concerned that more public funds are being allocated to the LTC with no public or Parliamentary scrutiny, and that other departmental priorities will suffer as a result of this repurposing of DfT funds. This concern is exacerbated by the fact that these huge sums are subsidising a project which will be handed over to private investors in perpetuity, along with the Dartford Crossings and their significant toll revenues.

In addition to the risks raised with regards to the road being a ‘smart’ motorway in all but name which could require an upgrade in the future, a further risk was signalled in RIS3, where it states that: “*These figures take into account the intention for the private sector to reimburse the taxpayer for some of the costs incurred ahead of the transaction.*”⁶

Therefore, the new higher total of £1.655 billion of DfT funds for the LTC, might only be the lowest anticipated draw on public funding. If the private operator refuses to pay back funds, or negotiates away any requirement to do so, the total could be much higher. This ambiguity in the levels of public funding is not acceptable. We should be told what public funding is being committed and is at risk, and what the DfT expects to be repaid and when.

² <https://www.gov.uk/government/publications/budget-2025-document/budget-2025-html>

³ [UK Infrastructure: A 10 Year Strategy](#), HM Treasury, June 2025 (para 3.22)

⁴ [Road Investment Strategy 3 \(2026 – 2031\)](#), DfT, 26 March 2026 (page 61)

⁵ <https://www.theguardian.com/business/2026/jun/08/extra-cash-spiralling-lower-thames-crossing>

⁶ [Road Investment Strategy 3 \(2026 – 2031\)](#), DfT, 26 March 2026 (page 48)

Allocating further public funds and starting construction works without a completed outline business case

Our 11 March letter raised the concern that construction work was starting on the LTC and public funds were being spent prior to the completion of a Full Business Case (FBC), which the Senior Responsible Office appointment letter of December 2025⁷ had said would not be completed until 2028.

The NAO's reply of 2 April 2026 said "*At outline business case stage, the decision to commit further public funding to the project and to proceed with government's preferred financial model for the project was subject to departmental and ministerial approvals by DfT and HM Treasury.*"

Transport Action Network submitted an information request to the DfT for the Outline Business Case (OBC) which was used in the decision to allocate more public funds and proceed with the public/private RAB funding model⁸.

The DfT refused the request citing Regulation 12(4)(d), claiming the OBC has "*not been finalised*" and was still "*draft*". We are seeking an internal review of this refusal but in the meantime this raises some serious issues.

If we were already concerned that the LTC was proceeding without a Full Business Case, we are astonished to discover that vast sums of public funds are being allocated and construction works started without even a completed **Outline** Business Case in place. This cannot be good practice, let alone acceptable, and we once again invite the NAO to investigate this.

LTC governance is failing

Your response of 2 April indicated that the governance provided by NISTA, DfT and Treasury was sufficient. However, we are not convinced, given that there is a gap between what should be happening, and what is actually happening, and while the concerns raised in our 11 March letter remain unanswered.

The evidence suggests that the decision making on Lower Thames Crossing is being driven by political considerations and is not based on a sound business case or value for money grounds. If NISTA has a robust assurance and governance role with the LTC, then it would appear to be failing. The publicly available NISTA infrastructure pipeline gives very little information on the LTC⁹. For example, in its 'Financial Overview' section, it does not show any of the allocated funding for the LTC that has been publicly announced since the General Election in July 2024.

⁷ [Lower Thames Crossing SRO appointment letter](#), Department for Transport, 15 December 2025

⁸ Environmental Information Regulations 2004 request made by TAN, 27 April 2026:

https://www.whatdotheyknow.com/request/outline_business_case_for_the_lo

⁹ [NISTA Infrastructure Pipeline](#), NISTA, March 2026

It is extraordinary that the LTC, funded with £3.1 billion of taxpayers' money, is progressing without a completed outline business case. The rush to deliver this scheme seems to be at the expense of following due process and safeguards to ensure public money is well spent.

Although the LTC may be a "priority" for the Starmer led Labour government, this is not relevant in terms of the NAO deciding its own priorities, which should remain scrupulously neutral.

We hope you find this new evidence useful in your reconsideration of whether to include the £11 billion Lower Thames Crossing, the privatisation of significant public assets, and the DfT's actions putting at risk unspecified amounts of public funding, in your future investigations.

We look forward to hearing from you.

Yours sincerely,

Chris Todd
Director
Transport Action Network

cc

Sir Geoffrey Clifton-Brown MP, Chair, Committee of Public Accounts
Ruth Cadbury MP, Chair Transport Committee
Rt Hon Richard Holden MP, Shadow Transport Secretary
Rt Hon Robert Jenrick MP, Reform Treasury Spokesperson
Olly Glover MP, Liberal Democrat Transport Spokesperson
Sian Berry MP, Green Transport Spokesperson
David Fairbrother, Treasury Officer of Accounts
Jonny Mood, National Audit Office