



Response to:

**Local refinement
consultation on:
Lower Thames Crossing**

Introduction

Transport Action Network welcomes the opportunity to object to the proposed Lower Thames Crossing (LTC) in the local refinement consultation, and to object to the proposed changes outlined in the consultation.

1. Scheme does not meet its objectives

1.1 The objectives for the scheme are listed in the Consultation Guide:

- to relieve the congested Dartford Crossing and approach roads, and improve their performance by providing free-flowing, north-south capacity
- to improve resilience of the Thames crossings and the major road network
- to improve safety
- to support sustainable local development and regional economic growth in the medium to long term
- to be affordable to Government and users
- to achieve value for money
- to minimise adverse impacts on health and the environment

2. Scheme does not relieve congestion on the Dartford Crossing

2.1 Although a detailed traffic model has not been made available in this consultation, Thurrock Council estimate that the proposed scheme will **not** relieve congestion at the Dartford Crossing in any significant way, certainly not to justify £8.2 billion of scarce public funds.

2.2 Using the latest, available traffic data Thurrock Council estimate that the reduction in traffic on the Dartford Crossing would actually be only 4%¹. National Highways own figures show that the Dartford Crossing would still be over capacity on the opening day of the LTC. This scheme has never been able to meet this key objective, and should be scrapped. Alternative ways to relieve traffic congestion should be examined, including:

- taking HGVs off the road network by investing significantly in increasing capacity in rail freight from the south eastern ports;

¹ [Wider Debate is Needed on the Merits of LTC Creating a New M25 Outer-orbital Route](#), Thurrock Council, May 2022

- Investing in a public transport crossing such as the proposed Kennex tram scheme which is cheaper and has a higher Benefit-Cost-Ratio (BCR)²

3. Scheme does not improve safety

- 3.1 The latest available [Appraisal Summary Table](#) (AST) for the scheme, dated October 2020, shows the scheme will lead to an increase in collisions and fatalities. National Highways forecast that as a result of the scheme there will be 2,147 additional crashes over 60 years, including 26 fatalities, 220 serious injuries and 3,122 slight injuries.
- 3.2 The scheme is being built to Smart Motorway standards with a 70mph limit, the same traffic standards as motorways, but with no hard shoulder. Smart motorways have been paused due to concerns about their safety and the effectiveness of the technology relied upon when breakdowns occur.
- 3.3 We remain especially concerned about the safety of the scheme should traffic breakdown inside the tunnel, including HGV traffic, and there is nowhere for it to go. The consequences of pileups, fires and explosions within the tunnel could be catastrophic.

4. Scheme does not support local sustainable development or regional economic growth

- 4.1 There is no evidence given that the scheme will support local or regional development and economic growth. Thurrock Council oppose the scheme, and claim that it is simply using their district to create a “bypass” of the M25, will not bring economic benefits and will cause major health and environmental disbenefits.

5. Scheme is not affordable and does not provide good value for money

- 5.1 The scheme was costed in the 2020 second Road Investment Strategy (RIS2) at up to £8.2 billion. However, an outline business case for the scheme has never been published, despite being requested by Thurrock Council and the Thames Crossing Action Group (TCAG). Since this £8.2bn figure was published in March 2020, construction inflation has massively increased due to the pandemic and Russia’s invasion of Ukraine. According to some sources, construction inflation is running at around 17 per cent, with the cost of steel and concrete in particular seeing huge increases. As there will be over 50 bridges as part of the proposed scheme, the inflated

² KenEx Tram [website](#)

prices of steel and concrete mean the cost of the scheme would now surely have increased by a substantial amount eroding any purported economic benefits.

- 5.2 Similarly, since the publication of RIS2, the value of carbon has also substantially increased with the publication of BEIS's new carbon values to be used in project appraisal. National Highways has calculated that the extra carbon caused by the construction and operation of the scheme would be 5.3 million tonnes³ (making this scheme the single largest emitting scheme in RIS2). Therefore its overall value for money will have been further eroded.
- 5.3 Due to the enormous environmental impact of this scheme (including increased carbon emissions, habitat loss, increased air pollution, loss of ancient woodland), National Highways have recently made uncosted promises to mitigate the scheme's environmental impact and to "offset" the carbon increases. This includes purchasing substantial areas of land. All of this would have all driven the price of the scheme up even further.
- 5.4 National Highways are not being transparent about the cost of the scheme, and whether it represents good value for money. The Outline Business Case and traffic modelling for the scheme should be published to increase understanding of whether this scheme represents value for money for taxpayers.

6. Scheme does not minimise adverse impacts on health and the environment

- 6.1 The scheme would increase air pollution as it would increase traffic in both Essex and Kent by creating extra trips that would not otherwise be taken. An uptake in electric vehicles would not mitigate the increases in PM2.5 produced by tyres and brake pads.
- 6.2 The scheme would increase noise pollution which is harmful for human health.

7. Climate change

- 7.1 We have previously commented on the carbon impact of this scheme in our responses to the supplementary consultation in April 2020 and the community impacts consultation in September 2021.
- 7.2 Transport Action Network has obtained the carbon estimates for 92 per cent of the 50 schemes in RIS2 from the Environmental Statements of scheme or from Freedom of Information Act requests. The extra carbon emissions resulting from this scheme were calculated by National Highways to be a total of 5.3 million tonnes from construction

³ [Freedom of Information request to Transport Action Network](#), December 2020

(2 million tonnes) and operation (3.2 million tonnes) over the 60 year appraisal period⁴.

- 7.3 The Appraisal Summary Table⁵, produced as Appendix D of the Combined Modelling and Appraisal Report (ComMA)⁶ which was part of the aborted 2020 DCO submission (obtained via FOI request) underestimates the carbon emissions of the scheme by a significant degree. The ComMA and AST state that the operational carbon emissions are 2.76 million tonnes (rather than 3.2 million, or 5.3 million total emissions⁷), and that the cost to the economy of these emissions is only £122 million. No explanation has been given as to why construction emissions have not been included.
- 7.4 Regardless of which total is used, the carbon monetary value would be substantially higher if NH were now using the latest DfT TAG databook carbon prices. This would significantly lower the BCR of the scheme, making it low value for money.
- 7.5 The scheme runs counter to the Transport Decarbonisation Plan and the Net Zero Strategy, makes it harder for us to meet our legal commitments to reduce carbon emission in the next carbon budgets, and also contradicts our commitments under the Paris Agreement to reduce emissions by 68 per cent by 2035. It also significantly undermines the outcomes of Transport for the South East's Strategic Investment Plan due to the large increases in traffic and carbon that it will cause.

8. Lack of information about the new compound

- 8.1 We are concerned about the lack of information about new changes to the scheme including the new compound near the M25, right next to North Ockendon Conservation Area, and that this major change is not included in the consultation. Proposed works compounds are not minor changes and should be consulted on fully.

9. Consultation questions and responses

Q1a. Do you support or oppose the proposed changes to the section of the route: the A2/M2 corridor?

STRONGLY OPPOSE

Q1b. Do you support or oppose the proposed changes to the section of the route: south of Gravesend (A2/Cyclopark)?

⁴ [Freedom of Information request to Transport Action Network](#), December 2020

⁵ [Appraisal Summary Table](#) (AST), produced for the aborted DCO submission in 2020

⁶ [Combined Modelling and Appraisal Report](#), published in response to a Freedom of Information request by Laura Blake, 10 May 2022

⁷ [Freedom of Information request to Transport Action Network](#), December 2020

STRONGLY OPPOSE

Q1c. Do you support or oppose the proposed changes to the section of the route: south of the River Thames/southern tunnel entrance?

STRONGLY OPPOSE

Q1d. Reasons/comments

We **strongly oppose the entire scheme**, and do not think a roadbuilding scheme is the solution when we need to reduce traffic and carbon emissions.

Q1e. Do you support or oppose the proposed changes to the section of the route: the Tilbury area?

STRONGLY OPPOSE

Q1f. Do you support or oppose the proposed changes to the section of the route: A13/A1089 junction?

STRONGLY OPPOSE

Q1g. Do you support or oppose the proposed changes to the section of the route: Mardyke Valley/North Road?

STRONGLY OPPOSE

Q1h. Do you support or oppose the proposed changes to the section of the route: M25 junction 29?

STRONGLY OPPOSE

Q1i. Reasons/comments

We **strongly oppose the entire scheme**, and do not think a roadbuilding scheme is the solution when we urgently need to reduce traffic and carbon emissions. We also object to the proposed new compound.

Q2a. Do you support or oppose the proposed changes to our plans for walking, cycling and horse riding routes?

STRONGLY OPPOSE

Reasons/comments

We are concerned that National Highways is claiming many pre-existing cycleways and footpaths as “new”. There is also no provision for public transport in the proposed scheme.

Q3a. Do you support or oppose our initial proposals for compensation area: M2 corridor and Blue Bell Hill?

STRONGLY OPPOSE

Reasons/comments

The scheme should be cancelled, then there would be no increases in nitrogen deposition, and no need for compensation or mitigation.

Q3b. Do you support or oppose our initial proposals for compensation area: Gravesham and Shorne Woods?

STRONGLY OPPOSE

Reasons/comments

The scheme should be cancelled, then there would be no increases in nitrogen deposition, and no need for compensation or mitigation.

Q3c. Do you support or oppose our initial proposals for compensation area: Southfields, Thurrock?

STRONGLY OPPOSE

Reasons/comments

The scheme should be cancelled, then there would be no increases in nitrogen deposition, and no need for compensation or mitigation.

Q3d. Do you support or oppose our initial proposals for compensation area: Hole Farm, Brentwood?

STRONGLY OPPOSE

Reasons/comments

The scheme should be cancelled, then there would be no increases in nitrogen deposition, and no need for compensation or mitigation.

Q3e. Do you support or oppose our proposed methodology for addressing the potential impacts of nitrogen?

STRONGLY OPPOSE

Reasons/comments

The best option would be for the scheme to be cancelled, then there would be no increases in nitrogen deposition, and no need for compensation or mitigation.

Q4a. Do you support or oppose the changes to the proposed area of land that would be needed to build the Lower Thames Crossing?

STRONGLY OPPOSE

Reasons/comments

The best option would be for the scheme to be cancelled, then there would be no need for extra land take to compensate for the environmental impacts. We should not be taking farmland out of food production.

Q4b. Do you support or oppose the changes proposed regarding special category land?

STRONGLY OPPOSE

Reasons/comments

The best option would be for the scheme to be cancelled, then there would be no impact on existing areas of special category land and private recreational facilities.

Q4c. Do you support or oppose the changes proposed regarding private recreational facilities?

STRONGLY OPPOSE

Reasons/comments

The best option would be for the scheme to be cancelled, then there would be no impact on existing areas of special category land and private recreational facilities.

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Rebecca Lush
Roads and Climate Campaigner
Transport Action Network

Transport Action Network provides free support to people and groups pressing for more sustainable transport in their area and opposing cuts to bus services, damaging road schemes and large unsustainable developments

254 Upper Shoreham Road, Shoreham-by-Sea, West Sussex, BN43 6BF

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