

Lower Thames Crossing - TR010032

Submission for Programming Meeting

Thames Crossing Action Group

Unique Reference: 20035660

Deadline: 23:45 - 5th May 2023 / Submitted 5th May 2023

Introduction

1. Thames Crossing Action Group are a community action group who represent thousands of people from all areas who are opposed to the proposed Lower Thames Crossing (LTC).
2. As well as representing our supporters, we also communicate with various organisations, including Local Authorities, NGOs and others. This also includes having a seat on Thurrock Council's LTC Task Force committee, which gives us a good insight and working relationship to the council's position in regard to the proposed LTC.

Comments

3. We do not believe that National Highways have given fair representation of the situation in regard to Thurrock Council's request [AS-084] for the Pre-Examination period to be extended.
4. We have serious concerns that National Highways have not fully understood the implications that 114 has had on Thurrock Council, and their need to stand down the team working on LTC for them.
5. We can also understand why Thurrock Council would have little confidence in a PPA unless it was actually confirmed and signed off, since National Highways have failed and/or delayed to deliver on so much they have promised over the years. It would have been irresponsible in the position they

are for Thurrock Council to push ahead without seeking full confirmation of a PPA, even if they could have done with all the 114 restrictions.

6. National Highways said that it was only Thurrock Council that had requested an extension/delay. Yet Tonbridge and Malling Borough Council also requested an extension/delay [AS-087].

7. Tonbridge and Malling Borough Council were a late addition as a host authority, and in fact have not even participated in a Statutory Consultation for the proposed LTC as a host authority, only non-statutory, as they were not considered a host authority at the time of the LTC Statutory Consultation.

8. To become a host authority so late in the day, for such a huge and complex project is something that needs to be given adequate relevance. Enabling a local authority into a position to be a host authority doesn't just happen overnight, and they should be given fair and adequate time to participate as a host authority.

9. National Highways have commented that extension of the Pre-Examination stage would add stress and cost to various parties. We would argue that not allowing host authorities adequate opportunity to make representations adds stress and issues for those whom they represent. Thurrock Council representing the area that suffers the largest percentage of the project adds weight to the relevance of this point too.

10. We were disappointed that the ExA did not invite further comments on National Highways response prior to issuing the Rule 6 letter, and would therefore very much appreciate your reconsideration of these issues now, please.

11. As members of the public we also have concerns over the sheer volume and complexity of the DCO application and process, and our ability to participate with such concentrated deadlines.

12. With respect for members of the public, who are unfamiliar with the DCO process, but wanting to take part, it can even take time to get our heads around the content of the various letters issued by PINS, to allow us to understand what needs doing and when.

13. In addition to the DCO process National Highways have also now advised us that the LTC Minor Refinements Consultation will run for 30 days from 17th May through to 16th June. This adds to what we are up against, and further adds to time and resource pressures for everyone.

14. The consultation ends on Friday 16th June and the Examination is obviously due to start on Tues 20th June, so very close together. It will also likely lead to yet more changes to the DCO application that we have to get our heads around.

15. In addition we have been requesting information from National Highways in regard to the newly set legal targets of the Environment Act, which to date we have been told are still being assessed. This again suggests yet more additional information that we won't likely get until after Examination has started, if it continues as per the draft schedule. Considering the target had been due to be set by the end of October, it is public perception that National Highways chose to rush getting the DCO application resubmitted knowing these targets were soon to be set and would need to be considered and relevant data/assessment provided in regard to the proposed LTC.

16. We and others have been asking for so much information over the years which National Highways have refused to share. Instead advising us it will be available at DCO stage. This now means we are faced with a considerable amount of information that we have been keen to review for some time, and a limited timeframe to firstly find it amongst the huge amount of documentation, and secondly to review and consider it.

17. We respectfully ask for consideration that many of us are very keen to participate in the process, and feel important that we do so, especially considering how hugely destructive and harmful the project would be. But we are not being employed full time to do this, we are members of the public doing our best to participate in a huge and complex process.

18. We also note that a considerable amount of the examination would take place during the Summer Holidays, which again makes it hard for us as a group and individuals to participate on such compacted deadlines.

Conclusion

19. The proposed schedule seems very fast paced, and for such an important and complex process we would very much appreciate further consideration of delaying things to allow us and those that represent us (local authorities) a fair and adequate opportunity to be in the best position to make representation in the DCO process please.

20. With such a huge amount of taxpayers' money being proposed to be spent on this project, it is essential that all who would be impacted by the project are given fair and adequate opportunity to participate, which we believe would also assist the ExA in your work and consideration prior to you making your recommendation to the Secretary of State for Transport.