

Lower Thames Crossing - TR010032

Submission for Preliminary Meeting

Thames Crossing Action Group
Unique Reference: 20035660

Deadline B: 23:45 - 26th May 2023 / Submitted 26th May 2023

Introduction

1. Thames Crossing Action Group are a community action group representing thousands of people from all areas opposed to the proposed Lower Thames Crossing (LTC).

Comments

2. Assessment of Principal Issues - we would respectfully request inclusion of Health and Safety Concerns. There is rightly a lot of concern over issues such as Unexploded Ordnance (UXOs), contamination risk from historic landfill sites, the risk of sink holes and similar issues (particularly following recent HS2 events that could also relate to LTC chalky areas).

3. As a group that represents people including those who reside in Thurrock we welcome and support Thurrock Council's request for a delay within the DCO process.

4. It is not the fault of Thurrock residents that the council is now in 114 procedures. We believe that Thurrock Council's LTC team have done great work up until the point they were stood down because of the 114, and since recently beginning work again. We do not feel it would be fair that those representing Thurrock residents are unable to do so in an adequate manner

because of restrictions placed upon them due to 114. All residents deserve the right to be fairly and adequately represented.

5. As the borough of Thurrock has the largest area of impact of the proposed LTC we feel this should be taken into account when considering the request for delay.

6. In the Programming Meeting, National Highways referred to the amount of meetings they'd had with Thurrock Council, as though the amount of meetings was what was important. We'd argue that from experience we know that quantity does not equate to quality when it comes to meetings with National Highways. Our participation at LTC Task Force meetings has shown time and time again that having meetings with NH doesn't necessarily result in meaningful and adequate communications. We do not therefore see their defence of quantity of meetings to be relevant to Thurrock Council's request for delay.

7. We note Tonbridge and Malling Borough Council's comments ([AS-087](#)) that they too disagree with National Highways' conclusion that a delay would not be beneficial. Additionally their comments ([AS-088](#)) that reiterate the requested delay would assist them also. Our supporters in the Tonbridge and Malling area would also appreciate their Local Authority having the best opportunity possible to make representations in the Examination.

8. Our supporters in other areas also feel it would be beneficial for their Local Authorities to have more time, to allow for them too to make fair and adequate representations, as it is obvious they have stated that while they will make representations it would be hard in the current proposed timeline.

9. Over the years of consultation National Highways have continually withheld a lot of info that has been requested by ourselves and others, including host authorities and NGOs etc. We have been told repeatedly that the requested info would be made available at DCO stage. We feel this had led

to increased and unnecessary pressure on time/resources of everyone.

10. Additionally, the latest round of consultation, the Minor Refinements Consultation also adds to the drain on time/resources of everyone.

11. We also note that there are other relevant consultations currently taking place, which participants like (but not limited to) ourselves, will also be keen to participate in, such as Local Plan Consultations, National Networks National Policy Statement Consultation, RIS3 consultation, Environmental Outcomes Report consultation, as well as others prior to this time that have equally taken time out from purely focusing on the LTC DCO.

12. The majority of Local Authorities that represent supporters of our group have also had purdah and local elections recently, which impacts democratic process for decision making and meetings etc, as well as accessibility to councillors for members of the public as full council is reformed following the elections, with numerous new councillors.

13. The LTC DCO application documentation is so vast and complex, with so much of the content being new information that we have been asking for over the past years, that we now need to take adequate time to review and find all info we want and need to see to be able to make fair and adequate representations.

14. We appreciate that the DCO process has to follow legislation and policy, but also highlight that for most of us this is a confusing and intimidating process that takes time to get our heads around, it is not something we can simply jump into and work on, as we have to figure out what's what before we can even begin to prepare to respond.

15. Those we represent have jobs, businesses, families etc meaning they may not always be able to spend as long as they would like and need wading through such huge amounts of documentation, so a short delay would allow a

little extra time.

16. Many people will also be taking summer holidays during the main examination period, again limiting possibilities to participate.

17. We note that there is currently only one evening hearing , others are all daytime during weekdays, largely limited to Tues, Weds, Thurs which again limits possibilities for those wishing to request to speak at hearings.

18. We believe pushing ahead with the draft timetable as is, would do more harm than good, and result in an unfair and inadequate examination, since the process should allow fair representation.

19. National Highways have already delayed the process themselves when the first attempt to submit the DCO application in 2020 led to it being withdrawn due in part to concerns over the adequacy of consultation and lack of adequate information provided in the DCO application.

20. They have added to the pressures on others participation by withholding so much information prior to the DCO application being resubmitted.

21. They have added to the pressures on resources with yet another round of consultation. We question how they only so recently became aware that a landowner had other commitments to carbon deposition land, how they had not previously considered and planned options for the portal entrance and tunnel boring machine options.

22. Public perception is that National Highways rushed to resubmit the DCO due to growing opposition and issues the project faces, rather than take the time to ensure consultation and the application were as adequate as needed.

23. We believe that there are still areas of information that will be very relevant and important in the DCO examination that have still not been

provided. We have still not seen any assessment of the LTC against newly set legal targets within the Environment Act for example. This is super important information that National Highways would have known was about to be published at the time they pushed their application resubmission in. Whilst we appreciate that the Preliminary Meeting is not the place to discuss merits of the project, we simply refer to this as an example of information that is lacking that would be a vital part of the examination. Delaying the start of examination would ease pressures on everyone if such information was made available prior to the start of examination.

24. Since Government announced that the start of construction of the LTC will be delayed by two years, if permission is granted, it is not as though a short delay would also be delaying the start of the construction period. In fact the announcement referred to the delay partially being to allow further time for consulting stakeholders.

25. We also feel that the Government's announcement about the 2 year delay to the start of construction should result in National Highways needing to make updates to assessments and information within the LTC DCO application documents. We would expect this delay to result in a new Outline Business Case, updated Cost, Benefit Cost Ratio (particularly since the ones quoted in the application are as at August 2020, so already outdated), updated Carbon Emissions, Biodiversity Net Gain, Air and Noise Pollution Assessments, as well as updated Traffic Modelling for example. We again highlight the benefit of these kind of updates being provided prior to the Examination starting, to avoid confusion and extra workload on everyone.

Conclusion

26. We hope you find our submission helpful and would respectfully ask you consider allowing a delay to allow those wanting to participate in the LTC DCO to be able to make fair and adequate representations, to assist you in the examination process that will shape your recommendation to the Secretary of State for Transport.

This is of course the largest proposed road project in the country, and at a cost of £10bn+++ we believe it would be more beneficial than detrimental to anyone, to delay the start of Examination until September to allow everyone who wishes to participate, the best opportunity to prepare and make their representations to you. Thank you.