

The detailed basis for my opposition is broken down into distinct subheadings:

Environmental Destruction, Local air quality, loss of ancient woodland / ecocide:

• The LTC scheme will directly contravene legally binding environmental and carbon abatement legislation that the UK government has become a signatory for such as the Paris accord. The scheme will emit more than 7,000,000 tonnes of carbon dioxide during construction and operation in the 1st 20 years - This astonishing amount of carbon released into the atmosphere is diametrically opposed to this legally binding carbon abatement legislation. Instead of new hugely environmentally damaging roads building schemes the UK government should instead be investing at pace in green transport infrastructure including extensive investment in train freight rather than road building to facilitate road haulage.

• Highways England claim this will be "the most green road building scheme to date", however the stated carbon emissions and disregard for protected ancient woodland (which sequester more carbon than juvenile trees) disprove this assertion. The LTC flies in the face of all scientific evidence. Road building is the very last thing this country needs in the context of rapidly escalating global temperatures and exponential biodiversity loss.

• There was no demonstration in the public consultation of any metrics by which claims for net zero carbon can be proven for the LTC scheme despite freedom of information requests.

• It is well understood in forestry that for every 100 new trees planted, only 90 to 95 will survive. Carbon accounting metrics for the LTC do not factor the death-rate of a proportion of the newly planted trees. A baseline tree-death rate of 10% could in fact become far higher as a result of increasing drought, flooding and tree pests and diseases caused by climate change. This means that HE's carbon accounting is inaccurate.

• The LTC scheme will generate toxic and highly dangerous levels of air pollution for local communities in perpetuity. The forecast levels of PM 2.5 will far exceed World Health Organisation safe limits and are known to disproportionately affect the cognitive development of school-age children. There are numerous schools in proximity.

• The LTC scheme will fail to meet legally binding requirements for biodiversity net gain at the same time as destroying and negatively impacting more ancient woodland than any other road building scheme in England's history. Ancient woodland accounts for only 2.5% forest cover in the UK and is supposed to be legally protected /enshrined in law against any form of destruction or development. Despite these laws, highways England and the have ridden roughshod over these unique and irreplaceable habitats by pursuing ecocide over scientific recommendations on protection of the environment. Once destroyed these unique ecologies can never be replaced and the biodiversity associated with them is known scientifically to be many times greater than any form of newly planted woodland that HE claims (incorrectly), will mitigate for this huge loss. The minor refinements consultation proposed not only to maintain the unprecedented high level of ancient woodland destruction but to actively reduce the planted area of new tree cover that was designed to mitigate the impacts of this ecocide.

Flooding:

• This week (w/c July Monday 17th July 2023), South Korea experienced unprecedented flash-flooding of the 685-metre-long Osong underground road tunnel, very likely as a direct result of climate change. At the time of writing, the death toll is x40 lives. The likelihood of and mitigation for, flooding of the LTC as a result of climate change have not been factored into the LTC design and mitigation.

Cost:

Highways England's own data demonstrates that the Dartford crossing will only see a reduction of traffic of approximately 20% once the lower Thames crossing is open and operational and the meagre percentage is not improved in any way by the minor refinements consultation. This analysis of 20% congestion reduction at Dartford proves beyond reasonable doubt that the lower Thames crossing is not, and will never be, fit for purpose and certainly does not justify the vast investment of over £10 billion pounds in what will be a failed project as soon as it opens. A much smaller investment in improved rail haulage and co-ordinated diversion of cargo shipping to ports north of London carrying cargo designated for business north of the southern counties, would achieve the same congestion-reduction as the LTC, but at a fraction of the total cost and a fraction of the total carbon emitted.

The negative financial impacts of environmental damage and loss of ecologies caused by the LTC have also not been analysed or factored-in in terms of financial metrics for / assessments of the scheme. This means the 'adjusted benefit- cost ratio' used by the government to judge the value for money of the LTC does not represent the complete financial picture -particularly that associated with the environmental damage caused by construction and operation of the scheme. For example, studies funded by the Woodland Trust have estimated the aggregated value of UK Woodlands to be over £270 billion. The mental health benefits of woodland alone, are estimated to save the UK taxpayer £185 million in treatment costs annually. Woodlands prevent flooding and actively reduce air-pollution, the financial benefits of which do not feature in the loss calculations for destroyed ancient woodland associated with the LTC.

#### Misleading Consultation Statements and Unbalanced Consultation Resources from HE:

During the consultation period Highways England made the following claim on the public consultation website for the Lower Thames Crossing: "Air quality: improved across the region." This constituted disinformation. Unsubstantiated and misleading claims during the public consultation process meant the public could not make an objective and informed decision on the air quality and other local impacts of the LTC. Air quality in Gravesend and Thurrock region will not "improve" as a result of the scheme.

URL evidence from HE LTC Public Consultation website:  
<https://ltcconsultation.highwaysengland.co.uk/#:~:text=acomcommunitywoodland-,Airquality,improvedacrosstheregion,-Economy>

The "add you pin of support" mapping feature of the HE LTC website does not give a fair representation of the public feeling about the LTC project and distorts presentation of the consultation feedback received by HE. To be representative of public opinion and provide a balanced visual representation of the outcome of the public LTC consultation, there should be an "add your pin of opposition" page. By not representing public opinion on this massive controversial project, HE are guilty of attempting to give a disproportionately positive representation of support for the scheme during the DSO process. URL:  
<https://nationalhighways.co.uk/our-roads/lower-thames-crossing/why-do-we-need-the-lower-thames-crossing/support-map/>

#### Smart Motorways:

The proposed operation of the LTC will be as a smart motorway in all but name. These have been proven to be dangerous by scientific studies and statistics. This is yet another reason to stop the LTC scheme now as this aspect does not feature anywhere in consultation documents.

#### Future proofing and value for money for the UK taxpayer:

â€¢ The Â£10bn+ financial cost of the LTC is unprecedented and would be a terrible waste of public funds in the face of climate change. The UK government must invest, at pace, in truly sustainable transport measures such as rail infrastructure too actively reduce the number of car and truck journeys in England.

â€¢ We are on the verge of autonomous vehicles being commonplace on England's roads. Significant advances have been made in what is known as 'platooning' of HGV trucks in particular, vehicles that account for approximately half of all congestion traffic passing across the Dartford crossing. Platooning or efficient vehicular stacking of HGVs results in significantly better use of existing road infrastructure, whilst dramatically reducing congestion, without the need for any multi-billion-pound investment in new road construction, such as the LTC scheme. The UK government has already said that if the LTC is approved through the DCO application process, the scheme will still be delayed by a further two years. In this time the technological advances of platooning and autonomous vehicles will have advanced exponentially to the point where existing roads will have the potential to more than accommodate for increased growths in road journeys predicted by highways England, but crucially, without the need for any new road building infrastructure like the LCT project. In this context the LTC is in no way future-proofed or considered in terms of a future value for money context for the UK taxpayer. Platooning will be widespread before construction of the hugely wasteful LTC is even complete. As such, future-proof traffic modelling that includes the positive impact of autonomous HGV platooning should have been included in the scoping work for LTC required of Highways England.

In summary, we are in a climate emergency. The LTC is a disastrous road building scheme that will only serve to accelerate climate change whilst being ineffective at reducing the congestion it was supposed to resolve. HE's proposals directly contradict environmental science, public health policy, carbon mitigation legislation and fail to meet basic thresholds of fiscal responsibility / value for money to the UK taxpayer. As such the LTC does not meet the stringent requirements of a DCO application and must be rejected on this basis.

Sincerely,

George Fereday  
Gravesend Resident.