



Written Representation
for
Lower Thames Crossing
Examination

Introduction

Transport Action Network (TAN) OBJECTS to the Development Consent Order (DCO) application for the Lower Thames Crossing (LTC). The scheme is LOW value for money, with an adjusted benefit cost ratio (BCR) of just 1.22, and would cost up to £9bn of public funding. Meanwhile the adverse impacts of the scheme are substantial (including 6.6 million extra tonnes of carbon caused by the scheme, increased air and noise pollution, a Large Adverse impact on the historic environment, and a Very Large Adverse impact on biodiversity). The case and need for the scheme are not made. There is no compelling case in the public interest for land to be acquired compulsorily as required by s122(3) of the Planning Act 2008. Applying the planning balance, the substantial costs and harms of the project overwhelmingly outweigh the purported benefits. It is in the national interest that the DCO is not granted, and we ask the Examining Authority to recommend that the DCO should not be made.

Cost and scheme economics

The [Funding Statement](#) (APP-063) costs the scheme between £5.2 billion to £9 billion of public funding (2.1.1). The cost was "estimated at 2019 Q1 prices in line with National Highways guidance. They were then inflated to outturn prices".

The [Combined Modelling and Appraisal Report](#) or ComMA, (APP-518) records the initial BCR as 0.48 (Poor value for money according to the [DfT's value for money framework](#)), and the adjusted BCR which includes wider economic benefits at only 1.22 (Low value for money) (APP-518, 7.5.5).

The CAPEX costs for the planning and construction of the scheme are given as £8.083 billion (APP-518, 7.4.11). The operation, maintenance and renewal (OMR) is given as £4.691 billion (APP-518, Table 7-15). The total cost of planning, constructing and operating the scheme is therefore £12.774 billion.

The Applicant has done a few sensitivity tests of various scenarios, including traffic growth and CAPEX cost confidence levels, but also scenarios based on policies within its Transport Decarbonisation Plan (APP-526). In its CAPEX costs sensitivity test, the Applicant tested a scenario where there is a 90% chance that the CAPEX costs will not exceed the cost confidence level (P90 in Table 7.19 of APP-518) and the initial BCR dropped to 0.31 and the adjusted BCR dropped to 0.80, meaning the scheme could cost more to build than it would ever deliver in benefits.

The Applicant also tested against various traffic growth scenarios. Low traffic growth is needed to meet our carbon budgets as stated by the Climate Change Committee in its recent progress report to Parliament. Electrification of the vehicle fleet is not enough to decarbonise transport fast enough, and modal shift and traffic reduction must also be part of measures to rapidly decarbonise transport. In the low traffic growth scenario the adjusted BCR dropped to 1.09 (APP-518, Table 7.18).

The Applicant assumes carbon savings if policies in the Transport Decarbonisation Plan (TDP) are implemented (APP-526, 11.3.8). However, the Applicant has used the Department for Environment, Food and Rural Affairs (Defra) Emissions Factor Toolkit (EFT) v11 (Defra, 2021) to calculate the carbon from vehicles. The EFT v11 already has factored in increased usage of electric vehicles (EVs) and a reduction of tailpipe emissions, so the Applicant is in danger of double counting carbon savings from electrification of the vehicle fleet.

Climate

The carbon emissions from the scheme are the largest of any road project, possibly any infrastructure project, at 6.6 million tonnes of carbon. The climate chapter of the Environmental Statement (Chapter 15, APP-153) calculates the construction emissions to be 1.763 million tonnes (APP-153, 15.6.2 or APP-518, 7.3.35). The user emissions from the additional traffic caused by the scheme over the 60 year appraisal period is 4,833,762 tonnes (APP-153, Table 15.16) and 95,415 extra tonnes of CO₂ in the opening year alone.

At 5.6.19 in APP-153, the Applicant admits that "The total net GHG emissions over the appraisal period of the Project (construction stage plus 60-year operational phase from opening) are calculated to be approximately 6.596 million tCO₂e with TAG GHG Workbook (DfT, 2022a) / EFT v11 (Defra, 2021)"

We note that the greenhouse gas (GHG) worksheet is missing from the Combined Modelling and Appraisal Report - Appendix D - Economic Appraisal Package: Appraisal Summary Table Report (APP-524). We ask that the Examining Authority asks the Applicant to submit this.

The Climate Change Committee in its 2023 progress report (June 2023) recommended that there should be a "systemic review" of all road projects to ensure they help the UK to meet its legal obligations to rapidly reduce its carbon emissions.

Lack of consideration of non-road alternatives

The Statement of Reasons (APP-060) reports that the last - and only - time non-road alternatives were considered was fourteen years ago, in 2009 (APP-060, 5.13.4). A rail link was considered, but then immediately dismissed. Since then only various routes for road options have been considered despite the dramatically changed climate, and the need to reduce traffic and rapidly decarbonise.

Biodiversity

The impact on biodiversity has been categorised as Very Large Adverse. The Terrestrial Biodiversity chapter of the Environmental Statement (APP-146) records that three veteran

trees will be lost (8.6.54), and there would be an irreversible loss of 5.35ha of ancient woodland (8.6.53). This cannot be compensated for as it is impossible to replace. The Biodiversity chapter also states that there will be a permanent removal of 7.67ha of seminatural broadleaved woodland, 34.87ha of plantation woodland and 4.23ha of scrub habitats that are of county importance (8.6.55). Also, there would be an irreversible permanent loss of 4.67km of hedgerow habitat (8.6.59). The following protected sites would all be directly impacted (APP-146, Table 8.8):

- North Downs Woodlands SAC,
- Wouldham to Detling Escarpment SSSI,
- South Thames Estuary and Marshes SSSI
- Shorne and Ashenbank Woods SSSI including Ashenbank, Shorne and Brewers ASNW, Ashenbank Woodland Trust Reserve LWS and Shorne Woods Country Park
- Great Crabbles Wood SSSI and ASNW

Accidents

The ComMA report (APP-518) shows that there would be an **increase** in accidents due to the LTC ((APP-518, Table 7.7) 26 more fatal collisions, 182 serious, and 2,464 slight - over the 60 year appraisal period.

Air quality

The Appraisal Summary Table Report (APP-524) says there would be an increase in air pollution. There would be an increase of 89,786 tonnes of NO₂ over the 60 year appraisal period, and 64,450 tonnes of PM_{2.5}

Conclusion

The case for the scheme has not been made. There is no compelling case in the public interest for land to be compulsory purchased. The economic benefits do not outweigh the considerable harm the scheme causes. The scheme increases carbon emissions by 6.6 million tonnes at a time when we need to rapidly decarbonise. The DCO should not be made.

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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 and rail services, damaging road schemes and large unsustainable developments

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

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