

Lower Thames Crossing

10.4 Change Application (August 2023)

Appendix B - Minor Refinement Consultation Report

Annex D – Responses to consultation

(Part 2 of 2)

Infrastructure Planning (Examination
Procedure) Rules 2010

Volume 10

DATE: August 2023
Change Application (August 2023)

Planning Inspectorate Scheme Ref: TR010032
Examination Document Ref: TR010032/EXAM/10.4

VERSION: 1.0

10.4 Change Application (August 2023) Appendix B - Minor Refinement Consultation Report Annex D – Responses to consultation

List of contents

	Page number
Responses to consultation	1
D.1 Introduction	1
D.2 Responses by those previously consulted under section 42	1
D.3 Other responses	60

Lower Thames Crossing – Minor refinement consultation
Response form

Introduction

We're holding this minor refinement consultation to seek your feedback on a small number of minor changes we are proposing to make to our Development Consent Order (DCO) Application. These are localised in nature and small in extent, with only minimal change to the impacts which we reported in our DCO Application. We have highlighted any change in those impacts within the consultation booklet, which is available on the minor refinement consultation website:

<https://highwaysengland.citizenspace.com/ltc/minor-refinement-consultation-2023>

Chapter 3 of the booklet sets out the changes we are seeking your feedback on as part of this consultation. Starting from south to north these are:

- Reduction of nitrogen deposition compensation area and Order Limits at Blue Bell Hill and Burham
- Increase in limits of deviation for the northern tunnel entrance headwall
- Revised utility proposals at East Tilbury (three changes)

Chapter 4 provides a construction update, setting out how the tunnels beneath the River Thames could be constructed by either two tunnel boring machines, or by using a single tunnel boring machine to construct both.

We have also reduced the Order Limits to reflect the changes we are proposing, see Figure 3.1 on page 5 of the booklet for further information.

Pre-examination

We submitted our DCO Application to the Planning Inspectorate on 31 October 2022 to secure consent to construct and operate the A122 Lower Thames Crossing (the Project). Our DCO Application was accepted for Examination on the 28 November 2022. The application and how to engage in the DCO process can be found using this link:

<https://infrastructure.planninginspectorate.gov.uk/projects/south-east/lower-thames-crossing/>

A panel of five independent inspectors has been appointed as the Examining Authority to examine our application on behalf of the Secretary of State for Transport. They will review the evidence submitted and listen to issues raised.

Since the submission of the DCO Application, the Lower Thames Crossing team has identified some minor changes to the Project. These are as a result of ongoing engagement with landowners and other stakeholders, and further design refinement.

Through this consultation, we want to let you know about the proposed changes and provide an opportunity for feedback to be given in relation to them. We will consider all responses before submitting any request to the Examining Authority to incorporate these changes into the DCO examination process.

If these changes are accepted by the Examining Authority, they will be considered during the examination of the DCO Application.

Lower Thames Crossing – Minor refinement consultation
Response form

How to have your say

Full details of how you can respond to this minor refinement consultation can be found at the back of this form.

See the consultation booklet for your data rights.

Please provide your feedback by 23:59 on 19 June 2023.

Any responses sent after this point may not be included in our analysis.

Lower Thames Crossing – Minor refinement consultation
Response form

Reduction of nitrogen deposition compensation area and Order Limits at Blue Bell Hill and Burham

Q1a. Do you support or oppose the proposed reduction of the nitrogen deposition compensation area and Order Limits at Blue Bell Hill and Burham?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Strongly support	Support	Neutral	Oppose	Strongly oppose LTC	Don't know

NONE OF THESE ARE RELEVANT AS ~~THE~~ THE LTC SHOULD NOT BE BUILT AND THIS QUESTION IS AMBIGUOUS

Q1b. Please let us know the reasons for your response and any other comments you have on the proposed reduction of the nitrogen deposition compensation area and Order Limits at Blue Bell Hill and Burham.

WITHOUT THE LOWER THAMES CROSSING THERE WOULD BE NO NEED FOR EXTRA NITROGEN DEPOSITION. THE FARMER HAS TAKEN UP COUNTRYSIDE STEWARDSHIP (WHICH YOU SHOULD HAVE FOUND OUT IF YOU DID YOUR RESEARCH ADEQUATELY). I STRONGLY OPPOSE THAT YOU ARE TAKING ANY AGRICULTURAL LAND ANYWHERE ALONG THE ROUTE AS WE NEED TO GROW MORE OF OUR OWN FOOD INSTEAD OF BUILDING NEW ROADS TO ENABLE FOREIGN LOBBIES TO USE TO BRING FOOD INTO THE COUNTRY. THE IMPACT ON FARM BUSINESS SHOULD BE ZERO - LEAVE THIS LAND ALONE.

Lower Thames Crossing – Minor refinement consultation
Response form

Increase in limits of deviation for northern tunnel entrance headwall

Q2a. Do you support or oppose the proposed increase to the limits of deviation for the northern tunnel entrance headwall?

Strongly support Support Neutral Oppose Strongly oppose LTC Don't know

IRRELEVANT IF THE LTC IS NOT BUILT

Q2b. Please let us know the reasons for your response and any other comments you have on the proposed increase to the limits of deviation for the northern tunnel entrance headwall.

AGAIN YOU WOULD NOT HAVE THIS TO CONSIDER IF THE LTC IS NOT BUILT.
HOW CAN THERE BE A REDUCTION IN MATERIALS AND SPOIL - THE DIGGING WOULD BE THE SAME.
THIS IS ALL FLOOD PLAIN AND IN THE FUTURE THE WHOLE AREA INCLUDING YOUR TUNNEL IF BUILT WILL BE UNDER WATER.

Lower Thames Crossing – Minor refinement consultation
Response form

Revised utility proposals at East Tilbury

Temporary Linford water pipeline realignment including relocation of Muckingford Road Utility Logistics Hub (ULH)

Q3a. Do you support or oppose the proposed realignment of the temporary Linford water pipeline and the relocation of Muckingford Road ULH?

Strongly support Support Neutral Oppose Strongly oppose LTC Don't know

IRRELEVANT IF LTC NOT BUILT

Q3b. Please let us know the reasons for your response and any other comments you have on the proposed realignment of the temporary Linford water pipeline and the relocation of Muckingford Road ULH.

HOW COME ALL OF A SUDDEN INSTEAD OF 2 LOGISTIC HUBS THERE WOULD BE JUST 1?
HOW COME YOU CAN REMOVE THE LAND IN ORANGE FROM THE ORDER LIMITS SO LATE IN THE DAY? ANYTHING TO DO WITH HOUSING APPLICATION IN THAT AREA?
HOW COME EXTENSIVE WIRGLY LINE (4-3-4) IS NOW STRAIGHT?
OF COURSE THAT AGAIN COULD BE TO DO WITH HOUSING APPLICATION IN THAT AREA.

Relocation of Low Street Lane ULH

Q4a. Do you support or oppose the proposed relocation of Low Street Lane ULH?

Strongly support Support Neutral Oppose Strongly oppose LTC Don't know

THERE WOULD BE NO REASON TO RELOCATE LOW ST ULH IF LTC NOT BUILT.
I HAVE HEARD THAT THE WATER COMPANY FOR THAT AREA ARE NOT HAPPY BY ANY OF THIS.

Lower Thames Crossing – Minor refinement consultation
Response form

Q4b. Please let us know the reasons for your response and any other comments you have on the proposed relocation of Low Street Lane ULH.

I HAVE HEARD THE WATER COMPANY FOR THAT ARE ARE NOT HAPPY WITH THIS.

Land use change west of Linford

Q5a. Do you support or oppose the proposed changes to the land use west of Linford?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know

IRRELEVANT IF LTC NOT BUILT

LTC

Q5b. Please let us know the reasons for your response and any other comments you have on the proposed changes to land use west of Linford.

LEAVE ALL THE LAND WEST OF LINFORD ALONE.

Lower Thames Crossing – Minor refinement consultation
Response form

Q6. Other comments

We welcome any other comments you would like to make about the changes proposed to the Lower Thames Crossing as part of this minor refinement consultation.

REGARDLESS OF THIS TOTAL WASTE OF MONEY CONSULTATION I AM STRONGLY OPPOSED TO THE BUILDING OF THIS ROAD. IT WILL NOT SOLVE ANY PROBLEMS AT THE DARTFORD CROSSING REGARDLESS OF WHAT MATT PALMER SAYS ON PAGE 1 OF BOOK. IT WILL NOT BE A GREENEST ROAD EVER. IT WILL NOT CONNECT COMMUNITIES. QUITE THE OPPOSITE IT WILL NOT ENHANCE NATURE. IT WILL DESTROY HABITATS.

AS FAR AS WHETHER TO USE 1 OR 2 BORING MACHINES I'VE GOT A BETTER IDEA - DON'T USE ANY. DON'T BUILD THIS USELESS ROAD.

YOU HAVE DONE ENOUGH DAMAGE TO PEOPLES LIVES ALREADY WITH THE UNCERTAINTY OF WHAT THEIR FUTURE WILL BE AS TO WHETHER YOU WILL DESTROY THEIR HOMES, BUSINESSES, OPEN SPACES, BRING EVEN MORE POLLUTION TO AREAS THAT ALREADY ARE NOT GOOD, WHETHER THE ROAD WOULD BE SO NOISY IT WOULD KEEP THEM AWAKE ALL NIGHT AND NOISY ALL DAY. THIS HAS GONE ON FAR TOO LONG AND I SINCELY HOPE YOU DO NOT GET PERMISSION TO SPEND IN EXCESS OF £10b++++ TAXPAYERS MONEY AND THE WHOLE PROJECT, ALONG WITH NATIONAL HIGHWAYS GET THROWN OUT.

SHAME ON EVERYBODY CONCERNED.

I STRONGLY OBJECT TO THE LOWER THAMES CROSSING IN THIS AREA.

THERE ARE OTHER ALTERNATIVES.

Lower Thames Crossing – Minor refinement consultation
Response form

Q7. The consultation

Please let us know your views on the quality of our minor refinement consultation materials, the accessibility of our online information and anything else related to this consultation.

	Very good	Good	Average	Poor	Very poor	Not applicable
Was the information presented clearly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Was the website easy to navigate?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please let us know the reasons for your response and any other comments you have on the delivery of this consultation.

WASTE OF PAPER, TAXPAYERS MONEY.
IT IS OBVIOUS THAT LOTS OF DETAILS WILL BE LEFT TO THE CONTRACTORS CONCERNED, SO WHY WASTE OUR AND YOUR TIME ASKING WHETHER WE AGREE OR NOT.

Lower Thames Crossing – Minor refinement consultation
Response form

About you

We would be grateful if you could answer the following identification questions, which will help us to categorise responses. Your personal details and views expressed as part of your consultation response will not be made public. You do not have to provide any personal information if you do not want to. However, postcode data can help us to better understand the views of different communities in relation to the proposals. To view our privacy statement, please see the minor refinement consultation booklet.

1. Name:

CONCERNED THURROCK RESIDENT

Postcode:

2. Address: THURROCK

3. Email address:

If you provide an email address we will use it to let you know about important developments in our proposals.

4. If you are responding on behalf of an organisation, business or campaign group, please include the name below. (This helps us to understand whether respondents can be categorised as 'prescribed consultees', as defined by the Planning Act 2008.)

Organisation:

Type of organisation, business or campaign group:

- Academic
- Business
- Campaign group
- Elected representative
- Environment, heritage, amenity or community group
- Local government
- Statutory agency

Transport, infrastructure or utility organisation

Other (please state):

Lower Thames Crossing – Minor refinement consultation
Response form

5. Do you own land or hold any interests or rights, such as private rights of way or sporting rights, within or close to the Order Limits where we have proposed changes in this consultation?

Yes No

If you have ticked yes, have you received a letter to notify you of the consultation?

Yes No

6. If you use the transport network in an area that may be affected by the Lower Thames Crossing, please tell us how you travel by ticking one or more of the following boxes:

- As a horse rider
- As a pedestrian
- Bus
- Car
- Cycle
- Goods vehicle
- Motorcycle
- Train
- Other (please state):

7. Please let us know how you heard about this consultation by ticking one or more of the following boxes:

- Received an email from the Planning Inspectorate
- Saw information on the Planning Inspectorate website
- Received a letter from National Highways
- Received an email from National Highways
- Received information from a local authority
- Saw a Public Notice in local or national newspapers
- Saw information on the LTC website
- Saw social media coverage
- Saw coverage in local media
- Word of mouth
- Other (please state):

Lower Thames Crossing – Minor refinement consultation
Response form

Equality and diversity

We would be grateful if you could answer the following equality and diversity questions. We will use the information we receive to help understand whether our consultation has been useful to people of different backgrounds and with different requirements.

The answers you provide to this question are defined as 'special category data'. If you agree to provide this information, you can withdraw your permission for us to use it at any time. To do that, please email DataProtectionAdvice@nationalhighways.co.uk

- I consent to National Highways processing my special category data for the purposes of understanding the accessibility of the Lower Thames Crossing consultation. I have read National Highways' privacy notice (found on page 34 of the minor refinement consultation booklet) and understood how it will be processing this data.

1. How would you define your gender?

- Male Female Transgender Prefer not to say

2. Do you consider yourself to be disabled?

- Yes No Prefer not to say

3. Please describe your ethnic background: *I DO NOT SEE THE RELEVANCE OF THIS QUESTION*

- Asian or Asian British
 White
 Black, African Caribbean or black British
 Mixed or multiple ethnic groups
 Gypsy or Irish Traveller
 Other ethnic group
 Prefer not to say

4. Age:

- Under 16
 16–24
 25–34
 35–44
 45–54
 55–64
 65+

Lower Thames Crossing – Minor refinement consultation
Response form

How to submit your response form

Please only use the following official response channels. We cannot guarantee that responses sent to any other address will be included in our analysis.

Online

Fill in the online survey at:

<https://highwaysengland.citizenspace.com/ltc/minor-refinement-consultation-2023>

Email

Send your comments to consultationresponses@lowerthamescrossing.co.uk

Post

Send a printed response form or letter to the following address:

Consultation Response LTC
Pilgrims Lane
Chafford Hundred
Grays
RM16 6RL

Unless using a pre-paid envelope supplied by National Highways, respondents are required to pay appropriate delivery charges for responses sent to this address.

National Highways cannot guarantee that responses sent to any other address will be received.

How your response will be used

We will carefully consider all the responses we receive, and this will inform any change request we submit to the Examining Authority. If these changes are accepted by the Examining Authority they will be considered during the examination of the DCO Application.



Have your say

Please send your response before
23:59 on 19 June 2023



Reduction of nitrogen deposition compensation area and Order Limits at Blue Bell Hill and Burham

Q1a. Do you support or oppose the proposed reduction of the nitrogen deposition compensation area and Order Limits at Blue Bell Hill and Burham?

Strongly oppose.

Q1b. Please let us know the reasons for your response and any other comments you have on the proposed reduction of the nitrogen deposition compensation area and Order Limits at Blue Bell Hill and Burham.

As an overriding point, to CPRE Kent this now seems a fairly pointless consultation exercise given the DCO application has been submitted and accepted with the hearings now underway. That is, whatever we or others say now is quite patently going to make no difference to whether or not National Highways (NH) decide to submit the proposed changes to the examination as clearly this is a given. What this consultation does however do is further muddy the waters with respect to the projects air quality impacts. With the DCO hearings sessions where Air Quality is to first be discussed occurring on the 20th June 2023, the day after this consultation closes, this is simply unacceptable.

In any event, given the lack of information provided alongside this consultation, it is clear that NH see this as just a tick box exercise deemed necessary owing to the order limit changes.

Specifically, and with respect to the nitrogen deposition compensation area at Blue Bell Hill, we are told "*Ongoing engagement with the landowner of the Blue Bell Hill and Burham sites has highlighted new information including the implications of our proposals on the farm business and a newly agreed Countryside Stewardship scheme*". We are not however told the detail of this new information, exactly what the implications are, or any details of the Countryside Stewardship scheme. We are also not informed whether the Countryside Stewardship scheme alone is sufficiently robust to secure these currently unquantified additional benefits in perpetuity. Rather, we are left to guess these details and simply accept that the same level of mitigation can now be achieved through a much reduced area.

This continued opaqueness/lack of transparency is a significant and continued failing of the DCO application process so far. It is understood that NH has spent £266.7 Million of taxpayers money producing the largest planning application ever submitted at more than 63,000 pages. Against such numbers, the assumption becomes that if that amount of money has been spent and that number of documents have been produced, then it all must be in order. To the contrary, what we at CPRE Kent are actually finding is that it is next to impossible to easily and efficiently find basic information and when we do, this tends to raise more questions than it answers. To us right now, this appears to be a deliberate tactic designed to limit informed robust third-party scrutiny.

By way of illustration, whilst the question posed above seems simple enough, to truly form an opinion on this requires detailed knowledge of the Habitats Regulations Assessment/Appropriate Assessment submitted with the DCO application and at least a working knowledge of the 356 separate documents that form the Environment Statement. It is only through reading these documents we see that NH have themselves concluded that there are 29 sites totalling 176.4 hectares (ha) where the change in Nitrogen Deposition results in a significant effect.

We then however see via a combination of the screening report to inform the Appropriate Assessment, the Environment Statement Air Quality chapter and the Project Air Quality Action Plan that all these sites, where there is an otherwise accepted significant effect, are all being screened out of the Appropriate Assessment. This is on the basis that the mitigation and compensation being proposed will be sufficient to bring all sites collectively below the 1% of the critical load for nitrogen threshold to allow a conclusion of no significant effect.

Our first response to this is to continue to question why avoidance measures have been disregarded in favour of mitigation and compensation contrary to what is required in line with the established mitigation hierarchy. The only justification provided within the DCO documents is that "*the Project route and design have been selected after extensive development, engagement, and consultation*". As set out in previous consultation responses by CPRE Kent, mitigation and compensation should be options of last resort, yet nowhere are we seeing a detailed assessment as to what bearing the Air Quality (and other ES issues where significant effects have been found) have had in terms of the initial site selection process. That is, would selection of one of the other site location options have avoided the current extent of significant nitrogen deposition effects we are currently presented with?



In terms of active mitigation being considered, it appears from the DCO documents that this is now limited to a 70mph enforced limit, eastbound between M2 junctions 3 and 4. So not a lot then.

It is therefore the case that what actually is being proposed is an almost entirely compensation approach of habitat creation. It is only when we dig deep into the Project Air Quality Action plan that amazingly we see that habitat management measures within affected sites, along with habitat creation or enhancement measures adjacent or near the affected sites, were disregarded as options in favour of just creating new compensation/offset sites of which Blue Bell Hill is one.

The problem with this approach is that such offsetting measures do nothing to help or protect the actual existing SAC sites where nitrogen deposition is already causing significant degradation. Instead, the degradation of these sites will only be exacerbated further by the LTC project. This includes Epping Forest and the North Downs Woodlands, where the SAC citations highlight air quality as a key attribute underpinning the conservation objectives of the sites. Of concern, both these SACs have 'restore' targets for the air quality attribute of the conservation objectives which relate to the concentrations and deposition of air pollutants to at or below the site-relevant critical load or level values. To CPRE Kent, the compensation/offsetting approach would seem to be at odds with the conservation objectives of at least these sites and hardly represents a precautionary approach.

We also then have to consider some of the wider issues/concerns previously raised, though seemingly ignored, with respect to the air quality impact modelling. These include our concern that the assessment of air quality impacts on each SAC remains predicated upon the traffic modelling which we consider far from robust. This is because it is based upon out-of-date 2016 baseline data and also under represents true in-combination impacts, as it does not include traffic from residential schemes of less than 200 units, nor new employment sites of 2,011 sqm.

Further, and with respect to in combination impact specifically, we note that the Habitat Regulation Assessment (HRA), in concluding no significant impact, considers the impact of the project in isolation only and not future projects. This includes projects such as improvements to the A229 at the junctions with the M2 and M20 which, in part at least, will be needed as a consequence of increased traffic flows arising from the LTC project. It also still fails to consider the 2,000 houses to be allocated at Lidsing despite the recent conclusion at the Maidstone Local Plan hearing sessions that in fact the Maidstone plan alone is likely to result in a significant effect upon the North Downs SAC, though as yet no mitigation proposed to bring it under the 1% threshold.

It is only once we have considered these wider points that we can come back to the crux of what is being proposed here, to reduce the overall compensation/offsetting land from the 247ha currently proposed within the DCO to 205ha. This however is being proposed in isolation to an update to the Project Air Quality Action Plan or the Habitats Regulations Assessment/Appropriate Assessment. We are however told that these calculations/assessments/conclusions will not change, for reasons unknown, despite the 43-ha reduction.

Given it is our view the compensation/offsetting approach is already a flawed approach at odds with the conservation objectives of at least some of the affected sites, and that the Air Quality impacts already appear to be being underplayed, we can only but strongly object to a further reduction of what we already consider to be insufficient compensation.



About you

We would be grateful if you could answer the following identification questions, which will help us to categorise responses and organise our Consultation Report. Details and views of individuals will not be made public. You do not have to provide any personal information if you do not want to. However, postcode data can help us to better understand the views of different communities in relation to the proposals. To view our privacy statement, please see page 3 of this response form.

1. Name:

2. Address:

3. Email address:

If you provide an email address, we will use it to let you know about important developments in our proposals.

4. If you are responding on behalf of an organisation, business or campaign group, please include the name below. (This helps us to understand whether respondents can be categorised as ‘prescribed consultees’, as defined by the Planning Act 2008.)

Organisation:

Type of organisation, business or campaign group:

- Academic
- Business
- Campaign group
- Elected representative
- Environment, heritage, amenity or community group
- Local government
- Statutory agency
- Transport, infrastructure or utility organisation
- Other (please state):

5. Do you own land or hold any interests or rights, such as private rights of way or sporting rights, within or close to the proposed Order Limits?

No



If you have ticked yes, have you received a letter to notify you of the consultation?

Yes No

6. If you use the transport network in an area that may be affected by the Lower Thames Crossing, please tell us how you travel by ticking one or more of the following boxes:

- As a horse-rider
- As a pedestrian
- Bus
- Car
- Cycle
- Goods vehicle
- Motorcycle
- Train
- Other (please state): **We represent members who will travel by all above means**

7. Please let us know how you heard about this consultation by ticking one or more of the following boxes:

- From our drop-in community events
- Received a letter from National Highways
- Received a leaflet from National Highways
- Received an email from National Highways
- Received information from a local authority
- Saw a Public Notice in local or national newspapers
- Saw advertisements in local media
- Saw information on the project website**
- Saw social media coverage
- Saw coverage in local media
- Saw information at a deposit location or information point
- Word of mouth
- Other (please)



From: [REDACTED]
To: [Consultation Responses](#)
Subject: Lower Thames Crossing
Date: 17 May 2023 15:11:51

PLEASE, JUST ON WITH BUILDING IT!!!!

From: [REDACTED]
To: [Consultation Responses](#)
Subject: Lower Thames Crossing.
Date: 17 May 2023 17:34:56

IT is reasonable to expect that the Highways agency has heard , if not understood the concept of Climate Change.

The scale of road building , including this project is not compatible with CO2 emission targets set by this Government. Environmental impacts of major developments must take priority over the profits of vested interest.

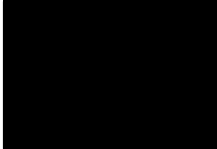
Derek West.
Sent from [Mail](#) for Windows

Dickens' Country Protection Society

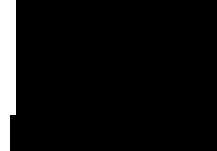


Founder
Dr. Colin Smith. MA.,BM.,BCh.,MSc.,DCH.,FRCGP

Chairman :

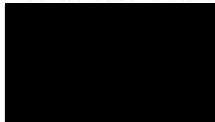


Hon.Secretary:



Mr M Palmer
Consultation Response
Lower Thames Crossing

13th June 2023



Dear Mr Palmer,

Lower Thames Crossing - Minor Refinement Consultation 2023

Please find enclosed the Society's representations in response to the National Highways, Lower Thames Crossing - Minor Refinement Consultation 2023.



Robin Theobald
Chairman

Enc.

Registered Charity number : 264004

Lower Thames Crossing Minor Refinement Consultation 2023 Dickens Country Protection Society

**The Dickens Country Protection Society’s Response to the
National Highways - Lower Thames Crossing
Local Refinement Consultation June 2023**

1. The Society

1.1 The Society was formed on 10th February 1972 with the object of improving, protecting and preserving for the benefit of the public its area of benefit, which is that of the former Strood Rural District together with the eastern part of the ecclesiastical parish of Chalk. For this purpose, but not otherwise, the Society aims to:-

- a) arouse, form and educate public opinion in order to ensure the promotion of the aforesaid object,
- b) make representations at Public Inquiries, or in such other ways as shall from time to time appear necessary, and,
- c) take such other lawful action as shall be considered appropriate to promote the aforesaid object.

The Society is a registered charity affiliated to the Council for the Protection of Rural England (Kent Branch), and the London Green Belt Council. The Society currently has some 60 members.

The Society's Area of Benefit includes the civil Parishes of Higham, Cobham, Meopham, Shorne and Luddesdown together with the eastern part of the ecclesiastical Parish of Chalk (all in the Borough of Gravesham) and the civil Parishes of Cuxton, Frindsbury Extra, Hoo St.Werburgh, High Halstow, Cooling, Cliffe, Hoo St.Mary, Stoke, Allhallows and Grain (all in the Medway District).

The land south of the River Thames where the construction of the Lower Thames Crossing is proposed, and some of the mitigation land, is within the Society's area of benefit.

2. Introduction

2.1 The Society has responded at each consultation stage of the proposed Lower Thames Crossing and maintains the views it has previously expressed. In responding to the May/June 2023 Minor Refinement Consultations, the Society notes the contents of the consultation document published on-line.

P.T.O

Lower Thames Crossing Minor Refinement Consultation 2023 Dickens Country Protection Society

3. Minor Refinement Consultations

3.1 Most of the changes reported in the document affect areas north of the river Thames in the Mucking - East Tilbury area which is outside the Society's area of benefit.

3.2 The potential changes described in the final part of the document, Part 4 the Construction update, has the potential to cause a major adverse impact on the environmentally sensitive areas on the south side of the river Thames. To date, tunnel boring has been described in the proposal as working from north to south. That is, the servicing of the two tunnel boring machines would be undertaken on the north side of the river and the arisings from the two machines would be delivered to the northern portal and removed from works. As described, the impact on the area of the southern portal would be restricted to the recovery of the two machines following completion of the boring.

What is now being proposed would have an immediate impact on the area protected under the international Ramsar Convention (ratified by the UK in 1974). The level of disturbance at the southern portal would significantly increase with the need to turn the single boring machine, the delivery of materials to the machine boring south to north and removal of the arisings from boring, both solid and liquid at the southern end of the bore.

The emergence of this proposal, at this late stage of the planning process with inadequate impact assessment, is very much to be regretted.

The Society is strongly opposed to the proposal to use a single tunnel boring machine with the prospect of boring taking place from south to north.

Dickens Country Protection Society
May/June 2023

From: [REDACTED]
To: [Consultation Responses](#)
Subject: Minor Refinement Consultation 2023
Date: 19 June 2023 20:50:30

I am Strongly Opposed to the proposed Lower Thames Crossing, and this is my response to the Minor Refinement Consultation, and I would appreciate acknowledgement that it has been received and accepted.

There is nothing “Minor” about this or any of the other numerous consultations, as the whole proposed Lower Thames Crossing will have an extremely major effect on everybody and everything along the proposed route. The considerable stress and anxiety that this whole project has caused is completely unacceptable with consultation after consultation, but no notice being taken about the principle fact that this project is in the wrong place, will not solve any problems at the Dartford Crossing and would be a complete and utter waste of taxpayers’ money, which would be better spent on the NHS, will cause disruption to our health and everyday lives with congestion, pollution, noise, rat-running through our local roads, all in all, devastation across the whole route for humans and wildlife and loss of life-giving trees, woodlands, open spaces.

Page 6 - Reduction of nitrogen deposition compensation area and Order Limits at Blue Bell Hill and Burham

As I Strongly Oppose the LTC completely in the proposed location, I obviously Strongly Oppose the need for nitrogen deposition compensation.

It is noted on Page 7 of the consultation book, that –
“[The change would reduce the impact on agricultural land](#)” and on Page 10 that the “[agricultural land classification at Burham is determined to be Grade 2](#)”, yet Grade 1 land, which is the “best”, is being destroyed in other parts of the route.

Without the proposed Lower Thames Crossing there would be no need for any nitrogen deposition, and our food source would be protected and the fewer vehicles would be travelling from Dover northwards full of foodstuff etc, that could be grown in the UK, thereby negating the need for the proposed LTC.

It is also noted on Page 7 that –
“[The change reduces the impact on the farm business and the loss of productive agricultural land.](#)”

Again the use of Grade 1 land in other parts of the route is being destroyed and will heavily impact the farm business and loss of productive agricultural land to those farmers and the country as a whole, with loss of essential food supplies. I am certain that those farmers would also like to reduce the impact on their farm business and loss of productive agricultural land, some of which is Grade 1.

It is noted from –

The Planning Inspectorate - Draft Agenda1 for Issue Specific Hearing 1 (ISH 1): Project Definition

“Can the extent of land take and acquisition for mitigation be fully justified

as addressing need arising from LTC?”

I await your answer on that one.

It is also noted from

The Planning Inspectorate - Draft Agenda1 for Issue Specific Hearing 1 (ISH 1): Mitigation design and delivery

“The observation that land proposed for nitrogen management at Bluebell Hill and Burham was added to the land requirement for the project between the first application and the second application, but that elements of this land are identified in the minor refinements consultation as potentially surplus to need and to be reduced in extent. The possible inclusion of some of this land in Stewardship is given as a basis for some of the exclusion, but again there does not appear to be a direct link between the management of land under Stewardship and the management of the effects of LTC?”

I wait to see how your research into the mitigation design and delivery could not have known about the Stewardship.

Page 12 - Increase in limits of deviation (LOD) for the northern tunnel entrance headwall

Q2a. Do you support or oppose the proposed increase to the limits of deviation for the northern tunnel entrance headwall?

I Strongly Oppose the proposed increase as I Strongly Oppose the proposed LTC in any shape or form in the proposed location.

Why has it taken so long to come to this conclusion?

Evidently it will be left to the contractors whether they actually make this change or not.

On Page 12 – it states “They provide a limited degree of flexibility for contractors when building projects”.

That will probably mean that the contractors will do whatever is the cheapest option for them.

Revised utility proposals at East Tilbury Temporary Linford water pipeline realignment including relocation of Muckingford Road Utility Logistics Hub (ULH)

Q3a. Do you support or oppose the proposed realignment of the temporary Linford water pipeline and the relocation of Muckingford Road ULH?

I Strongly Oppose this and It would appear that I am not the only one to oppose this.

Taken from “Essex & Suffolk Water Procedural Deadline B Submission 26 May 2023

Compulsory acquisition and water supply

6. The draft DCO includes powers of acquisition over plot 24-133 which contains the Linford Well. National Highways intends to use the Linford Well to supply at least some of the water to its tunnel boring machines (“TBMs”) to be used to construct the tunnel.

7. ESW is especially concerned by the proposed compulsory acquisition powers included in the DCO to acquire this strategically important asset and to facilitate the supply of water for the project in this way.

Water Quality

11. The topic of water quality is linked to that of public potable water supply but raises a further distinct set of issues which are not covered by other principal issues listed in Annex B and, ESW asks to be addressed specifically as part of its proposed further category within issue 10 or elsewhere.

National Highways obviously did not bother to consult with ESW about this area and again did not carry out enough research.

As far as Pages 22 and 23 it is very hard to comprehend why it was originally deemed necessary to have both the Low Street Lane Utility Logistic Hub and the Muckingford Road Utility Logistic Hub, but now have relocated both together to a completely different location.

It is also strange that on Page 23 the land removed from the Order Limits is where planning permission is being sought for housing development, and the Linford Water Pipeline is being diverted around that site. That planning permission has been in place since 2016 and should have been known and considered by National Highways well before 2023.

Matt Palmer, on page 1 of the Consultation booklet states – “This is an important stage in the development of the Lower Thames Crossing which will be vital in tackling the daily delays and frustration caused by congestion at the Dartford Crossing and in unlocking the true potential of the Thames Estuary”

That is definitely not true as NH have admitted on numerous occasions that it will not reduce the amount of traffic using the Dartford Crossing by anything like enough to actually make a difference, and induced demand will just increase the traffic using the Dartford Crossing, taking it back over capacity, so what would be gained?

There is no designated link to Tilbury Ports, DP World Port and access to either, so how does that unlock the true potential of the Thames Estuary?
It would be very detrimental to the local road network and other users of those roads and the delays would just be moved to the local road network.

So it will be very interesting, In respect of the above, to hear the responses to the following –

Draft Agenda1 for Issue Specific Hearing 1 (ISH 1): The need case –
“Can the Applicant demonstrate that the proposed development will meet anticipated need?”

Definitely not and Highways England/National Highways have stated in person and in writing that the proposed LTC will not meet the anticipated need
What it will do is form a toxic triangle for the designated area.

“Is it anticipated and if so, how swiftly is it anticipated that the proposed LTC alignment might become capacity constrained by traffic demand?”

National Highways have never supplied us with any reasonable figures as to the expected demand for the proposed LTC, daily or yearly.

“How will the proposed LTC affect the operation of the existing M25/ A282 Dartford crossing?”

Induced demand will soon fill the capacity.

Economic Benefits –

“Is any adjustment to economic benefits necessary, given submissions from Ports to the effect that the lack of local highway connectivity to the waterfront could reduce local journey time reliability and have negative economic impacts on port operations?”

Not only would there be no economic benefits, but the cost, which is spiralling out of control year on year, has not been finalised and any figures being used are out of date.

The Tilbury Link Road was removed from the project and designated as a stand alone project for which the cost is not included in the proposed LTC budget. The Orsett Cock junction/Manorway and local road network needed to access the proposed LTC would be gridlocked, along with extra pollution and noise for the highly residential areas of Orsett, Stanford and Corringham and the A13 in general.

[Matt Palmer also states](#)

[“Through that input we have made great strides in planning the greenest road ever to be built in the UK, which will connect communities, enhance nature and provide new ways to build infrastructure in a net zero future.”](#)

Again that is complete and utter nonsense as the proposed LTC is not green of any shade, and would destroy agricultural land including Grade 1, taking away the availability of land on which to grow our much needed food.

Take away paddock and stable yards where people spend their leisure time.

Destroy, encroach on woodland including ancient woodland, such as the Wilderness, Shorne Country Park etc.

It would necessitate the need to move and disrupt wildlife, river animals, birds and bats.

Would be built so close to residential areas that the pollution and noise would be unbearable for a lot of residents, at least one care home that would be blighted on three sides by major roads. School and businesses, would suffer the added noise both day and night time.

It would destroy an up and running solar panel facility, to be used as mitigation and trees planted, taking away the means of providing electricity to the local area and beyond .

It would demolish and take away people's homes and livelihoods, with threats of CPOs, and has been causing unwarranted stress and anxiety for 6-7 years.

The proposed LTC would not have access to non-motorised users, with no access for local bus routes.
Several footpaths and cycleways would end up running alongside the polluting LTC, making it impossible to enjoy healthy outdoor pursuits.

It would generally decimate all of the areas in close proximity and surrounding areas and be a blight on the overall countryside.

It would put extra pressure on the emergency services, which are already oversubscribed having to service the M25, A 127, A13, A128, local road network and thousands of households, Lakeside shopping centre, the Dartford Crossing where there are very frequent accidents,

The “local” hospitals – Basildon, Broomfield and Southend - which are already extremely oversubscribed, all currently have an “Inadequate” rating.

So Matt Palmer is either very misguided, is just continuing the greenwashing that we have been given over the years from Highways England/National Highway, or is knowingly bending the truth to make the project seem viable.

I also await with interest the responses to –

Draft Agenda1 for Issue Specific Hearing 1 (ISH 1):Routing and Intersection Design

“What consideration has been given to possible alternative routes?”

The only viable alternative route was A14 option which was supposed to be consulted on, but that did not happen, only Option C was ever included.

“Has adequate provision been made for the provision/ restoration of community connections across the LTC alignment?”

No provision for connections across the LTC alignment.

“Has adequate provision been made for the provision/ restoration of connectivity across the LTC alignment for non-motorised users (NMUs)?”

No provision for non-motorised users.

Also no provision for public transport as there are no suitable pick up, drop off points along the route.

Construction Update

As for No.4 on Page 30 construction update, I note that you have not asked for our opinion on this matter, which should have been done in a consultation as it is a change from what was submitted in the DCO Application.

It would appear that without any positive knowledge, most of the “[Change in significant effects reported in the DCO Statement](#)” which stated that you would be using two TBMs,

you state On pages 31, 32, 33, that “[no new or different significant effects are anticipated](#)”. “Anticipated” is not good enough.

I and everybody else I have spoken to, find your statements are illogical, perplexing, and as is normal in your consultations, and totally misleading as you have no definitive proof of any of those statements, and I make the following observations.

Page 30

“Delivering the works using a single TBM **could** deliver several efficiencies, particularly in terms of significant cost savings and a reduction in material use. “Using a single TBM would result in a saving of approximately 38,000 tonnes of carbon (CO₂e) by using less machinery.”
Also - “This is because the use of a single TBM requires fewer staff,”.

How can using a single TBM result in any saving of carbon as it will be used for twice as long as 2 TBMs?

Whilst there may be fewer staff required, they will be working for twice as long, so how does that save costs?

“The overall construction programme set out in the DCO Application would remain the same, whether the road tunnels were constructed with one or two TBMs”.

“There would be a minimal impact on the timing for construction of the tunnels.”

Surely it will take twice as long to use 1 TBM boring from the north, then turning around and boring from south to north, rather than 2 TBMs at the same time, so how can that be “a minimal impact on the timing”?

Page 32

“Population and Human Health – there are no significant effects reported”.

Draft Agenda1 for Issue Specific Hearing 1 (ISH 1):

“What is the effect on construction duration and environmental effects of the proposed use of a single tunnel boring machine (TBM)?”

As it will take twice as long to build both tunnels separately, there will be an extended period of time with extra pollution from construction/staff vehicles, for residents to contend with, noise, vibration and pollution from construction equipment.

I await your response to that question.

I also note that in the last paragraph –

“If we are granted permission to build LTC then our contractors would determine whether to use one or two TBMs.”

So it would appear that National Highways will not have the final say in this matter anyway, nor as I was told at a previous consultation venue, what the noise barriers will be constructed from, and who knows what else National Highways will have no jurisdiction over, and the contractors will go for the cheapest option regardless of whether or not they are actually what is best for the people who would have to suffer the consequences, or accidents to either the construction workforce and/or future road users, due to faulty workmanship from being made to do the job as quickly as possible.

The consultation was not at all helpful and presented more questions that could not be answered in everyday terms, as there were no public events, and from previous experience I know that responses back from National Highways can take more time than is allowed to complete the consultation adequately, and more importantly the questions are never or rarely, factually answered in an acceptable way.

The consultation was a complete waste of paper, time, taxpayers money, as a most of the “refinements” should have been included in previous consultations and Highways England, now National Highways, should have done their research more efficiently much earlier in the project
Instead National Highways rushed to submit the DCO Application without having all the necessary, required documentation available, especially as there are new laws and building legislations being considered, that would mean that the Lower Thames Crossing would fail on each and every one of a number of required stipulations, including the PM2.5 law which is so important as it is such an important factor to be considered.

It would seem that a lot of the decisions regarding construction will be decided by the various contractors who will do the cheapest, quickest job possible, and little or none of the problems anticipated by residents who know the area, have been taken into consideration and acted upon.

It is a fact that there are unexploded bombs in the Thames estuary and fields within the order limits, especially around Ockendon, as Hornchurch airport was bombed regularly during the war and bombs were dropped by Germans on their way to and away from there.

There is a sunken ship, the SS Richard Montgomery, with about 1,400 tonnes of explosives remaining on board, that could be set off by vibration from something like the tunnel boring machines which would cause drastic damage to the Thames estuary.

Have National Highways made all of the contractors aware of those facts?

The Lower Thames Crossing is being coded as a Smart Motorway and we all know what that means – people will die if it goes ahead.

I STRONGLY OPPOSE THE LOWER THAMES CROSSING AS IT IS NOT FIT FOR PURPOSE AND SHOULD BE SCRAPPED AS SOON AS POSSIBLE. - IMMEDIATELY WOULD BE GOOD.

From: [REDACTED]
To: [Consultation Responses](#)
Subject: The Future
Date: 17 May 2023 14:01:03

Good Day,

As I have mentioned before this project is out of date before you even start. You have not future proofed it at all.

You have thousands of examples to demonstrate my point at the current Dartford Crossing. Even that has more traffic lanes than you propose.

You should be aware that it is more cost effective to enlarge the scheme now, than it is in a few years time, when you will then realise it didn't have enough capacity.

You have the perfect opportunity to make it future proof now that the project has been very foolishly delayed.

Regards

Eric Pennington

Sent from my iPad

From: [REDACTED]
To: [Consultation Responses](#)
Subject: Lower Thames Crossing - Consultation
Date: 19 June 2023 22:52:29

I am writing to communicate my dismay and disgust at recent changes to the minor refinements consultation, in particular proposed reductions to the environmental mitigation tree planting as cynical and calculated attempt by Highways England to not properly compensate local communities for the huge environmental and public health consequences the scheme will bring.

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 knowing that 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 Rd building to facilitate road haulage.
- It is simply astonishing that highways England would have the audacity to reduce the carbon abatement tree planting associated with the lower Thames crossing as part of the LTC minor refinements consultation. Highways England claim this will be “the most green road building scheme to date”, however the stated carbon emissions and destructive disregard for ancient woodland (which sequester more carbon than juvenile trees), is astonishingly destructive in the context of climate change. Frankly speaking, this approach flies in the face of all scientific evidence and rational thought. Road building is the very last thing this country needs in the context of rapidly escalating global temperatures and exponential biodiversity loss in the UK.
- There is no demonstration in the minor refinements consultation which demonstrates any metrics by which claims for net zero carbon can be proven for the scheme.
- It is well understood in forestry that for every 100 new trees planted, only 90 to 95 % will survive – and this is in the context of careful maintenance and management of newly planted woodland, for which there is no plan provided by highways England in this consultation.
- The LTC will be a monumentally damaging scheme for the local environment attracting huge increase in traffic to the Gravesham and Essex regions, whilst also congesting smaller trunk roads at the same time as not even fixing or significantly reducing congestion at the existing Dartford crossing (for which the vast scheme was originally proposed).
- 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.
- 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.
- 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 Rd 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 and this history, highways England and the conservative government have ridden roughshod over these unique and irreplaceable habitats by pursuing ecocide over scientific recommendations on protection of the environment. Once destroyed these unique ecology's can never be replaced and the biodiversity associated with them is known scientifically to many times greater than any form of newly planted woodland that HE claims (incorrectly), will mitigate for this huge loss. The current minor refinements consultation proposes 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. How is this possible? How is it justifiable? It quite simply isn’t in the face of the challenges associated with climate change.

Construction / Tunnel boring:

- Tunnel boring-the new proposal with a single boring machine rather than two well prolong construction time and be less cost effective in terms of financial payback of the scheme to local regions negatively impacted by prolonged construction time the most.

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 tax payer:

- The £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.
- 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. Quite simply we will spend a vast sum of money on a hugely environmentally damaging scheme that provides no financial or environmental benefits to anyone living in England once autonomous vehicles are commonplace. Platooning will be widespread before construction of the hugely wasteful LTC is even complete.

In summary, this is an ill-judged and disastrous road building scheme that flies in the face of environmental science, public health policy, traffic-modelling/ vehicular autonomy and fiscal responsibility. **Stop the LTC now and stop throwing good public money after bad!**

Sincerely,

George Fereday
Gravesend Resident.

To whom it may concern

By email: consultationresponses@lowerthamescrossing.co.uk

19 June 2023

RESPONSE TO Lower Thames Crossing Minor Refinements Consultation 2023

Firstly, may I say that I have expressed in all my previous consultation responses frustration about the web response form. This has still not been taken into account, so I am not using the template provided, which is not user friendly, is misleading and leaves room for misinterpretation of my response.

I STRONGLY OPPOSE TO THE LOWER THAMES CROSSING

The main reasons being:

- The proposed LTC is not fit for purpose and does not solve the problems it is aimed to solve (capacity at Dartford crossing)
- The cost estimation provided for the project (£8.2bn for 14.5 miles of road – and this is the figure that was provided in the consultation documents in 2018 and has not been updated since despite me, and I am sure several others, asking for it) suggests that the cost of the road will be over £573.5m per mile. This at least £573.5m per mile for something that is not fit for purpose and damaging for wildlife and resident's health and wellbeing.
- The A14 option is cheaper and much less damaging, not to mention more fit for purpose. The current cost of proposed LTC does not justify the project or the damage that will be caused by it considering that it will bring along more destruction than benefits. This kind of spend in the light of the financial impact of Covid-19 is absolutely not justified when health and care sectors and economy are struggling, and will continue long to do so for the foreseeable future
- Proposed LTC is highly damaging to the environment
- Proposed LTC's impact on residents' health is highly damaging
- Proposed LTC fails on WHO standards for PM2.5 while two days ago the Lords voted for the Environment Bill to include World Health Organization guidelines for PM2.5 to be met by 2030
- The (estimated) 5+ million tonnes of carbon emission will have a negative effect on the climate change and makes the government's commitment to reduce carbon emission void
- Proposed LTC's design has not created sufficient or fit for purpose road connections and will bring along traffic chaos, congestion and high levels of pollution in the area and surrounding areas

- The estimated 6-7 years of construction is optimistic not to say utopic. The proposed 24/7 working bringing along high level of air as well as noise and light pollution to residents resulting in worsening if not fatal health conditions is unacceptable

I **strongly oppose** how you plan to build the Lower Thames Crossing in its current shape and form

I **strongly oppose** how you propose to mitigate the impacts of building the Lower Thames Crossing as they are not effective or fit for purpose

I **strongly oppose** how you plan to operate the Lower Thames Crossing

I **strongly oppose** your proposed mitigation for the operational impacts of the Lower Thames Crossing

Nitrogen Deposition Changes

The Consultation talks about the removal of the Burham site from the Order Limits but the site itself was not included in the last, i.e. Local Refinement Consultation. This is a new addition in the DCO and hardly a minor refinement which is misleading. It is unacceptable to add to the DCO docs in this way and then raise it in a consultation after the DCO has been submitted.

The consultation docs refer to figures 3.8 and 3.9 for the details of land use while in fact the changes in the south of the river are in fact not specified in these figures leaving that side unclear and confusing.

The land previously allocated to nitrogen deposition compensation has been reduced again in the DCO which is not justified and impacts even further the use of the land in active agricultural use and therefore food security. In the current economic climate, local produce should be encouraged as the threat of global food crisis increases, especially with the ongoing war in Ukraine while one of the biggest crop producers in the world is being invaded and it will take years and years to restore its agricultural productivity.

The nitrogen deposition assessment itself has been carried out inadequately and should also leave room for the two year delay in the start of the construction of the TLC that may change the impact significantly. NH has also chosen to omit considering the impact of the increased traffic in relation to Blue Bell Hill improvements.

Northern Tunnel Entrance and Tunnel Boring Machines

This aspect of the project focusses only on the northern side of the tunnel thus leading us to believe that using only one tunnel boring machine means that there is only one tunnel entrance. I doubt this will be an underground tunnel with only one

entrance, there must be an exit on the southern side as well. Even further, saying that the use of only tunnel boring machine will result in the reduction of carbon emissions does not make sense, if the construction traffic has to travel the whole distance of the tunnel when it reaches the end (as there is no entrance in the south side ?) the distance will double not lessen. It is not clear either how using only one tunnel boring machine will enable the construction to start months earlier.

The claim that this change will result in less material being used and thus creating less carbon emissions and construction waste is also ridiculous. Anybody who learnt maths at school will see that unless the tunnel size is changed, the amount of materials used will remain the same and thus there will be no change in waste amounts either.

While this has been presented as a cost saving, it is clear that this is not the case and if anything, it will increase costs and environmental impact. While it is also said that using only one machine will result in less staff, I agree with the less staff part, but surely they would still have to work the same hours to get the work done unless the tunnel length will also be in proportion with the number of staff used? This is probably why the consultation document fails to say how long the tunnelling will last.

Considering all this, the consultation doc contradicts all information provided by saying that the contractors will be able to decide whether to use one or two tunnel boring machines. Should they decide to go with two, will we have another consultation or will this change be considered too insignificant? Wouldn't it benefit everybody affected if this is made clear prior to bidding?

The focus of the northern side of the river also leads to the conclusion that the spoil of the river will be dumped on the northern side rather than being spread evenly between both sides, increasing thus also traffic on the northern side and longer distances for the construction traffic + more carbon emission etc.

It is not clear either where the increased water supply will come from nor its impact on the ground water.

It is not clear what has happened to the water pipeline feeding the boring machine either as suddenly it has changed shape and has become a straight line instead of the previous bendy one.

The application of the utility company for permanent acquisition of rights while previously contending to temporary rights only is concerning as it seems to be linked to something that has not been made clear in any of the consultation docs.

It is also worth mentioning that the HS2 project experienced issues with sinkholes and bubbling holes and there is no mention of mitigation of this risk (lessons learnt?) in the LTC project docs.

Other comments

- It is still unclear what has happened to Tilbury Link Road that used to be part of proposed LTC; it is evident that this project is going ahead and every effort

is made to hide its cost as that of relating to proposed LTC to keep the whole cost of proposed LTC down. Prove me wrong!

- The mitigations listed do not address adequately what should be key considerations, i.e. people's health, safety and environment.
- It should be made clear that the proposed 'new parks' are just means to dump all the spoil from the tunnelling as close as possible to the tunnel portals.
- Use of Hole Farm Community Woodland as a mitigation measure while taking credit for a community project. Neither does it outweigh the damage to be done to Forestry England's Thames Chase Community Forest, which was planted as a community forest, by proposed LTC.
- There is no mention of mitigation for water pollution from the run off from both construction and the road once opened.
- The mitigating alternatives proposed in the consultation are not adequate or undo the damage of destroying wildlife and habits that have taken years to establish. Living beings should always come before cars and not pay with their health for something that brings more damage than benefits.
- HE has not addresses the 'smart motorway' by stealth issue in the light of the government's announcement that all new smart motorway projects have been scrapped.
- HE say that air quality would improve across the region if the proposed LTC goes ahead but their own evidence proves otherwise. HE has provided no information on how they will reduce the carbon emissions as they have stated that LTC will not go ahead if they are unable to reduce them.
- In the light of the newly set legal targets of the Environment Act and the new legal requirement for Biodiversity Net Gain, it is unacceptable that HE has chosen to not to include further assessments related to them in this consultation. This makes the consultation outdated and incomplete.
- A lot has changed since the project started and most of all, the population health and needs have changed. This requires a thorough assessment of the suitability of LTC in the current shape and form and whether there are more suitable alternatives rather than relying on data from years ago.
- The LTC should be at least paused whilst the Transport Select Committee conclude their inquiry into the road investment programme, and the government update the roads policy since there is a high likelihood that the LTC would fail to meet the requirements of either.

- The most misleading part of this consultation is not providing the tax payers with the correct cost of the whole project. The figure from the beginning of the project is long outdated.

THE CONSULTATION

	Very good	Good	Average	Poor	Very poor	Not applicable
Was the information presented clearly?					X	
Was the website easy to navigate?					X	

Like I already said during the initial and supplementary consultations, the online consultation form is not user friendly having to navigate between different pages to see what has already been said and where, and the same applies to the comments box that was too small and required constant scrolling up and down. This again has not been rectified, furthermore, this time different sections have not even been listed so in order to navigate between them one has to go back and forth without a guide to find the right section. Hence my use of email despite not being able to find the submission email address on the Highways England consultation website.

All the consultation has been aimed to people with internet access rather than people who are affected. Our area has a high percentage of elderly population who do not use internet and several of them have not been reached to be advised about this consultation. Some of our residents are illiterate and have been discriminated during the consultation as no additional help was provided to them – how could it have been if they did not ask for it as they did not even know the consultation was on?! My elderly neighbours, for example, who do not have Facebook or email accounts were not even aware of the changes in the bin collection, not to mention that a new consultation has been launched.

The maps of the consultation are difficult to understand, don't reflect the full scale of the construction as it is and are inaccurate in places. There is still no updated fly through video or a 3D model which would be helpful.

There are mistakes in referring to sections which make it more confusing trying to find answers in wrong places.

Identification questions

1. Name: **Gladys Vellamaa**
2. Address: **Ceillidh, Greyhound Lane, Orsett Heath**
Postcode **RM16 3AA**
3. Email address **Gmv083@gmail.com**
4. If you are responding on behalf of an organisation, business or campaign group, please include the name below. **N/A**
5. Do you own land or hold any interests or rights, such as private rights of way or sporting rights, within or close to the revised red line boundary? **Yes**
If you have ticked yes, have you received a letter to notify you of the consultation? **No**
6. If you use the transport network in the area that may be affected by the Lower Thames Crossing, please tell us how you travel by ticking one or more of the following boxes: **As a pedestrian; Bus; Car; Cycle; Goods vehicle; Train**
7. Please let us know how you heard about this consultation:
 - Received an email from Highways England**
 - Saw social media coverage**
 - Word of mouth**
 - Other – We have not received local or national newspapers for years and as a single mother with young children I hardly get a chance to go out to 'information points'**

Equality and diversity

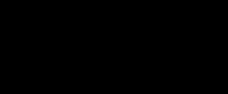
I consent to Highways England processing my special category data for the purposes of understanding the accessibility of the Lower Thames Crossing consultation. I have read Highways England's privacy notice and understood how it will be processing this data.

1. What is your gender? **Female**
2. Do you consider yourself as a person with a disability? **No**
3. Please describe your ethnic background: **White**
4. Age: **45-54**

I would like to confirm that these are my individual views which have been formed as a result of reading through your consultation document, other materials available to me, and discussions to enable me to make an informed decision. I am not part of any campaign of any shape or form and I would like confirmation that my response will not be treated as a part of any campaign or group.

I would like to request an acknowledgment of receipt of my response.

Kind regards



Gladys Vellamaa



HIGHAM AND SHORNE BOROUGH COUNCILLORS

Councillor Helen Ashenden, Councillor Jordan Meade , Councillor Leslie Pearton

Proudly standing up for Higham and Shorne on Gravesham Borough Council

CLLRS ASHENDEN, MEADE AND PEARTON

Gravesham Borough Council
Civic Centre, Windmill Street
Gravesend, Kent
DA12 1AU

CONSULTATION RESPONSE LTC

Pilgrims Lane
Chafford Hundred
Grays
RM16 6RL

18th June 2023

LOWER THAMES CROSSING MINOR REFINEMENT CONSULTATION 2023

Dear Sir/Madam,

As the elected Ward Councillors for Higham and Shorne Ward on Gravesham Borough Council we are writing to formally respond to the LTC Minor Refinements Consultation. We are proud to represent the two villages of Higham and Shorne. These villages border the River Thames with approximately 2 miles of wetland and marshes.

We would like to start by reiterating our complete and absolute opposition to the proposed Lower Thames Crossing. This scheme will have a devastating affect on our villages and cause mayhem for our residents.

We therefore fully endorse the submissions that have been made by both Shorne Parish Council and Higham Parish Council in response to this consultation and to the Accompanied Site Inspections. We ask that the comments made by our Parish Councils are taken onboard and that National Highways pays particular attention to the serious concerns raised.

Further to this we do not believe that this consultation has been adequate. We believe that you should have been much more proactive in gathering views from residents in the areas that this scheme is set to impact. We find that your engagement with the residents that we represent has been poor. This consultation has been run at a time when Councils were still reforming after local elections and with new ward members in place it would have been much more helpful to have postponed this consultation until late summer.

We remain completely opposed to the Lower Thames Crossing but hope that you will take onboard the comments made by Higham and Shorne Parish Councils so that mitigation for our residents may be achieved.

Yours faithfully,

Councillor Helen Ashenden

Councillor Jordan Meade

Councillor Leslie Pearton

Gravesham Borough Councillors for Higham and Shorne

From: [REDACTED]
To: [Consultation Responses](#)
Subject: Response to latest consultation for the Thames Crossing
Date: 13 June 2023 12:48:27

Dear Sirs and Madams,

I live in [REDACTED] as you will be aware the blight zone. I oppose the Thames Crossing for various reasons, personal and other substantial important logical and reasonable sense as the disadvantages out rule the advantages by far.

The crossing will ruin our area that is mainly made up of lanes not roads. The infrastructure will not be able to cope with the traffic congestion. Already the area has started to be affected with woodland being culled and businesses such as the Southern Valley Golf Club being taken over and apparently now not be used as part of the crossing. A very bad decision with no forth thought of a worthwhile service that improves people's wellbeing and health being closed and left to be wrecked by vandals.

The air pollution that will be caused and destruction to our wildlife and natural woodlands of beauty we are fortunate to still have in this area. Once destroyed these areas in the UK will never be able to be replaced and as we are all aware green areas are vital and should be protected. Even with your half hearted proposal of making park land around this project which is clearly a farce and will be used as a dumping area for the excess soil and waste and will be unfit to grow anything on as will be contaminated similar to the project evidenced from HS2 speed link.

This crossing will not alleviate the vast build up of traffic caused at the Dartford crossing but will replicate their problems and chaos. The issues are not being addressed in our country of the quantity of vehicles due to our lack of fit for purpose and extremely costly public services.

The cost is phenomenal at over £10bn or more when our county is in a cost of living crisis. We are constantly reminded and encouraged to be environmentally friendly and live cleaner and 6.6 million tonnes of carbon emissions is detrimental to our health, wellbeing, environment, future health needs on our NHS and other health services and our wonderful wildlife. The pollution will also affect our agriculture and climate change. Again issues that are at the forefront of campaigns for the UK to become greener and more aware.

I am suspicious of your proposal to only use one boring machine and to cut staff and believe this is more due to this project being considerably over budget.

A lot of your information is conveniently not clear and doesn't answer people's concerns and so baffling to decipher for the every day person to understand. All very underhanded tactics and beneficial to your cause for people to not be able to confidently respond.

Neither has the unsafe design of a smart motorway been further raised even though this have been identified and scrapped by our government with people loosing their lives and quite clearly not worked and been a huge waste of money.

Although a lot of information has been provided it has always been a minefield with heavy dialect and jargon but still as clear as day this venture is poor value and criminal to the cost of our countryside in this day and age.

I look forward to your response

Yours sincerely
Jackie Cohen

Sent from [Outlook for iOS](#)

From: [REDACTED]
To: [Consultation Responses](#)
Subject: Minor refinement consultation
Date: 19 June 2023 20:49:38

This is my response to the minor refinement consultation 2023

I am strongly opposed to the Lower Thames Crossing.

There is no way that the Lower Thames Crossing should be built and it doesn't matter how many consultations you have, and how many minor or any refinements you make, it would never be

- fit for purpose,
- would never solve the problems at the Dartford Crossing,
- would never be good value for money,
- would never connect communities,
- would never be green unless you paint it green,
- would never enhance nature

regardless of what Matt Palmer says in his Foreword.

What it would do is

- destroy acres of agricultural land, including precious Grade 1 land, limiting the amount of crops and foodstuff that the farmers could produce and putting farmers out of business completely,

- destroy natural habitats, including insects, bees and other native species which are already at risk of becoming extinct,
- destroy woodlands, such as the Wilderness which is proven to be ancient, rather than the dump site right next to it, as that is deemed to be too expensive to clear,
- destroy forests by chopping down trees that are the life blood of our planet,
- destroy businesses such as the Southern Valley Golf Course in Gravesend and the open space for people to enjoy as a leisure pursuit,
- destroy the tranquillity of places such as the Mardyke
- make the residents in the areas surrounding the proposed LTC, which are already heavily polluted, suffer even more with asthma and COPD,
- bring congestion to the local road network, meaning everyday lives are disrupted,
- cause more mental health problems with lack of sleep from the noise that the extra traffic would make continuously during the day and night, as the M25 is already very loud for residents nearby, which would mean that people would not be able to work, so local businesses would suffer with staff problems,
- make it very difficult to enjoy the countryside, footpaths, bridleways, cycle paths with all the extra pollution,
- be an extra burden on the police, and fire emergency services who are already under tremendous pressure,
- be an extra burden on the NHS which is also under tremendous pressure and is currently now deemed as totally inadequate for the vast area that the hospitals in Essex have to deal with, namely Basildon, Southend, Broomfield,
- destroy a fully operational solar farm alongside the M25 which would be demolished to plant trees to try to counteract the pollution levels along the road,
- make people suffer who would be CPO'd and currently have to live with the stress of not knowing whether or not their houses or businesses would be demolished

There are lots more negative points that I could add and absolutely no positive ones in connection with the proposed not fit for purpose Lower Thames Crossing.

I am strongly opposed to the Lower Thames Crossing in this location.

The option that should have been chosen was the A14 option which would have been a tunnel connecting the M25 at J 2 to the M25 between J 30 and J29 which would take the national traffic right away from the Dartford Crossing.

An alternative would be to give the Port of Dover a railway line to take the traffic straight off the ships and not onto the roads.

An alternative would be to stop destroying our agricultural land and we would not need so much traffic using our roads to transport produce that could be grown in the UK.

I request that you acknowledge that you have received and accepted this response please.

Lower Thames Crossing – Minor refinement consultation
Response form

Introduction

We're holding this minor refinement consultation to seek your feedback on a small number of minor changes we are proposing to make to our Development Consent Order (DCO) Application. These are localised in nature and small in extent, with only minimal change to the impacts which we reported in our DCO Application. We have highlighted any change in those impacts within the consultation booklet, which is available on the minor refinement consultation website:

<https://highwaysengland.citizenspace.com/ltc/minor-refinement-consultation-2023>

Chapter 3 of the booklet sets out the changes we are seeking your feedback on as part of this consultation. Starting from south to north these are:

- Reduction of nitrogen deposition compensation area and Order Limits at Blue Bell Hill and Burham
- Increase in limits of deviation for the northern tunnel entrance headwall
- Revised utility proposals at East Tilbury (three changes)

Chapter 4 provides a construction update, setting out how the tunnels beneath the River Thames could be constructed by either two tunnel boring machines, or by using a single tunnel boring machine to construct both.

We have also reduced the Order Limits to reflect the changes we are proposing, see Figure 3.1 on page 5 of the booklet for further information.

Pre-examination

We submitted our DCO Application to the Planning Inspectorate on 31 October 2022 to secure consent to construct and operate the A122 Lower Thames Crossing (the Project). Our DCO Application was accepted for Examination on the 28 November 2022. The application and how to engage in the DCO process can be found using this link:

<https://infrastructure.planninginspectorate.gov.uk/projects/south-east/lower-thames-crossing/>.

A panel of five independent inspectors has been appointed as the Examining Authority to examine our application on behalf of the Secretary of State for Transport. They will review the evidence submitted and listen to issues raised.

Since the submission of the DCO Application, the Lower Thames Crossing team has identified some minor changes to the Project. These are as a result of ongoing engagement with landowners and other stakeholders, and further design refinement.

Through this consultation, we want to let you know about the proposed changes and provide an opportunity for feedback to be given in relation to them. We will consider all responses before submitting any request to the Examining Authority to incorporate these changes into the DCO examination process.

If these changes are accepted by the Examining Authority, they will be considered during the examination of the DCO Application.

Lower Thames Crossing – Minor refinement consultation
Response form

How to have your say

Full details of how you can respond to this minor refinement consultation can be found at the back of this form.

See the consultation booklet for your data rights.

Please provide your feedback by 23:59 on 19 June 2023.

Any responses sent after this point may not be included in our analysis.

Lower Thames Crossing – Minor refinement consultation
Response form

Reduction of nitrogen deposition compensation area and Order Limits at Blue Bell Hill and Burham

Q1a. Do you support or oppose the proposed reduction of the nitrogen deposition compensation area and Order Limits at Blue Bell Hill and Burham?

- Strongly support Support Neutral Oppose Strongly oppose Don't know

Q1b. Please let us know the reasons for your response and any other comments you have on the proposed reduction of the nitrogen deposition compensation area and Order Limits at Blue Bell Hill and Burham.

WHY IS IT ONLY NOW YOU DO NOT NEED SO MUCH LAND.
IS IT THAT YOU ARE LISTENING TO PEOPLES VIEWS IF SO WHY
ARE STILL TRYING TO GO AHEAD WITH A PROJECT WHICH IS SO
FAR OUT OF DATE.

Lower Thames Crossing – Minor refinement consultation
Response form

Increase in limits of deviation for northern tunnel entrance headwall

Q2a. Do you support or oppose the proposed increase to the limits of deviation for the northern tunnel entrance headwall?

Strongly support Support Neutral Oppose Strongly oppose Don't know

Q2b. Please let us know the reasons for your response and any other comments you have on the proposed increase to the limits of deviation for the northern tunnel entrance headwall.

I STRONGLY OPPOSE THE WHOLE PROJECT WHICH IS OUT OF DATE AND ONLY GIVE A SMALL REDUCTION IN TRAFFIC AT THE DARTFORD CROSSING. WHY HAS IT TAKEN SO LONG TO REALISE THE NORTH TUNNEL NOW NEEDS CHARGES? HOW DOES THIS CHANGE GENERATE LESS MATERIAL WHEN BORING THE TUNNELS CLIMATE? NEGLIGIBLE EFFECT ON RESILIENCE
NO NEW OR DIFFERENT SIGNIFICANT EFFECTS ANTICIPATED
IN OTHER WORDS YOU DON'T KNOW OR NOT SURE

SURELY ONLY USING ONE TUNNEL BORING MACHINE WOULD INCREASE THE TIME THE PROJECT TAKES NOT REDUCE?

Lower Thames Crossing – Minor refinement consultation
Response form

Revised utility proposals at East Tilbury

Temporary Linford water pipeline realignment including relocation of Muckingford Road Utility Logistics Hub (ULH)

Q3a. Do you support or oppose the proposed realignment of the temporary Linford water pipeline and the relocation of Muckingford Road ULH?

- Strongly support Support Neutral Oppose Strongly oppose Don't know

Q3b. Please let us know the reasons for your response and any other comments you have on the proposed realignment of the temporary Linford water pipeline and the relocation of Muckingford Road ULH.

THE WATER USED ON THE T.B.M WILL COME FROM THE RE-LOCATION OF THE PIPELINE FEED EAST TILBURY AND LINFORD. THE T.B.M AT SILVERTOWN USES 260 CUBIC METRES OF WATER PER DAY I GUESS THE L.T.C WILL BE THE SAME, IF SO WITH THE CLIMATE CHANGE AS IT STANDS THERE WILL WATER SHORTAGES IN THE FUTURE WHAT TAKE'S PRIORITY PEOPLE OR T.B.M ?

Relocation of Low Street Lane ULH

Q4a. Do you support or oppose the proposed relocation of Low Street Lane ULH?

- Strongly support Support Neutral Oppose Strongly oppose Don't know

Lower Thames Crossing – Minor refinement consultation
Response form

Q4b. Please let us know the reasons for your response and any other comments you have on the proposed relocation of Low Street Lane ULH.

IS ICENI PROJECTS ONE OF YOUR STAKEHOLDERS ?

Land use change west of Linford

Q5a. Do you support or oppose the proposed changes to the land use west of Linford?

- Strongly support Support Neutral Oppose Strongly oppose Don't know

Q5b. Please let us know the reasons for your response and any other comments you have on the proposed changes to land use west of Linford.

~~Q5a~~ IS ICENI PROJECT ONE OF YOUR STAKEHOLDERS ?
BY REMOVING LAND FROM YOUR ORDER LIMITS YOU HAVE OPENED THAT LAND FOR HOUSING DEVELOPMENT IN WHICH ICENI WILL BE MOST GREATFUL. THE INFRASTRUCTURE WITHIN EAST TILBURY CANNOT COPE NOW WITH EXTRA HOUSING IT WILL BRING OUR AREA TO A STANDSTILL. KEEP THE LAND AND GIVE IT TO THE RESIDENTS FOR BADLY NEEDED FOOTBALL PITCHES IN THE AREA

Lower Thames Crossing – Minor refinement consultation
Response form

Q6. Other comments

We welcome any other comments you would like to make about the changes proposed to the Lower Thames Crossing as part of this minor refinement consultation.

WHERE WILL THE GREY WATER SEDIMENT TANKS BE LOCATED FOR THE WATER USED BY THE T.B.M ?
IT WOULD BE GOOD TO KNOW AS WHERE YOU ARE TUNNELING WILL BE CONTAMINATED AFTER 30-40 YEARS OF TOXIC WASTE LEAKING INTO THE GROUND AND RIVERBED. COULD YOU PLEASE STATE THE POSITION OF SAID SEDIMENT TANKS ON A MAP

Lower Thames Crossing – Minor refinement consultation
 Response form

Q7. The consultation

Please let us know your views on the quality of our minor refinement consultation materials, the accessibility of our online information and anything else related to this consultation.

	Very good	Good	Average	Poor	Very poor	Not applicable
Was the information presented clearly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Was the website easy to navigate?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please let us know the reasons for your response and any other comments you have on the delivery of this consultation.

OVER THE YEARS OF THE LT,C I HAVE ALWAYS HAD TO ASK ANY CONSULTATION TO FOCUS ON EAST TILBURY AND LINFORD WHO WILL BE MOST AFFECTED BY THIS PROJECT
 YOU SHOULD BE HERE TO SPEAK TO PEOPLE ON REFINEMENTS
 NOT HAND OUT RESPONSE FORMS

Lower Thames Crossing – Minor refinement consultation
Response form

About you

We would be grateful if you could answer the following identification questions, which will help us to categorise responses. Your personal details and views expressed as part of your consultation response will not be made public. You do not have to provide any personal information if you do not want to. However, postcode data can help us to better understand the views of different communities in relation to the proposals. To view our privacy statement, please see the minor refinement consultation booklet.

1. Name:

2. Address:

Postcode:

3. Email address:

If you provide an email address we will use it to let you know about important developments in our proposals.

4. If you are responding on behalf of an organisation, business or campaign group, please include the name below. (This helps us to understand whether respondents can be categorised as 'prescribed consultees', as defined by the Planning Act 2008.)

Organisation:

Type of organisation, business or campaign group:

- Academic
- Business
- Campaign group
- Elected representative
- Environment, heritage, amenity or community group
- Local government
- Statutory agency

Transport, infrastructure or utility organisation

Other (please state):

Lower Thames Crossing – Minor refinement consultation
Response form

5. Do you own land or hold any interests or rights, such as private rights of way or sporting rights, within or close to the Order Limits where we have proposed changes in this consultation?

Yes No

If you have ticked yes, have you received a letter to notify you of the consultation?

Yes No

6. If you use the transport network in an area that may be affected by the Lower Thames Crossing, please tell us how you travel by ticking one or more of the following boxes:

- As a horse rider
- As a pedestrian
- Bus
- Car
- Cycle
- Goods vehicle
- Motorcycle
- Train
- Other (please state):

7. Please let us know how you heard about this consultation by ticking one or more of the following boxes:

- Received an email from the Planning Inspectorate
- Saw information on the Planning Inspectorate website
- Received a letter from National Highways
- Received an email from National Highways
- Received information from a local authority
- Saw a Public Notice in local or national newspapers
- Saw information on the LTC website
- Saw social media coverage
- Saw coverage in local media
- Word of mouth
- Other (please state):

Lower Thames Crossing – Minor refinement consultation
Response form

Equality and diversity

We would be grateful if you could answer the following equality and diversity questions. We will use the information we receive to help understand whether our consultation has been useful to people of different backgrounds and with different requirements.

The answers you provide to this question are defined as 'special category data'. If you agree to provide this information, you can withdraw your permission for us to use it at any time. To do that, please email DataProtectionAdvice@nationalhighways.co.uk

- I consent to National Highways processing my special category data for the purposes of understanding the accessibility of the Lower Thames Crossing consultation. I have read National Highways' privacy notice (found on page 34 of the minor refinement consultation booklet) and understood how it will be processing this data.

1. How would you define your gender?

- Male Female Transgender Prefer not to say

2. Do you consider yourself to be disabled?

- Yes No Prefer not to say

3. Please describe your ethnic background:

- Asian or Asian British
 White
 Black, African Caribbean or black British
 Mixed or multiple ethnic groups
 Gypsy or Irish Traveller
 Other ethnic group
 Prefer not to say

4. Age:

- Under 16
 16–24
 25–34
 35–44
 45–54
 55–64
 65+

Lower Thames Crossing – Minor refinement consultation
Response form

How to submit your response form

Please only use the following official response channels. We cannot guarantee that responses sent to any other address will be included in our analysis.

 Online

Fill in the online survey at:

<https://highwaysengland.citizenspace.com/ltc/minor-refinement-consultation-2023>

 Email

Send your comments to consultationresponses@lowerthamescrossing.co.uk

 Post

Send a printed response form or letter to the following address:

Consultation Response LTC
Pilgrims Lane
Chafford Hundred
Grays
RM16 6RL

Unless using a pre-paid envelope supplied by National Highways, respondents are required to pay appropriate delivery charges for responses sent to this address.

National Highways cannot guarantee that responses sent to any other address will be received.

How your response will be used

We will carefully consider all the responses we receive, and this will inform any change request we submit to the Examining Authority. If these changes are accepted by the Examining Authority they will be considered during the examination of the DCO Application.



Have your say

Please send your response before
23:59 on 19 June 2023

From: [REDACTED]
To: [Consultation Responses](#)
Subject: LTC
Date: 19 June 2023 18:18:35

I oppose the LTC at the current location.
Sent from my iPhone

From: [REDACTED]
To: [Consultation Responses](#)
Subject: amendments.
Date: 17 May 2023 14:47:17

Just get on with it, long overdue.

Lower Thames Crossing Minor Refinements Consultation Response

I begin by stressing that I remain strongly and completely opposed to the proposed Lower Thames Crossing (LTC)

By recognising that the proposed changes are part of the proposed LTC I also oppose those by association that I strongly oppose the proposed LTC.

Plus, there has not been adequate, clear and informative information provided as part of this consultation to provide the detail that is needed.

I also seriously question why most if not all of these changes were not proposed prior to the LTC DCO being resubmitted.

I do not buy into things have changed since the application was resubmitted, because the things you are proposing should have been covered and dealt with prior to the application being resubmitted.

Instead I believe NH/LTC just tried to push the resubmission in as quickly as possible, when clearly there was more work that needed doing.

This consultation is just another way to try and create more consultation fatigue and overload resources that everyone is trying to utilise for participating in the LTC DCO.

The consultation has been completely inadequate, with a booklet that generates more questions than answers. The response to emails submitted have avoided answering questions, or given wishy washy answers that offer no evidence to back up claims being made.

I have serious issue with the fact NH/LTC added the Burham site to the order limits as part of the Nitrogen Deposition compensation without any public consultation. It should not be the case that the first we are learning about it is when you are proposing removing the site from the order limits.

I have serious concerns about what else you may have added or changed in the LTC DCO application upon resubmission that you have not brought to the public's attention. It would be too easy for you to bury important info within such a huge and complex suite of documents.

I do not believe it is adequate or acceptable to continually remove more and more of the land proposed for nitrogen deposition.

I think the harm the proposed LTC would cause through nitrogen deposition is not being adequately assessed and reported.

I also have concerns over the large difference between mitigating something and providing compensation for something.

At a time when we're living in a climate emergency we should not be pushing ahead with hugely destructive projects that will cause large adverse effects on our natural environment, and I have no doubt that the proposed LTC falls into that category.

I find it very hard to believe that the landowner did not mention the Countryside Stewardship before NH/LTC are saying, also that the LTC Land & Property Team have not taken the time to properly discuss the proposed land with the landowner to check on any such status or applications for relevant matters.

These kinds of things are not gained quickly, government usually need considerable paperwork and time for them, so one would think that this would be something that would have been mentioned or could have been questioned.

Surely NH/LTC must ask landowners what plans they have for the land, if any, and whether there is anything outstanding in regard to land during discussions?

I do not buy into the fact that you are considering removing this site because of a Countryside Stewardship, yet you continue to propose destroying other sites such as ancient and long established woodlands etc.

I do not believe that you have given due consideration to the impacts of nitrogen deposition, if the LTC goes ahead. I don't see how you can continue to reduce the amount of proposed compensation, and do not believe you have properly calculated the amount needed adequately either.

I still have concerns that there is to be no compensation for the nitrogen deposition impacts to places like Epping Forest Special Area of Conservation. I still also believe that this is an area that should have been included in consultation, and hasn't been.

I have concerns about the impacts of the proposed LTC on farmers and food security, due to the huge loss of agricultural land and impacts to surrounding farm land, if the LTC goes ahead.

We are living in a time when food security is a very real and serious concern.

At the end of the day you are saying you can remove it and do not need to replace it because of the Countryside Stewardship which gives the impression you feel you can count that towards compensation for the LTC, if it goes ahead.

This would not be acceptable and even the DCO Examining Authority appear to be questioning this double counting, as per the agenda for the Issue Specific Hearing¹.

This is not the only instance that I believe you are being creative on your accounting on. Hole Farm Community Woodland should not be considered environmental mitigation or compensation for the LTC either, since you announced publicly that it would be progressed regardless of the proposed LTC being granted permission or not.

It also concerns me that the nitrogen deposition compensation is being proposed in that area because of the increase in traffic using existing roads, like the A229 Blue Bell Hill.

You ruled out improvements to this road (the A229) as part of the LTC Option C Variant as you deemed it would have limited economic benefits, high environmental impact, high cost, and was not needed for a new crossing. Yet now it is being progressed as a separate standalone project by Kent Country Council,

The lack of adequate consultation and consideration of alternatives is more apparent now than it was back then, and even back then it was obvious.

The original task of a new crossing was initially to solve the problems at the Dartford Crossing, and evidence shows that this would not happen if the LTC goes ahead.

The LTC project has now morphed into being about serving the ports and providing them with another route from the South East to the Midlands and beyond. This is unacceptable, especially since there are better and more sustainable options.

Why in this day and age does the Port of Dover not have rail connection? Why are 70% of all goods in and out of the Port of Dover alone using the Dartford Crossing?

Rail improvements between Ashford and Reading would negate the need for the proposed LTC, by taking more freight off roads and onto more sustainable rail, and for a lower cost too.

But the problem is again in the fact we have National Highways, not National Transport or National Travel, your focus is purely on highways, and highways are no longer viable options. Evidence proves that new roads do not solve the issue of congestion, it only adds to the problem.

The lack of inclusion of the Blue Bell Hill improvements also shows the false economies of the LTC project. There are way too many separate standalone projects and works that would be needed as a direct result of the LTC, if it goes ahead. The costs of those works should be assessed and taken into account within the LTC project, anything else is a false economy.

I do not believe that any land should be taken for the proposed LTC, as I simply do not believe it should go ahead, as it is not fit for purpose.

Regarding the proposed Northern Tunnel Portal change, it is not explained why this proposed change has not been considered and consulted upon previously. Why has it taken until now to be considered and consulting on this?

I also have concerns that so much would be left up to the contractors, if the LTC goes ahead. What is the point in consulting on things, if it would ultimately be up to the contractors. I strongly believe that they would just do what is in their best interest to make the job as easy as possible and cost as little as possible, to improve their profit.

I do not believe that it would use less materials needed nor that there would be less construction waste, if there is no change to the total length of the tunnel.

I am concerned that it is stated that the proposed change will have a negligible effect on resilience of the project to climate change and on the amount of carbon generated in the construction phase.

Since the proposed portal and route at this point are in the flood plain, I have concerns that the mentioned climate change resilience may refer to flooding. However, it is impossible to tell as no adequate information has been provided in this aspect.

I will therefore have to make my own assumption based on my knowledge of the local area and climate change issues.

It seems to me judging by the high-risk factor of flooding in this area that the tunnel portals could be at future risk of flooding, which hardly seems like good planning or spending of public money if the projects days could be so limited due to the flood risk being so high.

I am strongly opposed to this proposed change based on the fact that it is part of the LTC project which I am strongly and completely opposed to.

In regard to the proposed revised utility proposals in East Tilbury I have serious concerns on the reasoning of why this is now being proposed, and why it hasn't been considered and proposed sooner.

I am all for reducing the amount of land taken, if the worst happens and the LTC goes ahead. Also, to reduce the impacts on the local community.

However, I find it very suspect that the land in question is land that is wanted for a large housing development. This is even more suspect by the fact that the planning application all of a sudden includes plans for a bridge over the railway in the same location as NH promised a bridge to Thurrock Council, as we have heard discussed at LTC Task Force.

It is strange that the promise of the bridge was withdrawn and now is being picked up by the developer of the land that you are now proposing removing from the order limits.

I don't understand why you first proposed the temporary Linford water pipeline to be in a zigzag alignment, that would have taken up so much more land than a straight alignment would take.

I also have serious concerns about the water source being utilised by the LTC, as you would be putting future water supply at risk at a time of a climate emergency when we are already suffering from water shortages.

I know that Essex and Suffolk Water also have concerns about this, as per their submission in the DCO.

You are also proposing to potentially only use one tunnel boring machine, which would mean that the water supply would have to be pumped further which again must increase the impacts.

I don't understand why it has taken until now for it to be identified that permanent access rights would be needed for utilities in this area, surely that should have been identified sooner?

I do not understand why a joint utility logistics hub wasn't proposed in the first place, instead of two different hubs in the same vicinity adding more impacts to a larger area.

I am all for moving any construction possible, including associated hubs away from impacting the community, but equally or more so object to the impacts of the whole project to our communities all along the proposed route.

I have serious concerns that whether to use one or two tunnel boring machines would be again up to the contractors, and wouldn't trust them to necessarily do the right thing, and believe they would do what was in their own best interest instead.

I also have serious issue with the fact NH/LTC are making various claims about cost savings, reducing carbon emissions etc, but are unable and/or unwilling to share any evidence to back up these claims.

I have concerns that the impacts of using one tunnel boring machine rather than two would actually worsen impacts because of the additional movements that would be needed to get segments across the river to load the TBM, for the extra power to pump the water and slurry further for the south to north return journey of the TBM.

I cannot see how only using one TBM and the second tunnel going from south to north would not increase the impacts on people south of the river in this vicinity, as there would be more going on with the TBM departing from the south and needing supplies being fed into it 24/7 as the TBM progresses until it reaches the other side.

I am concerned, after seeing reports on serious incidents relating to tunnelling of HS2, about what could happen with tunnelling of the LTC, if it goes ahead.

This is particularly heightened by fact that the initial reports suggest what is happening with HS2 is due to the chalky ground, and LTC would be through chalky ground.

I strongly object to the Foreword by Matt Palmer in the consultation booklet, as it is full of propaganda and nonsense.

The information is misleading, and gives the wrong impression that the LTC is guaranteed to go ahead, when the reality is that a decision is yet to be made, and

evidence shows that the project should not go ahead as it fails to meet scheme objectives, is not fit for purpose and would be hugely destructive and harmful.

I object to the claims he makes, and know it can all be proven to be misleading and/or wrong. For him to try and sway public opinion about the project in this way is completely unacceptable.

Sadly, this is a common theme with the LTC, with all the propoganda and greenwashing attempts.

I do not believe the consultation has been adequate and the booklet has led to more questions than answers. The info is misleading and confusing.

With a consultation booklet that is so lacking in information and clear and informative information, it would have been normal to attend a consultation event to seek further clarification and clarity, but there have been no such events.

Responses via email have been greatly lacking and avoided answering many questions, also arriving very late in the day, with no time to send follow up emails and get a response in time to submit a response.

It is questionable to say the least that this consultation is being held. I believe that the proposals in this consultation should have been identified prior to the DCO application being submitted.

I feel this consultation is just adding to the workload for those of us trying to participate in the process, particularly as we are going into DCO examination. The time we have spent working on consultation responses is time we have not been able to spend on preparing DCO submissions.

I am not surprised that the consultation has been inadequate as that is the norm with NH/LTC consultations sadly.

I am surprised that the consultation didn't cover carbon emissions more, and that no changes have been proposed bearing in mind that a top NH boss has publicly stated that unless the carbo emissions can be resolved there will be no LTC.

I am surprised there has been no assessment and update on the newly set legal targets for the Environment Act, considering that the whole proposed route would fail against the newly set targets for PM2.5.

Also, that there hasn't been consultation on Biodiversity Net Gain, since the newly set legal requirements for that mean that what is being proposed for the LTC is not good enough to meet the new requirement.

I am particularly concerned that there has been no further update in regard to the fact the proposed LTC would be a 'smart' motorway by stealth. Government have scrapped new 'smart' motorways, so the proposed LTC should be scrapped in keeping with this.

It would have no hard shoulder, would use 'smart' technology, and is being designed/coded as a 3 lane motorway (with the exception of the southbound stretch between the M25 and A13.

The Transport Select Committee have been holding their inquiry into RIS, with LTC being mentioned during the associated hearings.

The roads policy (NN NPS) is currently being consulted on and updated.

RIS3 is being consulted on.

All of these aspects are relevant to the proposed LTC which is why with such a huge and expensive project it should at very least be paused while all these decisions are made.

It is not right for the LTC to be progressed knowingly judging it against a policy that is outdated and not compliant with UK legislation on things like Net Zero.

The proposed LTC fails to meet scheme objectives.

Alternatives have not been properly considered.

The cost of the LTC has risen considerably and the BCR dropped.

Figures being quoted for the cost and BCR now are nearly three years out of date and should be updated to reflect the reality of the huge cost.

Government have announced a 2 year delay to the start of LTC construction, if permission is granted.

This two year delay should result in further assessments being carried out, including cost implications.

It is totally unacceptable and wrong that NH/LTC are not considering doing so.

There is no doubt in my mind that the proposed LTC would be hugely destructive and harmful, and is not fit for purpose. It would be a complete waste of taxpayers' money, and needs to be scrapped now.

I conclude by stressing my strong and complete opposition to the proposed £10bn+++ Lower Thames Crossing, and call for it to be scrapped immediately.

From: [REDACTED]
To: [REDACTED]
Subject: Consultation response
Date: 19 June 2023 21:41:43

I am writing to express my dismay at the latest changes proposed in the LTC minor refinements consultation. It is astounding, that at the last minute, Highways England are proposing to reduce the amount of compensation tree planting. Given that the LTC would harm more ancient woodland than any other road scheme, the extent of compensation planting proposed previously was already woefully inadequate. Ancient woodland is irreplaceable - no amount of new saplings can compensate for the loss of ecologies evolved over centuries. The woodlands on which HE wants to build are Sites of Special Scientific Interest, home to rare wildlife, including dormice, great crested newts and hundreds of species of fungi. The carbon absorption capabilities of ancient woodlands are vast compared to newly planted woods, which would take many hundreds of years to have anywhere near the same impact. The older the tree, the better it absorbs carbon. Much more land for new trees is therefore needed to absorb the same amount of carbon as a small area of mature woodland.

Ancient woodland accounts for just 2.5% of UK land, yet still it is chipped away at, shrinking every year. Our remaining ancient woodland is vital to halt the decline and extinction of native wildlife and to fight climate change. Scientific evidence on the trajectory of climate change and species extinction is clear, as is the impact on human health and survival.

Surely, now is time to draw the line, and protect the last few pockets of ancient woodlands from development - especially developments which will release vast quantities of carbon and accelerate climate change still further. Ignoring the science and disregarding legally binding carbon targets seems quite insane - especially given the enormous cost of this project at a time of economic crisis, and the limited and uncertain benefit to people affected by congestion at Dartford. The LTC won't fix the awful traffic and pollution at Dartford - just 20% of traffic is likely to be diverted. Moreover, the smart motorway HE are proposing will cause deaths and chaos and should not be legal. We need to be reducing pollution and carbon emissions with better public transport, more efficient use of the river and northern ports, new traffic calming technology and higher toll charges for using the Dartford Crossing - not increasing them whilst destroying the ecologies we rely on to keep the planet habitable.

How can this project be given permission when the UK has committed to net zero by 2050, when the Environment Act has enshrined in law the halting of species abundance decline, the protection and restoration of wildlife rich habitats, and a 35% reduction in PM2.5 exposure by 2040?

Why has Highways England reduced the amount of compensation tree planting when in previous consultations it had said that this planting was required to counteract the harmful

impact of nitrogen disposition from the LTC on regional ecologies? It is unclear how the nitrogen disposition assessment was carried out, and how the required compensation requirements could have changed between consultations?

How can HE claim that the LTC is the 'greenest road ever built in the UK' when it is destroying and harming swathes of woodland, (some ancient and irreplaceable), releasing an enormous quantity of carbon, and worsening further air quality in Gravesham and Thurrock (which is already toxic to human health according to the WHO)?

How can HE make this claim, when at the very last minute, when consultation fatigue is highest, they backtrack on the compensation planting previously planned?

HE has stated that the project will not go ahead unless the carbon emissions can be reduced. Where is the new and improved plan for reducing carbon emissions and the impact on the environment? Why instead have HE made the environmental impact even worse by reducing compensation planting? How will this help them meet the new legal requirement for Biodiversity Net Gain? Where in the consultation are the detailed assessments and plans for how net gain will be achieved?

HE have not made it clear where the enormous amount of water required for the single tunnel boring machine will come from.

Given the ever-increasing cost of the LTC, and the ever more urgent need to reduce carbon emissions and protect the natural environment, why has there not been a review of the Cost Benefit ratio of the LTC? The LTC accounts for much of the road investment programme and should be halted while the Transport Select Committee conduct their inquiry into the programme. Further, updates to the National Networks Policy Statement are required before the LTC can be considered in light of the the UK's legal commitment to net zero.

Please confirm receipt of my consultation response.

Dr Lauren Rayner

From: [REDACTED]
To: [Consultation Responses](#)
Subject: minor refinement response [REDACTED]
Date: 19 June 2023 23:08:51

Minor refinement consultation response.

I strongly oppose all the changes and the whole proposed project. What a waste of time and tax payers' money, the changes proposed in this consultation are major not minor, every change affects communities and land owners. It is becoming more apparent that the changes NH are making are only to support the contractors, giving them free rein to make changes and cut costs as they see fit through the proposed construction period.

Why consult with residents only to change their suggestions/concerns in favour of the contractor, 'you say we did' has only been lip service.

I do question the whole scheme and the variability of this, £10 ++ billion project being value for money and meeting the scheme objectives, which were set out many years ago.

Burnham was not mentioned in the last consultation as being taken for nitrogen deposition compensation, so why are we consulting on its removal?

NH state the change reduces impact on the farmer's business and loss of productive land which is grade 2 to 3 and grade 3b, but why is it being removed when you state 'the change would result in a very small increase in reported greenhouse gas emissions due to the removal of land use'. This is very contradicting. This is just a greenwash tick box exercise making it look like you are sympathetic to the farmer and giving back.

Why is there no thought to the farmers South of the river. Farmers in South/North Ockendon where grade 1 agricultural land (5% only left in the country) that can never be replaced are just being ignored.

Why isn't there a nitrogen deposition compensation area in North Ockendon it also has a site of metropolitan importance on the landfill located in North/South Ockendon and due to this the proposed construction compound has been moved away from this location.

North Ockendon is also a conservation area and has the existing M25 which will merge with the proposed LTC, here it is also where the low admission zone is due to be expanded to in August.

Unlike the areas on the North side there are many residents living in this area and near to the boarder of South Ockendon, who seem to have been overlooked/ignored.

Hole farm is to far away to have any affect in compensating for this, again more Greenwashing.

How can there be an increase to the limits of deviation and then claim there will be a reduction in the amount of material required for construction and the volume of excavated material. you are asking for permission take a bigger area to build a bigger hole.

The TBM information should have been consulted on and not just mentioned in the construction update, as this is a major change.

Changing from two to one would cause the tunnel to take twice as long, causing communities to be more affected for a longer duration.

How would this start 10 months earlier? Would the haul roads be in place then earlier also, to leave the local roads flowing and free from construction vehicles?

NH have always stated haul roads would be put in first before any construction starts, to cause less disruption, is this policy now changed and again being left to the contractor to decide?

NH talk about saving costs but where is the evidence to back this claim? Are the TBMs being hired/rented? And if so, the cost won't be reduced due to the equipment being hired for twice as long.

If bought what project would this machinery be going on to?

How much would it be worth after the project is finished?

Is this value for money?

I have concerns/questions about the temporary water pipeline at Linford for the construction of the tunnels, is this due to Kent having their own issues generally supplying residents with water? Is this why only 1 TBM is being considered so that the water will solely be supplied from the South side? If this is the case what affect will this have on the water supply here on the South side, Essex and Southern Water do have concerns about this due to the sheer amount needed, this would put considerable pressure and cause problems on the south side of the river.

Why was Low Street Lane utility hub located on a flood compensation area in the first place?

Why are both utility hubs being moved to a location that is still so near the flood compensation area?

Why are they shown on the diagram as being one logistic hub when I have been told they are separate?

Why are the utility hubs being moved onto valuable land that is being used for farming especially since NH in this consultation are trying to win brownie points by giving back land to farmers.

In the past consultations any land being used for utilities has been given Temporary Possession of Land and Permanent Acquisition of rights. Why has this been overlooked and only changed now, it's not very efficient and doesn't bode well on a project that has been submitted to DCO. What other mistakes are yet to come to light. Is this land being reduced due to the developers Iceni resurrecting a planning application which was submitted back in 2016 for the permission of building hundreds of new homes and the promise of a new foot bridge which Tilbury badly needs. At a past Task Force meeting, NH commented on the need for a foot bridge in this area and was very sympathetic with the residents of Tilbury, but it was never added to the development presumably over cost on a project already costing £10 ++ Billion.

I would like to comment of Matt Palmers statement at the front of the consultation booklet about the LTC.

The LTC will not solve the problems at the Dartford Crossing.

It doesn't meet scheme objectives.

Will increase carbon admissions (around 6.6 million tonnes).

Will increase air/noise/light pollution.

The whole route fails on WHO- 10 levels for PM2.5.

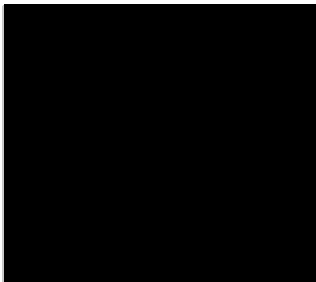
Due to the above the true potential being unlocked for the whole route and the Thames Estuary would be illnesses such as COPD, Cancer, Strokes and mental health issues.

What should have been consulted on is why/how a project that will be so devastating to the environment can have a cost ratio which as fallen from 3.1 to 1.2 and has not been scrapped.

The proposed route is referred to as an all-purpose trunk road but the evidence shows there would be no hard shoulder, designed as a 3-lane motorway with exception to the southbound section off of the M25, just running past the A13. The use of vehicle detection technology, lane control and variable speed limits. This is a smart motorway by stealth and needs to be scrapped by the government.

The proposed LTC will have devastating effects on the greenbelt, which we need for food stability in a time of climate change. ancient woodlands, trees and hedgerows will be demolished and damaged causing an onward and devastating effect on the wildlife.

We are in a climate emergency this proposed new road has no provisions for public transport it is an out of date not fit for purpose project that needs to be scrapped and no amount of greenwashing can disguise this project for what it is. Perhaps this is one of the reasons why the Secretary of State has put a hold on the project for an extra 2 years, due to these concerns and the escalating costs. Let's hope that he comes to the same conclusion that, you can't polish a turd and expect tax payers' money to pay for it. The whole project stinks.



From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Lower Thames Crossing minor refinement consultation 2023
Date: 24 May 2023 12:19:59

Hi Alex,

As discussed, grateful for responses to the consultation questions received below.

Thanks so much

Kind regards
Eva

-----Original Message-----

From: Noel Clark [REDACTED]
Sent: Tuesday, May 23, 2023 1:57 PM
To: Eva Simunovic [REDACTED]
Cc: Peter Crow [REDACTED]
Subject: Lower Thames Crossing minor refinement consultation 2023

Good Morning Eva

I hope you are well. Thank you for the notification of the new consultation.

Could I introduce Peter to you?

At the last council election Peter took over from me as councillor with portfolio for Highways and rights of Way. He will therefore be very interested in what National Highways are doing. Perhaps you could copy him on the links to get the documentation sent through and ensure his name is on the contact list for the Parish Council?

I no longer sit on the PC, but out of interest I have a couple of questions on the current consultation (I'm sure Peter will have more).

On the LOD argument; the potential impact of the changes proposed is not clear; have you re-issued the engineering drawings for the portal to indicate the changes? If so could you forward us the link?

With regards to Chapter 4 (one TBM); will this mean that you are now proposing to bore from the South as well as from the North? If that is the case what will happen to the spoil from the second tunnel (bored from the South)? Will it be deposited on the south side?? If so, how much, where are the engineering drawings to show it, or what is the plan for it?

On the changes overall; it's difficult to see what is driving these changes, unless it is purely to drive changes to the budget. Will the budget be revised? Should that not form part of this consultation if indeed that is the driver behind these changes?

Best regards

Noel Clark

--

formerly of
Luddesdown Parish Council
<http://www.luddesdown-pc.gov.uk/>

From: [REDACTED]
To: [Consultation Responses](#)
Subject: Lower Thames Crossing - Minor refinement consultation - May 2023
Date: 13 June 2023 15:36:16

Dear sir,

In response to the above consultation exercise, I wish to strongly support the proposed removal from the Order Limits of approximately 10 hectares of land at the Burham site and 29 hectares of land at the Blue Bell Hill site originally designated for nitrogen deposition compensation, as detailed in Figure 3.2.

My grounds for this support is, as stated in the consultation document of May, 2023, that ecological compensation connectivity is maintained by means of the Countryside Stewardship Scheme and that productive agricultural land is retained, thereby ,reducing the impact on the farm business affected in this case.

Regards.

Mark Bavin

From: [REDACTED]
To: [Consultation Responses](#)
Subject: Minor refinement consultation 2023
Date: 12 June 2023 12:49:42

Dear Sir/Madam,

Here are my responses to the minor refinements consultation (closing date for responses 19 June 2023).

I have always been, and remain, vigorously opposed to the whole scheme. The main grounds are that it is a waste of money, which will simply transfer any congestion problems from the Dartford crossing to the A227, the Bluebell Hill-M2 junction and the 2 lane section of the M2. It will not reduce, and is likely to increase, total volumes of road traffic at a time when all investment should go into public transport to reduce road use. This reduction is urgently necessary because of air pollution and climate change.

It is particularly objectionable that the scheme is still being promoted when the nearby reopening to passenger traffic, from Hoo Junction to a new station at Hoo St Werburgh, of the railway line to Grain, has been postponed by Medway Unitary Authority for lack of money. This development was to support new housing on the Hoo Peninsula. The housing and associated roads are to go ahead.

I am also surprised that this consultation is being undertaken, using taxpayers money, at a time when -

- the scheme has been postponed for 2 years
- the Transport Select Committee are still conducting an enquiry into the Road Investment Programme
- the Government is still under legal challenge as to whether some current road schemes are compatible with the declared Net Zero targets

As to the technical issues, I am not expertly qualified to comment. However two issues are worth highlighting -

1 Nitrogen deposition changes, Presumably the Burham site was added after the last consultation because it was considered necessary. So why has it now been removed? No evidence has been presented that the need has reduced.

2 Tunnel boring machines. The information on this is confusing. If a tunnel boring machine has a maximum tunnelling rate, it is obvious that using two machines will be quicker than using one. I think you are saying that using one would not slow down the overall tunnelling time, which seems unlikely. Or are you saying it would not slow down the whole project? implying that the associated construction, not the tunnels, determines the overall timescale. It also seems that the same total man hours would be required either way. Also using one machine allows no flexibility for breakdowns and other outages.

One could get the impression that by immersing everyone being consulted in large amounts of trivia, there is an attempt to obscure the underlying major defects of this unwanted scheme.

Yours faithfully,

[REDACTED]

From: [REDACTED]
To: [Consultation Responses](#)
Subject: No to option C
Date: 19 June 2023 10:51:01

I object to option C going ahead on environmental and financial grounds.

Thank-you

Mary Young

Sent from [Mail](#) for Windows

From: [REDACTED]
To: [Consultation Responses](#)
Subject: Abandon the whole thing before you kill the planet.
Date: 18 May 2023 21:05:57

Abandon the whole thing before you kill the planet.

Waste of money on a environment wrecking road.

Thank you
Nick

From: [REDACTED]
To: [Consultation Responses](#)
Subject: Minor Refinement
Date: 18 May 2023 06:59:14

The Lower Thames Crossing is unsustainable with or without refinements.

A far more sustainable solution would be a railway from the Maidstone area to the Chelmsford area to take both passengers and freight.

The road crossing needs abandoning immediately for reasons of the carbon impact in its operation by inefficient road vehicles.

Regards
Noam BLEICHER

Sent from my Galaxy


From: [Peter Reynolds](#)
To: [Info; Consultation Responses](#)
Subject: Re: Lower Thames Crossing: New minor refinement consultation opens
Date: 17 May 2023 18:36:58

Hello,


Air quality continues to deteriorate with increased HGV's using fossil fuels and no realistic and viable alternatives.

Please ensure you plant more trees.
Thousands not hundreds.
We must increase Afforestation not deforestation!

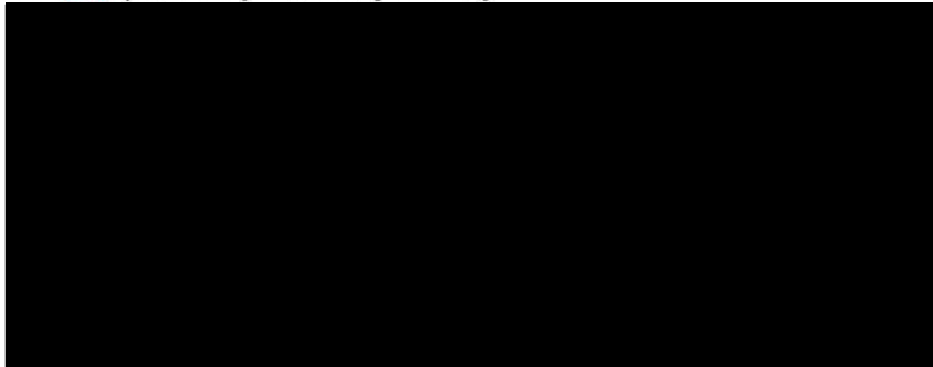
Thank you,

Peter Reynolds
Thurrock born and currently employed


----- Forwarded message -----

From: Lower Thames Crossing <noreply@lowerthamescrossing.co.uk>
Date: Wed, 17 May 2023 at 12:53
Subject: Lower Thames Crossing: New minor refinement consultation opens
To: 

Take part in the Lower Thames Crossing minor refinement consultation.
Click [here](#) if you are having trouble viewing this message



Visit our dedicated [consultation website](#) to view the consultation documents and complete an online response form.

Minor refinement consultation open until 23.59 on 19 June 2023



A new consultation has started on a handful of small changes being proposed to the Lower Thames Crossing, which will result in changes to the [Development Consent Order Application](#) we submitted late last year.

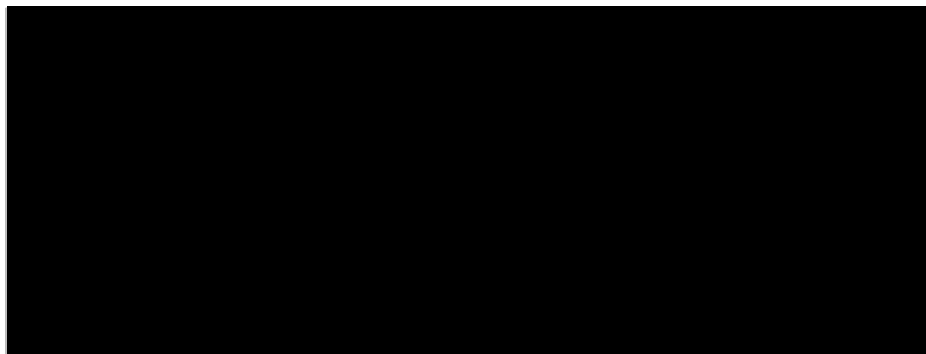
We would like your views on a small number of changes that would improve the design of the project and respond to stakeholder feedback including:

- Reducing the land needed for Nitrogen Deposition compensation at Blue Bell Hill and Burham
- Updating our plans for utility works at East Tilbury to reduce the amount of land needed

Information is also being provided on how the tunnels beneath the River Thames could be constructed. These minor, localised refinements result in minimal change to the impacts reported in the Development Consent Order application.

After the consultation, we will analyse your responses before making a formal submission to the Planning Inspectorate to make a change to the application. The Planning Inspectorate will then confirm if the changes have been accepted into the examination process or not. If they are accepted they will be examined alongside the rest of the application. The Planning Inspectorate has confirmed that the examination period will start on 20 June and finish on 20 December.

[Find out more and have your say](#)



You can visit our dedicated [consultation website](#) to view the consultation documents and complete an online response form.

You can find out more about the Lower Thames Crossing on:

Facebook: [LowerThames](#)
Twitter: [LowerThames](#)
LinkedIn: [Lower Thames Crossing](#)
YouTube: [LowerThames](#)
Web: lowerthamescrossing.co.uk

Phone: 0300 123 5000 (local rate call)
Email: info@lowerthamescrossing.co.uk
Website: www.lowerthamescrossing.co.uk

Please do not reply to this email. You are receiving this email because you participated in the Lower Thames Crossing consultation, have been involved in the project, or have subscribed to our email updates. In an effort to ensure that all those interested are informed of project updates, you may receive this email notification more than once. We would like to apologise in advance for any inconvenience that this may cause.

Click [here](#) to unsubscribe or to change your Subscription Preferences.

From: [REDACTED]
To: [Consultation Responses](#)
Subject: LTC:- CON10035173 SPA-1-20 and LTC:- CON10035154.....DCO
Date: 17 May 2023 16:00:19

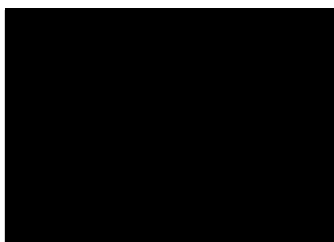
Dear
Consultation Response LTC

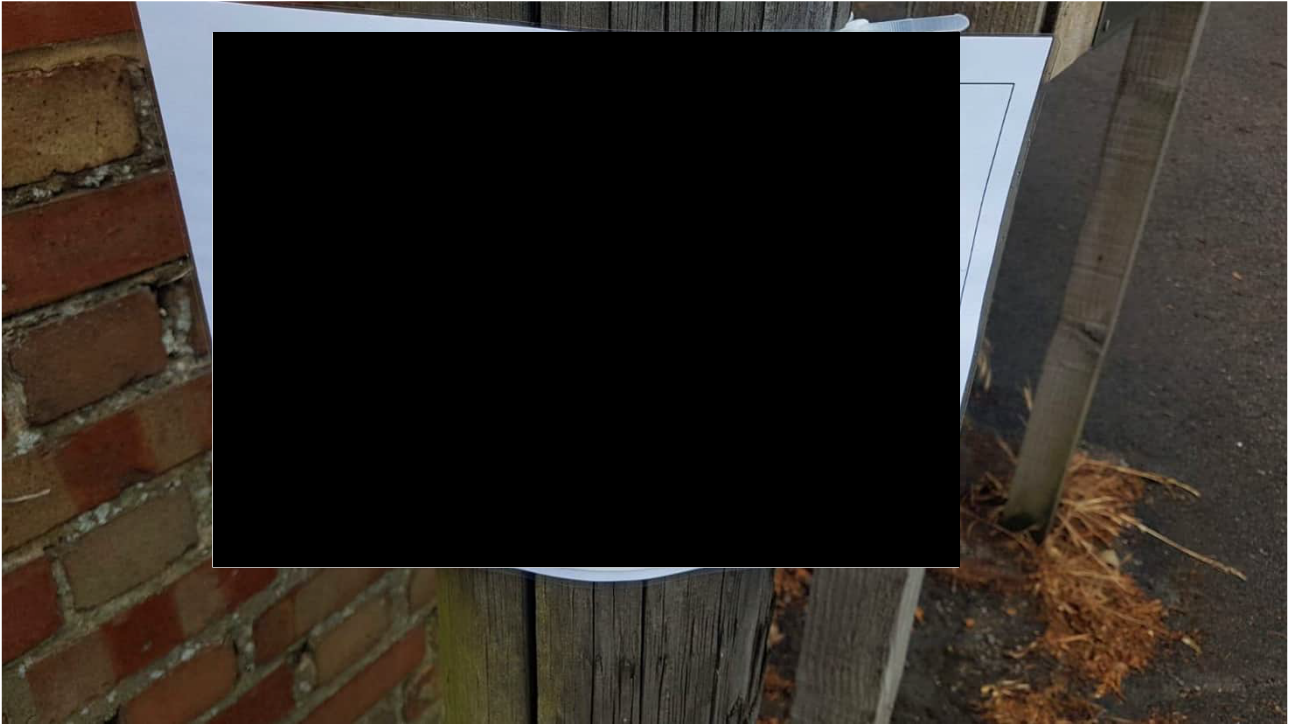
Thank you for letting us comment, Title Number K302615 is within the Development Boundary affected by the LTC

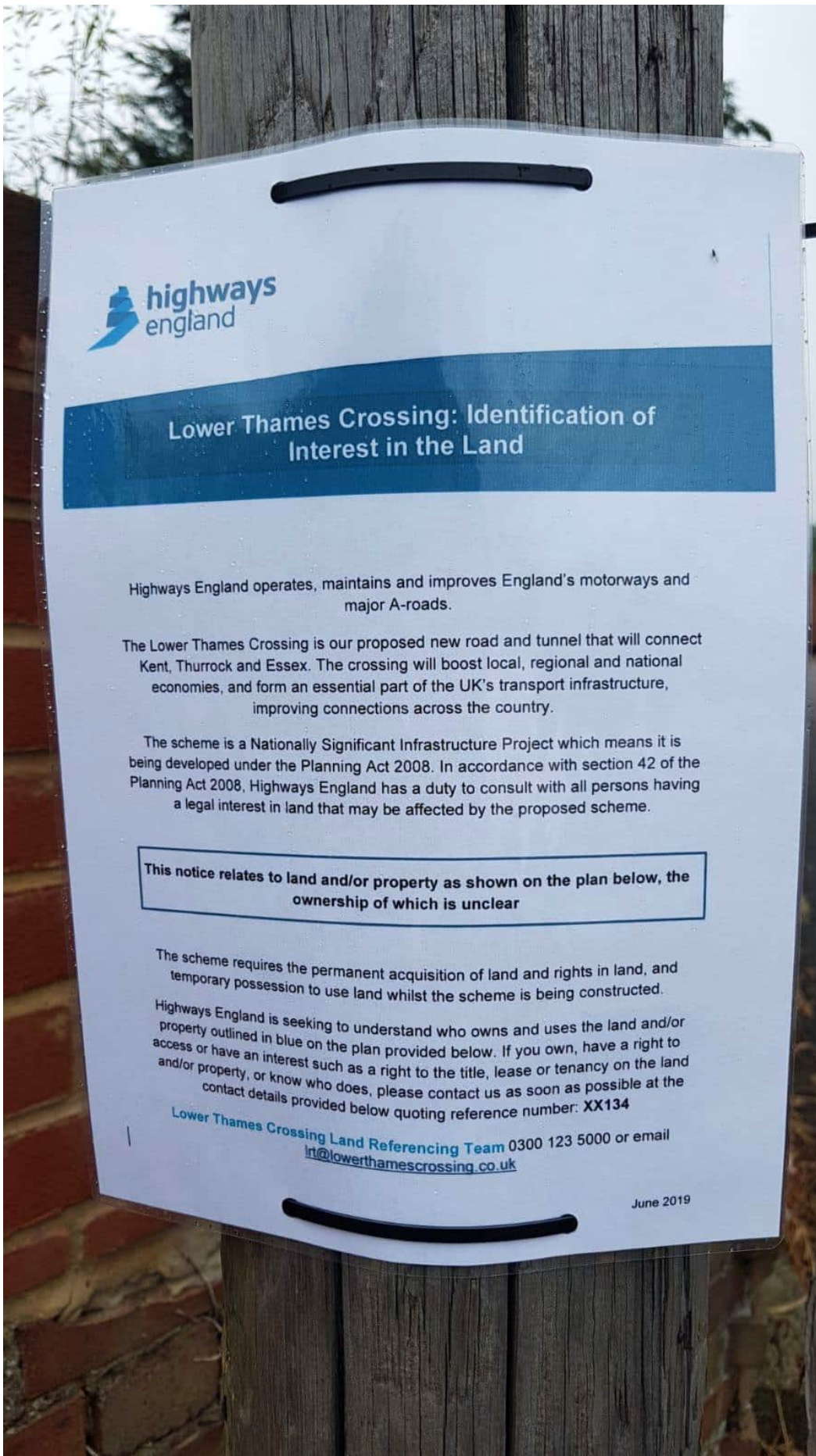
I like to know are how is this land is going to be used, at the moment LTC Maintenance workers are accessing the properties "MARLING MANOR", "MARLING CROSS LODGE" and "THE ANCHORAGE" Watling Street, Gravesend Kent, DA12 5UD, as you are aware that these properties are owned by HIGHWAYS ENGLAND, and no one has applied to us for rights of way over this land Title K302615. Obviously the land in question looks like it is blighted by LTC works, and you have not confirmed any blight COMPENSATION! On the current LTC plans in place are showing in RED this tite is within Development Boundary, are you going to carry out some works to improve the FOOTPATH, which is the approach road to our properties at "[REDACTED]" the adjoining land in question is owned by myself and my Wife, [REDACTED] please let us know what are your plans regarding the above, if you are going to use it any, we DEMAND COMPENSATION for USE, and for any disturbance. At the moment from your plans to build LTC, When the LTC is built there will be no access from the A2, as this is the main entrance to the property "Marling Manor " DA12 5UD OWNED by LTC, Lower Thames Crossing staff are at moment trespassing on to our title [REDACTED]

Regarding notice that was displayed back in JUNE 2019, see the attached Photo's REF: XX134 The land in question is adjoining our land. Can you let us know how this is affecting us, what are your proposals for this land? LTC Never clarified to us what is being done about this and how you are going to use and avoid TRESPASS onto Title [REDACTED] I look forward to your response, many thanks.

Kind regards
Mr and Mrs Bhatoa







From: [REDACTED]
To: [Consultation Responses](#)
Subject: Lower Thames Crossing No thank you .
Date: 19 June 2023 15:52:47

Hi readers ,

With a series need for getting enough water and healthy work force and next generation of children to be healthy respect for being productive if not working from homes .

1960 when tunnels opened if that had been how the tunnels would not be diverted via Gravesend .

There's three drivers in objection here .

Callers to local radio shows want trams across the river . at a fraction off the price of those 2 three lane tunnels and the fire hazard that could be ref daily fires on our roads .

When I worked at FRD in Basildon on A127 from Rochester 20mins upto Dartford then 20 mins down A127 .

40 hospital could be a better reward for the public overdue 3year waits for joint operations etc .

Regards Ray Styles , James Styles , Janette Styles

From: [REDACTED]
To: [Consultation Responses](#)
Subject: Thames Crossing
Date: 17 May 2023 13:01:56

Dear Sirs,

I would agree to any proposal that would reduce the amount of land required as included in the latest consultation document.

Regards,

R.M.Langworth

From: [REDACTED]
To: [Consultation Responses](#)
Subject: Fw: Lower Thames Crossing Consultation Response
Date: 19 June 2023 11:45:07

From: Robert Quick
Sent: 17 June 2023 14:32

[REDACTED]

Subject: Lower Thames Crossing Consultation Response

This is my consultation response.

just to demonstrate the complications that NH have added to this LTC process, i forward this as my response to the latest consultation carried out by NH. I inadvertently sent this yesterday to the DCO panel.

Apologies for any confusion caused by the NH complicated procedure you have given all the way through this process.

To National Highways

I am a resident in [REDACTED] Over that time the village and East Tilbury have grown considerably in size and is still growing. Unfortunately the same cannot be said for the local infrastructure. The narrow roads and lanes remain, frequently causing accidents and damage to the road verges and pavements because of the inappropriate use of the roads by HGV's.

Now we are asked to approve of the LTC, which to an outsider might appear to be a good idea, I think many people were when the project was first proposed. However the primary function of an additional crossing was to reduce the congestion on the current Dartford crossing. This fundamental primary objective of the LTC is not met by the route proposed by NH which you are asked to make your decision on. Indeed not only does it meet the fundamental objective, it does so at an unacceptable cost both in terms of £££ and in impact on the environment.

I THEREFORE STRONGLY OPPOSE THIS LOWER THAMES CROSSING AS OUTLINED IN THE D.C.O.

It will decimate the countryside on both sides of the river

The road infrastructure on both sides of the river will create traffic issues, especially the interchanges with A13, A1089, with Orsett Cock junction and Manorway Junction.

The additional traffic on [REDACTED] right outside our front door, which is already horrific during the morning and evening rush hours, will be further impacted by the heavy load of HGV's during the construction period. Said to be 7/8 years but more likely to be 10. This at a time in our lives ([REDACTED]) when we should be able to relax without this burden of traffic and pollution placed on us.

As for Nitrogen Deposition,

This seems to change frequently, often without a clear reasoning. Why did the Burham site get added after the last consultation but get included in the DCO submission. Have NH taken Blue Bell hill improvements and associated traffic into account.

Northern Tunnel entrance

Why has it taken so long to identify the extra leeway “may” be needed between “bored” and “cut & cover”. If they missed identifying this during the consultation period, what else have they missed. What do they base their view on this on and why was it not shared with the Task Force.

Utilities

Why have these changes come all of a sudden at the DCO application stage and not included it in the consultation period. A suspicious person would ask what these changes have to do with the proposed housing development adjacent to the LTC route near East Tilbury.

Having participated in all the NH/LTC Task Force meetings it is clear that NH have deliberately mis-led local communities in Thurrock having talked at these meetings about promising the inclusion in the plans of a new bridge for local traffic over the railway line to the west of East Tilbury railway station. This they have done at Task Force meetings and at consultation events in East Tilbury.

In addition we were promised that NH planned to put in place an East Bound access road from Lakeside shopping centre to join the A13 towards Southend to assist reducing congestion from Lakeside to the Dartford crossing.

Tunnel Boring

This in itself is a major concern. Will they/won't they have a massive increase in HGV's along East Tilbury road, Buckingham Hill road moving supplies in and spoil out 18 hours a day. Which will increase carbon emissions locally, and no monitoring of air quality to be done at this access point for the construction traffic.

Other Concerns

The proposed LTC route structure will not achieve its primary role of reducing congestion either side of the Dartford crossing. Even the out of date traffic flow data which the NH insist of referring to, does not support their view of the traffic flow reduction. If this route goes ahead, by the time it is finished, the volume of traffic will have grown so much that the congestion at Dartford will be far in excess of its current level.

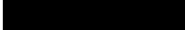
The new route will be designed and run as a Smart Motorway which ignores the Government decision to stop all smart motorways because of the safety concerns generated by the number of fatal accidents on existing Smart motorways. So on these grounds why is the project still going ahead.

The current “shared” costs of this project is vastly understated, the benefit cost ratio is very low and so this project is poor use of government and taxpayers money, so it is understandable that the government has put a two year delay on the project timing. Very sensibly leaving the final government decision to the next occupiers of the British Governments Parliament.

I rely on you, the team put in the unfortunate position of having to adjudicate on NH DCO application which has been a very expensive (£1 billion already spent and very poorly managed).

Regards

Robert Quick
Linford Resident & Lower Thames Crossing Task Force Local Resident Representative

From: 
To: [Consultation Responses](#)
Subject: Ltc consultation
Date: 19 June 2023 22:06:33

I strongly oppose the refinements proposed in this consultation, you are handing back land that has never been indicated to be taken in previous consultations in Kent. This is greenwashing at its finest, this scheme is a waste of tax payer money and not fit for purpose. And this consultation was fair from adequate as per your previous rounds!

Sent from [Outlook for iOS](#)

From: [REDACTED]
To: [Consultation Responses](#)
Subject: Fwd: Lower Thames Crossing
Date: 21 May 2023 21:56:05

See below

Sent from [Outlook for Android](#)

From: Simon Lewis
Sent: Sunday, May 21, 2023 9:55:02 PM
To: info@lowerthamescrossing.co.uk <info@lowerthamescrossing.co.uk>
Subject: Lower Thames Crossing

This project is an appalling waste of public money.

The cost benefits economics are false and the project will massively overspend.
The environmental impact assessment is a labyrinth of green wash. For example, the Dagenham marshes will be under water by the time planned construction is theoretically completed.

Why not spend the money improving the railways. My journey time to London from Worthing is the same a Victorian times.

The Journey time from Worthing to Maldon is even worse.

Why not invest the money in new railway lines including wider freight lines that can take lorries from European destinations direct to Midlands Scotland etc

Please confirm you have passed my thoughts on to the relevant planning authorities for consideration as part of the planning process.

Regards
Mr S D Lewis

[REDACTED]

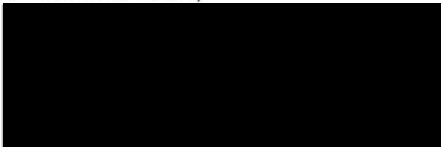
Sent from [Outlook for Android](#)

From: [REDACTED]
To: [Consultation Responses](#)
Subject: Minor changes
Date: 17 May 2023 20:00:49

How can minor changes such as these drag on until December? This is ridiculous. Other countries move so much faster.

Regards

Simon Westmacott,



From: [REDACTED]
To: [Consultation Responses](#)
Subject: LTC
Date: 19 June 2023 19:52:08

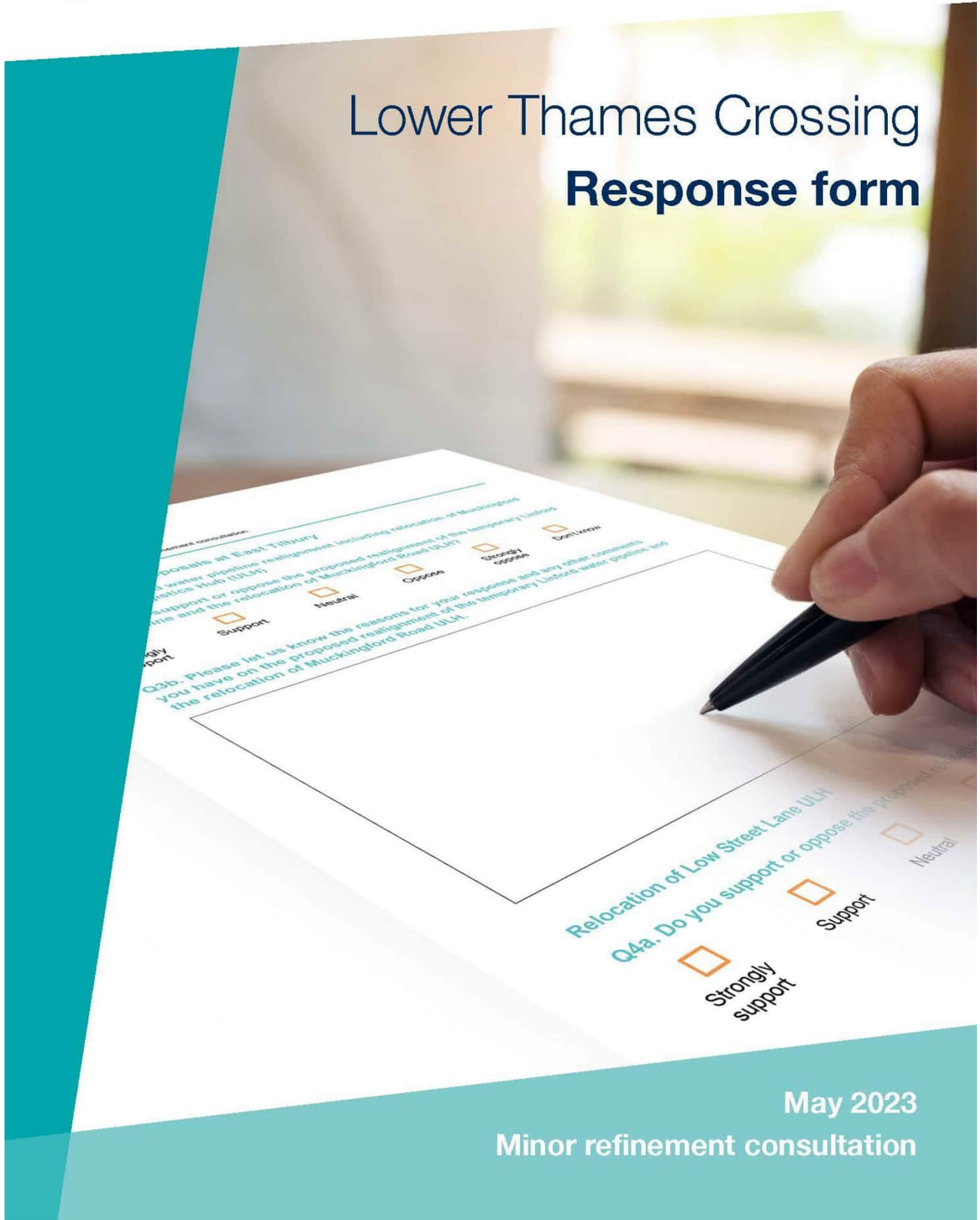
How can this reduction in compensation tree planting possibly be justified? It was hopelessly inadequate as previously planned - newly planted forestry cannot begin to replace precious ancient woodland. A reduction of any kind makes a mockery of the whole idea of 'compensation'!

Regards

Susan Rayner

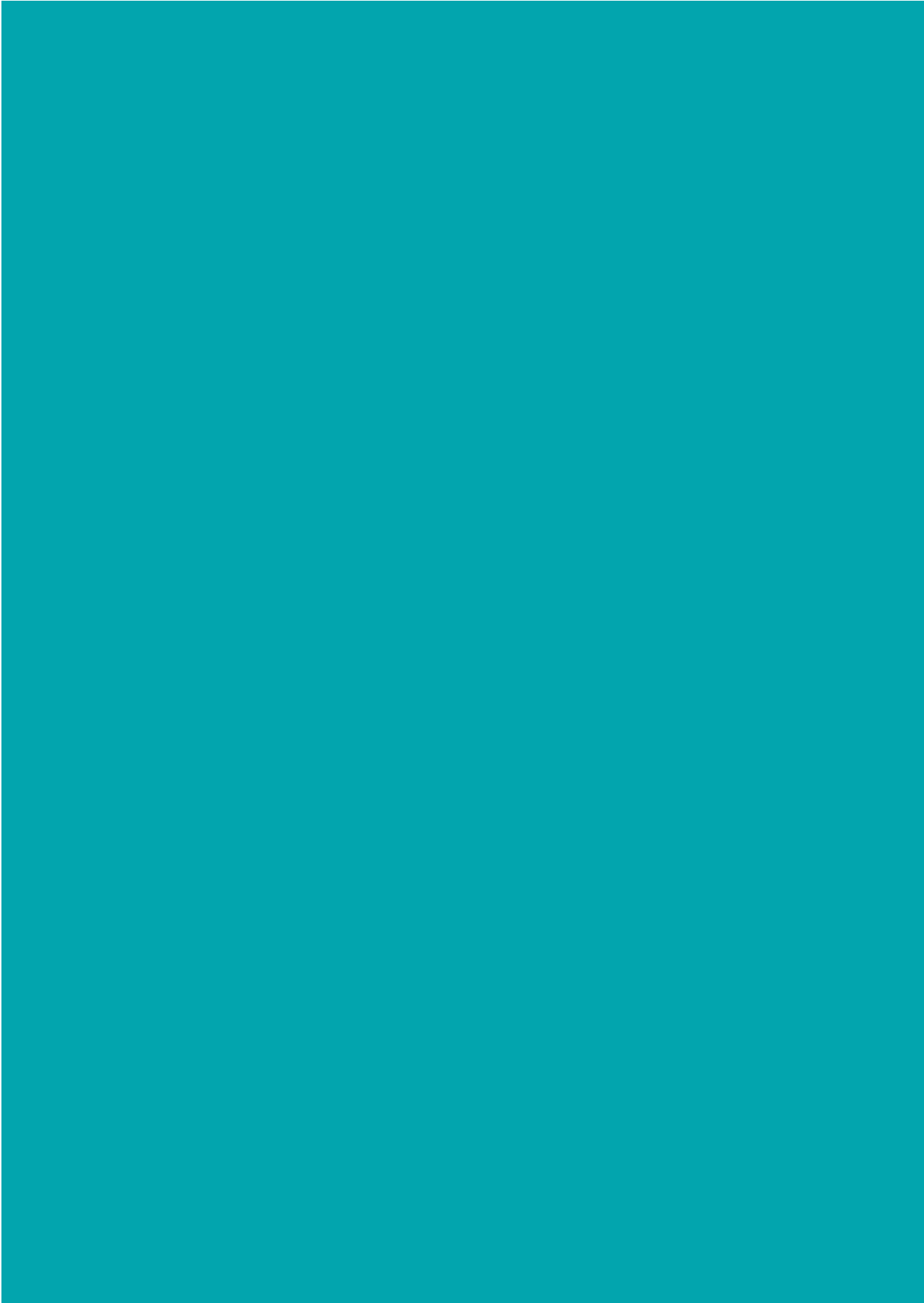


Lower Thames Crossing Response form



May 2023

Minor refinement consultation



Introduction

We're holding this minor refinement consultation to seek your feedback on a small number of minor changes we are proposing to make to our Development Consent Order (DCO) Application. These are localised in nature and small in extent, with only minimal change to the impacts which we reported in our DCO Application. We have highlighted any change in those impacts within the consultation booklet, which is available on the minor refinement consultation website:

<https://highwaysengland.citizenspace.com/ltc/minor-refinement-consultation-2023>

Chapter 3 of the booklet sets out the changes we are seeking your feedback on as part of this consultation. Starting from south to north these are:

- Reduction of nitrogen deposition compensation area and Order Limits at Blue Bell Hill and Burham
- Increase in limits of deviation for the northern tunnel entrance headwall
- Revised utility proposals at East Tilbury (three changes)

Chapter 4 provides a construction update, setting out how the tunnels beneath the River Thames could be constructed by either two tunnel boring machines, or by using a single tunnel boring machine to construct both.

We have also reduced the Order Limits to reflect the changes we are proposing, see Figure 3.1 on page 5 of the booklet for further information.

Pre-examination

We submitted our DCO Application to the Planning Inspectorate on 31 October 2022 to secure consent to construct and operate the A122 Lower Thames Crossing (the Project). Our DCO Application was accepted for Examination on the 28 November 2022. The application and how to engage in the DCO process can be found using this link:

<https://infrastructure.planninginspectorate.gov.uk/projects/south-east/lower-thames-crossing/>

A panel of five independent inspectors has been appointed as the Examining Authority to examine our application on behalf of the Secretary of State for Transport. They will review the evidence submitted and listen to issues raised.

Since the submission of the DCO Application, the Lower Thames Crossing team has identified some minor changes to the Project. These are as a result of ongoing engagement with landowners and other stakeholders, and further design refinement.

Through this consultation, we want to let you know about the proposed changes and provide an opportunity for feedback to be given in relation to them. We will consider all responses before submitting any request to the Examining Authority to incorporate these changes into the DCO examination process.

If these changes are accepted by the Examining Authority, they will be considered during the examination of the DCO Application.

Lower Thames Crossing – Minor refinement consultation
Response form

How to have your say

Full details of how you can respond to this minor refinement consultation can be found at the back of this form.

See the consultation booklet for your data rights.

Please provide your feedback by 23:59 on 19 June 2023.

Any responses sent after this point may not be included in our analysis.

Lower Thames Crossing – Minor refinement consultation
Response form

Reduction of nitrogen deposition compensation area and Order Limits at Blue Bell Hill and Burham

Q1a. Do you support or oppose the proposed reduction of the nitrogen deposition compensation area and Order Limits at Blue Bell Hill and Burham?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know

Q1b. Please let us know the reasons for your response and any other comments you have on the proposed reduction of the nitrogen deposition compensation area and Order Limits at Blue Bell Hill and Burham.

I am opposed to the Lower Thames Crossing as I do not think it will make a difference to the congestion at the Dartford Crossing. It will ultimately provide a link between the south side and north side of the Thames but the damage caused to the environment, the loss of habitat for all flora and fauna including insects and invertebrates far outweighs any potential benefits to mankind. The work will release thousands of tons of carbon increasing global warming and leading to an ecological threat to human beings as we are reliant on both the plants, insects and animals for our survival.

I have read the booklet outlining why the minor changes are needed and am worried by the proposed lessening of of the nitrogen deposition compensation area which I feel is short sighted.

Lower Thames Crossing – Minor refinement consultation
Response form

Increase in limits of deviation for northern tunnel entrance headwall

Q2a. Do you support or oppose the proposed increase to the limits of deviation for the northern tunnel entrance headwall?

Strongly support Support Neutral Oppose Strongly oppose Don't know

Q2b. Please let us know the reasons for your response and any other comments you have on the proposed increase to the limits of deviation for the northern tunnel entrance headwall.

I am opposed to the Lower Thames Crossing. This particular change appears unnecessary but i am also concerned changes to the south tunnel would also be necessary. From reading the booklet about the changes I am not sure what the benefits of the changes are, they will still result in a massive release of carbon from the excavations and the use of concrete. The environmental impact will be harmful to all flora and fauna including humans

Lower Thames Crossing – Minor refinement consultation
Response form

Revised utility proposals at East Tilbury

Temporary Linford water pipeline realignment including relocation of Muckingford Road Utility Logistics Hub (ULH)

Q3a. Do you support or oppose the proposed realignment of the temporary Linford water pipeline and the relocation of Muckingford Road ULH?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know

Q3b. Please let us know the reasons for your response and any other comments you have on the proposed realignment of the temporary Linford water pipeline and the relocation of Muckingford Road ULH.

I am opposed to the lower Thames crossing and am concerned that this has the potential to waste gallons of water, which is becoming more and more precious. This relocation of the temporary Linford water pipe will have an environmental impact on nature and people.

Relocation of Low Street Lane ULH

Q4a. Do you support or oppose the proposed relocation of Low Street Lane ULH?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know

Lower Thames Crossing – Minor refinement consultation
Response form

Q4b. Please let us know the reasons for your response and any other comments you have on the proposed relocation of Low Street Lane ULH.

I am opposed to the Lower Thames Crossing as I don't believe that it will reduce congestion at the Dartford crossing but will have a huge negative impact on the environment. The relocation of low street lane will have a detrimental environmental impact on the local area, flora and fauna.

Land use change west of Linford

Q5a. Do you support or oppose the proposed changes to the land use west of Linford?

- Strongly support
- Support
- Neutral
- Oppose
- Strongly oppose
- Don't know

Q5b. Please let us know the reasons for your response and any other comments you have on the proposed changes to land use west of Linford.

I oppose the Lower Thames Crossing due to the huge environmental impact that it will have during the building work and afterwards. What is needed is a better public transport system with better provision for cycling and walking. There has been a huge reduction in train and bus services in recent years with a focus on road building which will just increase pollution. The loss of habitats for nature will be irreparable, with many species being lost forever.

Lower Thames Crossing – Minor refinement consultation
Response form

Q6. Other comments

We welcome any other comments you would like to make about the changes proposed to the Lower Thames Crossing as part of this minor refinement consultation.

I am opposed to the Lower Thames Crossing proposal as I do not feel that it is fit for purpose. The suggested reduction in traffic from the Dartford Crossing will not make a difference to the current levels of congestion as the proposed LTC will only take a fraction of the traffic away and will not reduce the traffic to the original capacity for the Dartford Crossing. The LTC will cause huge disruption for those living near the proposed routes. It will cause huge environmental damage and will not help with the carbon emission target of net zero by 2030. The impact on global warming, the environment and nature and ultimately the human race will be devastating.

Lower Thames Crossing – Minor refinement consultation
Response form

Q7. The consultation

Please let us know your views on the quality of our minor refinement consultation materials, the accessibility of our online information and anything else related to this consultation.

	Very good	Good	Average	Poor	Very poor	Not applicable
Was the information presented clearly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Was the website easy to navigate?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please let us know the reasons for your response and any other comments you have on the delivery of this consultation.

The information was not clear and used terms which were not easily understandable by a non-expert.

Lower Thames Crossing – Minor refinement consultation
Response form

About you

We would be grateful if you could answer the following identification questions, which will help us to categorise responses. Your personal details and views expressed as part of your consultation response will not be made public. You do not have to provide any personal information if you do not want to. However, postcode data can help us to better understand the views of different communities in relation to the proposals. To view our privacy statement, please see the minor refinement consultation booklet.

1. Name:

2. Address:

Postcode:

3. Email address:

If you provide an email address we will use it to let you know about important developments in our proposals.

4. If you are responding on behalf of an organisation, business or campaign group, please include the name below. (This helps us to understand whether respondents can be categorised as 'prescribed consultees', as defined by the Planning Act 2008.)

Organisation:

Type of organisation, business or campaign group:

- Academic
- Business
- Campaign group
- Elected representative
- Environment, heritage, amenity or community group
- Local government
- Statutory agency

Transport, infrastructure or utility organisation

Other (please state):

Lower Thames Crossing – Minor refinement consultation
Response form

5. Do you own land or hold any interests or rights, such as private rights of way or sporting rights, within or close to the Order Limits where we have proposed changes in this consultation?

- Yes No

If you have ticked yes, have you received a letter to notify you of the consultation?

- Yes No

6. If you use the transport network in an area that may be affected by the Lower Thames Crossing, please tell us how you travel by ticking one or more of the following boxes:

- As a horse rider
 As a pedestrian
 Bus
 Car
 Cycle
 Goods vehicle
 Motorcycle
 Train
 Other (please state):

7. Please let us know how you heard about this consultation by ticking one or more of the following boxes:

- Received an email from the Planning Inspectorate
 Saw information on the Planning Inspectorate website
 Received a letter from National Highways
 Received an email from National Highways
 Received information from a local authority
 Saw a Public Notice in local or national newspapers
 Saw information on the LTC website
 Saw social media coverage
 Saw coverage in local media
 Word of mouth
 Other (please state):

Lower Thames Crossing – Minor refinement consultation
Response form

Equality and diversity

We would be grateful if you could answer the following equality and diversity questions. We will use the information we receive to help understand whether our consultation has been useful to people of different backgrounds and with different requirements.

The answers you provide to this question are defined as 'special category data'. If you agree to provide this information, you can withdraw your permission for us to use it at any time. To do that, please email DataProtectionAdvice@nationalhighways.co.uk

- I consent to National Highways processing my special category data for the purposes of understanding the accessibility of the Lower Thames Crossing consultation. I have read National Highways' privacy notice (found on page 34 of the minor refinement consultation booklet) and understood how it will be processing this data.

1. How would you define your gender?

- Male Female Transgender Prefer not to say

2. Do you consider yourself to be disabled?

- Yes No Prefer not to say

3. Please describe your ethnic background:

- Asian or Asian British
 White
 Black, African Caribbean or black British
 Mixed or multiple ethnic groups
 Gypsy or Irish Traveller
 Other ethnic group
 Prefer not to say

4. Age:

- Under 16
 16–24
 25–34
 35–44
 45–54
 55–64
 65+

Lower Thames Crossing – Minor refinement consultation
Response form

How to submit your response form

Please only use the following official response channels. We cannot guarantee that responses sent to any other address will be included in our analysis.

Online

Fill in the online survey at:

<https://highwaysengland.citizenspace.com/ltc/minor-refinement-consultation-2023>

Email

Send your comments to consultationresponses@lowerthamescrossing.co.uk

Post

Send a printed response form or letter to the following address:

Consultation Response LTC
Pilgrims Lane
Chafford Hundred
Grays
RM16 6RL

Unless using a pre-paid envelope supplied by National Highways, respondents are required to pay appropriate delivery charges for responses sent to this address.

National Highways cannot guarantee that responses sent to any other address will be received.

How your response will be used

We will carefully consider all the responses we receive, and this will inform any change request we submit to the Examining Authority. If these changes are accepted by the Examining Authority they will be considered during the examination of the DCO Application.



Have your say

Please send your response before
23:59 on 19 June 2023

Please submit your response by
23:59 on 19 June 2023

If you need help accessing this or any other National Highways information, please call **0300 123 5000** and we will help you.

© Crown copyright 2023.

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence:

visit www.nationalarchives.gov.uk/doc/open-government-licence/

write to the **Information Policy Team, The National Archives, Kew, London TW9 4DU**, or email psi@nationalarchives.gsi.gov.uk.

Mapping (where present): © Crown copyright and database rights 2021 OS 100030649. You are permitted to use this data solely to enable you to respond to, or interact with, the organisation that provided you with the data. You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form.

This document is also available on our website at www.nationalhighways.co.uk

For an accessible version of this publication please call **0300 123 5000** and we will help you.

If you have any enquiries about this publication email info@nationalhighways.co.uk or call **0300 123 5000***. Please quote the National Highways publications code **PR40/23**.

National Highways creative job number CRE23_0139 v3

*Calls to 03 numbers cost no more than a national rate call to an 01 or 02 number and must count towards any inclusive minutes in the same way as 01 and 02 calls.

These rules apply to calls from any type of line including mobile, BT, other fixed line or payphone. Calls may be recorded or monitored.

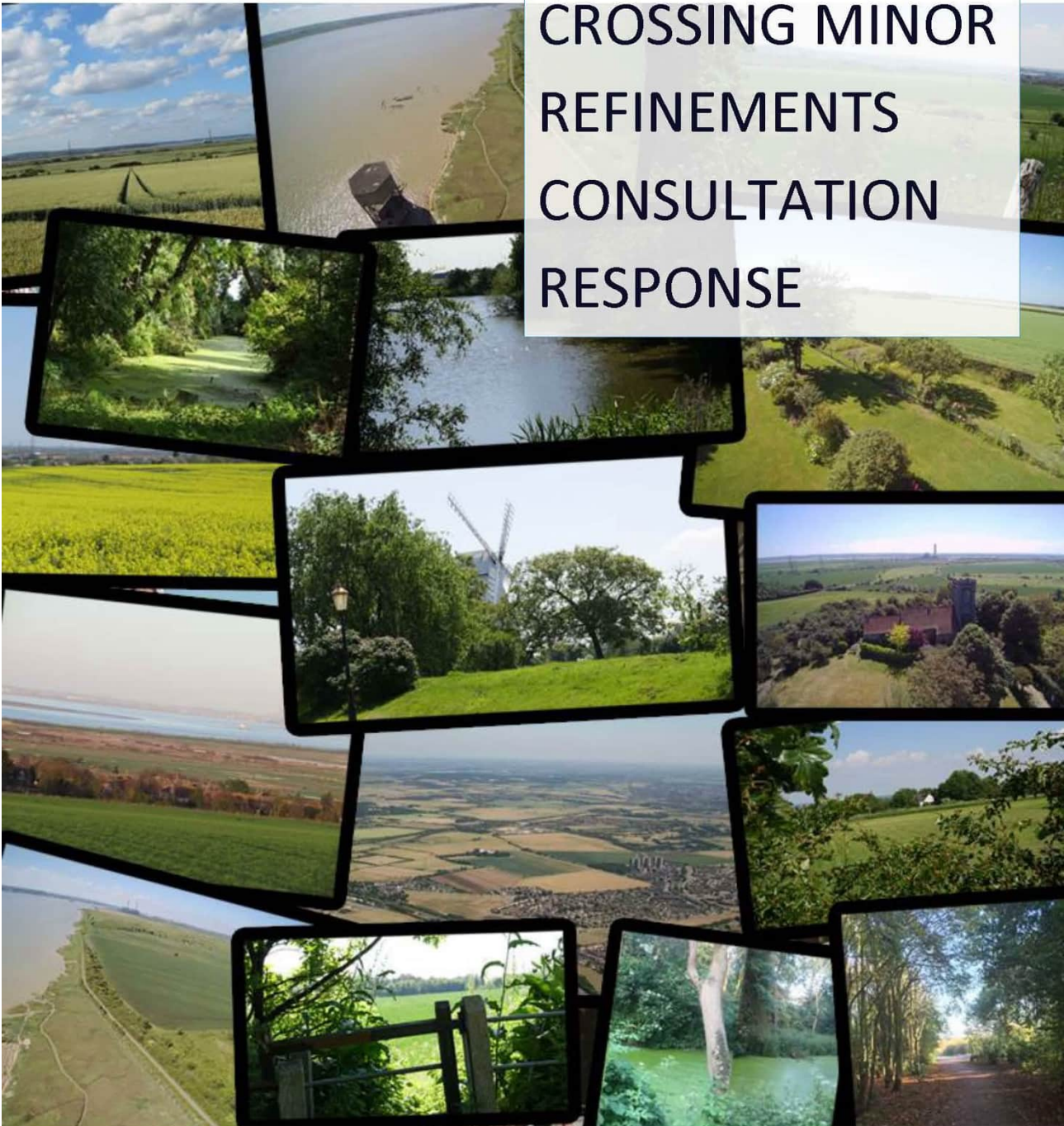
Printed on paper from well-managed forests and other controlled sources when issued directly by National Highways.

Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ

National Highways Limited registered in England and Wales number 09346363

THAMES CROSSING
ACTION GROUP

LOWER THAMES
CROSSING MINOR
REFINEMENTS
CONSULTATION
RESPONSE



Introduction

Thames Crossing Action Group represents thousands of people who are opposed to the proposed Lower Thames Crossing.

We are strongly opposed to the proposed Lower Thames Crossing because it would not fulfil the project objectives. It would be hugely destructive and harmful, is not fit for purpose and would be a complete waste of taxpayers' money.

This response to the Minor Refinements Consultation should be considered in addition to our responses to all previous consultations, and should be read in conjunction with those documents. The Statutory Consultation¹, Supplementary Consultation², Design Refinement Consultation³, and the Community Impacts Consultation⁴, Local Refinement Consultation⁵.

This consultation has been far from adequate, and contains many claims that cannot be backed up with evidence. The consultation booklet generates more questions than answers, yet we have done our best to prepare and submit our representation below.

We remain completely and strongly opposed to the proposed £10bn+++ hugely destructive and harmful, not fit for purpose Lower Thames Crossing.

Laura Blake
Chair, Thames Crossing Action Group
www.thamescrossingactiongroup.com
admin@thamescrossingactiongroup.com

¹ [TCAG Response to LTC Statutory Consultation](#)

² [TCAG response to LTC Supplementary Consultation](#)

³ [TCAG response to LTC Design Refinement Consultation](#)

⁴ [TCAG response to LTC Community Impacts Consultation](#)

⁵ [TCAG response to LTC Local Refinement Consultation](#)

Table of Contents

Introduction	2
Table of Contents	3
Nitrogen Deposition changes.....	5
Northern Tunnel Portal change	12
Revised utility proposals (East Tilbury)	15
Tunnel Boring Machine	22
Consultation booklet – Foreword	34
Adequacy of Consultation	43
The Foreword.....	43
The consultation booklet	44
Lack of consultation events.....	45
Responses to questions via email	46
Timings.....	46
Inadequacies Conclusion.....	47
Other comments	48
Carbon Emissions	48
Environment Act	48
Noise pollution	49
Biodiversity Net Gain	50
‘Smart’ Motorway by stealth	50
Food Security	52
Other relevant consultation and inquiries etc	52
Other issues	53
LTC Objectives.....	53
Alternatives.....	53

Cost and value for money	53
Government’s announcement of 2 year delay.....	54
Conclusion.....	55

Nitrogen Deposition changes

We begin by highlighting that this section of the consultation booklet was confusing and misleading with the way information was presented, and we have highlighted this further in our comments on the inadequacies of the consultation later in our response.

We would also voice concern that the site at Burham was added to the Order Limits without any public consultation, following the Local Refinement Consultation and prior to the LTC DCO application being resubmitted.

We consider any additional land being placed within the Order Limits to be significant and something that should have been consulted upon.

The fact you have only even highlighted this addition publicly at the time you are now proposing removing it, we consider to be unacceptable and underhand.

It also leads us to wonder and question what else you may or may not have changed/added to the DCO application that you are trying to bury in the sheer volume and complexity of the DCO documentation.

The way the Burham site was added just goes to show that you had not given adequate thought and consideration to what you were proposing prior to the Local Refinement Consultation.

We have to question why you had not discussed the Burham site adequately enough with the landowner to identify that there was Countryside Stewardship being considered.

This is not something that is applied for and awarded overnight. The fact you had not identified such relevant and important information again highlights yet more inadequacy.

This is made even worse by the fact that you sneakily added it without public

consultation, to now propose removing it again. This clearly shows a lack of adequate consultation and consideration of what you are proposing.

This is a common theme to the whole project in general, whereby there has not been adequate consultation right from the very beginning when you failed to present all the route options you were asked to consult on at route options stage.

You suggest that you are now proposing to remove the Burham site due to the Countryside Stewardship. In an email response to us you said, *“The new information about the Countryside Stewardship scheme led us to put forward alternative proposals which respond to the feedback from the landowner while also meeting our objectives.”*

In light of this we would question why you have not done similar in other areas and aspects of the project. Why for example have you moved the proposed route through The Wilderness in South Ockendon, an ancient/long established woodland, to avoid having to take the proposed route through a landfill site?

We believe it is because it is easier and cheaper to destroy The Wilderness than go through the landfill site, regardless of the fact that the woodland is an important and irreplaceable habitat and of historic importance.

You also suggest the removal of the Burham site is because of impacts to the farm and business. Whilst we support reducing impacts to farms, and all homes, businesses and land, we again question why you do not seem as concerned about impacts to other farms, land, businesses and homes. The proposed LTC is not fit for purpose and it cannot therefore be in any way deemed acceptable to be proposing destroying and impacting land, habitats, homes, businesses, communities etc anywhere.

We also do not buy into the fact that you feel it acceptable to further reduce the nitrogen deposition compensation.

You originally stated that there was an initial provision for 279ha of nitrogen deposition compensation, which you say you intended to reduce to around 250ha. Yet the latest proposal sees it drop to just 205ha.

It is unclear why you felt it necessary to propose the level of compensation you did, but then so quickly deem it acceptable to reduce it. This suggests that you either were not adequately calculating the necessary compensation in the first place (when you are only supposed to propose taking what is absolutely essential for an NSIP), or that you are attempting to reduce it below an acceptable level.

This is totally unacceptable. We also draw attention to the fact that this is not mitigation, it is compensation. This means that what is being proposed will not mitigate, but simply supposedly compensate for the impacts and harm caused. Your priority should be not to cause harm in the first place, and at very least if harm cannot be prevented or mitigated the compensation would need to be adequate.

You appear to be suggesting that the reduction in nitrogen deposition compensation land is acceptable because of the extra benefits the Countryside Stewardship brings. However, that is not part of the proposed LTC project and therefore should not be considered a 'benefit' or compensation for the impacts and harm of the proposed LTC project, should it go ahead.

The Examining Authority (ExA) responsible for examining the LTC Development Consent Order (DCO) also seem to have questions in this regard of double counting some elements of the proposed project, as highlighted in Item 4 of the agenda for Issue Specific Hearing 1 (Project Definition)⁶.

As also highlighted in that point in the agenda, this is not the only instance of creative accounting for the project. We also have concerns about this aspect and misleading and unethical behaviour and practice.

⁶ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-002237-LTC%20-%20ISH%201%20Project%20definition%20Draft%20Agenda.pdf>

We reiterate our concerns and frustrations that you are attempting to include Hole Farm Community Woodland as environmental mitigation and compensation for the LTC project. The reality is that you announced the new community woodland publicly as an initiative to ‘improve’ biodiversity along the major road network, and that it would be progressed regardless of whether the proposed LTC is granted permission or not.

This is all completely unacceptable, and must lead to questions about what else you are attempting to get away with, and mislead people about; and the implications of those factors on the whole project.

We also have serious concerns about the impacts to agriculture and the environment. The loss of land and impacts to land and the natural environment.

Our country faces serious concerns about food security, we cannot afford to be losing more agricultural land, especially for projects that like the proposed LTC are simply not fit for purpose.

Our country is one of the most nature depleted in the world, so again we cannot afford to be losing and negatively impacting our natural environment with projects like the proposed LTC.

We have concerns that your assessment of nitrogen deposition is also not taking the proposed Blue Bell Hill improvements into account. This is of particular importance since those works are needed as a direct result of the proposed LTC, if it goes ahead.

This again highlights the failings in assessing and consulting on route options, because you failed to give adequate importance and consultation on Option C variant, which included improvements between the M20 and M2, the A229 (Blue Bell Hill).

Option C variant was ruled out because it was deemed it would have limited economic benefits, high environmental impact, a high cost and would have little benefit in

transferring traffic from Dartford onto Location C routes. It was not considered to be essential to the new crossing scheme⁷. Yet as mentioned, it is now being progressed as a separate stand-alone project as a direct result of the proposed LTC, which stands to reason if the proposed LTC is aimed at serving the ports in the South East.

With 70% of all goods in and out of the Port of Dover alone using the Dartford Crossing, and there being no rail connection to the port, all freight is by road. The main route in and out of the Port of Dover is via the M20. The proposed LTC does not connect to the M20, which then leads to the need for the A229 (Blue Bell Hill) to be used by all port traffic wanting to access the LTC, if it goes ahead.

This is just another example of the false economy of the proposed LTC, which itself already has questionable value for money issues and an adjusted benefit cost ratio that continues to drop.

If as you say you are truly considering feedback, then why are you not taking all feedback into consideration and acting accordingly? It seems to us that the only thing you take into account is anything that benefits your needs and wants, rather than what is the right thing to do.

This of course becomes even more obvious when you take into account the fact that National Highways own Annual Reports highlight that failure to deliver the proposed LTC is an existential threat to the organisation⁸.

We are concerned that the consultation booklet reports an increase in greenhouse gas emissions. Whilst NH/LTC may consider it to be small and insignificant, we believe all the 'small' 'insignificant' increases across the board will add up and make a difference, and should not be played down and ignored.

⁷ https://highwaysengland.citizenspace.com/ltc/lower-thames-crossing-consultation/user_uploads/lower-thames-crossing-consultation-summary-business-case.pdf

⁸ https://nationalhighways.co.uk/media/baphtjxv/national_highways_ar22_interactive_final.pdf

It is of course impossible to properly assess this kind of thing, since NH/LTC are not sharing any actual data. Instead we are supposed to blindly trust what we are being told. With the track record that NH/LTC have we are not inclined to blindly trust, and instead remain concerned and questioning.

We also question the fact that despite Government announcing that the start of construction of the LTC will be delayed by two years, if permission is granted, no new assessment is being carried out by NH/LTC.

The cumulative impacts need to be given proper and adequate consideration.

We fail to see how you can consider it mitigation or compensation because for every bit of land you propose to take for the project, whether it be for the proposed route, or environmental mitigation or compensation, you are reducing the amount of land available for farming and the natural environment.

Particularly with habitats and wildlife you cannot keep attempting to cram more and more into smaller and smaller areas. How would you like it if more and more people were put in your home to live with you? How would you like it if the supermarket where you usually do your grocery shopping was unable to get more stock, but the amount of people shopping kept growing?

At a time of climate emergency all impacts to our environment, including nitrogen deposition need to be considered and steps taken to stop the harm caused. Rather than playing with the amount of compensation, the serious fact that the proposed LTC is not fit for purpose and needs scrapping needs to be addressed.

On the topic of nitrogen deposition, we also still have all the concerns we have voiced previously in earlier consultation. We do not deem that what is being proposed would be adequate, nor that consultation on this aspect has been adequate.

We are surprised since you are covering the topic of nitrogen deposition again in this consultation that you have not extended the consultation to cover the impacts to

Epping Forest Special Area of Conservation. This was an area that has been controversial as to what is deemed acceptable in regard to the impact of nitrogen deposition, but no consultation in the area has been carried out. This is not acceptable and a real concern.

We do not agree with the need to take land for this project full stop, whether it be for the proposed route, mitigation, or compensation, as evidence shows that the proposed LTC fails to meet scheme objectives, fails against various legislation, and is simply not fit for purpose. We therefore completely disagree with this and all changes being proposed, because they are part of a project that needs to be scrapped immediately.

Northern Tunnel Portal change

We begin by stating that yet again this section of the Consultation Booklet has been very confusing to many, and we do not feel that the information has been presented in a clear and informative way.

It is not clear why it has taken to this stage in the process for NH/LTC to finally decide that more leeway may be needed. We believe that this is just another example of inadequate planning and design up to this point, and it is something that should have been decided and clarified prior to the submission/resubmission of the LTC DCO.

Since the first attempt to submit the LTC DCO was in Oct 2020, it has been a considerable length of time for this aspect to be adequately considered and proposed. There has also been plenty of time for any further consultation such as this to be included in consultations prior to the resubmission of the LTC DCO application.

We also note that the ultimately decision will be up to the contractor, which seems to pre-determine that what we think is bypassed, and also that public perception is that the contractor will likely do what is deemed easiest and cheapest for them, rather than what is necessarily the best thing to do.

In light of the update about the possibility of using either one or two Tunnel Boring Machines (TBM) we also question why there is no clarification as to the assessment or potential need for any changes to the southern end of the LTC tunnel, if only one TBM were to be used, meaning it would start tunnelling back from the southern end.

If as NH/LTC state in an email to us there is no need for reassessment and proposed change to the southern portal we question why adequate assessment could be carried out for one side but not the other, and why this issue of leeway for the contractor has not been picked up sooner.

We fail to see how the claim of there being less material use and construction waste can be true, if the 'tunnel' is not actually changing in total length. NH/LTC have failed to provide any information or evidence to back up this claim.

Page 18 of the consultation booklet covers the ‘Environmental topic’ of Climate, and states that the proposed changed *“will have a negligible effect on resilience of the project to climate change and on the amount of carbon generated in the construction phase of LTC. Therefore, no new of different significant effects are anticipated”*

Again, we have concern and question what is deemed ‘significant’, and how cumulatively these ‘insignificant’ amounts add up.

This statement is contradictory, and doesn’t even clarify whether the negligible affect would be positive or negative, but we assume it would be negative, just like the rest of the proposed project.

When we questioned NH/LTC about this aspect the response we got was, *“There is no connection between the proposed increase to the limits of deviation and resilience for climate change. The headwall location is an internal interface between the bored tunnel and the cut and cover structure.”*

Yet again, this is contradictory to what is stated in the consultation booklet, as per above.

Resilience of the project to climate change is of particular concern in this aspect of the project due to concerns about the tunnel portals being within flood plain, and an area that is predicted to be at high risk of being flooded in the not too distant future.

Since flooding is one aspect of how the project needs to be climate resilient, this is a very important factor that is missing any real clarification within the booklet.

To be proposing such a hugely destructive and harmful project is bad enough.

To be proposing such a hugely destructive and harmful project, that fails to meet scheme objectives and is not fit for purpose is even worse.

To be proposing such a hugely destructive and harmful project, that fails to meet scheme objectives and is not fit for purpose, and would be part of the cause for the project not having longevity just to flood risk from climate change is ludicrous and unthinkable.

In regard to climate change impacts, we again stress our concerns that despite the Government's announcement to delay the start of LTC construction by two years, if permission is granted, NH/LTC are still not considering a review and reassessment of the project based on the two year delay, which could be extremely important as carbon budgets change year to year, and that fact needs to be analysed at very least.

It is not good enough that in the response provided to us via email on this topic said that *"the carbon assessment within the DCO Application represents a reasonable worst case assessment"*, because the DCO application was prepared and submitted before the two year delay was announced, so has not likely been factored into the analysis.

NH/LTC are very quick to publicise their claims of reduction in carbon emissions of the proposed LTC. Yet when questioned further on various occasions have been unable or unwilling to provide any evidence to back up the claims. This is blatant attempts to greenwash the project. The lack of transparency and evidence leaves a lot to be desired, and does not equate to fair and adequate consultation, or promotion of such a hugely destructive and harmful project.

Therefore, yet again we do not believe or trust the claims made, and remain concerned and strongly opposed.

Revised utility proposals (East Tilbury)

In regard to the first proposed change regarding the proposed change to the temporary Linford water pipeline, we question why the alignment of the temporary water pipeline was originally proposed in such a zigzag route.

It is our understanding that Nationally Significant Infrastructure Projects (NSIPs) are supposed to be designed so they only include land that is essentially needed for the project.

To have been proposing taking so much land to accommodate such a zigzag route for the temporary water pipeline seems unnecessary.

We question why a route more closely aligned to the proposed route was not originally proposed, particularly since this is supposed to be a temporary pipeline. Why has it taken so long to propose such a change?

We also have concerns about the impacts the use of water for the Tunnel Boring Machines will have on future water security.

We note that Essex and Suffolk Water have concerns over this aspect also, as highlighted in their LTC DCO Procedural Deadline B submission⁹.

Now more than ever, at a time of climate emergency we need to be super careful to protect our natural environment and resources. To be negligent and wasteful of our water supply is completely irresponsible and unacceptable.

If people are going to be in a position of not having enough water to survive, or not having another road that is not fit for purpose, it is obvious where priorities should lay.

⁹ [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-002179-Northumbrian%20Water%20Limited%20operating%20as%20Essex%20and%20Suffolk%20Water\)%20-%20Written%20submissions%20on%20the%20Examination%20procedure%20and%20draft%20timetable.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-002179-Northumbrian%20Water%20Limited%20operating%20as%20Essex%20and%20Suffolk%20Water)%20-%20Written%20submissions%20on%20the%20Examination%20procedure%20and%20draft%20timetable.pdf)

We also question the additional impact of getting the water for the Tunnel Boring Machine (TBM) south of the river, if only one TBM is used, for when it returns south to north for the second tunnel.

Pumping water a further distance must have implications too, which don't appear to have been covered in the information provided. It seems to us to again be a case of NH/LTC only presenting the information that is favourable to getting what they want and need, rather than offering the facts and realities.

We also question the fact that the land proposed to be removed from the order limits is land that is currently subject to a planning application for a housing development that has been ongoing since 2016 (Planning Application 16/01232/OUT)¹⁰.

The latest documentation associated with this housing development planning application has provision for whether the proposed LTC goes ahead or not.

We note that part of the housing development planning application covers a new bridge across the railway line, as a selling point, presumably to win over locals in the hope they will support the proposed housing development because East Tilbury is so cut off due to the railway line.

It appears to us that the proposed new bridge is similar if not the same location as was being discussed and offered by NH/LTC to Thurrock Council as also discussed at an LTC Task Force meeting.

It seems very co-incidental to us that NH/LTC were offering to build this bridge to firstly facilitate a haul road route for construction of the LTC, but also as a permanent bridge for future use by the public, and that such an offer was withdrawn, only for the said land to now be in a position of being removed from the order limits and the associated housing developer of said site is now proposing the same bridge.

¹⁰ <https://regs.thurrock.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=OD52TXQGH2J00>

We find it unacceptable that NH/LTC have denied the promise of the bridge, despite it being on public record that they had indeed made the offer¹¹.

In regard to the housing development we asked via email whether NH/LTC have assessed the impacts to the proposed housing development (on the shaded orange area)? If so please provide details. If not please explain why not.

We were told: *“The proposed development is included within the Project’s Uncertainty Log – as set out in Table A.1 of 7.7 Combined Modelling and Appraisal Report – Appendix C – Transport Forecasting Package Annexes [APP-523]¹². This means the growth within the Project’s transport model has been spatially adjusted to include this proposed 1,000 residential development.*

Output from the Project’s transport model is shown within the 7.9 Transport Assessment [APP-529]¹³ and data from the model is used by a number of environmental topics as set out within the 6.1 Environmental Statement.

The inter-project cumulative effects assessment presented in ES Chapter 16 Cumulative Effects Assessment [APP-154]¹⁴ did not include Planning application 16/01232/OUT as at the time of assessment the development did not fall within the temporal scope of the assessment. The age of the information available for the planning application indicated that the development was no longer being progressed. The amended information for the development was not submitted until after the DCO Application for the Project was submitted.

¹¹ <https://youtu.be/hukA4RHw-hQ?t=2425>

¹² <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001334-7.7%20Combined%20Modelling%20and%20Appraisal%20Report%20-%20Appendix%20C%20-%20Transport%20Forecasting%20Package%20Annexes.pdf>

¹³ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001481-7.9%20Transport%20Assessment.pdf>

¹⁴ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001585-6.1%20Environmental%20Statement%20Chapter%2016%20-%20Cumulative%20Effects%20Assessment.pdf>

The proposed housing development was not included in ES Chapter 13's [APP-151] assessment of development land because it does not benefit from an allocation or planning permission."

Yet again it appears that NH/LTC are manipulating the information and analysis to suit the needs and wants of the project and themselves.

How can it be that the housing development is included in one aspect of analysis, yet deemed it wasn't available at the time of the DCO application being submitted for another form of analysis.

There were 1000 house proposed within the original 2016 planning application¹⁵, and all associated documentation is available on Thurrock Council's planning portal. We would also expect that the landowner/developer would have been in discussions of some sort with NH/LTC, so would likely have expressed their interest in moving ahead with the development.

The Uncertainty Log actually details the development as 'More than likely', which hardly matched the comment of *"The age of the information available for the planning application indicated that the development was no longer being progressed"*.

We again have to question the coincidence and timing of the withdrawal of the promise by NH/LTC of a bridge over the railway, the housing developer updating the planning application including details of the bridge across the railway, and now the removal of the said land from the LTC order limits.

In regard to the second proposed relocation of Low Street Lane Utility Logistics Hub we again question why it has taken so long to make such a proposal?

¹⁵ https://regs.thurrock.gov.uk/online-applications/files/EFB3DA5B59750A1B50A6A153FFF0747C/pdf/16_01232_OUT-APPLICATION_FORM-275250.pdf

We also question why there is a need for two different Utility Logistics Hub in this location, and why they have not been combined.

How can you reduce the size of land needed for the two Utility Logistics Hubs, if you say they are co-located rather than combined? This is particularly questionable since you directed us to the Indicative ULH layouts contained on Page 39 of 6.3 Environmental Statement – Appendix 2.1 – Construction Supporting Information Plate 1.19 Utility Logistics Hub alternative indicative layout – [APP-335]¹⁶.

The indicative plans show two different shaped plans, one rectangular and other square. Neither match the proposed shape of the co-located hubs. If they are co-located and not combined then how can a size reduction be viable if no sections of the hubs to be shared, since they are co-located not combined?

The information provided has certainly not been clear and informative.

In a number of the responses sent by NH/LTC to our questions via email on these aspects of change there was mention of reduction in Flood Compensation Area (FCA).

Our question:

Can someone please explain why the temporary water pipeline was proposed in a zigzag line prior to this proposed change? What was the reasoning of that configuration, and why is a similar configuration not needed now?

NH/LTC response:

“The previous alignment was located between the proposed Tilbury Flood Compensation Area (FCA) – which has subsequently reduced in size, and existing utility networks. The pipeline is now located within the area that the FCA has vacated and is located further from receptors in East Tilbury.”

Our question:

¹⁶ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001485-6.3%20Environmental%20Statement%20Appendix%202.1%20-%20Construction%20Supporting%20Information.pdf>

Why all of a sudden is the land that is proposed to be removed from the Order Limits not needed? What changed and why wasn't the reason identified sooner?

NH/LTC response:

"The Project continues to develop its design as a collaborative and iterative process, as explained in the Environmental Statement Chapter 2 – Project Description [APP-140]. Following stakeholder feedback and other design developments such as the reduction in the size of the FCA, the Project has reviewed its wider proposals, and following assessments of them, has determined it wishes to undertake these modifications to the application. This consultation was the first point at which these were developed sufficiently to consider and consult on them."

Our question:

Why has it taken this long to consider and propose locating the Utility Logistics Hub where it is now being proposed? Why was there previously a need to have two separate ULH rather than condensing them into one ULH?

NH/LTC response:

"To clarify, there are still two ULH proposed. The ULH are co-located rather than combined.
The Project continues to develop its design as a collaborative and iterative process, as explained in the Environmental Statement Chapter 2 – Project Description [APP-140]. Following stakeholder feedback and other design and programme developments such as the reduction in the size of the FCA and when this FCA would need to be constructed, the Project has reviewed its wider proposals and determined that re-locating the ULH to its proposed location reduces the impact to the residents of Low Street Lane and permits the reduction of the combined sizes of the ULH's, therefore impacting less land temporarily whilst ensuring the deliverability of the Project on time."

What is not apparent is where and when the Flood Compensation Area (FCA) was reduced. If it was prior to the DCO application being resubmitted why were these latest changes not also identified and either consulted on or changed in the DCO application? If it was since the DCO application was resubmitted why are details of the reduction not being highlighted and consulted on now?

This appears to be more confusing and misleading information, that is yet again anything but clear and informative.

In regard to the third proposed change of land use to the west of Linford we yet again question why this something that hadn't been considered and dealt with before now, and certainly prior to the DCO application being resubmitted.

The overhead powerlines have not changed location, so why didn't the utility owner or NH/LTC recognise that the land in question was only detailed and being proposed as a temporary possession of land, rather than temporary possession of land with permanent acquisition of rights before now?

It has been apparent to us that proposed utility works tend to also seek this land use status by the very nature that utilities will need ongoing maintenance, so rights would be needed.

Rather than a proposed change as such we see this as yet another example of inadequacies of the LTC consultation and project works.

It leaves us concerned about what other aspects have been poorly considered or overlooked that could lead to other changes being proposed, or issues being created through poor design and planning.

Tunnel Boring Machine

We note that NH/LTC consider whether one of two Tunnel Boring Machines (TBMs) are to be used an update rather than a proposed change that is being consulted on.

However, we also note that the LTC DCO Examining Authority feel it is relevant, since they have included such an aspect in Item 4 of the agenda for the Issue Specific Hearing 1 (Project Definition)¹⁷.

Since this is technically something that has changed, or not been presented to us previously we too believe it is something to be consulted on, and therefore share our comments.

The consultation booklet states that *“Delivering the works using a single TBM could deliver several efficiencies, particularly in terms of significant cost savings and a reduction in material use. Using a single TBM would result in a saving of approximately 38,000 tonnes of carbon by using less machinery.”*

These claims have been made, but no real information or evidence to back up the claims was provided, so we asked some questions via email.

In response to us asking for an estimated cost of using two TBMs would be, and also what the estimated cost of using 1 TBM would be, we received the following response: *“We are currently in the process of procuring the delivery partner for the Tunnels and Approach Roads contract. We anticipate cost savings could be derived from using one tunnel boring machine (TBM), however costs will not be firmed up until the procurement is completed. No decision has been taken on whether one or two TBMs would be used.”*

¹⁷ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-002237-LTC%20-%20ISH%201%20Project%20definition%20Draft%20Agenda.pdf>

This clearly shows that claims are being made which have not/cannot be quantified, and are yet again misleading.

We could equally claim that we could buy a lottery ticket and anticipate that we could become millionaires, doesn't mean to say it will happen!

Of the claim about reduction of carbon emissions we asked how the reduction of 38,000 tonnes of carbon emissions has been calculated, since you would still be completing two tunnels and therefore the same amount of work must need to be done regardless of whether it is done with 1 or 2 TBMs. The response we received was *"The reduction in carbon emissions relates to the reduction in machinery required for one TBM, for example the reduced TBM steel required to build one TBM rather than two."*

According to the LTC 7.19 Carbon and Energy Management Plan¹⁸ Table C3 states in regard to tunnels activities that *"Bill of Quantities except for any items not quantified in sufficient detail, in which case, professional judgement has been used. This mainly relates to temporary assets that have not yet been designed in detail. Third-party data for tunnel boring machine and mechanical and ventilation plant in tunnel."*

Why is it that when asked about carbon figures you feel it suitably adequate and acceptable to provide guesstimates, but when asked about cost of a project that is clearly increasing in cost and dropping in Benefit Cost Ratio you are unable or unwilling to provide an estimated cost of TBMs?

Again, this is not clear and informative, it is speculative propaganda, that has not or cannot be quantified at this stage.

As has already been mentioned previously in regard to the temporary Linford water pipeline to supply the water for the TBM(s), we have concerns over the risk and impacts to the water supply.

¹⁸ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001501-7.19%20Carbon%20and%20Energy%20Management%20Plan.pdf>

We know Kent have issues of water shortages, and clearly Essex and Suffolk Water are also concerned about the threat of the LTC to this water supply.

No clear information has been shared about the consequences of pumping the water to the south side of the river to supply the TBM on the return journey south to north, if only one TBM is used. We anticipate, since anticipating seems to be deemed acceptable when you are doing so, that there would be a negative impact as more power would be needed as well as materials to pipe the water to the southern side of the tunnel.

Similarly, we questioned what process would be used in regards to slurry treatment and segment production facilities, and how the spoil would be taken back through the first tunnel, if only one TBM was used, and whether they would need to be set up on both sides of the river to accommodate which side of the river the TBM was starting from.

The response from NH/LTC was, *“Slurry treatment and tunnel segment production remains the same as described in the Environmental Statement Chapter 2 – Project Description [APP-140]¹⁹. Please refer to paragraphs 2.7.147 to 2.7.150. All tunnel production activities remain within the North portal, and slurry from the northbound tunnel drive would be pumped through a pipe network to the north portal through the tunnel that would already have been constructed by the southbound drive.”*

and

“The spoil arising from the tunnelling process, as described in the consultation material, will be a slurry of chalk and water, which is fluid and can be pumped through pipelines. The excavation arisings from the tunnelling, suspended in a water-based slurry as detailed in the Environmental Statement Chapter 2 – Project Description [APP-140], Paragraph 2.7.147 will be pumped via a pipe network from the cutter head back to the

¹⁹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001588-6.1%20Environmental%20Statement%20Chapter%202%20-%20Project%20Description.pdf>

slurry treatment plant (STP) which is located within the North portal. This process remains unchanged for a single TBM, with the pipeline passing through the first tunnel during the construction of the second tunnel. “

We again question the implications this would have on the power and materials need for this, also how the segments would be transported through to the southern side for use when the single TBM tunnels south to north, and we anticipate it would have a negative impact.

The consultation booklet states that *“the construction works required at the northern tunnel entrance before the tunnelling can start would be smaller in scale, allowing tunnelling to start approximately 10 months earlier in the programme”*.

Even with the response provided by NH/LTC via email this does not make sense as portal structures must surely still be needed for both tunnel entrances, so works would still need to be carried out, the only difference being that part of the work would be carried out south of the river rather than to the north to accommodate the single TBM on the return journey south to north.

We asked via email how many staff would be used if two TBMs were to be used, and also how many staff would be used if one TBM were to be used. The response we received from NH/LTC was, *“Please refer to the Workers Accommodation Report [APP-551]²⁰ for information on estimated worker numbers for TBM(s). Numbers for one TBM will be slightly lower associated with the reduction in the number of TBMs.”*

Yet again the response does not answer the question asked. The linked DCO document is a 73 page document and no clear signposting was offered. We also question why a simply answer could not be shared, ie an actual figure.

²⁰ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001497-7.18%20Workers%20Accommodation%20Report.pdf>

Clearly there is not a relevant figure in the linked DCO document for if only one TBM were to be used, as the DCO application has been submitted on the basis of two TBMs being used.

Again, we question why a clear and informative answer could not be provided, as in an actual estimated figure, rather than an evasive response that told us nothing, and offered nothing to back up the claim being made.

Whilst it may be so that if only one TBM is used less staff may be required, the staff that were needed would be needed for at least twice as long, because the fact is the TBMs would not be tunnelling any faster.

Statements are made about there being changes to staffing patterns, but when questioned about it the NH/LTC response said that “Staffing patterns will be determined by the Delivery Partner”.

Again, the information is not clear and informative, and is not based on any real planning that has been confirmed.

Yet again, this is another aspect that appears to be being left to the contractor, and we again question what is to say that they will do the right thing as opposed to what is cheapest and best for them?

It seems that whilst there have been many consultations, there are many aspects that are simply going to be left to the contractors to decide. Why consult us on things, and how can a true image of what is actually being proposed be considered when there are so many unknowns, with things being left to contractors whose main concern is going to be the cost and their profit, not what’s in our best interest. This is a serious concern.

When questioned we were told that the workers accommodation would still be on the north side of the river, and also that there wouldn’t be any additional set up/units etc needed on the south side of the river, if only one TBM were used.

We question how many additional vehicles movements this would generate if only one TBM is used with workers having to travel north to south to work and then back to the north when not working?

When we asked about this we were told *“As noted within the consultation booklet, there would be an overall reduction in movements related to the tunnelling activities if a single TBM was chosen. As the remainder of the construction programme and movements would not be affected by this change, this means that overall the total number of vehicle movements would reduce.”*

We cannot see how this can be, and do not trust or believe such a statement, as workers would need to make additional journeys to the south side of the river if everything associated remains on the north side of the river.

The consultation booklet states, *“As some works would be starting sooner at the northern compound, there would be an increase in journeys related to construction in the second year of building LTC. However, even with this increase they would remain lower than during the most intensive construction phase. Traffic during the most intensive construction phase would be slightly lower than compared with using two TBMs.”*

This statement is confusing and contradictory in itself, especially when the response to our question about when the most intensive construction phase is considered to be is taken into account.

We were told, *“The proposed construction programme would be complex in nature, lasting for a number of years and covering a wide area. Given its complexity, there is no one phase that is most intensive in all locations. The forecast impact of the construction of the Project remains as is set out in Chapter 8 of 7.9 Transport Assessment [APP-529]²¹.”*

²¹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001481-7.9%20Transport%20Assessment.pdf>

How can you be stating something would remain lower than during the most intensive phase of construction, but then also be admitting that there is no one phase that is most intensive in all locations? This is again confusing and contradictory.

We asked, “When you have previously quoted tunnelling would take 4.5-5 years was this with both TBMs tunnelling at the same time simultaneously, or sending one through, then setting it back up north of the river to do the second tunnel?”

The response we received, “*The duration referred to relates to the tunnel construction as a whole and includes fit out and commissioning*”.

The response doesn’t actually answer the question that was asked.

We also asked, “How long would it take one TBM to tunnel each tunnel?”

The response was, “*The indicative tunnelling programme remains consistent with the programme shown in Plate 2.13 on page 147 in the Environmental Statement Chapter 2 – Project Description [APP-140]²².*”

Firstly, when we asked if the 4.5-5 years previously quoted as how long tunnelling would take you said it was the duration relating to the tunnel construction as a whole and includes fit out and commissioning.

Yet Plate 2.13 (as signposted above) states ‘Tunnel and fit out’ as taking 3.75 years.

This is clearly different from the information we have been told previously, and there has been no further update or explanation as to the difference in the time scale.

²² <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001588-6.1%20Environmental%20Statement%20Chapter%202%20-%20Project%20Description.pdf>

Secondly, the details in the DCO document that was signposted and link provided for, is based on two TBMs being used, so why have we been signposted to it in response to a question asking how long it would take one TBM to tunnel each tunnel?

Just another example of NH/LTC not being willing or able to answer our questions, and provide clear and informative information.

Additionally, we asked how long would it take to turn the TBM around, if only one is used. The response we got was, *“The indicative tunnelling programme remains consistent with the programme shown in Plate 2.13 on page 147 in the Environmental Statement Chapter 2 – Project Description [APP-140]. The duration of the turn around will be determined by the Delivery Partner.”*

Again, no answer to our question, and again being signposted to a document that is clearly about a scenario where two TBMs are being proposed.

How can it be stated that the indicative tunnelling programme remains consistent with the programme for using two TBMs, if only one TBM were to be used? It stands to reason that there would be a difference in the schedule and timings if only one TBM were used.

Plus, you admit that you do not know how long the turn around of the TBM would take as it would be determined by the Delivery Partner.

By default you would also therefore not know how long the overall tunnelling is expected to take, yet you advised us that the indicative programme would remain consistent. This does not add up as you admit certain aspects would be determined by the Delivery Partner.

We asked NH/LTC to provide details of the process involved in setting up, turning, and dismantling the TBMs. Would cranes be needed at both ends? How long would the cranes be set up for? What would the additional vehicle movements associated with the cranes be?

The response, *“There is no change to the process for setting up or dismantling the TBMs. The TBM will be turned around using temporary moveable platforms. There are no additional fixed cranes required to turn the TBM around and no additional vehicle movements required for cranes.”*

This response does not make it clear whether the temporary moveable platforms would generate additional vehicle movements or other impacts. We suspect that careful wording has been used to avoid disclosing the possibility of additional vehicle movements, as there must be some level of additional impact involved in the turn around of such a huge TBM.

We also asked NH/LTC to provide further details of the negative impacts to those living south of the river, as clearly there would be a significant difference between them having the TBMs arrive south of the river compared to having one TBM that needs to be turned around and then all the spoil arriving south of the river and having to be taken back to the northern side.

We were told, *“The TBM will be turned around within the southern portal structure. There are no changes to the impacts already assessed for those residents south of the river associated with the turnaround of the TBM or a south-north tunnel drive. Please refer to Q5 for details on the slurry movement.”*

This makes no sense at all, how can a huge TBM be turned around within the southern portal structure? What is this structure? If it is large enough to accommodate the turn around of a huge TBM then there must be impacts associated with the construction of such a structure. Surely there would be no need for such a structure if two TBMs were used and tunnelling were coming from the north to the south, so this would be an additional impact as a result of only using one TBM.

We do not believe that there would not be additional impacts to those in the vicinity of the southern tunnel portal and construction area, if only one TBM were to be used, and we have concerns about those impacts.

Additionally, we asked, whether NH/LTC would be questioning the shortlisted contractors on whether they will use 1 or 2 TBMs prior to awarding the tunnels contract?

The response was, *“The bidders will set out their proposed construction methods in their tender submissions.”*

If this is the case then firstly with some contracts already having been awarded surely there must be a new level of information available that has not yet been highlighted/shared with the public?

We have been told “it will be up to the contractor” on various aspects, if they are at a stage whereby proposed construction methods have been set out, then further clarity could be given on these aspects.

We also raise concerns and question the impacts of the Government decision to delay the start of construction by two years on the costing and bids that have been awarded contracts, as costs will of course rise over the course of the delay, which could be extremely relevant and impactful to both the bids that have been accepted, and the overall cost and associated Benefit Cost Ratio (BCR) of the project.

We therefore believe that the cost and BCR should be reviewed and updated, as the costings that are currently being used are already out of date, because they are as at August 2020.

All too often projects like this run over time and over budget, and we have concerns about the rising cost and dropping BCR of the proposed LTC before the project has even been examined, let alone been granted permission or works begun.

The cost has risen from £4.1bn up to £9bn, and the adjusted BCR dropping from 3.1 down to 1.22. This is all of course as at August 2020, and doesn't take many other aspects, including the two year delay into consideration which would clearly make a difference.

We asked whether the TBM/s would be rented or bought, if LTC goes ahead?
We were told, *“The TBMs would be procured by the Delivery Partner. It will be a matter for them which procurement route they choose.”*

We also asked, if rented, how can it be considered a cost saving to use only one as it would need to be rented twice as long?
The reply, *“Irrespective of the procurement mechanism taken by the Delivery Partner there would be savings from the use of only 1 TBM both in terms of its procurement and operation.”*

And, if bought, please provide the estimated cost, and what would be done with the TBM/s after LTC is constructed (if it goes ahead)?
The response, *“Costs for TBMs will form part of the bids for the Tunnels and Approaches contract. The TBMs would likely be dismantled and recycled at the end of construction, however that is a matter for the appointed delivery partner.”*

All three responses show a clear lack of clarity on what the cost implications of whether one or two TBMs were used would actually be, along with any other associated impacts.

If NH/LTC do not know these things how can the claims being made be considered legitimate and trustworthy?

The consultation booklet states there would be minimal changes to the construction that would alter the air quality effects, no new or different significant effects are anticipated.

This does not clarify whether the minimal change would be a potential worsening or improvement in air quality. The response you offered to our questioning this fact did not answer the question either.

We have as outlined above concerns about how much anticipated outcomes there might be, and how little confidence we have in the claims that have been made in regard to whether one or two TBMs would be used, if the proposed LTC goes ahead.

We therefore have no way of knowing the truth about effects on air quality as a result of this possible change to the construction of the tunnels, which is cause for concern.

On the topic of tunnelling and TBMs we also have concerns about the potential of incidents and impacts associated with tunnelling.

Particularly in light of the strange and worrying issues that are being faced in regard to HS2.

Bubbling water and foam, large sinkholes appearing, are not things that we wish to have the potential risk of.

From what we have seen possible causes have been so far pointing towards the fact the area that is being tunnelled is largely chalk.

With the proposed LTC route largely passing through chalk areas, we are not reassured that similar won't happen if the proposed LTC goes ahead.

The response we got from NH/LTC about this, *"We regularly meet with other major projects to learn lessons across different programmes relating to a range of matters. HS2 have confirmed their investigations are ongoing."* offers no real reassurance.

We have little, if any, confidence in HS2 as they initially said the first issue was a one off, when the reality has obviously been very different.

From experience of dealing with NH/LTC for a number of years now, and the amount of inadequate and misleading information that has been provided, we equally have little if any confidence on that front either.

Consultation booklet – Foreword

The LTC Minor Refinements Booklet includes a Foreword by the LTC Executive Director, Matt Palmer. The wording of this Foreword contains information that is misleading and full of propaganda and nonsense.

For a government company to be misrepresenting information in this way it totally unacceptable, and to us screams of the desperation of a project that is struggling and hopefully soon to be put out of its misery.

It also wrongly gives the impression that the proposed LTC is guaranteed to go ahead, which is simply not true, and to attempt to insinuate anything else is disingenuous to say the least.

It is stated, *“This is an important stage in the development of the Lower Thames Crossing, which will be vital in tackling the daily delays and frustration caused by congestion at the Dartford Crossing and in unlocking the true potential of the Thames Estuary.”*

When we questioned how the proposed LTC would be vital in tackling the daily delays etc as above we were told, *“The Project would include junctions with key parts of the strategic road network (SRN), such as the A2/M2, A13/A1089 and M25. It would also provide connections to a number of local roads via the junctions at Orsett Cock in Thurrock and at Gravesend East.*

The new road would feature advanced safety systems, including variable mandatory speed limits, red X lane signalling to support incident management, stopped vehicle detection systems, CCTV, and emergency areas for road users to access in an emergency. Incident management plans and protocols would play a key part in minimising the impact of incidents.

The number of incidents and collisions at the Dartford Crossing would fall as a result of the reduced traffic flows, which would improve resilience at both crossings. For more information about the traffic modelling, see 7.7 Transport Forecasting Package, which is Appendix C of the Combined Modelling and Appraisal Report [Application Document

APP-523²³. As a result of the around 20% reduction in traffic in the peak hours the impact of incidents on the road network would be reduced and the road network would be able to recover faster.”

The simple fact is that the Dartford Crossing has a design capacity of 135,000 vehicles per day, yet regularly sees 180,000 per day. This means that we’d need to see a reduction of more than 25% to bring the current crossing back below design capacity.

As stated in the response the traffic reduction at the current crossing, if the proposed LTC goes ahead, is expected to be around 20%. We have also previously been told that this would drop to just 14% by 2044.

Thurrock Council as a host Local Authority has been provided with official traffic modelling data and a cordoned model, and after analysis have publicly stated that they believe the reduction to actually be as low as 4% in the am peak hour and 11% in the pm peak hour.

It is clear to see that even if the proposed LTC were to go ahead, the current Dartford Crossing would remain over design capacity, and therefore still suffer many of the same issues and incidents.

Evidence states that there are over 3000 incidents per year at the current crossing, so this is hardly a small number of incidents that are going to vanish overnight.

The proposed LTC will also not address the fact that traffic is brought to a halt every 15-20 minutes by the traffic lights turning red to allow hazardous vehicles to be escorted. Nor the traffic being stopped to allow oversized vehicles to be corralled when they are in the wrong lane. It does not change the fact there is a stretch of road that has a 50mph speed limit on what is essentially part of the M25, that was never properly completed as a motorway orbital. Nor the fact that poor planning and design sees junctions too close to the crossing. All with more and more development being proposed that would increase traffic in and through the area.

²³ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001348-7.7%20Combined%20Modelling%20and%20Appraisal%20Report%20-%20Appendix%20C%20-%20Transport%20Forecasting%20Package.pdf>

It is therefore apparent that there would still be a high number of incidents at the current crossing, which would remain over design capacity.

Not only that, but since NH/LTC are not planning how traffic would migrate between the two crossings, when there are incidents, and there wouldn't be adequate connections, the result would be more chaos, congestion and pollution.

We are seriously concerned that there would be just one single lane for traffic from the A2 coastbound onto the LTC.

Also, that there would be no direct access to the LTC from the A13 eastbound, and that traffic would instead have to take the Stanford Detour as it have become known. All the way down the A13 eastbound to the A1014/Stanford junction, up around the already busy traffic lighted roundabout alongside all the port and other traffic, then back westbound on the A13 until the LTC slip road which would be just after, but accessible from, the A128 Orsett junction.

If instead traffic tries to come off the M25 onto the LTC directly, the M25 would be 5 lanes at this point, going onto just 2 lanes southbound on the LTC until past the A13 junction.

This would again all cause further negative impacts, more chaos, congestion and pollution.

As for connections with other existing roads, the proposed LTC would negatively impact traffic flow on many other roads, many of which are already at or overcapacity themselves.

It is not acceptable for NH/LTC to utilise roads like the A13/Orsett Cock roundabout in order for the LTC to be able to operate. These roads/junctions are already busy. There would also be the question of not only the congestion and pollution created, but who takes responsibility for the management and maintenance and associated costs for such impacts.

There is also the fact that new roads create more traffic, induced demand, and that around a 50% increase in cross river traffic is expected, if the proposed LTC goes ahead. New roads do not solve the problem of congestion, far from it.

As for the ‘advanced safety system’ it doesn’t matter how NH/LTC attempt to dress it up and hide the fact, the proposed LTC would be a ‘smart’ motorway by stealth, as covered later in our response.

We asked NH/LTC for an explanation of how it has been calculated that the proposed LTC would be the greenest road ever built, and provide evidence to back up this claim.

The response, “There are a number of ways in which the Lower Thames Crossing will be the greenest road ever built in the UK. A Pathfinder scheme, the Lower Thames Crossing is exploring ways to achieve carbon neutral construction, and will pass on learnings to future major infrastructure projects. The amount of carbon expected from construction has been significantly reduced by optimising the design of the road, as well as the methods and materials used to construct it. For example, we are considering alternatives to carbon intensive materials such as concrete and steel; and exploring removing diesel from our work sites by only using hydrogen and electric powered plant.

The project is the first major UK infrastructure project to put carbon reduction at the heart of its procurement process, with incentives for contractors to drive further continuous carbon reduction. Due to planned government policy, (outlined in the Transport decarbonisation plan – GOV.UK (www.gov.uk)²⁴) by the time the new road opens, brand new petrol and diesel cars will no longer be offered for sale. The government’s plans to decarbonise cars and goods vehicles would cut the 60-year forecast of carbon emissions from Lower Thames Crossing traffic by at least 80%.

²⁴ <https://www.gov.uk/government/publications/transport-decarbonisation-plan>

The Lower Thames Crossing is also green by design – over 80% of the road will be in a tunnel, cutting or behind an embankment to reduce its visual impact on the landscape. Two new public parks will be created,

Chalk Park on the south bank of the River Thames and Tilbury Fields on the north bank. Over one million extra trees will be planted in Kent, Thurrock, Essex, Havering and Brentwood.”

We firstly comment that the bar for the greenest road every built in the UK is an extremely low bar in the first place, as road building is anything but green.

Secondly, the response received, and the propaganda that has been used in this respect for the project is highly speculative without any evidence to back up the actual claim.

Intentions, expectations, hopes and a fancy made up title of ‘pathfinder project’ are no guarantee that the road will be anything other than what evidence shows, a hugely destructive and harmful project.

The carbon emissions are still estimated to be a whopping 6.6 million tonnes, which is not compliant and in keeping with Net Zero.

There has also been a distinct lack of transparency on carbon emissions, with NH/LTC failing to share evidence to back up claims and data provided varying greatly and being completely all over the place.

When questioned by us and a leading industry journalist NH/LTC admitted that the technology is not available, and is unlikely to be available until at least towards the end of the construction period, if the LTC goes ahead.

The claim of an 80% reduction is also based on government claims for which there is no guarantee of happening. In fact, evidence suggest that Government are likely to fail to meet their legal commitments to Net Zero.

Putting a road in tunnel, cutting and embankment to reduce visual impact in no way stops the road being hugely destructive and harmful.

As for the claims of ‘parks’ please stop with the misleading propaganda, the reality is they are dumping grounds for the tunnel spoil, and a way to attempt to reduce vehicle movements by dumping the spoil as close to the tunnel portals as possible.

Nobody considers the ‘parks’ to be genuine community assets. Who wants to spend time in a park that is being polluted from a busy road like the proposed LTC?

And please no nonsense about air pollution dispersing within 200m of the road. Evidence shows that PM2.5 can travel thousands of miles and is deadly.

The claim of large amounts of tree planting is equally insulting considering the destruction and impacts to existing woodland and trees, including ancient woodland and veteran trees.

There is also the serious concern and issue that many of the proposed trees are to be planted within Hole Farm Community Woodland, which as highlighted elsewhere in our response is questionable to say the least, since the woodland is being progressed regardless of whether LTC goes ahead or not.

We therefore strongly object and declare that there is no way the proposed LTC can or should be considered or claimed to be green in any way shape or form.

When we asked NH/LTC to explain and provide evidence of how the proposed LTC would connect communities, the response we got was *“The Lower Thames Crossing would provide much needed additional capacity and reliability that would not only improve journeys, but drive growth across the region, as well create new jobs and green spaces for the local community and wildlife. It would give millions of people more flexibility and choice regarding where they choose to work, where they live and where they get their education, through quicker and more reliable journeys. Over 400,000 more jobs would be accessible within a 60-minute commute due to improved journey times.*

We are also creating around 40 miles of new and improved routes for walkers, cyclists and horseriders that will make it easier to enjoy nature as they move between parks, woodlands and heritage sites.”

As we have already detailed the proposed LTC would not provide additional capacity, it would actually create more traffic and more issues and chaos. It would not improve journeys, and growth simply results in yet more traffic movements and therefore more congestion and pollution, which ultimately leads to more calls for more roads, and so the vicious downward spiral continues.

Claims of more jobs being more accessible within a 60 minute commute just confirm what we have just said, that new roads create more traffic, more traffic creates more congestion.

We need to be moving to more sustainable transport/travel options, not encouraging the destructive and harmful modes of transport, we need to encourage and see modal shift.

We see a large part of the problem in that being that National Highways exists, and the clue is in the name, the pure focus in highways. What we actually need is integrated sustainable transport/travel options, not such a huge focus on highways.

Claims of creating new and improved routes for walkers, cyclist and horse riders are infuriating, and in many instances untrue. The realignment of an existing route purely because of the need to move it due to the proposed LTC is not and should not be claimed as a 'new' route.

There is no provision for any cross river active travel, and largely the proposed 'new and improved' routes are routes to nowhere. Take for example the zigzag and spiral routes, and the route that runs directly parallel to another through Tilbury Fields. All clear attempts to tick the active travel box, without any real benefits to active travel.

The proposed route is also not viable for public transport options, such as bus routes, due to the lack of adequate connections.

As a group that represents many in the local communities and those from further afield we do not agree that there are any benefits or ways in which the proposed LTC

would connect communities, other than in our fight against the proposed LTC, as it would sever, destroy and harm our communities.

The claim that the proposed LTC would enhance nature would be laughable if it wasn't so insulting and misleading.

When we asked for evidence to back up this claim the response we received was *"The Lower Thames Crossing is green by design, and aims to give nature the chance to thrive in the area. We're building seven green bridges to connect habitats across the new road, providing safe and easy ways for wildlife to travel between new and existing habitats along the length of the route. We will be planting over one million extra trees in the region, and we're working closely with wildlife experts to create bigger, better, more connected habitats across the region. We are creating three times as much woodland as that being lost, twice as much ditch and watercourse length as that affected, four times as many ponds, and a 50% increase in hedgerow length."*

As has already been highlighted, there is nothing green about the proposed LTC. Far from giving nature the chance to thrive, it would destroy and impact many habitats and much wildlife, including endangered species.

The 'green' bridges are just more attempts to greenwash the hugely destructive and harmful project.

Take the proposed Thong Lane 'green' bridge that comes to a T-junction after crossing the A2 southbound and provides no means for wildlife to safely cross a busy road. This is not a true green bridge and it is not beneficial to wildlife, more it would be guiding wildlife to a dangerous and busy road junction with no safe means to cross.

Such a hugely destructive and harmful project can never be considered to enhance nature, the complete opposite is the reality.

This fact is proven by the fact that the proposed LTC would fail to meet the newly set legal requirements for Biodiversity Net Gain.

We also asked NH/LTC to provide evidence/details of how the proposed LTC provides new ways to build infrastructure in a net zero future.

The response was “As mentioned above, the Lower Thames Crossing is a Pathfinder scheme, exploring ways to achieve carbon neutral construction. This means the project will be exploring new and innovative methods of construction, power and materials to help the UK government achieve its target of being net zero by 2050 – and, crucially – the project will share its carbon reduction learnings with the next major UK infrastructure scheme. The UK will still need new infrastructure in the future, whether that be transport, homes, schools or hospitals. The challenge for the UK construction sector is how can it continue to provide that new infrastructure in a net zero future. We are determined to play a significant part in defining how that can be achieved.”

The title of Pathfinder scheme offers no guarantees, it is just fancy made up title that has been created to try and greenwash a hugely destructive and harmful project.

‘Exploring’ new and innovative methods does not guarantee anything, other than time and money will be spent trying to find new/different ways of doing things, with no guaranteed results.

The reality is that the new ways we need, in regard to infrastructure in a net zero future, need to move away from the crazy and destructive and harmful obsession with new roads.

In conclusion on the Foreword by Mr Palmer, it is very clear that there is no evidence to back up any of the ludicrous claims being made, and to make these claims is disingenuous at any time, but particularly underhand and unethical to do so as a Foreword for a consultation booklet. It simply wrecks of desperation to try and make a failing project look better than it truly is.

Adequacy of Consultation

The Foreword

The foreword in the consultation booklet is very misleading and wrongly attempts to give the impression the proposed LTC is better than it would actually be if granted permission.

It attempts to give the impression that it would solve the problems at the Dartford Crossing. The reality is that evidence shows that the current crossing would still remain over design capacity, even if the proposed LTC goes ahead.

It advises that the construction partner for the roads to the north has been appointed, and that the tunnels and road to the south will be announced in the months ahead. We believe this is a blatant attempt to give the impression that the proposed LTC is definitely going ahead, a done deal, when the reality is that permission has not been granted and any agreements with contractors like this will be subject to permission being granted. To suggest anything else is disingenuous, especially within a foreword for a consultation.

Similar can be said of the statement about the proposed LTC being *the greenest road ever built in the UK, connect communities, enhance nature, and provide new ways to build infrastructure in a net zero future*.

The reality is that the bar of being a green road is set extremely low, and there is definitely nothing green about the hugely destructive and harmful proposed LTC.

Far from connecting communities, the proposed LTC would sever connections and have a large negative impact on communities.

Again, the proposed LTC would be hugely destructive and harmful, and would have a significant adverse impact on nature.

To date we have seen no evidence to show any new ways to build infrastructure in a net zero future. The estimated 6.6 million tonnes of carbon is very likely an underestimate, and in no way compatible with Net Zero commitments.

For the Executive Director of the project to be making statements and claims in this way is misleading and we deem it unacceptable at any time, and particularly as a foreword in the consultation booklet.

The consultation booklet

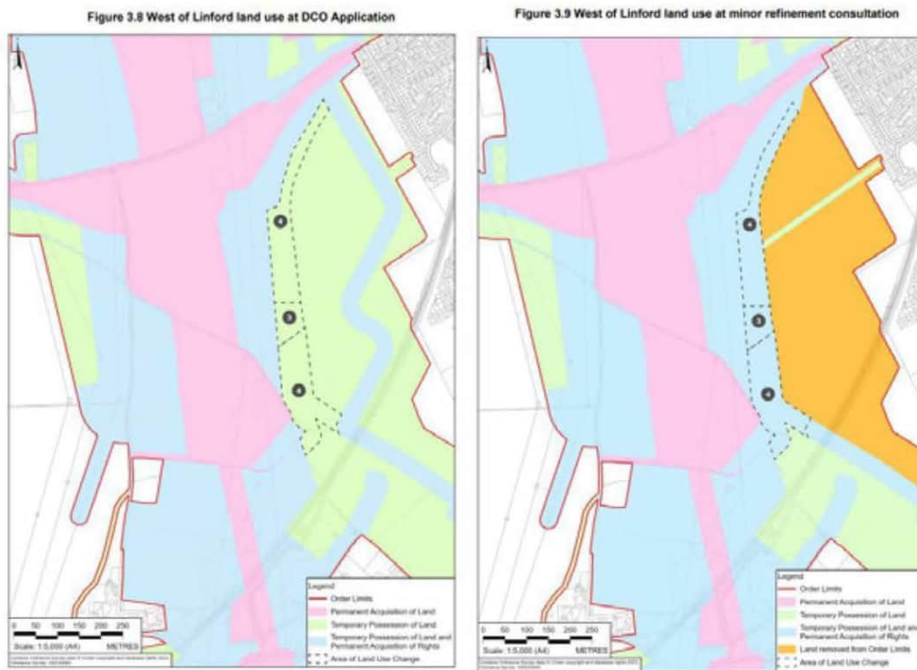
Whilst we acknowledge that National Highways/LTC believe this to be a minor refinements consultation, the consultation booklet provided is far from adequate.

We believe this to be more than a minor refinements consultation, and the consultation booklet has a distinct lack of evidence to back up the claims being made, and is also contradictory in places.

The consultation booklet generates more questions than providing answers or offering any real information, which is unacceptable when consultation materials should be clear and informative.

There is misleading and confusing information in the Minor Refinements Consultation booklet, for example you refer to Land Use on page 4, and state' "The land we need permanently to build and operate the LTC was 14.87km² and is now proposed to be 14.49km². This is indicated by pink shading in Figure 3.8 and Figure 3.9".

When you turn to pages 24 and 25 where Figures 3.8 and 3.9 are located there is no difference at all that we can see between the pink shaded areas. (*shown below*).



You have actually since admitted/confirmed there is no change in the land you need permanently to build and operate the LTC shown in in Figure 3.8 and Figure 3.9. To word the information in this way is extremely misleading and inadequate.

Lack of consultation events

The frustration and inadequacy of the consultation booklet is further exasperated by the fact there are no consultation events to attend to seek further clarification and information.

Even if National Highways/LTC didn't deem it necessary to have in person consultation events, some kind of virtual event would have been a token gesture for people to ask questions and seek further clarification on the confusing and inadequate consultation booklet.

Responses to questions via email

With the consultation booklet being far from adequate, clear or informative, and no consultation events to attend, we submitted a large number of questions to National Highways/LTC.

We did not receive responses to the majority of questions until within the last few days of the consultation. This has not given us fair opportunity to be able to send follow up questions and receive further responses before the deadline for responses.

The reference of responses, rather than answers, is purposeful and an accurate description of what we received, since many of the questions were not actually answered. Instead we received more nonsense and propaganda that avoided answering the questions we had submitted.

For us this appears to be a case that National Highways/LTC are unable to provide the answers because they don't want us to know the realities, and/or they simply do not have the answers of evidence to back up their claims and statements within the consultation booklet. Either way this is not acceptable behaviour during a public consultation, and confirms the inadequacy of the LTC Minor Refinements Consultation further.

Timings

When the potential of another round of consultation was made NH/LTC stated the intention of holding the consultation during the local election purdah period.

At that time, it was also stated that any proposed changes to the DCO application, along with a consultation report, would be made to the Examining Authority (ExA) in June 2023.

Whilst we raised concerns about the conflict of the consultation being held during purdah, so appreciate that didn't happen, we are still not happy that the delay and holding of another consultation has impacted resources to prepare for the DCO.

The timing has also meant that our Local Authorities have had extra pressure because they are busy trying to prepare for the DCO, and are also reforming after local elections.

We consider most, if not all, the proposed changes to be things that could have been dealt with prior to the DCO being resubmitted. Instead NH/LTC chose to push ahead and rush getting the DCO application resubmitted, which is unprofessional and unacceptable behaviour that has resulted in additional work and effort for all, including the ExA.

Inadequacies Conclusion

We conclude by saying that we and many people who we have been in contact with believe this to be yet another inadequate consultation from National Highways/LTC.

The information was misleading, confusing, contradictory, greatly lacking, inadequate, and lacked any real substance and evidence to back up much of what was being said.

National Highways/LTC failed to provide adequate answers to questions, instead choosing to avoid answering what was asked, and providing more propaganda and nonsense.

The fact the consultation booklet included a Foreword by the LTC Executive Director which was misleading propaganda is also deemed totally unacceptable, but sadly typical of National Highways/LTC behaviour throughout the project and process.

This consultation is largely about things that we believe could have and should have been dealt with prior to the DCO application being resubmitted. It has been an additional drain on time and resources of all who are attempting to participate in both the consultation and the LTC DCO.

The LTC Minor Refinements Consultation, just like all the LTC consultations that preceded it, has been another example of the inadequacies of National Highways and the proposed Lower Thames Crossing.

Other comments

Carbon Emissions

Since the Local Refinement Consultation ended in June 2022, and in December 2022 it was reported by New Civil Engineer²⁵ that NH/LTC had admitted that there wouldn't be an LTC if they don't resolve the carbon issues, we are surprised that there has been no further consultation or update in regard to carbon emissions of the proposed LTC.

We are equally surprised that bearing this fact in mind NH/LTC have continued to resubmit the LTC DCO knowing that with an estimated 6.6 million tonnes of carbon emissions, the proposed LTC would not be in keeping with the UK's legal commitment to Net Zero.

If an NH/LTC boss can publicly state that if the problems are not resolved there won't be an LTC, it is concerning that no evidence of progress in reducing the emissions has been announced and consulted on, and even more puzzling that NH/LTC are attempting to push ahead regardless.

Environment Act

Also in December 2022, new legal targets for the Environment Act were finally set²⁶. Legally these targets should have been set by the 31st October 2022, but despite knowing the new legal targets were being set NH/LTC chose to rush to resubmit the LTC DCO application rather than waiting for the new targets to be set, and carrying out the appropriate assessments and deal with any issues.

We have been voicing concerns that the whole proposed LTC route would fail against World Health Organization targets for PM2.5, from when it was WHO-10.

²⁵ <https://www.newcivilengineer.com/latest/national-highways-boss-there-wont-be-a-lower-thames-crossing-if-we-dont-resolve-carbon-issues-09-12-2022/>

²⁶ <https://www.gov.uk/government/news/new-legally-binding-environment-targets-set-out>

The newly adopted legal target in the Environment Act is the same level as WHO-10, and therefore the whole proposed LTC route would fail against the newly set legal target.

We are concerned that NH/LTC have not shared details of PM2.5 analysis, if such assessment has even yet been completed, as we were told it was still being assessed when we last asked.

Since NH/LTC knew these new targets were coming, and had a good idea what they would be from the consultation process for the new targets, we find it unacceptable that these works had not been carried out and considered.

However, from experience we are not surprised NH/LTC have stuck heads in the sand over the new legal targets, and they will not be favourable to the project, which is another problem for NH/LTC, as well as a serious concern for all of us.

Noise pollution

Since NH/LTC have admitted that more info is shared by contractors as bids are put together and awarded, we are disappointed that no further information has been shared and consulted upon in regard to noise pollution, and what is being proposed by way of noise barriers, which again is another aspect that is worryingly being left to contractors.

We also have concerns that noise pollution has been calculated to a distance of 300m of the proposed route.

As we are currently experiencing levels of noise pollution over a distance greater than 300m from the works taking place for London Gateway we are concerned that the distance being used to calculate the noise pollution of the LTC, particularly during construction is not adequate, and will result in issues, if the LTC goes ahead.

We would ask that further consideration is given and assessments carried out to ensure similar does not occur, if the proposed LTC goes ahead.

We also have concerns that the air and noise pollution monitors that have been placed in impacted communities are currently recording unusually high levels of noise pollution associated with the London Gateway works, which will not be a true representation when it comes to baselines for the proposed LTC.

Biodiversity Net Gain

We are also disappointed that there has been no further update or consultation in regard to Biodiversity Net Gain, since the proposed LTC would fail to meet the newly set legal requirements for Biodiversity Net Gain²⁷ either.

‘Smart’ Motorway by stealth

Following the Government’s announcement on 15th April 2023 that all new ‘smart’ motorways are being scrapped²⁸, we are concerned that National Highways/LTC still continue to attempt to push ahead with the proposed LTC, when evidence shows it would be a ‘smart’ motorway by stealth.

Paragraph 2.2.6 of Section 6.2 of the Transport Forecasting Package²⁹ states:

“In common with most A-roads, the A122 would operate with no hard shoulder but would feature a 1m hard strip on either side of the carriageway. It would also feature technology including stopped vehicle and incident detection, lane control, variable speed limits and electronic signage and signalling”

This shows LTC would have no hard shoulder, and is designed to use ‘smart’ technology as used on ‘smart’ motorways.

²⁷ <https://www.legislation.gov.uk/ukpga/2021/30/notes/division/21/index.htm>

²⁸ <https://www.gov.uk/government/news/all-new-smart-motorways-scrapped>

²⁹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001348-7.7%20Combined%20Modelling%20and%20Appraisal%20Report%20-%20Appendix%20C%20-%20Transport%20Forecasting%20Package.pdf>

Paragraph 6.2.3 of Section 6.2 of the Transport Forecasting Package³⁰ states:

“Notwithstanding that the Project is to be designated as an all-purpose trunk road (APTR), the mainline is coded as a three-lane motorway (except for the northern section between the M25 and A13 where the southbound direction has two lanes)”

This shows LTC is designed as a 3 lane motorway.

We note the use of the word ‘coded’ which has definitions such as “converted into a code to convey a secret meaning” and “expressed in an indirect way”.

Based on the information provided in National Highways official LTC documentation, highlighted above, it is quite clear to us that the proposed LTC would be a ‘Smart’ Motorway by stealth if it goes ahead.

No hard shoulder + ‘Smart’ technology + motorway design = ‘Smart’ motorway

How does calling it an All Purpose Trunk Road make it any safer than what it would actually be, a ‘Smart’ Motorway by stealth? It doesn’t.

In light of the decision by Government, this further round of consultation could have been used to seek feedback on this highly controversial aspect of the project.

The proposed LTC would be a ‘Smart’ Motorway by stealth, and should therefore be scrapped in keeping with the Government’s decision on ‘Smart’ Motorways.

³⁰ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001348-7.7%20Combined%20Modelling%20and%20Appraisal%20Report%20-%20Appendix%20C%20-%20Transport%20Forecasting%20Package.pdf>

Food Security

With climate change becoming more and more apparent, and food security becoming more and more of an issue as result of this and other matters, we are concerned that no further assessment has been carried out in regard to the loss and impacts to agricultural land, if the proposed LTC goes ahead.

Other relevant consultation and inquiries etc

NH/LTC are more than aware that the Transport Select Committee are in the midst of their inquiry into the Strategic Road Investment Programme, and have already been voicing serious concerns, even mentioning the LTC within hearings.

There is also the matter that the proposed LTC is knowingly being pushed through the DCO process, as quickly as possible, because the National Networks National Policy Statement is knowingly out of date and will be updated.

Not to mention the fact RIS3, which the LTC now falls into and beyond, is being consulted on.

Government have also announced a new ‘Long Established Woodland’ status, which should result in further assessment of impacts of the proposed LTC, as we know it would destroy at least one woodland in this new category, The Wilderness in South Ockendon.

Again, to knowingly be attempting to push ahead, knowing there are so many changes that would go against the LTC is unethical and unacceptable.

With so many other inquiries, consultations and changes in legislation it would be good practice and the right thing to at very least pause the proposed LTC. The right thing to do would be to finally put it out of its misery since it clearly is not fit for purpose.

Other issues

We are concerned about the level of greenwashing attempts, as well as general misleading propaganda that NH/LTC are using in an attempt to promote and save a project that is hanging by a thread and needs putting out of its misery as a matter of urgency.

LTC Objectives

Considering the evidence that shows that the LTC would fail to meet scheme objectives³¹ we are concerned that there have been no changes or consultation in this regard.

Alternatives

Considering there are clearly better and more sustainable alternatives to the proposed LTC, like rail improvements between Ashford and Reading³² that would negate the need for the proposed LTC, we are concerned that there has been no review assessment of whether the proposed LTC is still considered a viable option, as clearly evidence proves it is not.

Cost and value for money

With the cost of the proposed LTC having risen from £4.1bn up to £9bn, and the adjusted Benefit Cost Ratio (BCR) dropping from 3.1 down to 1.22, and that's as at August 2020, we have concerns that there has been no further update in regard to cost and BCR.

We are not alone in concerns about the poor value for money the proposed LTC offers. With costs now expected to be £10bn+++ the BCR will have dropped even lower. The

³¹ <https://www.thamescrossingactiongroup.com/ltc-project-objectives/>

³² <https://www.thamescrossingactiongroup.com/rail-and-tram-alternatives/>

two year delay announced by Government will further push the cost up and the BCR down.

The reality is that the estimated cost of the proposed LTC is a false economy anyway, due to all the associated works that would be needed as a direct result of the LTC, if it goes ahead, that are being progressed as separate stand-alone projects.

With delays and changes impacting RIS3 there is also the question about whether stand-alone projects like the Tilbury Link Road (which was a RIS3 pipeline, and Blue Bell Hill which is seeking funding by Kent County Council, we seriously question the associated implications.

We are concerned that the LTC Accounting Officer Assessment is now nearly 3 years out of date, and is not a true reflection of the transparent guidance that is supposed to be presented in such an important report.

We believe a new up to date LTC Accounting Officer Assessment should be prepared and published to reflect a true representation of the LTC.

We have serious concerns, and believe the proposed LTC is terrible value for money and should be scrapped now before further millions, if not billions of taxpayers' money is wasted on a hugely destructive and harmful project that is not fit for purpose.

Government's announcement of 2 year delay

We at very least expected there to be further analysis and updates in regard to the impacts and implications of the two year delay that Government have announced about the start of construction of the proposed LTC, if permission is granted.

We believe there is a definite need for such assessment and review, and are concerned, disappointed, and angry that NH/LTC do not deem such important assessment necessary, it is irresponsible and unacceptable.

Conclusion

The LTC Minor Refinements Consultation fails to provide adequate information regarding the proposed changes, and contains large amounts of misleading propaganda, and claims that cannot be backed up with evidence.

By association of the fact that all changes relate to the progression of the proposed LTC, we strongly oppose the proposed changes, by default of the fact we strongly oppose the project as a whole.

The proposed LTC would be hugely destructive and harmful, fails to meet the scheme objectives, and is not fit for purpose.

Particularly it would not solve the problems at the Dartford Crossing, and would also add to the chaos, congestion and pollution both in the vicinity of the current crossing, in the vicinity of the proposed LTC (if it goes ahead), and further afield.

It is not compliant with our legal commitments to Net Zero.

The whole proposed route fails against newly set targets for PM2.5.

It would fail to meet the newly set legal requirements for Biodiversity Net Gain.

Evidence shows it would be a 'smart' motorway by stealth, so should therefore be scrapped inline with the government announcement that new 'smart' motorways have been scrapped.

Put simply the proposed LTC would be hugely destructive and harmful, is not fit for purpose, and would be a complete waste of £10bn+++ of taxpayers' money.

We need and deserve better, and there are better and more sustainable alternatives available. We remain strongly opposed to the proposed LTC and call for it to be scrapped NOW!

Response to LTC Minor Refinement Consultation:

This response has been produced on behalf of Thurrock District Scout Council (TDSC) any questions or follow-up should be addressed to Stewart Abbott via Email: stewart_abbott@msn.com.

Lower Thames Crossing - Overview

Scouting in Thurrock:

TDSC provide activities to the youth of Thurrock through 19 locations from Ockendon in the West, Orsett and Chadwell in the centre and Stanford and Corringham in the East. Our recent census (Feb 2023) registered 1,116 members (4 to 18-year-old) who benefit from the activities, delivered by our 432 volunteers, on a weekly basis. As well as delivering localised activities, we arrange for pan Borough events so that all young people can experience skills, activities and competitions which are delivered from Condovers.

Condovers is approximately 3.5 acres and is located on the south side of Church Road between Cooper Shaw Road and Low Street Lane, in the ward of East Tilbury. Condovers is a peaceful rural setting 'an oasis' in a heavily populated and industrial Borough. Condovers is approximately 600 metres from the proposed route of LTC, 500 metres from the Station Road compound and 1.5 km from the tunnel compound.

Condovers is used all year round by Thurrock Scout's youth and adult members. Condovers has developed and evolved over 70 years and is key to delivering the aims of scouting. During the last 13 years a major regeneration programme has been undertaken with £240K capital being invested, with many projects being delivered by volunteers. Most of the activities at Condovers take place outdoors and all people staying at the site use tents as sleeping accommodation.

TDSC is against the proposed development of LTC mainly on environmental grounds with potential impact of noise and air quality during construction and when operational. We are also concerned about the impact on Condovers, during construction, due to extended travel time to reach the site which could result in it being unviable for evening activities. We do not have any indoor accommodation for sleeping, so our members sleep in tents which is impossible to insulate against an increased noise level.

Lower Thames Crossing – Response to Local Refinement Consultation

Background:

TDSC has reviewed the published documentation issued as part of this consultation. The project leader also had a Microsoft Teams meeting on Thursday 15th June, with three members of the LTC Project.

Microsoft Teams Meeting - 15th June 2023

The following points were raised by TDSC, and the outcome of discussions were:

Q1, Figure 3.6 Utility proposals at East Tilbury at DCO Application shows a local connection in the legend. This is the 1st time we have seen this terminology used, what does it mean?

Response: LTC were unable to explain why this new terminology has been used and what it meant, they agreed to find out and respond.

Q2, Figure 3.6 Utility proposals at East Tilbury at DCO Application shows a local connection along Low Street Lane. This road was restricted by Thurrock Council several years ago but, has remained open for walkers and cyclists. If the ULH's are moved, as proposed in Figure 3.7, will Low Street Lane, south of Cole Road junction, remain open throughout the construction of LTC?

Response: LTC confirmed that this would be available, although there might be a short closure at one point, during the construction, when a diversion will be required.

Q3, Figure 3.6 Utility proposals at East Tilbury at DCO Application shows a secondary haul road running from Church Road to join the local connection. Will Low Street Lane, south of Cole Road junction, be a shared route with WCH's and construction traffic?

Response: LTC confirmed that this would be a shared route however, the construction traffic and WCH's will be segregated.

Q4, TDSC was concerned about this secondary route and the volume of construction traffic using this, with the move of ULH's. Could data be provided on the forecast of traffic movements along this route?

Response: LTC indicated that the data wasn't available, but it would be minimal because the primary access route is via Muckingford Road. Also, by moving the Low Street Lane UTL further north, away from houses, it makes more sense for construction traffic to use the primary route.

Q5, During the meeting, LTC staff pointed us to other maps in the draft DCO documentation to explain footpath routes during construction and the end position. We have reviewed this since the meeting, would it be possible to update Figure 3.7 clearly showing footpaths and secondary construction routes using the same terminology and colours used in the DCO?

Q7, if only one Tunnel Boring Machine (TBM) was being used, this is no doubt going to impact the overall timeline for the LTC project to be completed 100%, including the creation of Tilbury Fields. TDSC's concerns relate to the number of seasons (spring/summer) required to dry and move the spoil to landscape Tilbury Fields due to the potential environmental impact (noise and air pollution) within the East Tilbury Ward. TDSC would like to know the following:

- If 2 TBMs are used, how many seasons will be required to create Tilbury Fields?
- If 2 TBMs are used, what period (in months) would have elapsed, after the opening of the LTC, before Tilbury Fields is open for public use?
- If 1 TBM is used, how many seasons will be required to create Tilbury Fields?
- If 1 TBM is used, what period (in months) would have elapsed, after the opening of the LTC, before Tilbury Fields is open for public use?

Response: LTC staff were unable to answer this question but, agreed to take it away and pass onto to appropriate team.

General – Consultation:

Being a voluntary organisation, TDSC was disappointed that LTC were allowed to hold yet another consultation after the submission and acceptance of their DCO by the planning inspectorate. As we are a voluntary organisation, we have limited resources to respond especially as effort was being expended on the preparation of input to the planning inspectorate against their published timeline. Also, this consultation has been carried out during the start of our peak season (May to September).

It would have been helpful if public walk-in events could have been held within the impacted wards. TDSC requested a telephone conference and this took over 2 weeks from request, to arrange, not satisfactory.

From: [REDACTED]
To: [Consultation Responses](#)
Subject: My comments to consultation
Date: 18 May 2023 07:09:49

Dear sir,
The sooner you start construction work on this project the better.

GET ON WITH IT

Regards
Tony Hirschfeld

Sent from my iPad

From: [REDACTED]
To: [Consultation Responses](#)
Subject: Consultation response from Transport Action Network (TAN)
Date: 19 June 2023 18:27:43

Dear Sir/Madam

Please find below our consultation response.

Introduction

Transport Action Network (TAN) would like to OBJECT to the proposals outlined in the Lower Thames Crossing minor refinement consultation. It is not acceptable to propose major infrastructure which will significantly increase carbon emissions, taking us away from our demanding legal commitments to rapidly reduce carbon emission.

1.a Nitrogen deposition

We STRONGLY OPPOSE the changes. We are unclear why the Burnham site was added to the Order Limits without consultation and is now being removed. We believe that this is a clear indication that the DCO application has been rushed and is not ready. We also suspect the two compensatory sites at Burnham and Blue Bell Hill have been reduced to minimise the costs of the scheme as land acquisition is very expensive.

Construction Update

It is unclear from the consultation booklet how the claimed savings of 38,000 tonnes of CO2 have been calculated from using one Tunnel Boring Machine (TBM), and not two as outlined in the DCO application. Surely the emissions would be the same, as the one machine will simply do the same work as two, and shift the same amount of spoil.

Kindly acknowledge receipt.

Thank you

Rebecca Lush
Roads and Climate Campaigner

Transport Action Network
providing grassroots support

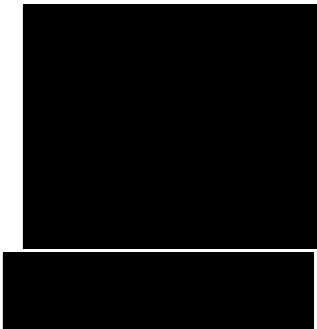
www.transportactionnetwork.org.uk | F: [@TransportActionNetwork](#) | T: [@TransportActio2](#)

From: [REDACTED]
To: [Consultation Responses](#)
Subject: Trevor Thacker Lower Thames Crossing Minor Refinement Consultation 2023
Date: 19 June 2023 22:40:18

Lower Thames Crossing: Minor Refinement Consultation 2023

Consultation response from:

Trevor Thacker



LTC is not fit for purpose

I am strongly opposed to the proposed Lower Thames Crossing.

The original aim of a new crossing was to reduce the congestion at and around the Dartford Crossing.

National Highways state that the LTC will only reduce traffic by 21% at the Dartford Crossing at opening and by even less as time goes on. Therefore once the new crossing is completed (in around 10 years time) most of this reduction will be negated by the natural increase in traffic levels and the Dartford Crossing will still be as congested as it is now, if not more so, and the problem unsolved.

The discarded Option A & A14 (expanding the Dartford Crossing) is the only option that actually INCREASES capacity AT the Dartford Crossing and this option should be reconsidered and consulted upon.

Since the Dartford Crossing will still be over capacity if the LTC opens, there will be no improvement on the traffic situation on local roads. In fact, due to the increase in traffic the LTC will bring, if there are incidents on the M25 and LTC at the same time, the effect on local roads will be even worse!

The LTC will not solve the problems of the Dartford Crossing now or in the future. It will instead bring a massive amount of new traffic into the area and will increase pollution levels and lead to destruction of local environment and wildlife and negatively impact communities and homes.

All of these negative impacts are unnecessary and simply unacceptable when other less destructive solutions such as Option A & A14 (expanding the Dartford Crossing) are available.

This really does not seem a good way to spend £8.2bn of taxpayers money (and its obviously going to eventually cost a huge amount more as projects of this size always overrun and massively exceed their original budgets, as we all know!)

In short, the LTC is not fit for purpose as it does not decrease congestion AT the Dartford Crossing!

A13/A1089 junction

Placing a junction of this size so close to residential areas is a ridiculous idea. Thurrock already has terrible air pollution ratings; the 4th worst in the UK. Air quality standards will most surely not be met in the residential areas around this junction. National Highways and the Government are simply opening themselves to the prospect legal action from the citizens of Thurrock in the future.

The changes proposed to A13/A1089 junction in this consultation do not solve the problems of this junction and will actually even worsen its effects for the residents of Orsett. The consultation materials state that this change would see a traffic increase of more than 40% along Conways Road and Rectory Road in Orsett. Orsett needs a reduction in traffic, not 40% increase. Rectory Road is close to the school, doctors, hospital, church and two pubs. How is this 40% increase in traffic through a residential area justified by National Highways? It is certainly not made clear in the consultation documents. Conways Rd is a very narrow, old country road. I cycle quite often down this road. I certainly wont feel comfortable using it any more if the traffic increases by 40% - it will be far too dangerous. Its tight enough with two cars going in opposite directions. Its going to be a disaster waiting to happen if trucks, vans and HGVs start using it along with the village traffic, farm vehicles, horses, cyclists. Pedestrians are going to be in real trouble as there is no pavement. I dread to think what is going to happen when its icy or foggy. At least there's a hospital close by in Orsett!

Construction

Stifford Clays Road Compound East

I have been unable to find any information about this or any of the construction compounds in the A13 junction area. They have simply disappeared from the consultation materials. Since no mention of them has been made in this consultation, am I to assume they have been removed? I am especially concerned about the Stifford Clays Road Compound East for the reasons listed below and it would be a great relief if National Highways have finally seen sense and removed this compound. I however feel that it is very unsatisfactory that such an important issue for myself, my family and the residents of Orsett has just simply been omitted from this consultation. How can we respond adequately to this consultation when we do not have the necessary information available?

If the LTC Stifford Clays Road Compound East has not already been removed from the current LTC plans then it needs to be relocated.

In its current location the Compound has several issues:

1. It is sited very close to a residential area. Noise, light, odour and particulate pollution are very likely to affect the quality of life of the residents.
2. Prevailing winds, being Westerlies, (90% of the time as a guesstimate) come from the west towards the east. This means that noise and particulate pollution will predominantly be carried towards the residential area.
3. In very close vicinity are several listed buildings:

[REDACTED] 17th century thatched barn. The thatch is of particular concern due to fire risk, and the stability (or lack thereof) of the structure should also be considered.

[REDACTED]

Mill House, Stifford Clays Rd. 15th century

Orsett Windmill (Baker Street Mills), Stifford Clays Rd. 1674

The Old Rectory, Fen Lane. Not listed, but at over 300 years old it is an historic building of local interest.

4. A variety of birds and other wildlife are regularly seen in the trees and hedgerow along the west border of our land adjacent to the Compound. They use the surrounding area to hunt and nest.

One possible solution is to relocate the compound further to the west, on the other side of the proposed LTC where there is ample space. This would keep the Compound away from any residential areas, seemingly without undue consequence to the Compound itself or to the building of the LTC.

In conclusion, given that the construction of the LTC is currently scheduled to last 7 years (and possibly longer as projects of this nature have a tendency to overrun), I feel that moving this Construction Compound to an alternative location would greatly reduce the impact of the construction of the LTC on the lives of my family and those of the residents in this area.

A13/A1089 junction

The impact of the work on this junction during construction on local communities, especially the residents of Orsett, will be unacceptable and will negatively affect their quality of life. Orsett will be severely impacted throughout the course of the construction with most of the roads in and out of the village being affected.

Construction Hours

The proposed construction hours are unacceptable.

Mon-Fri from 6am – 11pm, 6am – 5pm on Saturdays, and maintenance some Sundays. For 6-7 years.

This is surely excessive and will negatively impact lives. These hours should be curtailed.

I am especially concerned about the 24/7 working that is being proposed.

I have little trust that the 24/7 works would only be when needed, but I am convinced that when the project overruns as it surely will, this will simply be used get the work completed faster.

Carbon Emissions & Pollution

I am very concerned about the huge amount of carbon emissions both during construction and once operational. Over 5 million tonnes of carbon emissions would be emitted during construction. Very worrying indeed for our planet which is in grave danger – has National Highways not read the recent articles all over the media explaining clearly that our planet is at the tipping point. Just in case National Highways have not understood the situation – we need to stop carbon emissions NOW in order to save our planet. So does National Highways think adding 5 million tonnes of carbon will improve the situation or make it worse? Answers on postcard....

I am also extremely worried about air, noise, light, vibration pollution during construction.

Order Limits

The only changes I agree with are where National Highways have removed land from the Order Limits as this means at least some land has been saved from destruction by this ill-conceived project.

I strongly oppose the area of land that would be required to build the Lower Thames Crossing.

Far too much land has been taken.

The LTC will destroy the Greenbelt in Thurrock.

Grade 1 Agricultural land has been taken for a road. This is where we grow our food which we need to live. Are you crazy? Only 3% of the country has this type of land, and you're going to use some of it to build a road. Take a moment to really think if that makes sense. If anyone honestly answers Yes to that question, then I fear for the future of the planet we live on and the human race.

Additionally, I am totally opposed to the development boundary because of the negative impact it will have on:

Wildlife and habitats

Conservation areas

Listed buildings

Ancient woods and trees

I am also concerned over the lack of info about the flood and environmental mitigation land National Highways want to take.

Environmental & Health Impacts

Pollution & Carbon Emissions:

The LTC will cause a huge increase in air, noise, light and vibration pollution along the entire route and will create a toxic triangle in Thurrock that will clearly be detrimental to the health and well-being of its residents.

It is unacceptable that National Highways will be removing air and noise pollution monitors, once construction is complete. They should remain in place so that air and noise pollution can be tested continually once the LTC is operational.

The LTC fails on World Health Organisation standards for PM2.5. How can this project be allowed to go ahead when it fails such an important health issue? The LTC should be redesigned so that it meets this very important standard.

I am very concerned about the huge amount of carbon emissions both during construction and once operational. See above answer under Construction for details.

I am also concerned about the impacts of road surface water, tyre rubber and other pollutants and contaminants that will end up in on the agricultural land around the LTC route.

And who will be responsible for the litter along the LTC? National Highways should be contractually obliged to keep all the land along the route free of litter within a 200m boundary of the LTC.

Destruction of local environment and wildlife:

The LTC will cause huge damage and destruction to the Green Belt, woodlands and

forests, wildlife and its habitats, and agricultural land, some of which is rare Grade 1 listed

The LTC carves a path right through the supposedly protected Green Belt; protected that is, unless the government decides a huge new motorway should carve it up and then the protected status suddenly is not so important.

The LTC will need huge viaducts & interchanges. Some of the largest constructions of the LTC are located in the conservation area of Orsett and will blight the landscape and will change the rural nature of the area forever. There are numerous listed buildings in the Orsett area, such as Orsett Windmill, all of which will be negatively affected by the LTC.

The tunnel will be constructed on the nationally protected floodplain at Tilbury marshes, an area recognised for its wildlife biodiversity and which forms part of a wider flood control system of South Essex coastline.

All of these impacts are unnecessary and simply unacceptable when other less destructive solutions such as Option A & A14 are available.

Nitrogen impact and compensation

I am very concerned about the nitrogen deposition impacts of the LTC, especially regarding the impacts to ancient woodlands and farmland.

How can it be that National Highways have not completed the nitrogen impact surveys but are making claims in regard to nitrogen deposition and are consulting us on the issue when the full data is not yet available?

Furthermore, how can National Highways decide not to mitigate the nitrogen deposition impacts when the surveys are not yet completed?

Natural England have stated that the Epping Forest Special Area of Conservation would be impacted by nitrogen deposition from the LTC. I am very concerned that if a site so far from the LTC would be impacted then surely other closer sites would also be significantly affected?

Since Natural England do not agree with National Highways assessments of nitrogen deposition, I would suggest National Highways should engage an impartial body to reassess this very important topic. At the very least National Highways should give huge

weight to Natural England's feedback on mitigation measures.

The future funding for mitigation to landowners affected by Nitrogen Deposition should be clearly defined by National Highways before the DCO application.

Using the crossing

Non Motorised Users

I am very concerned that the proposals do not allow for any non motorised users.

Public transport should be made a priority for the design of the LTC.

There has been very little consultation with bus companies and the design will make it very difficult to run any kind reasonable bus service due to the lack of adequate connections.

A train tunnel should be built alongside to provide an alternative to car travel.

A free service to assist cyclists to cross the river, like at the Dartford Crossing, should be also be available at the LTC.

Toll Charges

The crossing should be free to local residents and to low emissions vehicles.

HGVs should face toll high charges.

I am concerned over who or what will benefit from the money collected by these charges once the construction cost is recouped. They money should be distributed to the local communities to compensate for and help them mitigate against the negative impact the LTC will have on their lives.

Walkers, cyclists and horse riders

With the threat that climate change poses to our planet we need a greener, cleaner environment. The LTC provisions for walkers, cyclists, horse riders etc, even with the changes in this consultation, are woefully inadequate. Provisions for alternative forms of transport should be at forefront of the design of the LTC and not just a box ticking exercise. E-bikes are seeing huge uptake in many countries and due to the increased speed and distance are providing a viable travel alternative. However they cannot safely be used on the same path as pedestrians. What provisions has the LTC made for e-bikes? None as far as I can see. This is a huge oversight on the part of National Highways.

There should also be provision for pedestrians, cyclists etc through the tunnels to encourage sustainable travel.

National Highways should guarantee to replace all public rights of way affected by the LTC.

I am also very concerned about how the air, noise, vibration and visual pollution from the LTC will negatively impact public rights of way.

The Consultations

This consultation was inadequate and not fit for purpose. I have not been able to get answers to most of questions and those that were answered took many hours of my time, were not delivered in a timely manner, and were vague and often contradictory. Most of my questions remain unanswered. This has unfortunately been the case with all the previous consultations – National Highways does not seem to learn from its mistakes. It can be incredibly difficult to get answers to even simple questions. For a classic example of the inadequacies of this consultation, please see the above issue of the missing construction compounds in the A13 junction area which have simply disappeared from the consultation materials.

2020 LTC Supplementary Consultation mismanagement:

My family's property is directly affected by the Lower Thames Crossing.

We received erroneous letters on 27 January 2020, which incorrectly stated that our property was now within in the development boundary, and even when the "corrected" version arrived it was confusing and the information regarding how our property is affected can only be described as vague and misleading. The letter on 31 January 2020 stated that our property was actually not within in the development boundary, and not needed to build the LTC project. However the map shows that part of the land was needed!?! Can you imagine how stressful and confusing this was for my family and especially my elderly parents? This is completely unacceptable. No indication of what the land is needed for was given, nor for how long nor how our land would be affected in the end. Again completely unacceptable. Many hours have been lost by my family in detective work to find out the answers to what the land is actually needed for. This should have been in the original letter. Your call centre was contacted on 12 Feb 2020 and asked to provide some clarity. Reference number 21573725. We were laughably told would receive an answer within 3 weeks! Even worse, that answer never came! This method of contacting National Highways is demonstrably not fit for purpose. Again completely unacceptable.

Then due to the Corona virus we felt unable to attend the consultation events, for fear of catching or spreading the virus. So we made use of your Telephone Consultation service on 25th March. This was also not fit for purpose. The operator could not answer our questions so arranged for experts to call us back.

1. Construction were unable to call us as there were no experts available. My questions remained unanswered.
2. Utilities called me, but had no answers, so said they would check with another expert and call me back. They never called back. I did however receive an email many weeks after the consultation ended!
3. Environment Team called me, but had no answers, so said they would check with another expert and call me back. They called back. I asked for a resume of the answers to be emailed to me. No email received.

2013 & 2016 LTC consultations mismanagement:

The National Highways 2016 LTC consultation was ineffective and mismanaged.

Public awareness of the 2016 consultation was extremely low until the general public got involved eg word of mouth, Facebook pages, leaflet drops etc. Public awareness had very little to do with any efforts by National Highways.

At the meeting Feb 25th at the London Cruise Terminal, James Whale asked for a show of hands of those who had taken part in the 2013 consultation. 6 (yes six) people raised their hands. I don't have figures for attendance, but a guesstimate would be around 500. 6 out 500 people in the meeting responded to the 2013 consultation. I would say this indicates that the consultation process was spectacularly ineffective at engaging the people affected by these proposals in the early stages.


This 2016 consultation questionnaire is in itself an example of an incompetent consultation process as it makes no mention of Option A, which National Highways was instructed to reconsider by the government. How can this consultation be deemed to be effective and truly represent people's views if one of the major options is not even mentioned in the document?

LTC Team & National Highways not fit for purpose

The whole LTC project has been mismanaged to a sometimes farcical degree by National Highways right from the start. It reached its nadir when National Highways had to withdraw its DCO application shortly after submitting it in November 2020. National Highways couldn't even get that right! Isn't that what National Highways does – design

road projects and submit DCOs? Despite initial assurance of only a short delay, so far its taken well over a year and a half to correct the errors. How does an organisation get it that wrong? Farcical.

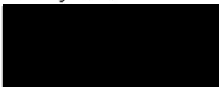
The above are just a few examples which serve to demonstrate National Highways' incompetence and mismanagement of the whole LTC development process. Unfortunately the vast majority of my interactions with National Highways and the LTC team are met with similar incompetence and mismanagement, which makes a difficult situation even more stressful. The whole LTC team and design process should be scrapped and begun again with a new team in charge. And if this LTC team are representative of National Highways as a whole then I would go as far as to says that National Highways itself should be shut down and replaced with a new organisation that better serves the people of England.

From: 
To: [Consultation Responses](#)
Subject: Lower Thames crossing
Date: 19 June 2023 15:58:04

Hi

I am completely against Thames crossing and against the refinement consultation as it's engineered to provide only the responses you wish to here
Each new consultation is a rehash of the last one and goes nothing to address or lessen the awful impact this scheme will have on the borough of Thurrock

Wendy White



Sent from my iPhone

If you need help accessing this or any other National Highways information, please call **0300 123 5000** and we will help you.

© Crown copyright 2023.

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence:

visit www.nationalarchives.gov.uk/doc/open-government-licence/

write to the **Information Policy Team, The National Archives, Kew, London TW9 4DU**, or email psi@nationalarchives.gsi.gov.uk.

Mapping (where present): © Crown copyright and database rights 2023 OS 100030649. You are permitted to use this data solely to enable you to respond to, or interact with, the organisation that provided you with the data. You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form.

If you have any enquiries about this publication email info@nationalhighways.co.uk or call **0300 123 5000***.

*Calls to 03 numbers cost no more than a national rate call to an 01 or 02 number and must count towards any inclusive minutes in the same way as 01 and 02 calls.

These rules apply to calls from any type of line including mobile, BT, other fixed line or payphone. Calls may be recorded or monitored.

Printed on paper from well-managed forests and other controlled sources when issued directly by National Highways.

Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ

National Highways Limited registered in England and Wales number 09346363