

Lower Thames Crossing TR010032

Submission on responses to comments on Written Representations

Thames Crossing Action Group

Unique Reference: 20035660

DEADLINE 3 (24th August 2023) / Submitted 24th August

Introduction

1. Thames Crossing Action Group wish to comment on National Highways' submissions at Deadline 2.
2. These comments are in response to 9.53 *Comments on WRs Appendix G – Parish Councils, Organisations and Groups* [[REP2-052](#)].
3. More specifically we respond to section REP1-425 Thames Crossing Action Group that covers comments to our Written Representation [[REP1-425](#)]
4. We would like to begin by stating that we find the Applicant's lack of meaningful engagement in their response completely unacceptable.
5. We have been simply signposted to lengthy documents, often without any clear indication as to chapters or paragraphs. In some instances, the signposting is not even correct. Other concerns we have raised have been ignored like glint and glare from the solar farms, and the rest and service area as just a couple of examples.
6. We note that the ExA have been needing to ask NH to be more specific in their signposting and actually answer questions during hearings. We highlight that there has been a distinct lack of meaningful engagement from NH throughout the process, which we find totally unacceptable.
7. Not only does the failure to actually directly respond to our comments, and poor signposting show how inadequate NH are at meaningful engagement, it also wastes our time that we could be spending reviewing and responding to other newly submitted documents that have been submitted. We have to wonder if this is their intention.
8. With such fast-paced deadlines, and such a voluminous and complex application the last thing anyone needs is the Applicant wasting our time due to inadequate engagement. We would note that we are not alone in this regard, and would request that the Applicant actually start responding to us and others in an adequate manner.

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Comments

In response to NH's comment on our statement that none of the Scheme Objectives would be met

9. NH refer us to the Need for the Project [[APP-494](#)] in regard to Scheme Objectives when we have quite clearly referred to them and the document in our WR. They make no attempt in their first response to explain directly why they disagree with the points we have raised, that we believe show that the proposed LTC fails to meet all the Scheme Objectives.

In response to NH's comment on our statement that the Dartford Crossing would still be over design capacity, and suffer with congestion and pollution

10. We note that the ExA have asked Q4.1.1 in ExQ1 – The Examining Authority's written questions and requests for information [[PD-029](#)] which questions whether the scheme would provide 'free-flowing' capacity at Dartford Crossing. We await NH's response to this question.

11. We draw attention to A.2.7 in Annex A of 9.10 Post-event submissions, including written submission of oral comments, for ISH1 [[REP1-183](#)] which states that the proposed LTC would bring the Dartford Crossing journeys/traffic back to 2016 levels. (*Captured and paste below for ease of reference*)

- A.2.7 There are two aspects to the impact of the Project on trips using the Dartford Crossing:
- a. First, for a considerable time into the future, the forecast journey times for longer distance trips using the Dartford Crossing, going from junction 2 to 29, are similar to the to 2016 journey times, and are significantly lower than the forecast journey times would be were the Project not provided (the Do Minimum scenario). There are few other, if any, busy sections of the Strategic Road Network that would see similar journey time improvements in 2045 when measured against 2016.
 - b. Second, more local trips are able to use the Dartford Crossing to make short distance trips across the river, using the capacity released as some longer distance traffic from Kent uses the Project. This is a benefit for local residents who wish to travel to the other side of the river, for example to take advantage of a job opportunity.

12. We draw attention to paragraph 1.15 of Chapter 1 – Executive Summary – Dartford River Crossing Study¹ into capacity requirements published by the DfT in April 2009, which states 'The Dartford Crossing experiences high levels of flow and

1

https://webarchive.nationalarchives.gov.uk/ukgwa/20100513192540mp_/http://www.dft.gov.uk/about/strategy/capacityrequirements/dartfordrivercrossing/chap1execsummary.pdf

congestion on a daily basis, with typical traffic flows in the order of 145,000 to 150,00 vehicles per day.'

13. This clearly confirms that in 2009 the Dartford Crossing was 10-15 thousand vehicles per day over the design capacity of 135,000 vehicles per day.
14. We then draw attention to paragraph 2.2.6 of the Summary Business Case from the 2016 Highways England LTC Public Consultation² which states, 'At present the crossing handles an average daily traffic flow of about 141,000 vehicles (2014) which is greater than the design capacity of 135,000 vehicles.'
15. As a final reference on this, we draw your attention to paragraph 3.1.1 of the Case for the Project³ from the 2018 Statutory Consultation, which states, 'Even though it was designed for 135,000 vehicles per day, it carried over 180,000 vehicles on some days in the year to September 2017.'
16. The above clearly shows that as early as 2009 reports were showing the Dartford Crossing was considerably over design capacity, and that things were even worse by 2016.
17. If National Highways are stating that the proposed LTC would bring the Dartford Crossing back to 2016 traffic flows/journeys, it is admitting that the Dartford Crossing would still be over design capacity and suffering from congestion.
18. It is our understanding that design capacity is an estimate of when a road/crossing will be free flowing. This therefore means that the Dartford Crossing would not be free flowing, if the proposed LTC goes ahead, and thus fails on the first scheme objective.
19. Additionally, we would like to draw attention to the fact that in 7.2 Planning Statement [APP-495] NH state in paragraph 4.3.1 that the LTC would provide over 80% additional road capacity across the River Thames east of London.
20. When most people hear this statement, they think of extra capacity being extra lanes. However, when NH are talking about extra capacity it is more complex.
21. We actually asked NH about this in 2018 since the Dartford Crossing has 8 lanes in total and the LTC would have 6 lanes in total, meaning the LTC would provide an extra 75% lane capacity. The reason we started looking into this in 2018 was because at that time NH were stating the LTC would provide over 90% extra

² https://highwaysengland.citizenspace.com/ltc/lower-thames-crossing-consultation/user_uploads/lower-thames-crossing-consultation-summary-business-case.pdf

³

https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/LTC%20%20The%20Case%20for%20the%20Project.pdf

capacity, and a lot of people were querying how that could be!

22. NH response to us questioning that the LTC would only offer 75% extra capacity when it came to lanes was:

"This is calculated based on the capacity of each lane at the Dartford Crossing and at the Lower Thames Crossing. The capacity of the northbound crossing at Dartford is impacted by the Traffic Management Unit (which closes all lanes to allow escorts to take place, and to enable high sided vehicles in the wrong lane to be removed etc) and as such a lower effective capacity is applied. As there is to be no TMU of the same nature at LTC, the capacity per lane is higher than at Dartford, which results in the 90% increase quoted, as opposed to 75%, which is the increase in the number of lanes"

23. Firstly, this leads to the question as to what has changed since 2018 for the estimated extra capacity to drop from being over 90% down to now being over 80%? As there are still the same amount of lanes and there would still be no TMU.
24. The 90% extra capacity claim being made at that time can be seen in the 2018 Case for the Project⁴ in paragraph 2.1.1.
25. The question also needs to be asked as to whether NH have taken into account things such as impacts to traffic flow when there are incidents at the Dartford Crossing that result in traffic migrating to the LTC. As previously highlighted, there would not be adequate connections, and this would negatively impact traffic flow, congestion and by association worsen air quality too.
26. Not to mention the fact that there could be increasing amounts of closures for maintenance at the Dartford Crossing considering the age of the tunnels, and works that likely need to be carried out. Like incidents this too would have a negative impact on traffic flow as there would be just one single lane from the A2 coastbound onto the LTC, if it goes ahead.
27. Or the Tilbury Link Road, if it too goes ahead, as the junction that would be close to the tunnel portals, in a similar way to the junction with the Dartford Tunnels, which again negatively impacts traffic flow. HGVs slowing to come off for the Port of Tilbury is likely to impact traffic flow in the LTC tunnel and on the LTC approaching the Tilbury Link Road junction.
28. It is not apparent if these impacts have been factored into the assessment of the claimed extra capacity. However, since NH don't seem to want to admit the

issues of migration between the two crossings when there are incidents we very much doubt that have included this in their calculations. We also expect they would likely say that the Tilbury Link Road is not part of the Project and is still only a pipeline project.

29. How has the 80% extra capacity been calculated? Is it expected to drop any further considering it has dropped from 90% to 80% in the past 5 years? If so by how much and in what time frame?
30. NH also predict that the proposed LTC would take around 19% of traffic away from the Dartford Crossing in the opening year (2030). We can find no data so far on what the predicted reduction would be following the two year rephase, meaning the opening year would be pushed back by two years.
31. Considering that previously it seems that there is a reduction year on year, we would ask how much do NH predict the reduction in traffic at the Dartford Crossing would be in 2032, the new estimated opening year, and in fact is there detail of the predicted reduction year on year for the Project, so that we can all get a better idea of by how much and how quickly any claimed reduction would be lost.
32. NH directs us to Table 5.2 of Need for the Project [[APP-494](#)] stating that it "sets out the changes in forecast daily traffic flows" Table 5.2 actually details 'How the Project supports the Scheme Objectives'.
33. We have searched the whole document and we can find no mention of the 32% or 44% mentioned by NH.

In response to NH's comment on our statement regarding induced demand

34. We note that in Section A.3 in Annexe A of Post-event submission, including written submission of oral comments, for ISH1 [[REP-183](#)] NH say in A.3.2 they avoid using the term induced demand to avoid confusion. Our use of the term induced demand is to highlight the fact the proposed LTC would result in an increase in new trips and miles travelled adding to the adverse impacts of the project.
35. A.3.3 in [[REP-183](#)] signposts us to Chapters 3 and 4 of the Traffic Forecasts Non-Technical Summary [[APP-528](#)]. Paragraph 3.2.5 of that document explains how March 2016 was used as a base line to reflect an average month.
36. We have questioned NH about how they calculate this before, and have been told they monitor the traffic for the month, but remove any data that reflects traffic they consider to not be 'normal'.

37. We have concerns about what they consider 'normal' and what we experience as normal. We believe they are removing the very data that represents the problem they are supposed to be solving.
38. We also question whether, when they predict that Dartford Crossing traffic flow/journeys would be at 2016 levels, if the proposed LTC goes ahead, whether that would be as presented in their manipulated 2016 baseline, or what was experienced in reality? As previously highlighted, the Dartford Crossing was already over capacity and suffering with congestion issues in 2016.
39. Paragraph 4.2.1 of [APP-528] highlights the modelled years. We question whether other years have been modelled, and if not whether they can be to allow proper adequate consideration, since the project has now been rephased by 2 years, so that we can assess the estimated opening year adequately.
40. Year on year modelling would also be beneficial so that we can all consider at what point the claimed reductions in congestion start to drop further. When we're talking about spending £10bn+++ of taxpayers' money proper and adequate assessments should be carried out, not just a few token years modelled without any real transparency of the realities.
41. We also note that Table 4.1 Road scheme included in the transport model in [APP-528] includes various 'smart' motorways. As Government have now announced the scrapping of new 'smart' motorways we question how this would affect the modelling?
42. We are very concerned that induced demand is presented for cars only, and does not include LGVs or HGVs, as per A.3.10 of [REP-183].
43. Considering the project is largely aimed at serving the ports in the South East through to the Midlands and beyond, the LTC is being aimed at HGV traffic, and would encourage growth and new journeys.
44. NH have previously shared videos with companies talking about how they believe the proposed LTC would benefit them, including videos from Thompsons⁵, Asda Distribution⁶, Erith Group⁷, and many more, as can be seen below.

⁵ https://youtu.be/eKdzUL_EgQk - NH YouTube Channel

⁶ <https://youtu.be/FBBOwn3fjiQ> - NH YouTube Channel

⁷ <https://youtu.be/SWkOO95KH3Y> - NH YouTube Channel



Lower Thames Crossing, support for the crossing - Thompsons



Lower Thames Crossing
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Each year tens of thousands of businesses rely on our roads to connect with customers and suppliers, and move essential goods and products to every corner of the UK. The Lower Thames Crossing will give businesses like Thompsons Fresh Produce the opportunity to reach out to new customers and suppliers in Kent and Europe by providing a direct new connection across the Thames, as well as improving the reliability of the Dartford Crossing.





45. In addition, Appendix A in The Need for the Project [[AP-494](#)] many of the Letters of Support share how the proposed LTC would lead to growth and more LGV/HGV traffic/journeys. After all NH do claim that the proposed LTC economic growth would be a benefit of the proposed LTC.
46. The Confederation of British Industry (CBI) that says *"The proposed scheme will lead to better utilisation of the M20/A20 to enable a greater flow of passengers and freight traffic", and "In addition to offering direct employment, the LTC would also allow local businesses to collaborate, compete and access new customers", and 'The increased road access in the SE will benefit the wider UK economy, whilst leading the way in sustainable road construction...-The LTC will nearly double road capacity across the Thames, East of London, which will result in double the amount of freight and transport usage for businesses."*
47. Essex Chambers of Commerce say *"...It will make it easier for our member to connect with new staff, customers and markets..."*.
48. John Lewis say *"...Vehicles from this location use the Dartford Crossing, but are somewhat restricted, as trips could include deliveries to the East of England, and then down into Kent and South London if there were a LTC"*
49. Kent Invicta Chamber of Commerce say *"If our members are going to look at business growth, they need to ensure they can maximise the opportunities that are out there and the Dartford Crossing is restricting their ability to do so. We need to ensure the right infrastructure is in place, such as the LTC, to enable them to reach these opportunities."* And *"...It will open up new opportunities,*

enabling businesses across Kent and the wider South East to achieve their growth potential and significantly improve our future prosperity."

50. London Southend Airport say *"We have ambitious plans to grow, and the LTC is one of the key ingredients of enabling that growth". Bear in mind they utilise the airport for cargo on off peak seasons, and we believe the airport is still part of the Stobbard Group.*
51. Stansted Airport say *"..the LTC would open up new markets for local businesses based in Essex and help them grow"*
52. Hutchinson Ports London Thamesport say *"...It will improve journey times to and from London Thamesport, right across the region, extending the hinterland around the port and opening up new growth markets."* And *"...it will create new opportunities for businesses from across the UK to collaborate, compete and reach new customers"*
53. Opportunity South Essex say, *"The project will have a truly transformative effect on our business and communities through the creation of access to new markets and opportunity"* and *"...The new crossing will open up whole new market areas and will be a key enabler of South Essex's ambitions to significantly grow its economy between now and 2050."*
54. Peel Ports say *"We know the Port of London Medway and our activities along the River Medway would represent a key partner for the development of this important project as well as opening up global markets for UK businesses to operate...."*
55. SELEP (South East Local Enterprise Partnership) say *"...We have no doubt that this scheme provides a solution and will be a vital foundation for future growth in the South East"* and *" The crossing will also open up new opportunities, changing market catchments and travel to work areas, connecting employees and employers, buyers and seller, business and customers. In this way, the Crossing will enable success at key locations such as Thames Freeport, DP World and Tilbury Ports, and in new Garden Communities in North Kent and South Essex",* and *"...It will support growth in high value and globally competitive industries, providing a catalyst for wider investment, job creation and regeneration. Crucially, it will also help cement the South East's position as the UK's Global Gateway and as a centre for trade and investment. It will make the flow of imported and exported goods much easier, smoother, and more reliable, magnifying the impact of regional investment in sectors such as logistics, manufacturing and distribution."*
56. Paragraph 4.2.62 of the Need for the Project [[AP-494](#)] highlights that *'Dart Charge data for 2019 shows that HGVs accounted for 21% of the total traffic (both southbound and northbound) using the Dartford Crossing, during chargeable hours. This was more than double the percentage typically observed on other parts of the SRN at 10% (Department for Transport 2020b), demonstrating the relatively significant business users' reliance on the Dartford Crossing and the importance of the crossing for facilitating the movement of goods from Continental Europe.'*

57. Paragraph 5.2.25 of the same document highlights that *'The Project is predicted to reduce HGV usage of the Dartford Crossing by around 34% in 2030 (opening year).....'* and *'...Approximately 13% of the vehicles using the Project in 2030 (opening year) are predicted to be HGVs which is greater than is typically observed on other parts of the SRN at 10% (SfT 2020b)...'*
58. We also know from Open Floor Hearing 3 that Dartford Borough Council support the proposed LTC because of the opportunities for economic growth it would bring, and that Miss Laver has already given forewarning that the council will be asked what consideration has been given to how much more traffic such growth would create, and how that would affect the predicted traffic reduction at the Dartford Crossing. We will be interested to hear Dartford Borough Council answer that at a future hearing!
59. As a lot of growth in the Dartford area seems to be logistics and business that is reliant on roads, we wonder how much of that might be HGVs that are not being considered in induced demand predictions.
60. With such predicted growth across the board, and the fact that both the Dartford Crossing and LTC (if it goes ahead) would already have higher percentages of HGVs than is average on the SRN, surely LGV and HGV induced demand should be calculated, if adequate consideration and assessments of the project are to be made?
61. The statement we made in regard to around 50% increase in cross river traffic is based on information that Thurrock Council released from their analysis of the official modelling.
62. Even if we take the predictions that NH claim of 32% increase in 2030, and 44% in 2045, if HGV induced demand was added to that the percentages would rise further, proving as evidence already suggests that more roads lead to more traffic, and more traffic leads to more congestion, which leads to calls for more roads. More roads do not reduce traffic and congestion, they just keep National Highways and the companies they use in business, as they continue to destroy and impact the natural environment and our lives and communities.

In response to NH's comment on our statement about rat running, detours and additional pressure on the existing road network

63. We note that this topic is included in EXQ1 and we will make further representation at this point.

In response to NH's comment on our statement about NH not planning how traffic would migrate between the two crossings when there are incidents and the resulting chaos due to lack of adequate connections.

64. The only application document that NH signpost us to in their response to this aspect is Chapter 9 of the Transport Assessment [[APP-529](#)]. We can see no reference in this document as to how NH have adequately planned/considered how traffic would migrate between the two crossings when there are incidents.
65. The other reference point in their response is to DMRB GM 793. We have located it here - <https://standardsforhighways.co.uk/search/fce4e513-080b-4d96-99ca-b653612c77ee>. We note that this document uses the term 'Agreed diversion route' with the definition of 'The recommended route to be taken by road users when a section of road has been closed. NOTE: Agreed diversion routes are agreed with local stakeholders, councils and highways authorities and are usually signed using symbols in the event of a closure.'
66. We can find no mention of what the agreed diversion routes would be for the two crossings, if the proposed LTC goes ahead.
67. We have previously highlighted just some of the scenarios that we are concerned about, and NH have not provided any kind of response to these scenarios.
68. In addition to those previous scenarios, we note that the DMRB document details 'Rearward relief' as 'The turning around of trapped traffic between a closed junction and an incident scene that has blocked all lanes of the carriageway. NOTE: Rearward relief allows traffic to leave the carriageway at the closed junction and continue their onward journey.'
69. Now consider what happens if for example there is an incident that blocks the LTC tunnel section southbound. We understand that the Operations and Emergency Access could be used to turn traffic around. However, where would it go next in its endeavour to cross the River Thames? The first available junction would be the A13, but there would be no westbound access from the LTC on to the A13. Instead traffic would have to come off the LTC onto the A13 eastbound, and either use the Orsett Cock/A128 roundabout to u-turn westbound on the A13 to the M25 to cross the Dartford Crossing. If instead traffic misses or avoid the LTC to Orsett Cock connection it would be on the A13 heading eastbound and use the Stanford Detour (A1014 junction) to get to the A13 westbound. All of this would likely result in traffic also attempting to rat run by any means to the Dartford Crossing once off the LTC.
70. Another section of the proposed LTC that would likely be susceptible to incidents in the southbound section between the M25 until past the A13, as it is only two

lanes, meaning an incident could quite likely result in a complete closure. Would it even be possible to provide rearward relief? Surely it would be impossible to turn traffic back to the next junction as it would be the M25 going against the traffic flow. If in this instance the M25 LTC junction is closed, or naturally blocked due to standstill traffic on the LTC, traffic would instead come down the M25 to either the Dartford Crossing (again putting more traffic back on the current crossing), or it would come off the M25 onto the A13 to get to the LTC, only to have to take the Stanford Detour as there would be no direct access to the LTC from the A13 eastbound.

71. And that's just two scenarios as examples! With the amount of congestion and incidents/issues we experienced in 2016, which appears to be the levels of traffic NH is looking to attain, it is not hard to see why we are concerned about the resulting chaos that would likely occur.
72. In addition, we know that the 'smart' technology used by NH often fails and has issues, so this too gives us no confidence in NH identifying and dealing with incidents.
73. E/2.1 of DMRB GM703 states '*All reasonable steps must be taken to ensure the continued availability and resilience of motorway and all-purpose trunk roads in accordance with Section 5 of the infrastructure Act 2015 [Ref 4.N]. NOTE: The Act states that all reasonable steps are taken to ensure the continued availability and resilience of the motorway and all-purpose trunk road network as a strategic artery for national traffic, and as an effective part of the wider road and transport system.*'
74. We cannot see how the proposed NH have fulfilled this requirement in regard to planning how traffic would migrate between the two crossings when there are incidents. What steps have NH taken to ensure the continued availability and resilience in this regard?
75. E/2.5 of the same document states '*Processes and procedures shall be developed to provide the necessary response for all phases of the incident (initial response, scene management and return to normality)*'
76. Again, we question what processes and procedures have been considered/developed in this regard for the proposed LTC?

In response to NH's comment on our statement that the proposed LTC is a 'smart' motorway by stealth

77. We again do not feel that NH have addressed our concerns here. Simply referring to the fact that APRT have been in existence for many years and are regularly used by the public doesn't mean that they are any safer.
78. We again note that the proposed LTC would primarily be used by motorway traffic, connecting the M2 to the M25. Funny how when it comes to making provision for active travel we have been told by NH/LTC that the proposed LTC connects motorway to motorway, but when it related to concerns about 'smart' motorway by stealth they prefer to put emphasis on connecting A roads.
79. We also note that the project is predominantly described as 'The Project would provide a connection between the A2 and M2 in Kent and the M25 south of junction 29, crossing under the River Thames through a tunnel' again highlighting the connection between the M2 and M25. Particularly when you consider much of the traffic would join the LTC from the M2 route south of the river. This is a road largely designed with the aim of providing an alternative route for motorway traffic.
80. Also, that regardless of whether there are green signs or blue signs (one of the primary differences between A and M roads) at the roadside make no difference to how safe the road is.
81. Whether a road is existing and converted to a 'smart' motorway or a new 'smart' motorway/road makes no difference to the safety of the road.
82. We note that the DfT is purely relying on NH to advise them on the proposed LTC, and as far as we are aware are not considering independent review or advice. The industry standards and guidelines, DMRB for these matters are set by NH, and could be set to suit their own needs and wants, rather than reflect reality. It is apparent historically that NH cannot be trusted in regard to 'smart' motorways.
83. NH signpost us to paragraph 6.2.3 of Combined Modelling and Appraisal Report Appendix C: Transport Forecasting Package [[APP-522](#)] which states: "...This is because an APTR with the same restrictions as a motorway means that this is considered the most appropriate coding..." We would question why and who considers this to be the most appropriate coding?
84. Table 2.2 in [[REP1-196](#)] details 'Safety and operational features descriptors' and show that the proposed LTC has everything in common with an ALR motorway/'smart' motorway, rather than anything in common with a conventional APTR.

85. Our concerns in regard to the proposed LTC being a 'smart' motorway by stealth is to do with the lack of hard shoulder and the fact it would operate using 'smart' technology and operations. These are what make it more dangerous.
86. The fact NH still deny that 'smart' motorways are more dangerous is disgraceful, and another reason why so many have little confidence in them or 'smart' motorways.
87. The 'smart' technology does not work efficiently. Cameras are often not directed where they should be, if they're working at all. The control room tech is often crashing/not working, and there are not enough staff monitoring things. The control room staff themselves have voiced concerns over the dangers and risks with 'smart' motorways and how bad the technology is.
88. In regard to 2.6 Baseline legal entity in the same document, we would question who designates motorways as 'special roads'? We assume it is either NH or the DfT likely with advice from NH. Again, we would consider this to be another case of NH marking their own homework.
89. 2.7 Permitted traffic classes of the same document details that the proposed LTC would operate with permitted traffic classes 1 and 11 only which is the same as ALR motorways or any other type of motorway. This again, points to the road being a motorway by stealth.
90. Table 2.3 of the same document highlights the permitted traffic classes, and again shows that the proposed LTC has more in common with motorways than conventional APTRs.
91. In regard to the Written Ministerial Statement in Section 3 of the same document, we again draw attention to the fact that Ministers only know what is fed to them. We know from experience that the responses from Ministers are usually standard NH replies, probably provided by NH via the DfT.
92. The copy of the letter sent to TCAG by the Minister again highlights that NH reviewed the DMRB between 2015 and 2020, around the time that public awareness and concerns about 'smart' motorways was rising and we as a group were raising concerns about the proposed LTC being a 'smart' motorway, which is what the LTC designation is based upon.
93. NH are hardly going to advise them that the proposed LTC is a 'smart' motorway by stealth knowing that would result in it's scrapping, when failure to deliver the proposed LTC successfully is an existential threat to NH as an organisation.

94. In addition, the reasoning was that the scrapping was in recognition of the current lack of public confidence felt by drivers and cost pressures. There is certainly a lack of public confidence in regard to the proposed LTC, and it also has cost pressures with the ever-rising cost and dropping BCR.
95. If safety truly is National Highways priority then they would have delivered what was signed off on 'smart' motorways originally, which they failed to do. They would acknowledge the dangers and downfalls of 'smart' motorways which they still deny. They would admit that the proposed LTC is a 'smart' motorway by stealth, which they fail to do, despite the project previously being referred to as a motorway and it being coded and having so many other similarities to 'smart' motorways.
96. Back in 9.53 *Comments on WRs Appendix G – Parish Councils, Organisations and Groups* [REP2-052] firstly if the proposed LTC is being referred to as a link, it predominantly links motorway to motorway according to NH usual blurb about the project. Secondly, if it is coded as a motorway for Saturn software due to things like number of lanes, mixture of traffic using the road, prohibition of slow-moving vehicles etc this actually suggests that the road is being coded because it would be used the same as a motorway, ie it is a motorway by stealth.
97. Whether NH want to call it an APTR rather than a 'smart' motorway does not change the fact that we and many others have very serious concerns that it would be a 'smart' motorway by stealth and present all the dangers we associate with killer 'smart' motorways. NH have done nothing to address those concerns, they have purely tried to argue why it is an APTR despite much of the evidence still showing it is a motorway by stealth that would use 'smart' tech – a 'smart motorway by stealth.

In response to NH's comment on our concerns about accidents

98. We note that NH have again failed to respond to our concerns and question on this topic. How can an increase in the number of accidents as a direct result of the proposed LTC be considered to improve safety?
99. We additionally note that there are questions relating to road safety in the ExQ1, which we will observe and respond to accordingly if needed.

In response to NH's comment on our concerns about Unexploded Ordnance

100. We note that NH make no comment on specific local community information and concerns regarding UXO that we provided, instead simply signposting us yet again to the application documents.

101. We note that UXO are on the agenda for ISH5, which we will be attending and will make representation where needed.

In response to NH's comment on our concerns on air pollution inc PM2.5

102. We note that this topic is included in EXQ1 and we will make further representation at this point.

In response to NH's comment on our concerns about impacts on health and wellbeing

103. We note that this topic is included in EXQ1 and we will make further representation at this point.

In response to NH's comment on the project being hugely destructive and harmful

104. We note that this topic is included in EXQ1 and we will make further representation at this point.

In response to NH's comment on our concerns about the loss of greenbelt

105. We do not agree with NH that the proposed LTC demonstrates Very Special Circumstances in regard to the destruction and impacts to greenbelt.

106. The project itself encroaches the greenbelt, and does nothing to 'Assist in safeguarding the countryside from encroachment'. The 'parks' referred to by NH are in reality dumping grounds for the tunnel spoil, and are not deemed as parks by the local communities, particularly as they would be subject to pollution from the LTC, and tunnels specifically as traffic pushes the pollution through and out of the tunnels into the 'parks'.

107. We also question what safeguards would be put in place? Thames Chase Community Forest was created as a form of mitigation/compensation when the M25 was built, yet part of that is under threat from the proposed LTC.

108. The proposed LTC does not preserve the setting and special character of historic towns. It would destroy and impact the setting where Queen Elizabeth I gave her great speech, and is right between the two historic forts (Coalhouse and Tilbury), as well as destroying grade listed buildings and passing very close to other historic sites, buildings and villages.

109. There is also concern that the proposed LTC would encourage development if it goes ahead, with provision already having been sought for junctions to

accommodate future development.

110. The project categorically impacts the openness of the greenbelt, it's a huge road project for goodness sake.

111. NH themselves admit that the project when taken as a whole is inappropriate development in the greenbelt.

112. We do not consider there to be a case for very special circumstances, particularly when you consider that the project fails to meet any of the scheme objectives and is not fit for purpose, and that there are better and more sustainable alternatives.

In response to NH's comment on our concerns about the loss of ancient woodland

113. We note that NH make no comment in regard to our concerns relating to the proposed destruction and impact to The Wilderness.

114. We will make further representation on this aspect at ISH6, where we note that The Wilderness is on the agenda. Thank you.

In response to NH's comment on our concerns about impact to AONB

115. We note that this topic is included in EXQ1 and we will observe and make further representation as required.

In response to NH's comment on our concerns about ecology surveys being out of date

116. We note that this topic is included in EXQ1 and we will make further representation at this point.

In response to NH's comment on our concerns about 'green' bridges

117. We note that green bridges are on the agenda for ISH6, which we will be attending and will make representation where needed.

In response to NH's comment on our concerns about the loss of agricultural land

118. We note that this topic is included in EXQ1 and we will make further representation at this point.

In response to NH's comment on our statement about Biodiversity Net Gain requirements

119. We note that biodiversity net gain is on the agenda for ISH6, which we will be attending and will make representation where needed.

In response to NH's comment on our statement about non-compliance with Net Zero

120. The comments provided by NH are simply signposting again rather than addressing our concerns.

121. We additionally note there appears to be a heavy reliance on the Transport Decarbonisation Plan which is questionable to say the least.

122. It fails to address the fact that the Climate Change Committee has said that new roads should only be built if they can be shown not to increase emissions. Also, that they have called for an urgent review of new and current road building.

In response to NH's comment on our concerns about flood risks

123. We note that this topic is included in EXQ1 and we will make further representation at this point.

In response to NH's comment on our concerns over proposed environmental mitigation and compensation

124. We note that this topic is on the agenda for ISH6, which we will be attending and will make representation where needed.

In response to NH's comment on our concerns about construction and associated impacts

125. NH are again largely signposting to application documents, and nothing they have said offers us any reassurances or confidence in this regard. We know as a group representing many in our communities that there has been a distinct lack of communication, inadequate communication when it has taken place, and in general there is a lack of meaningful engagement from NH.

126. We know the level of impact construction of the proposed LTC would cause to us and our communities. We know that we have very serious concerns. We do

not believe NH have shown any genuine care or concern in addressing the concerns of us and the communities we represent and are part of.

In response to NH's comment on our statement that there has been inadequate consideration of alternatives, and public transport provision.

127. We note that TCAG have a question on this topic directed to us in EXQ1 and we will make further representation at this point.

In response to NH's comment on our statement that rail alternatives have not been considered adequately

128. We note that TCAG have a question on this topic directed to us in EXQ1 and we will make further representation at this point.

In response to NH's comment on our concerns about economic growth and value for money

129. Again, NH fail to do anything other than signpost us to application documents rather than respond to our concerns, when we have made it quiet clear and given evidence as to why the proposed LTC fails to meet any of the scheme objectives and would be poor value for money.

In response to NH's comment on our concerns about the rising costs

130. And again, NH fail to address points we have raised and seem intent on ignoring the fact that the project cost would be higher than they are estimating.

In response to NH's comment on our concerns about BCR dropping, value for money, adequacy of assessment, updating costings, and including all LTC related costs.

131. Yet again, more signposting to application documents.

132. Comments such as, the BCR of 3.1 is now seven years old and reflects the scheme at a lower level of maturity, just go to show how out of touch and unrealistic the information was when it was being presented to government prior to a preferred route being announced. Would the Secretary of State for Transport have pushed ahead with a project knowing then what we know now? 3.1 down to 1.22 is a considerable and significant drop, and that is as of estimations in Aug 2020, two years ago. What would it be now with more up to date figures?

In response to NH's comment on our concerns over false economies

133. NH do not provide detail of why they deemed the Tilbury Link Road unnecessary to help meet the Scheme Objectives, when clearly this point has been raised by others as an issue. What about the fact that the Port of Tilbury stated publicly that they would only support the proposed route if they got their own junction/connection? What about the so-called economic benefits and growth. What about the fact that the Port of Tilbury is now part of Thames Freeport?
134. We clarify again, that our comments should in no way be considered support for the Tilbury Link Road, we are simply pointing out failures in the proposed LTC design.
135. NH also fail to pass any comment on the other aspects of false economies that we mentioned such as Blue Bell Hill Improvements, dualling of the A2 near Dover etc.

In response to NH's comment on our concerns about the rising estimated cost

136. We are more than aware that the LTC Accounting Officer Assessment (AOA) was published on 6 January 2023, much later than it should have been.
137. We have previously queried and commented on the fact that we believe the LTC AOA is misleading and outdated, using estimated cost and data as at August 2020.
138. We have also submitted an FOI to request copies of the IPA's stage gate assessment review in Nov 2021, and the follow-up IPA independent peer review in June 2022, which the Information Commissioners Office is now investigating.
139. We also note that NH draw attention to "*As a Tier 1 scheme, the project will return to the NH investment committee and DfT IPDC at six-monthly intervals (or sooner) if factors affecting the value for money, schedule, costs and/or benefits of the scheme change. LTC is reliant on the successful outcome of the DCO application and government's final funding and investment decisions at full business case*".
140. On this we would ask if this is true why the LTC AOA is using data from August 2020, rather than more up to date information?
141. In addition, we would question whether the LTC project has returned to the NH investment committee and DfT IPDC in light of the fact that since 6 January 2023 Government have announced that the project has been rephased by 2 years and cost are rising with BCR dropping further? If so please provide details, if not then please explain why not.