

Lower Thames Crossing TR010032

Responses NH submissions at D4

Thames Crossing Action Group

Unique Reference: 20035660

DEADLINE 5 (3rd October 2023) / Submitted 3rd October

Introduction

1. Thames Crossing Action Group represent those who are opposed to the proposed LTC.
2. Our Deadline 5 submission includes comments in response to D4 submissions, such as NH's D4 post-event submissions, and NH's responses to ExQ1.

Contents

Introduction	1
NH Post-event comments	4
9.83 Post-event submissions, including written submission of oral comments, for ISH3 [REP4-179].....	4
A.6.2.....	4
A.10.1.....	4
A.10.2.....	5
B.6.3	7
C.4.1.....	9
D.8.1	10
9.84 Post-event submissions, including written submission of oral comments, for ISH4 [REP4-180].....	12
A.6.....	12
A.10.1 and A.10.2	13
A.10.3.....	14
A.10.4.....	15
9.85 Post-event submissions, including written submission of oral comments, for ISH5 [REP4-181].....	16
A.7.1-A.7.4.....	16
B.7.1	17
C.4.1.....	18
D.2.1-D.2.4.....	19
9.86 Post-event submissions, including written submission of oral comments, for ISH6 [REP4-182].....	21
3.3.18	21
A.9.1	21
A.9.2.....	22
B.12.1	22
D.9.1	23
Comments on ExQ1 responses.....	24
Q2.1.3 – Electrification Carbon Savings - Our comment to NH response	24
Q2.3.1 – Carbon and Climate Considerations: R (oao) Boswell v Secretary of State for Transport - Our comment	24
Q4.3.5 – Diversion Routes – Our comment to NH response	24

Q 4.5.1 - WCH routes – Our comment to NH response	24
Q4.7.5 - Queuing onto Orsett Cock – Our comment to NH response	27
Q 5.1.3 - Methodology: Open Spaces for Human Users – Our comment to NH response.....	27
Q5.1.4 - Methodology: Air Quality and Junctions – Our comment to NH response.....	28
Q 5.1.5 – Methodology – Our comment to NH response	28
Q5.1.6 - Legislative Requirements – Our comment to NH response.....	28
Q5.1.9 – Operational Phase Impacts – Our comment to NH response	30
Q6.1.2 – East Tilbury Landfill – Our comment to NH response.....	30
Q9.4.7 – Indirect Beneficial Effects – Our comment to NH response	31

NH Post-event comments

9.83 Post-event submissions, including written submission of oral comments, for ISH3 [REP4-179]

3. We have captured and pasted the relevant comments into our submission for ease of reference.
4. We feel the need to make further response to NH comments in section titled A6

A.6.2

A.6.2 *Complexity of the junction and people getting lost* – The placement of signage for the junction will be in accordance with the design Standards. Further design will be the subject of Road Safety Audits to ensure the safety of the junction.

5. Just because placement of signage for junctions would be in accordance with the design standards does not mean it will be adequate or lessen confusion and/or risk. What design standards are being referred to? What is to say that the standards are adequate for such a complex project? What is to say people won't get confused and make wrong turns or late decisions increasing risk levels? What provision would be in place to help guide those who get lost find their way back to where they want to be going? If more signs are needed for that purpose it would just increase the amount of signs, further adding to the amount of signage road users are expected to deal with.
6. We feel the need to make further response to NH comments in section titled A10

A.10.1

A.10.1 *Potential for road users to be charged per mile in the future* – This is a matter for the Department for Transport to advise on and not something that the Applicant has control over.

7. Whilst decision making on this may not be within NH remit, ensuring the project is affordable to road users is. Since the proposed LTC would result in detours and considerable distances when wrong turns are taken at complex junctions, we believe that NH should give consideration to the possible additional costs that would be incurred by road users, should per mile charging be introduced, as has been speculated for sometime now.

A.10.2

A.10.2 With regards to traffic migrating from the Dartford Crossing to LTC, see response at A.9.2 above.

A.9.2 Very few incidents at the Dartford Crossing result in a full closure and therefore a full diversion of traffic from the crossing would be a very rare event. In the majority of incident cases at least two lanes in each direction are maintained at the Dartford Crossing, meaning that not all traffic would be required to divert to an alternative route. In addition, traffic on approach to the crossing and further afield would be informed of the restrictions and advised of alternative route information in advance, which may include using the A122 LTC.

8. NH clearly state in A.9.2 that "in the majority of incident cases at least two lanes in each direction would be required to divert to an alternative route".
9. We have to question whether this would mean that if the QE2 Bridge were closed due to high winds, whether NH would still shut one tunnel northbound and use it to accommodate southbound traffic, as it does now? Please also see B.6.5 which seems to confirm this would be the case.
10. If this were the case then not only do all the concerns and issues we have highlighted previously about lack of adequate connection and the resulting congestion, pollution and chaos still stand, additionally the bridge being closed would also still greatly impact the traffic travelling northbound/anticlockwise on the M25/A282.
11. In such scenarios if the tunnels are then congested traffic would start to seek an alternative route to the LTC, which as we know has just one single lane from the A2 coastbound onto the LTC.

A.10.3

A.10.3 *Connectivity with the M20* – The connection to the M20 via the A228 C Variant was assessed during the development of the route and was ruled out as it did not meet the objectives of the scheme. Further information is detailed in 6.1 Environmental Statement - Chapter 3 - Assessment of Reasonable Alternatives [[APP-141](#)].

12. As this response was made directly to us we simply wish to comment that we have provided further detail in our own response to the ExQ1 questions that were directed to us on route options stage, Please see Deadline 4 Submission - Responses to ExQ1 [\[REP4-404\]](#) from paragraph 51.

13. We feel the need to make further response to NH comments in section titled B2

14. These comments relate to Action 8 for ISH3

No	Party	Action	Deadline
8	Applicant	A13/ A1089/ LTC Arising from questions raised by Port of Tilbury London Ltd (PoTLL), the Applicant is asked to provide a breakdown of new movement numbers at the Orsett Cock Roundabout necessitated by traffic movements between the LTC and the Port of Tilbury.	D4

15. Whilst we acknowledge that this is specifically for traffic movements between the LTC and the Port of Tilbury, we would question whether there has been adequate assessment of general traffic movement impacts to the Orsett Cock. After all it is not just LTC to Tilbury via the A1089 traffic movements that would impact the Orsett Cock. Currently traffic on the A13 westbound wishing to access the A1089 doesn't need to use the Orsett Cock as there is a direct A13 to A1089 junction. However, if the proposed LTC goes ahead, all that traffic would need to use the Orsett Cock to join the A1089.

16. We are also not convinced that the estimated traffic movements presented are a true reflection of the amount of traffic that would be involved, even for LTC to A1089 movements. If they were accurate then what business case would there be for the proposed Tilbury Link Road, which purely connects the LTC to Tilbury? Why would Government have added the Tilbury Link Road to RIS2 as a RIS3 pipeline project if there wasn't going to be more traffic than NH predict?

17. We feel the need to make further response to NH comments in section titled B6

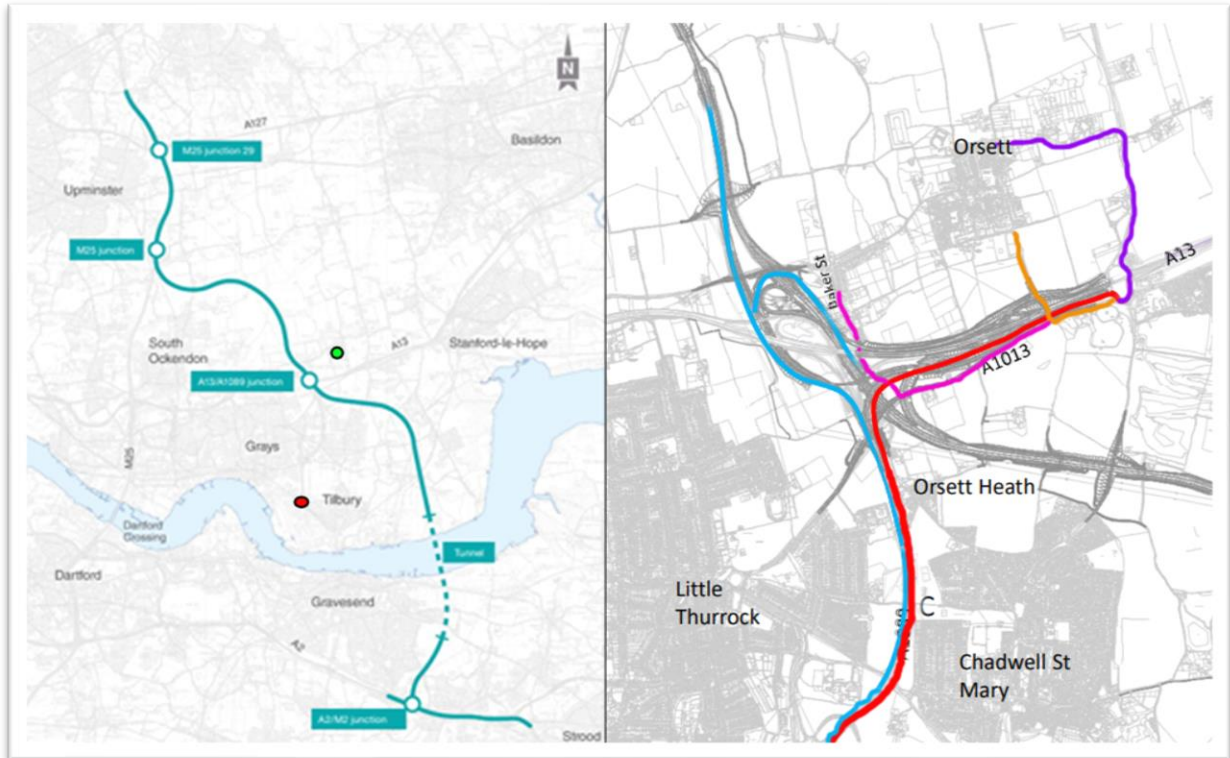
B.6.3

18. We would highlight that the A1089 is used for more than the Port of Tilbury, it is a busy area for Amazon, Asda and many other businesses, as well as residential areas. We feel that NH are presenting predicted traffic movements in a very selective and misleading way, and not identifying what so many of us who know our local area know, which is that what is being proposed would not work and would greatly impact businesses and local communities.
19. We do not believe that the figures in B2 are very realistic either, and believe in reality they would be much higher, especially with the growth of the port and it now being part of Thames Freeport.

B.6.4

B.6.4 Local journeys to and from the A122 LTC are set out in Visual Representation of A13/A1089/LTC Intersection for ISH3 [\[AS-146\]](#). Local traffic wishing to access the A122 LTC could do so via the A1089 (which connects to LTC northbound and southbound) or via the A13 from the east.

20. The local journeys to and from the proposed LTC that are set out in the signposted document are selective and limited on showing the true extent of the journeys local traffic would need to take to join the LTC.
21. For example, from Orsett to join the LTC traffic would have to leave Orsett either via Prince Charles Avenue (shown in purple on the map below), via Rectory Road (shown in orange on the map below), via Baker Street (shown in pink on the map below). Each would take the traffic to the Orsett Cock where it would then take the exit as though going to the A13 westbound, and take the A1089 slip road off of the slip road that would join the A13 westbound. It would then need to travel southbound on the A1089 to the Asda roundabout (shown in red), and then u-turn and head back north on the A1089 to join the LTC (shown in blue).
22. The map to the left in the image below shows Orsett (green dot) and Asda roundabout (red dot) to show the extent of the journey distance, since the Asda roundabout is not shown on the map on the right.



23. This is just one example. As we have mentioned before we also believe traffic would likely use the Stanford/A1014 junction of the A13 (the Stanford Detour) to join the LTC. Either way whether it be that local traffic uses the A1089 or the Stanford Detour it would force more traffic to use already busy junctions and roads that are the main routes to and from the ports.

B.6.5

B.6.5 In the event of an incident on the QEII bridge which results in its closure, an incident response plan would be instigated which would include use of the Dartford Crossing east tunnel for southbound traffic. This would maintain two lanes in each direction at the Dartford Crossing, meaning that not all traffic would be required to divert to an alternate route. Traffic on approach to the crossing and further afield would be informed of the restrictions and advised of alternative route information, which could include joining the A122 LTC south of M25 J29.

24. As already highlighted above in our comments on A.10.2, if NH propose that they would still close one of the Dartford Tunnels when the QE2 Bridge is closed, this does nothing to improve resilience and traffic flow at the Dartford Crossing, and as a result throughout the surrounding areas and region.

25. Until reading this we had assumed that if the proposed LTC went ahead the Dartford Tunnels would no longer be utilised in this way, as closing one tunnel

to allow southbound traffic a diversion route when the bridge is closed obviously has serious impacts on traffic travelling northbound at the Dartford Crossing.

26. In such instances not only would the traffic flow of the traffic that had wanted to use the QE2 Bridge to travel southbound be slowed down, but also the northbound traffic flow would be reduced too.
27. As congestion builds both sides of the river traffic would start to seek alternative routes, and then attempt to migrate to the LTC by any means possible, which as we have already detailed in our Written Rep [\[REP1-425\]](#) would end in chaos. Rather than it being just one of the previously described scenarios it would be multiple scenarios happening at the same time due to NH closing the bridge and therefore one of the tunnels at the same time. Also remembering that the tunnels are now old infrastructure that is in real need of maintenance and repair.
28. We feel the need to make further response to NH comments in section titled C4

C.4.1

C.4.1 In response to comments raised by Thames Crossing Action Group, the removal of Cranham solar farm is required to provide the M25 connector road. This connector road is provided due to the distance between the A122 LTC junction and junction 29, this removes the weaving on the M25 between these junctions.

29. We believe that there is supposed to be a strip of land between the actual edge of the M25 road and Cranham Solar Farm that is owned by National Highways and is provision for potential future widening of the M25. If that is correct then why can that land not accommodate the proposed new parallel road?
30. The solar farm land that is within the development boundary is also clearly marked as environmental mitigation land. NH have previously told us that *"...the land is required for the new road and for the diversion of utilities. The land that remains is not viable for the solar farm so we are using the area for environmental mitigation and replacement open space for Thames Chase as it is adjacent and provides connectivity to Thames Chase."*

31. The fact the connector road is needed to provide the distance that is required between the proposed LTC and junction 29 to remove weaving on the M25 between the two junctions again highlights to us that the proposed LTC is the wrong crossing in the wrong location, as there are so many instances whereby things need to be done to try and squeeze what we consider to be a poorly designed and not fit for purpose project into a route option that has been selected through inadequate consultation (as per our comments in our response to the ExQ1 [\[REP4-404\]](#) We also still find it hypocritical and unacceptable to present the demolition of a solar farm as environmental mitigation, and question what environmental mitigation/compensation is proposed within the LTC project to make up for the loss of Cranham Solar Farm?

32. We feel the need to make further response to NH comments in section titled D8

D.8.1

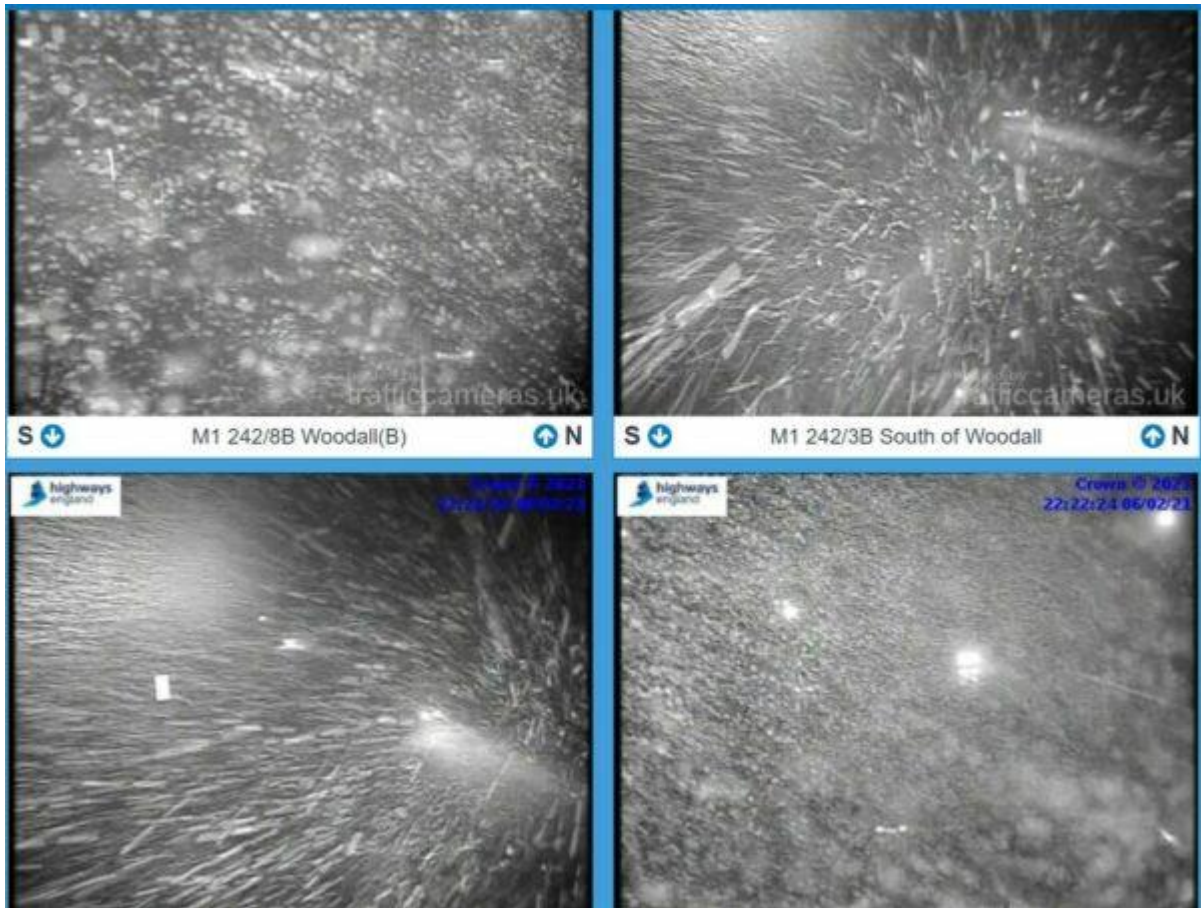
D.8.1 In response to comments raised by Thames Crossing Action Group, the design of the project will include technology such as variable message signs which can advise caution and give instructions in the event of fog or high winds.

33. This comment appears to show that NH do not deny that there would be fog and high winds across the Mardyke Valley, as we have stated and voiced concerns about on numerous occasions.

34. We fail to see how technology such as variable message signs will solve the problems and address the concerns we have. The fog will still reduce visibility, and high winds will still cause issue for vehicles, particularly higher sided vehicles such as HGVs.

35. There are also concerns about the fact there would be no hard shoulder, so when there are incidents where would road users find safe refuge?

36. The images below are what the 'smart' tech sees when it is snowing, and equally visibility would be greatly reduced when there is fog, thus putting road users at extra risk. These cameras are also often pointing away from where they should be focused and one reason for that can be due to high winds moving the camera's position.



37. We believe that NH stating technology would help in instances when there is fog and high winds across the Mardyke Valley, if the proposed LTC goes ahead, is just NH avoiding the obvious risks associated with knowingly routing the LTC through an area known for bad fog and high winds. We also question whether known weather issues like this have been factored into assessments of accidents and risks?

9.84 Post-event submissions, including written submission of oral comments, for ISH4 [\[REP4-180\]](#)

38. We have captured and paste the relevant comments into our submission for ease of reference.

39. We feel the need to make further response to NH comments in section titled A.6

A.6

40. It seems to us that NH are often hiding behind the fact that whatever they have done or are proposing is policy compliant, or follows guidelines and standards, regardless of the fact that the evidence against them clearly highlights issues.

41. We question why as a government company they seem happy to just sit and hide behind such policies, guidelines and standards, rather than fulfilling a duty of care to bring such matters to the attention of the DfT, so that proper and adequate review can be carried out to see whether updates are needed.

42. With particular reference to A.6.13 in regard to the full business case only being produced for Government if the DCO is granted consent. We again stress that we do not believe that the LTC DCO application has been prepared with up to date info, as the estimated cost is as at August 2020. We therefore believe that this needs to be reassessed before any decision is reached, as the difference between an estimated cost as at August 2020 and a full business case would be considerably different. With the cost anticipated to rise even further, the Benefit Cost Ratio would of course also drop further. We seriously question how this can be considered good practice, and also stress again that we believe this shows how the project fails the scheme objectives to be affordable to Government, and to achieve value for money. With such a huge, expensive and complex project this is too much of a gamble, and in light of the HS2 situation, this is a serious aspect that needs to be addressed sooner rather than later.

43. We note that NH again attempt to hide behind guidance, TAG Units, in regard to induced demand (or variable demand as they prefer to call it!) for HGVs and LGVs.

44. We raised our own concerns in this regard in our D3 submission [\[REP3-205\]](#) from paragraph 42. We note that NH have chosen not to respond to any D3 submissions other than those in regard to the draft DCO.

45. We feel it is essential that some assessment and consideration is given to induced/variable demand in regard to HGVs and LGVs, since NH have actively been promoting how many businesses would benefit from being able to cross the river opening up markets that weren't possible before. This is not just in the Need for the Project, but also on social media and in general throughout the consultation process, as a means to promote the project in what they consider to be a more favourable light. If they can use the increase in HGVs from business growth as a 'benefit' of the project, it should equally have to be considered when it comes to traffic modelling, and the associated disbenefits of induced demand.

46. We feel the need to make further response to NH comments in section titled A.10

A.10.1 and A.10.2

- A.10.1 The Applicant notes the comments made by the Thames Crossing Action Group (TCAG) in relation to residents of Thurrock being required to travel to the A13 Manorway junction in order to access the Project.
- A.10.2 Table A.1 of Comments on WRs Appendix E – Ports [\[REP2-050\]](#), sets out the vehicles performing this movement at the Manorway junction. The highest number forecast is 40 PCUs in the AM peak hour in 2030. As confirmed by the Applicant at Issue Specific Hearing 4, these vehicles are those travelling on the A128 north of the Orsett Cock junction and wishing to access the A122. The figures in Table A.1 are those forecast by the Applicant's transport model. Other trips wishing to cross the River (via either the Dartford Crossing or the Lower Thames Crossing) are forecast to do so via other routes.

47. A.10.1 notes our comments re Thurrock residents needing to use the Stanford Detour to access the LTC, yet in B.6.4 of 9.83 Post-event submissions, including written submission of oral comments, for ISH3 [\[REP4-179\]](#) they state that local traffic would access the LTC via the A1089, which we commented on earlier in this submission for B.6.4. This seems as though yet again NH will say what suits their needs and wants at the time, but when you check for continuity their responses are greatly lacking and misleading.

48. This is again apparent in A.10.2 when they again state that 'other trips wishing to cross the River are forecast to do so via other routes.'

A.10.3

A.10.3 In relation to “not taking account of incidents”, the Applicant has set out the approach it took to check the quality of existing data to it could be used as part of the model calibration and validation in Section 7.3 of Combined Modelling and Appraisal Report Appendix A: Transport Data Package [\[APP-519\]](#). This process does not mean that the Applicant’s transport model does not reflect the congestion experienced in many areas of the network, including the Dartford Crossing.

49. We have been told categorically by NH over the years that industry standards and guidelines do not require them to plan how traffic migrates when there are incidents, and so they do not have to do this in regard to the proposed LTC.
50. As we have stated time and time again, we know our local area and we can see what would happen when there are incidents, as we have previously detailed, and it is quite apparent that there would not be adequate connections and that the result would be more congestion, pollution and chaos.
51. To date NH have still not provided any detail of how they expect traffic to migrate between the two crossings when there are incidents. What routes do NH predict traffic would take?
52. NH have signposted us to Section 7.3 of Combined Modelling and Appraisal Report Appendix A: Transport Data Package [\[APP-519\]](#). This document is technical and 216 pages long. Time is obviously limited between D4 submissions being published and D5. As NH have failed to direct us to a specific section of the document that clearly explains how they have taken ‘what happens when there is an incident at either crossing and how traffic would migrate’, we have done our best to locate such information, and to date have been unable to find anything.
53. The main original reason for a new crossing was to solve the problems at the Dartford Crossing. As we all know, when there are incidents at the Dartford Crossing it causes chaos, because there are very limited and long alternative routes to cross the river.
54. We therefore believe that adequate assessment and consideration is needed as to how traffic would migrate when there are incidents at either crossing, if the proposed LTC goes ahead. We remain of the opinion that to date NH

have not shown that they have done so, and we feel this an important aspect that needs to be fully considered within the DCO Examination as part of the decision making process, as it is a critical aspect of the project and its failings.

A.10.4

A.10.4 With regards to the ongoing work between the Applicant and Thurrock Council in particular the localised traffic modelling, the Applicant will continue to engage with Thurrock Council, as well as other Interested Parties with the aim of reaching resolution between the parties.

55. We again stress that NH have failed to commit to meaningful engagement throughout the process. We have experienced this first hand, and witnessed it with others, including Thurrock Council due to our seat on the council's LTC Task Force meetings since Sept 2017, when NH have been in regular attendance.
56. It has been an ongoing response from NH throughout the process that info will be made available at DCO. They have knowingly refused and delayed way too much info being released, avoided meaningful engagement for too long, which is now putting extra pressure on everyone, including the ExA during this examination. We believe this to be unacceptable and disrespectful to everyone, they know how complex the project is and how limited time is within the DCO examination. We have to question whether this is part of their plan to try and push ahead with things and limit our time and ability to participate as we would have liked.

9.85 Post-event submissions, including written submission of oral comments, for ISH5 [[REP4-181](#)]

57. We have captured and pasted the relevant comments into our submission for ease of reference.

58. We feel the need to make further response to NH comments in section titled A.7

A.7.1-A.7.4

A.7.1 The Thames Crossing Action Group raised a concern regarding "Tilbury Fields being raised" and raised "the impact that the potential water flow would have on the river".

A.7.2 The Applicant notes there is no possible or feasible connection between the Tilbury Fields landscape feature on the North side of the river Thames and the North Kent Marshes situated to the east of Coalhouse Fort and to the South of the river Thames.

A.7.3 Rainfall runoff from the sloping topography of Tilbury Fields would be collected and managed, to discharge within the same catchment as it currently does and ultimately to the River Thames, as it currently does. No additional volumes of runoff would be generated compared to the baseline.

A.7.4 There will be a construction and operational discharge point into the river Thames beside Bowater Sluice. This discharged will require an environmental permit from the Environment Agency which would serve to ensure that any discharge into the river Thames is appropriate.

59. We have no idea why NH are commenting on a connection between the Tilbury Fields landscape feature and the above mentioned locations (in A.7.2) specifically.

60. Our concern is that with the proposed landforms around the tunnel portals, within Tilbury Fields, this would change the way that water can flow at times of heavy rain and/or flooding, high tides etc. If the water is unable to flow as it does now, it would have to go somewhere. Until it finds where it can naturally flow to it could be causing coastal erosion, another area of concern particularly in the vicinity of the East Tilbury landfill site, but in general any coastal erosion is not desirable.

61. Wherever it does end up being able to flow to would be different to now, even if it is a different volume of water, because the path it would normally flow now would be raised too high from the landforms. This would be the case from both water from inland flow out to the river, and also high water levels from the river.

62. We know from experience that there are often flood warnings for this stretch of the river, and historically there have been serious floods.
63. NH mention rainfall runoff being discharged, but where would it be discharged and when? Areas along the river are currently flood plains, and future predictions are that these areas would increasingly become flooded ongoing, particularly within future predictions in regard to climate change.
64. London obviously has its flood protection, including the Thames Barrier and when that is closed areas along the river downstream are subject to higher water levels. With the landforms raising the land alongside the river, this must have consequences, regardless of whether NH choose to acknowledge them or not.
65. Not only is it a concern to local communities and for the natural environment, but we also question what impacts it would have on the tunnel portals too, and whether positioning the tunnel portals, the northern ones in particular, could result in flooding issues on the LTC in the future as water levels rise due to climate change. We do not feel that NH are giving enough consideration to climate change resilience, or to the concerns of our communities in this, or any other regards.
66. We feel the need to make further response to NH comments in section titled B.7

B.7.1

B.7.1 The Applicant note's the concern highlighted by the Thames Crossing Action Group in relation to engagement with the community. In response, the Applicant would highlight Chapter 5 of the Code of Construction Practice (CoCP) [\[REP3-104\]](#) presents the approach to communication and community engagement. This includes a commitment for National Highways to develop a Communications Engagement Strategy and the contractors to develop Engagement and Communication Plans. Details of the content of the Engagement and Communication Plans are set out in Section 5.2. Community Liaison Groups will be developed to ensure that local residents are informed of construction activities.

67. In response to this we would just like to again stress that as a group we have very little if any confidence in NH and their contractors engaging meaningfully with the communities, if the LTC goes ahead.

68. We note the comment about ensuring that local residents are informed of construction activities, and remind NH that engagement is a two way thing, and that residents need provisions and reassurance that we would have means to contact NH regarding issues and concerns, and that they would be dealt with efficiently and adequately.
69. We already know from experience how many issues and concerns there have been during ground investigations etc so far, and we are more than aware that if the proposed LTC goes ahead, that will seem like the tip of the iceberg compared to at least 6-7 years of construction.
70. We feel the need to make further response to NH comments in section titled C.4

C.4.1

C.4.1 Please see section 4.1.7.5. of the main note for a response to the points made by Thames Crossing Action Group.

71. This response appears to suggest that there should be a section 4.1.7.5 in the main note. We assume this refers to document [\[REP4-181\]](#) since there doesn't appear to be any other signposting to a different document. We note that there is no section 4.1.7.5 within this document as far as we can see. **We would ask NH to signpost us to exactly where they refer and/or provide clear and informative detail in regard to this point.**
72. We feel the need to make further response to NH comments in section titled D.2

D.2.1-D.2.4

- D.2.1 At Issue Specific Hearing 5, Ms Blake indicated that the applicant did not acknowledge information that members of the community had presented about the potential location of UXO in South Ockendon.
- D.2.2 On 8 September 2020, the Applicant received an email from the Thames Crossing Action Group outlining its concerns about potential UXO in South and North Ockendon. On 10 September, the applicant responded to the email indicating that a desktop assessment on UXO around the site in question had been carried out and it had been assessed as Low Risk. Several emails were exchanged on the topic culminating in Ms Blake issuing a Freedom of Information request for UXO assessments. Ahead of sharing the *Lower Thames Crossing – UXO Desk Study & Risk Assessment*, the Applicant emailed an extract of information relating to the area of concern, which was derived from the report to the Thames Crossing Action Group. On 25 November 2020 the full *Lower Thames Crossing – UXO Desk Study & Risk Assessment* was provided to Ms Blake following the FOI request.
- D.2.3 The Applicant acknowledged TCAG feedback on this matter and, to the Applicant's knowledge, has responded to TCAG and Ms Blake's correspondence on this matter.
- D.2.4 The *Lower Thames Crossing – UXO Desk Study & Risk Assessment* is a comprehensive assessment of potential risks and issues concerning unexploded ordnance in the area of relevance to the Lower Thames Crossing DCO Application. The *Lower Thames Crossing – UXO Desk Study & Risk Assessment* methodology is robust, conforms to industry standards and is recognised it adheres to relevant guidance.

73. Firstly, we note that indeed NH did eventually provide us with additional information in regard to the UXO desktop study. However, they fail to mention that this was only after we had to appeal their initial decision to refuse to share the info we had requested under the FOI request. Evidence of this can be provided if needed.

74. The information we were referring to in the hearing was a map that we have presented to NH both prior to examination and including it in our Written Representation [[REP1-425](#)], from paragraph 96, including the image under paragraph 99.

75. As previously detailed this has caused great stress for residents in the area, and we still do not feel that NH are taking the level of concern and stress this is having on people, and those closest to this area are not at all reassured, and are living in fear of this risk. This again shows why residents have little if any confidence and trust in NH, and just how poor the level of engagement is. We know our local area better than NH, and we do not feel they have or are listening to us, on this and many other issues and concerns.

76. We also note that in 6.1.6 NH state that "...IT reassured TCAG that their concerns have been heard and the Applicant is aware of the risks and those risks have been assessed, characterised and the mitigation measures will be developed through stakeholder engagement. The Applicant will address TCAG's concerns further is writing."
77. We wish to put on record that TCAG have in no way shape or form been reassured on this aspect at all.

9.86 Post-event submissions, including written submission of oral comments, for ISH6 [REP4-182]

78. We have captured and pasted the relevant comments into our submission for ease of reference.

79. We feel the need to make further response to NH comments in section titled 3.3

3.3.18

3.3.18 In response to the submission by the Thames Crossing Action Group (TCAG), NC explained that Hole Farm provides compensation for a loss of ancient woodland and for the effects of nitrogen deposition on designated sites and habitats. Both of these aspects are omitted from the Applicant's BNG calculations, so Hole Farm does not generate any BNG uplift in its Metric. NC confirmed that it is therefore not possible to double-count with any other development that is proposed, as suggested by TCAG.

80. We have provided our evidence on this, and obviously the Hole Farm Community Woodland planning application that NH submitted to Brentwood Borough Council has now been submitted into the examination for the ExA to review as they need.

81. We will not repeat ourselves, except to say that we still remain of the opinion that there is double counting going on in regard to the Hole Farm Community Woodland and LTC projects. If something is going ahead regardless of the proposed LTC being granted permission it cannot and should not be considered as mitigation or compensation for the LTC project too.

82. We feel the need to make further response to NH comments in section titled A.9

A.9.1

A.9.1 In response to Thames Crossing Action Group comments on Agenda item 3bi, the Applicant would like to highlight the following chapters of the Environmental Statement, which address the impacts of the Project on soil and on agricultural businesses.

a. Chapter 10: Geology and Soils [APP-148]

b. Chapter 13: Population and Human Health [APP-151]

83. Again, NH signpost us to two lengthy documents, without any clear and direct signposting to anything that we feel answers the concerns we raised about the loss and impacts to agricultural land in regard to food security.

A.9.2

A.9.2 In relation to the Hole Farm project and the application made by Forestry England, more information on the relationship between the Hole Farm community woodland planning application and the DCO Application for the Project can be found under the 'Relationship to Lower Thames Crossing Proposal' section of the Planning Statement submitted in support of application reference 23/00862/FUL. Please refer to 'ISH6 Action Point 6 Hole Farm' [document reference 9.103] for a full response to comments at ISH6 about the Hole Farm community woodland and the Project.

84. As this response was directed to us specifically, but not wishing to go over points already raised in detail again, we will simply comment that we still feel that there is evidence to show that there is double counting when it comes to Hole Farm Community Woodland and the proposed LTC, as per our previous comments.

85. We feel the need to make further response to NH comments in section titled B.12

B.12.1

B.12.1 Details of all of the green Bridges can be found in Section B.3 above.

86. Again, as this response has been directed specifically at us, and not wishing to repeat what we have already submitted in our various reps. We have serious concerns about the proposed green bridges and do not feel they would provide for the species that NH suggest.

87. We feel the need to make further response to NH comments in section titled D.9

D.9.1

D.9.1 The Applicant refers to paragraph D.6.6 above in regard to when and why the Burham site was included in the proposals and to paragraphs D.6.9 to D.6.13 above in regard to when and why the Burham site was subsequently removed from the proposals.

88. We have been unable to locate the stated D.6.6 and D.6.9 to D.6.13, as the D paragraph numbering ends at D.6.3 and then moves onto D.7. We can only assume that NH have failed to include the information they refer us to.

89. Additionally, we also note that Mr Pratt has been signposted to D.6.14 to D.6.17, which again is not there. The same with Kent County Council – D.6.9 to D.6.23, and Kent Downs AONB – D.6.20 to D.6.23.

Comments on ExQ1 responses

Q2.1.3 – Electrification Carbon Savings - Our comment to NH response

90. NH have previously referred to reducing carbon emissions by 80% due to Government policy in regard to fossil fuel cars not being sold from 2030. Now this deadline has changed we question what assessment has been carried out by NH in regard to the recent announcement to push back the phasing out of fossil fuel vehicles, as it must surely have some kind of impact otherwise Government would not have needed to push the date back?

Q2.3.1 – Carbon and Climate Considerations: R (oao) Boswell v Secretary of State for Transport - Our comment

91. We would like to draw attention to the fact that there is an appeal in regard to this legal challenge.

Q4.3.5 – Diversion Routes – Our comment to NH response

92. It seems to us that NH are attempting to avoid the question of what the strategic diversion routes would be when there are incidents at either crossing, if the proposed LTC goes ahead.

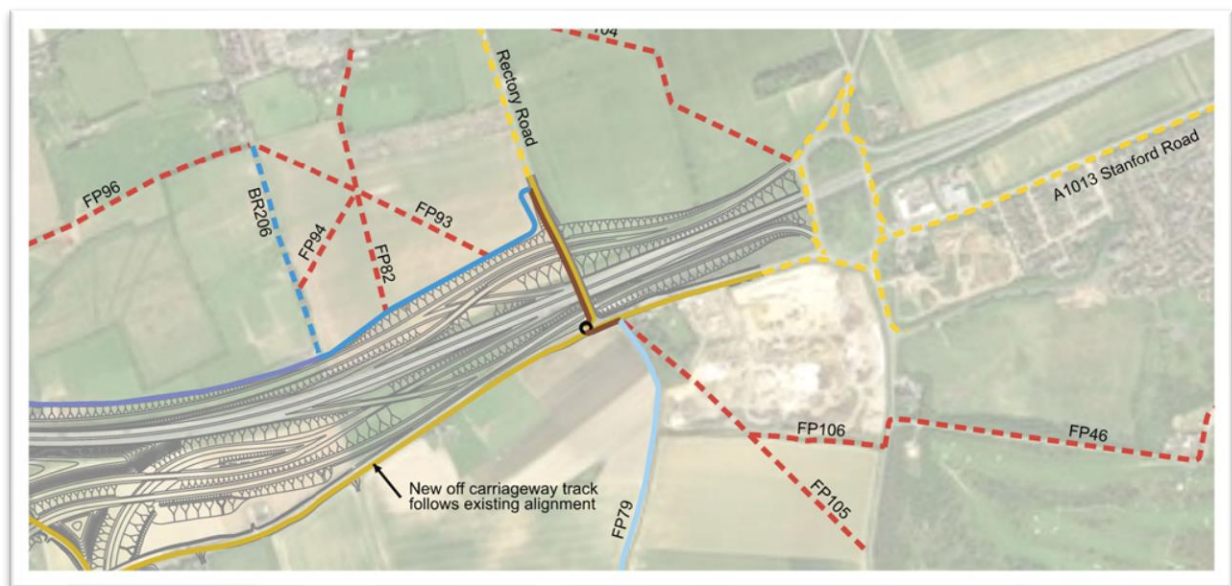
93. Please also see our comments in response to A.10.2 of 9.83 Post-event submissions, including written submission of oral comments, for ISH3 [\[REP4-179\]](#) above.

Q 4.5.1 - WCH routes – Our comment to NH response

94. Due to the limited time we have to review the info relating to WCH, and everything else, and prepare and submit our D5 submission, our comment will relate to a very focused area to provide an example of why we still consider that NH are not providing adequate information in regard to WCH routes. If we had enough time we are sure we would be able to highlight other issues, but felt it better to give at least one example now, rather than not comment as

we didn't have time to fully assess all the info in its entirety. We hope this is helpful.

95. Supplementary Walking, Cycling and Horse Riding (WCH) Maps (Volume B) [\[REP2-073\]](#) details 'New off carriageway track follows existing alignment' pointing to Stanford Road/A1013 in Orsett. Equally in Rectory Road, Orsett where the bridge over the A13 would be extended the colour coding appears to be the same colour, which the legend says is 'Off Carriageway Track – walkers and cyclists (new)'. We share the section we refer to below, for ease of reference.



96. These are routes we have previously commented on, as they are existing routes, not 'new' routes as NH have been presenting them.

97. The image below is a capture of Stanford Road taken on Google Maps, that clearly shows there is an existing walking and cycling route off the carriageway.



98. And below again is another capture, again taken from Google Maps, showing Rectory Road, Orsett, which again clearly shows an existing walking and cycling route off the carriageway.



99. We would also note, while comment on this area that the proposed 'Off Carriageway Track – Horse riders (new) along with the proposed Pegasus crossing from Rectory Road over Stanford Road/A1013, doesn't really offer any real options for horse riders once crossed, as it ends at a junction with footpath options only, which horse riders should not be using.

100. Our opinion remains the same as we have been expressing for years now. We believe NH have simply added some token routes in a misleading way, with many routes offering no real connection, in order to tick a box in regard to active travel.

101. Again, we stress we are sure there would be other similar issues that we could identify if we had time to review more thoroughly.

Q4.7.5 - Queueing onto Orsett Cock – Our comment to NH response

102. Like others, and as previously stated we believe the amount of traffic at the Orsett Cock junction would be an issue and is a concern. In addition, the section captured and pasted below we feel to be misleading too, as what NH consider to be normal operation, and what we as locals experience as 'normal' is very different. We live with the issues associated with incidents at or near the Dartford Crossing, and we can see what the issues would be if the proposed LTC goes ahead.

	The Applicant acknowledges that traffic flows on the road network are subject to uncertainty, and that incidents and road closures are likely to take place in the future. Such scenarios could cause queues to extend back along the Orsett Cock slip roads onto the A13/A122 Lower Thames Crossing mainline carriageways, but this would not happen under normal operation, and so the residual risk is considered to be low. Technology would be in place on the Project road to allow for the reduction of any risk in such an event, such as the ability to reduce speed limits and the use of Variable Message Signs (VMS) to inform drivers of queues.
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103. As we have also already stated previously we have concerns about the fact the proposed LTC would be a 'smart' motorway by stealth. Part of our concern in this regard is due to the fact that the technology often fails, so NH stating that technology would be in place "...to allow for the reduction of any risk in such an event" is again concerning.

Q 5.1.3 - Methodology: Open Spaces for Human Users – Our comment to NH response

104. The response from NH seems to lack any real clarity on what assessment has been carried out, we can't see any mention of PM2.5, and we also question how they can differentiate between how long people spend in their homes and in the garden or on a footpath etc. Some people will spend a lot of time in their gardens, or take long walks.
105. NH are attempting to sell the 'new parks' either side of the river as part of the project, as though they will be community assets that people can spend time in. And yet the response to this question seems to suggest that NH are not considering the risk of air pollution to people using those 'parks' that would be right next to the tunnel portals and subject to all the air pollution

from the tunnels being pushed out into them. Similarly, other areas such as Shorne Woods Country Park and Thames Chase, as just two examples, whereby people are likely to be spending a reasonable amount of time and be exposed to the air pollution associated with the proposed LTC, if it goes ahead. These are areas that locals may use on a very regular basis and therefore exposed to more pollutants on a regular basis.

Q5.1.4 - Methodology: Air Quality and Junctions – Our comment to NH response

106. Again, we have concerns as to whether PM2.5 is being adequately assessed. Also, particularly on the aspect of junctions, how realistic would the air pollution assessments be if they are in line with the traffic modelling predictions that many of us do not believe to be a realistic representation of what would happen, if the proposed LTC goes ahead?

Q 5.1.5 – Methodology – Our comment to NH response

107. NH state they haven't explicitly modelled PM2.5 concentrations for the assessment, for reasons outlined in Design Manual for Roads and Bridges (DMRB) LA 105¹. We wish to draw attention to the fact that DMRB LA 105 was issued in Nov 2019. It therefore predates the new legal targets for air pollution, including for PM2.5 that were announced in December 2022. We believe that this should be taken into account and that assessment for deadly PM2.5 is very much needed.

Q5.1.6 - Legislative Requirements – Our comment to NH response

108. We draw attention to page 73/262 (pdf numbering) of 'Environmental Improvement Plan: our manifesto for the environment for the next 5 years'², which states:

¹ <https://www.standardsforhighways.co.uk/search/10191621-07df-44a3-892e-c1d5c7a28d90>

²

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1168372/environmental-improvement-plan-2023.pdf

Air quality in the UK has improved significantly in recent decades. We have seen a decrease in all five major air pollutants: for instance, emissions of fine particulate matter (PM_{2.5}), the most damaging pollutant to human health, decreased by 18% between 2010 and 2020. Reductions in these pollutants have produced significant benefits for our health and environment.

In recent years we have broadly maintained this trajectory. However, air pollution continues to be the biggest environmental risk to human health, with particular hotspots in some urban areas.

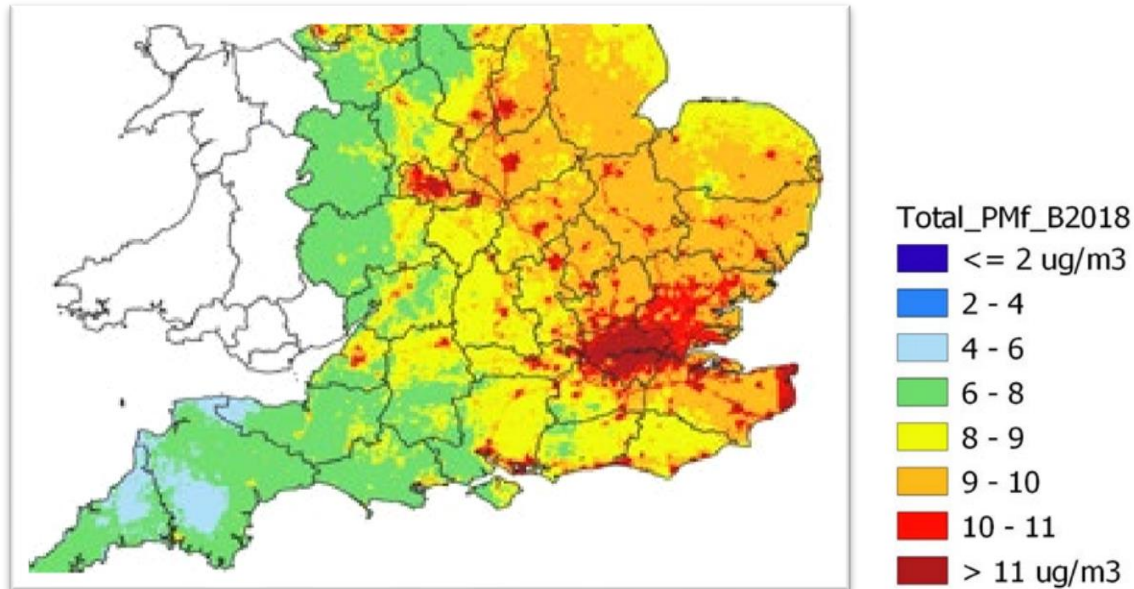
It also harms the natural environment, affecting our biodiversity, waterways and crop yields. In particular, emissions of ammonia have reduced more slowly than the other key pollutants and continue to damage sensitive natural habitats, adding to our existing challenges around house building with nutrient neutrality.

Therefore, to make further progress we are setting out an ambitious plan which tackles both overall concentrations and specific hotspots. In particular, we are taking further action on PM_{2.5}, as the pollutant which is most harmful to humans, and on ammonia, which we must reduce to achieve our apex target to halt species decline by 2030.

109. Firstly, this stresses just how dangerous PM2.5 is, when stating it is the most damaging pollutant to human health.
110. Secondly, it says, that to make further progress Government are setting out an ambitious plan which tackles both overall concentrations and specific hotspots, with particular further action on PM2.5, as the pollutant which is most harmful to humans.
111. We consider it completely irresponsible and unacceptable for NH to attempt to avoid such a serious issue.
112. We also question whether the reason they are attempting to avoid further assessment is because they know the whole proposed route would fail against the new legal targets. Surely if there is not a problem with the proposed LTC they would have no problem at all in carrying out assessments to show their plans would not be harmful?
113. Just because there may not be an associated monitor in the area doesn't mean to say that the pollution generated by LTC associated traffic, if it goes ahead, will not be putting people's lives and health at risk. Page 95/262 says that Government are expanding the network of PM2.5 monitors. We question whether any of the new monitors would fall within the LTC area, because with such a huge road project being proposed, and road traffic being one of the major contributors to PM2.5 pollution it is definitely something that needs to be assessed now, and monitored if the proposed LTC were to

go ahead.

114. It is quite apparent from the map on page 78/262 of the same document (captured and pasted below for ease of reference) that the area where the proposed LTC would be, if it goes ahead, is already suffering from very high levels of pollution.



115. We also draw attention to the fact that NH are required to work with local authorities in regard to reducing any exceedances in regard to air pollution. With the host local authorities voicing concerns about the impacts of the proposed LTC, we believe NH should be doing more in regard to ensuring they adequately assess PM_{2.5} in regard to the proposed LTC.

Q5.1.9 – Operational Phase Impacts – Our comment to NH response

116. We question why in their response to this question NH state that the target objective for PM_{2.5} is 25µg/m³, when the new legal target for PM_{2.5} is 10µg/m³ or below by 2040. This again shows how important it is for NH to carry out an assessment of PM_{2.5} against the new legal targets.

Q6.1.2 – East Tilbury Landfill – Our comment to NH response

117. We object to the fact that NH are simply stating that there would be no work in the East Tilbury Landfill. As already previously stated there is also an unknown aspect to the East Tilbury Marshes Landfill, when it comes to historic records.

118. Plus, it is not just direct works that could have an impact to the East Tilbury Landfill, because as we've already highlighted changes to the land level, with the introduction of the landfill around the northern portal/Tilbury Fields etc this would impact how and where the river would flood and impact the river banks. NH have not made clear whether any assessment has been carried out as to what the potential impacts are to coast erosion due to this change that the project would bring.

119. There are often flood warnings along this stretch of the River Thames, and if it can't go where the landforms would be then it has to go somewhere and the flow and power of the river would change due to the change in the water flow. We have concerns this would impact areas like East Tilbury Landfill and coastal erosion.

Q9.4.7 – Indirect Beneficial Effects – Our comment to NH response

120. With the limited time we have had to review the response between D4 submission being published and D5, we have been trying to understand NH response to this question. For example:

121. NH state: 16 receptors located on High Road and Shelford Close between the A13 and the M25 in Orsett.

- 2 receptors present a moderate beneficial change in road traffic noise during the daytime period.
- 14 receptors present a moderate beneficial change in road traffic noise during both the daytime and night-time periods.
- This is as a direct result of a 20% reduction in total flow and a 5% reduction in the percentage HGV content along High Road as a result of the Project.

122. We find it strange that Shelford Close is particularly identified, and also question why NH predict a 20% reduction in total flow and a 5% reduction in the percentage HGV content along the High Road as a result of the Project? How have they come to this conclusion?