

## The Lower Thames Crossing

### Written Representations - Deadline 6 – 31<sup>st</sup> October 2023

#### Response from Essex Area Ramblers - Registration no: 20034420

##### Introduction

My name is Graham Reeve and this is a submission written on behalf of the Essex Area Ramblers. I am a retired Transport Planner who worked for a large international consultancy for many years.

This representation is in response to the Applicant's document '9.84 Post-event submissions for ISH4', (REP4-180) paragraphs A16.1 to A16.5.

##### Essex Area Ramblers response

The Applicant notes in para A16.1 that the version of TAG Unit M4 (Ref 1) was published after the application for development consent was made. While this is correct, the Applicant has undertaken a series of different model run outputs reflecting different scenarios published by the DfT in November 2022, which is also after the DCO was submitted in October 2022. These different model run outputs were reported by the Applicant in August 2023 '9.72 NTEM 8 and Common Analytical Scenarios' (REP3-145) and therefore there would have been an opportunity to undertake assessments following the recommendations in TAG Unit M4, which was published in May 2023.

The Applicant refers to Tom Tom datasets for both 2019 and 2023 of observed data (para. A16.4) and '*has checked that the pattern of trips using the Dartford Crossing is similar to the pattern shown in the 2016 base data*'. The Applicant continues, that it is satisfied that it showed traffic patterns '*were the same in 2023 as in 2019, and in 2019 they were the same as in the 2016 base model.*' This raises the question of whether they are similar or the same? The comment is also very broad and does not identify which time periods were examined; peak hours or the inter peak. Even if they are the same, which in my view is unlikely, there would be several years of lost growth and also there are likely to be traffic flow changes elsewhere on the network which have not been taken into account.

Indeed, the Applicant accepts in their '7.9 Transport Assessment' (REP4-149) that traffic flows have changed elsewhere in the area. Paragraph 5.7.40 states '*From 2021 onwards, demand rebounded and has returned to pre- Covid 19 levels, although this does vary by location, and there have been some changes in the mix of vehicle types, especially during peak hours.*'

The Applicant does not consider that there is a basis for re-baselining the model (para A16.5), however TAG Unit M4, paragraph B.2.2 states: '*To account for Covid-19 related changes, trip matrices based before the beginning of the pandemic should ideally be rebased, or if this is not possible, an appropriate adjustment applied to model inputs or outputs in a proportionate way.*'

TAG Unit M4 recognises that rebasing of models takes time and resources, but where model rebasing is not practical but '*if it is clear that Covid has had an impact on travel, this should be represented using appropriate change in travel demand across the trip matrix, considering trip*

*purpose and patterns as appropriate, and apply this to produce an updated core forecast.'* (para B.3.2)

The Applicant has not explained why it has not represented the impact of Covid, using the appropriate change in travel demand as recommended in para B.3.2 quoted above.

The Applicant concludes (para A16.5, REP4-180) that as demonstrated in REP3-145, *'the updates to TAG Unit M4 and DfT traffic forecasts since the submission of the application would not have a significant effect on the traffic forecasts as contained within the DCO documentation.'* **This conclusion cannot be substantiated for the recommended updates in TAG Unit M4, as the impact of this update has not been examined.**

## **Conclusion**

The written Ministerial Statement by the Secretary of State for Transport on 9 March 2023, which is quoted in paragraph 2.4.1 of REP3-145, states: *'To date we have spent over £800 million on planning the Lower Thames Crossing. It is one of the largest planning applications ever, and it is important we get this right. We remain committed to the Lower Thames Crossing, and the development consent order process will be an important opportunity to consult further to ensure there is an effective and deliverable plan. In order to allow time for this process and given wider pressures on [Road Investment Strategy] RIS, we will look to rephase construction by two years.'*

**It is clear that current traffic forecasts do not get it right** and for such a major project and investment, it is not acceptable that no attempt has been made to adjust the traffic forecasts to take account of Covid, when it is clear that local traffic patterns have changed, particularly in the peak hours when the assessments are most important. The latest DfT guidance clearly states that the change in travel demand caused by Covid should be taken into account, as these changes could impact on the expected traffic flow projections and benefits, and the design of the project, particularly at junctions.

These changes in traffic patterns could also impact on the overall Benefit Cost Ratio (BCR) of the project, which currently ranges from 1.09 to 1.36. This is already considered to be 'Low' Value for Money (VFM). (Ref 2).

With this fundamental uncertainty with the Applicant's Transport Assessment, a decision to approve such a major project as the LTC cannot be made at this time. With the two year delay in commencing construction, there is ample opportunity to make the necessary adjustments to the transport model, to provide a more realistic assessment on the impact of the LTC project, before a decision is taken.

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Area Walking Environment Officer, Essex Area Ramblers

31<sup>st</sup> October 2023

## **References**

1. TAG Unit M4 'Forecasting and Uncertainty', Department for Transport, May 2023
2. Value for Money, 'Supplementary Guidance on Categories', Department for Transport, 2016

