



Response to:

**Deadline 8 of the Lower
Thames Crossing DCO
examination 2023**

1. Introduction

1.1 Transport Action Network (TAN) would like to respond to the Applicant's Deadline 7 submission 7.19 Carbon and Energy Management Plan v2.0 [[REP7-150](#)].

1.2 We would also like to request that the ExA requires the Applicant to produce a new Carbon Appraisal Table, in line with the latest TAG Unit A3 on Environmental Impact Appraisal, published on 1 December 2023. We also recommend the ExA requests the Applicant produces a GHG worksheet in line with TAG.

2. Applicant's new Carbon and Energy Management Plan v2.0

2.1 We note that the Applicant is claiming reductions in the construction emissions in the CEMP v2.0 of 320,000 tCO₂e (from 1.763 million tCO₂e to 1.44 million tCO₂e).

2.2 The Applicant claims these reductions have been secured through the procurement process, however there is very little detail in the Appendix F of the CEMP v2.0 to describe how exactly this will be achieved. There is limited information about "training" and "accreditation" and other such 'soft' measures that make no quantifiable difference. There are four bullet points about measures which may make a quantifiable difference (such as "lower carbon steel", but no details including on how much carbon each measure reduces, and absolutely no further information that can be scrutinised or challenged.

2.3 There is not enough information to assess whether the Applicant is double counting any emissions savings already outlined in the first iteration of the CEMP [[APP-552](#)].

2.4 There is not enough information about these barely outlined proposals to know whether they are realistic or merely speculation.

2.5 We note that National Highways has been sending out press releases to the media about procurement of hydrogen suppliers in the last week. However nowhere in the resultant publicity or the press release does the Applicant give any detail whether this is blue, grey or green hydrogen. There is a massive difference in the carbon impact and viability of each type of hydrogen. The Applicant meanwhile does not mention hydrogen in its CEMP v2.0.

2.6 We note the status of the CEMP, that it will be a Requirement in the DCO. However we are concerned that the CEMP is not part of the EMP, but only supports the EMP. It is also a vague document with lofty ideals, but little that is concrete (sic). At ISH12 the Applicant explained that the second iteration of the CEMP (signed off by the Secretary of State after

the grant of the DCO) will be developed by subcontractors and that carbon reduction would be achieved by pushing down through the supply chain.

2.7 We note that Ms Laver at ISH12 was also concerned about how contractors would be held to the commitments in the CEMP. She asked what the penalty would be. Would the penalty be sufficient to deter a contractor from making unevidenced and speculative claims that are not subject to scrutiny in this examination, in order to secure a lucrative contract for one of the largest engineering projects in the UK?

3. Need for a Carbon Summary Table

3.1 On 1 December the Department for Transport published new Transport Appraisal Guidance (TAG). Included in the TAG updates was an update to TAG Unit A3 on Environmental Impact Assessment¹.

3.2 The new TAG Unit A3 includes a new requirement for scheme promoters to produce a Carbon Summary Table (at 4.4.2) which clearly summarises, quantifies and monetises the carbon impacts of schemes.

3.3 We strongly recommend the ExA requires the Applicant to produce a Carbon Summary Table for Deadline 9 or 9A.

4. Need for a GHG Worksheet

4.1 In Transport Action Network's Written Representation [[REP1- 302](#)] we identified that the Applicant had failed to produce a Greenhouse Gas (GHG) Worksheet in its Combined Modelling and Appraisal Report - Appendix D - Economic Appraisal Package: Appraisal Summary Table Report [[APP-524](#)], despite having produced worksheets for everything else (noise, air quality, safety etc).

4.2 In its Deadline 2 Submission - 9.53 Comments on WRs Appendix G – Parish Councils, Organisations and Groups [[REP2-052](#)], the Applicant responded to Transport Action Network's Written Representation [[REP1- 302](#)]:

“In response to the missing greenhouse gas (GHG) worksheet: In agreement with the Department for Transport (DfT), and in line with the requirement for all National Highways schemes from 1 April 2022, National Highways Carbon Valuation Toolkit version 1.4.2 was used to value, and report the appraisal of, all greenhouse gas (GHG) emissions (i.e. road user

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<https://assets.publishing.service.gov.uk/media/65673ab8d6ad75000d02fcbb/tag-unit-a3-environmental-impact-appraisal.pdf>

tailpipe and embodied GHG emissions) rather than the Transport Analysis Guidance (TAG) GHG workbook, as such the Applicant has not provided an outdated workbook.”

4.3 However, on reviewing the latest DfT TAG guidance, published on 1 December 2023, it is clear that a GHG Worksheet is still a requirement of all schemes, and there is no exception made for National Highways. (4.4.2).

4.4 We strongly recommend the ExA requires the Applicant to produce a GHG worksheet to monetise the carbon impacts of the scheme, alongside the Carbon Summary Table recommended at 3.3 of this submission, by Deadline 9 or 9A.

5. Failure to assess induced HGV traffic

5.1 The Applicant has failed to assess induced HGV traffic. This is especially unacceptable as the Applicant has justified the scheme (in the Case for the Scheme, and in the Strategic Case) as a strategic freight route. The Applicant has therefore only included and considered the ‘benefits’ of increasing HGV traffic along the route, but has not assessed, quantified or costed the harms of encouraging and increasing HGV traffic along the route.

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Transport Action Network provides free support to people and groups pressing for more sustainable transport in their area and opposing cuts to bus and rail services, damaging road schemes and large unsustainable developments

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