

Closing submission from John Elliott for deadline 10 on 20th December 2023

Introduction

1. I would like to thank the Examiners for their kindness and courtesy in dealing with this Examination in Public. I only regret due to health problems I have not been able to contribute more to the evidence base. I hope the examiners will be able to accept this short final submission with that from HE and any other participants.
2. I believe that the DCO process for major highway schemes constrains the considerations and probably recommendations that the Examination Team can make to the Secretary of State. However, I would be grateful if you could consider the issues raised in my closing submission, relating to the previous evidence I have submitted, and if you are permitted, within your terms of reference, to make comments outside the direct constraints to the Secretary of State I would be most grateful.

RIS Programmes and minimal benefits of large schemes (or combinations of small schemes) in London and South East

3. My previous submissions have included documents from the majority of Professional Transport Planners overall pointing out that the Governments strategic road policy will deliver very few benefits to the population at large. Furthermore it is widely believed that the laid down methods of evaluation are flawed. I would like to register that the Transport Professional Institutions are continuing to follow up on these issues and any comments that the Examination team can make on the methods would be appreciated.

Induced or Generated Traffic and impact including need for widescale *mitigation* if large schemes are constructed

4. The first level 'below' this programme and assessment flaw is the *known* extra traffic a major road enlargement will directly cause. HE have claimed that there would be little or no induced traffic from the large capacity increase from the LTC. This is clearly just plain wrong on the basis of past evidence and experience. It has been proven time and again that major capacity increases, combined with a short-term travel time reduction, almost always generates enough traffic to fill the new road anywhere near large cities and cause more congestion elsewhere. It is clearly demonstrated that the extra traffic appearing is not diverted or reassigned from other routes especially after a few years once new travel patterns settle down. London and its immediate surrounding area of the south east is obviously the most extreme case in the UK.
5. River crossings, where there are limited alternative routes - like the Blackwall Tunnel dualling and indeed the history of Dartford Crossing, demonstrates this induced/generated traffic phenomenon most clearly. I hope that the DCO rules will allow the Examination team to be able to make this situation clear to the Secretary of State. This issue is covered best in my Appendix to Rep5 – 118 but the issue of induced traffic features in most of my submissions including the WR (REP1-364).

6. While none of my evidence covers in any detail CO2, air pollution, noise damage to ecology, etc the much larger increase in traffic as a result of induced demand (as mentioned in para 2 above) will have a worsening effect on all these issues.

Implications of Modelling and assessment carried out by HE

7. While my transport modelling experience is not up to date, I do understand the model used (even without all the generated traffic which will definitely occur) predicts some traffic problems within the study areas (eg the complex junction of the M2/A229 junction and Bluebell Hill). HE have rather disingenuously made it clear that such problems could be addressed by appropriate *mitigation* schemes in future RIS programmes or bids to the government from Local Authorities. These possible measures cannot be guaranteed and would be needed almost immediately after the LTC was opened. Also if an Authority was to secure expenditure from Government for schemes, which are needed as a direct result of the LTC, this would rob other authorities of potential funds for other (much more worthwhile schemes) just to address a problem directly caused by a badly conceived HE scheme.
8. The reliance on POPE type studies to identify problems caused by the scheme is too late especially when we know already, even by the HE models, that problems will exist which will need large scale 'mitigation' measures. It should be noted that no model is likely to be able to predict the real future situation. It has also been experienced that the POPE studies are nowhere near as comprehensive or representative of the long term consequences of major schemes as the induced traffic studies carried out by the GLC and indeed the CPRE and many others.
9. Beyond or outside the modelled study areas little attempt has been made by HE to advise on the deleterious consequences of the LTC even on their own roads eg the M2 between Gillingham and the A2/A299 junction. Problems similar to the Bluebell Hill situation will inevitably occur on this 10 mile section even just by reassignment

Benefit cost ration and business case

10. The claim by the HE that the cost benefit figure of 1.22 is robust is strange at best. A 10% increase in costs for a difficult major construction project seems the absolute minimum of likely cost overrun. The benefit calculations are also definitely fundamentally flawed. The flaws were identified in the combined Professional Institutions submissions in summer 2020 previously submitted as an Appendix to REP6a-015. Even without the fundamental flaws, if there was only about 10% overestimate of benefits, the benefit cost ratio would readily reduce to 1.0 or below. On the basis of what we hear there should be no business case for the scheme.

Conclusion

11. I earnestly hope as a highly experienced Professional Engineer who is making these submissions, without any pecuniary benefit for the time spent on my involvement with this project distorting my position that my submissions will be helpful to the Examiners team. I

hope you will be able to accept my representations are sound and that you will be able to ensure the Secretary of State knows and understands the basic flaws in this particular scheme.

JE 20-12-23

Appendix for reference

My previous submissions giving the details of this final closing submission are listed below:

- i. My full first Written Representation (actually submitted by my son due to my serious illness) on 17th or 18th July – **REP1 - 364**
- ii. A response to NH/the Applicant's comments on my Written Representation on 24th August – **REP3 - 175**

*This representation should have included an Appendix containing a letter from LGTAG, CIHT, TPS and RTP1 to Stephen Fiddler at the DfT and a Position Paper on modelling and scheme assessment submitted in 2020. The submission included, as (sub) Appendices, those Professional Institutions individual comments on a DfT consultation on these subjects. This whole Appendix was referred to in the text of submission REP3-175 but unfortunately it failed to upload. I have only just discovered its absence - **accordingly it is attached as an Appendix to this submission**. I submit that this Appendix is important to this Examination as its contents demonstrate that much of my evidence, particularly on Modelling, Assessment and choice of schemes, is widely supported by the most relevant professional bodies.*

- iii. Supplementary evidence on my verbal submissions at ISH4 on Wednesday 6th September and for future hearings in time for Deadline 4 on 19th September submitted on 18th September. This included an Appendix showing LGTAG's 2014 response to the DfT consultation on the draft NNPS. Apart from its detail contents it shows an argued and consistent line from LGTAG that applies to many schemes being promoted by NH/DfT - a position I support generally and which applies particularly to the LTC— **REP4 - 377**
- iv. Supplementary evidence on submissions by NH following hearing ISH 4 Wednesday 6th September in time for deadline 4 on 19th September but included for deadline 5 on 3rd October (**REP 5-118**). Together with this submission, is a PDF version of Volume 5 Number 2 1999 of the journal World Transport Policy and Practice (WTPP). The editorial on pages 2 and 3 and the main article on pages 28-48 are the relevant parts. The WTPP report was republished from a 1986 document produced by the then Transport Authority for London -

the GLC, titled 'The Effects of Strategic Network Changes on Traffic. This is also referred to in my other evidence as 'Roads Generate Traffic' and extracts were provided in my original WR as listed as (i) above – REP 1-364

- v. Submission **REP 6A-015** covering new and related issues to those addressed at ISH10 including:

The theme of 'Known Knowns' (foreseeable consequences) etc, 'as discussed at ISH10) related to mitigation and post opening monitoring.

TfL's approach to Transport Planning and Implementation including London Borough's, like Havering's, concerns.

My recalled experience with the Silvertown link

Need for secured funding for the obvious mitigations required

The rapidly diminishing 'business case'/ BCR for the LTC

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