

## LOWER THAMES CROSSING ADDITIONAL EVIDENCE

(John Elliott response to DfT letter of 28<sup>th</sup> November 2024)

[LowerThamesCrossing@planninginspectorate.gov.uk](mailto:LowerThamesCrossing@planninginspectorate.gov.uk)

[transportinfrastructure@dft.gov.uk](mailto:transportinfrastructure@dft.gov.uk)

### Interested Party Reference number: 20034190

Dear Planning Inspectorate team and Secretary of State for Transport

Thank for the opportunity to comment on the latest response by the applicant National Highways.

Firstly I would like to register the very limited time available for Interested Parties to consider all the various documents National Highways have linked to their fairly lengthy nine responses. National Highways have enormous resources available which even the largest objectors cannot call on a mere fraction of. Giving Interested Parties just 11 working days is simply not fair nor proportionate.

I have however endeavoured to draw attention to flaws in NH's recent response - <https://infrastructure.planninginspectorate.gov.uk/document/TR010032-006501>

In short these are asked under section 2 of the NH letter (and your requests) re:

1. Reducing carbon emissions in construction and operation/use
2. Public transport and active travel
3. Construction disruption, 'Local' people and consultation

I have also commented in section 4 on the impact of the value for money of this scheme in relation to these issues.

#### **1. Reducing carbon emissions in construction and operation/use**

- 1.1 On the first I am not an expert in **Carbon from construction** but do note the reliance on new methods and structures which would in NH's view substantially reduce the CO2 emitted in the production/manufacture of concrete. Nevertheless I believe that the 'construction' carbon and in practice and costs short and long term could also be seriously underestimated.
- 1.2 The construction methods espoused appear to be at the cutting edge of science certainly for use in large tunnels. History would indicate that serious problems are likely to arise after a few decades with such untried materials in the structure – retro repairs or reconstruction costs, if and when this would happen is likely to seriously impact the real costs and indeed benefits in the long term. Furthermore in the development of the detail design and construction there will be inevitable problems and potential large cost increases (it is notable that most large schemes there is almost always a large cost overruns). If the scheme is given the go-ahead it is more than possible that after starting preliminary works and further studies of the projected material that a decision might be made not to risk the new construction method and use a more traditional concrete. This would obviously increase CO2 in the atmosphere.

- 1.3 **Carbon during operation** is largely dependent on the traffic that would use the new tunnel and any changes on the local and strategic road network feeding the tunnel.
- 1.4 On the traffic changes and hence carbon reduction, I submitted substantial and irrefutable long term evidence of a practical kind rather than theoretical modelling. This is not to blow my own trumpet, but I explained in my evidence that I must be almost unique in understanding, from hard long term data and lengthy experience (50+ years!) of major network changes in the London area and particularly Thames crossings, the impact of such a scheme.
- 1.5 This hard evidence showed clearly that there is very unlikely to be any real 'relief' of traffic at Dartford after 2-5 years and that the extra traffic generated by the additional crossing will add substantially to traffic flows and congestion over a wide area of the eastern part of London, and the whole of Kent and Essex.
- 1.6 I would dispute strongly NH's assertions in their paragraph 2.24 on relief at Dartford; but even more seriously they have not shown or used in their calculations and analysis the impact of the extra traffic in the wider area of Kent, Essex and London. This was included in the various submissions I made on this scheme.
- 1.7 NH and many senior civil servants from the DfT have striven over several decades to ignore or at least play down numerous studies showing the potential traffic and its consequences from major new roads. It is interesting and notable that a number of Government *Ministers* over the last 30 years have recognised the serious adverse consequences of new or enlarged roads. This point is particularly relevant to the new Secretary of State for Transport as she is well aware of the situation in London from her previous roles.
- 1.8 All this means a substantial increase in carbon from operation and that this increase (and subsequent carbon emissions) has likely been substantially underestimated by the Applicant.

## **2. Public Transport and active travel**

- 2.1 Unfortunately this scheme and indeed the towns north and south of the scheme are outside London and so TfL, who have had freedom to operate public transport to meet the needs of users, are unlikely to assist significantly in providing such services. Therefore any bus services are entirely dependent on what commercial operators see as profitable. While car movement using the new crossing will be relatively easy it is unlikely that decent bus services will be introduced.
- 2.2 It is notable that until relatively recently bus services didn't operate across Dartford crossing and it serves towns/potential origins and destinations of passengers close to each bank of the Thames. Even at Blackwall tunnel both the GLC and TfL found it difficult to operate bus services that could compete with private car use. This was for geographical and physical constrictions (particularly in the northbound tunnel) reasons as well as the 1960's approach to the design of the whole scheme which was car orientated. The new Silvertown tunnel has been designed around provision of bus services and limiting car use. A very different

philosophy to both Dartford and the Lower Thames Crossings which have not been designed to accommodate proper bus services and to actively encourage car use.

- 2.3 Green Travel Plans are now often considered as part of the delivery of Active Travel. Good travel plans involve on and off-street public and private space parking control, improvements to bus services and car sharing. While improvements for pedestrian and cycle access are often included in Travel Plans, Active Travel by itself is in large part for the benefits of health and fitness.
- 2.4 Any improvements in local footpaths or cycle ways claimed by NH to help Active Travel could better be implemented without the LTC anyway. Actually using the LTC for crossing the Thames by foot or with a bicycle is clearly not an option unlike the tunnels provided about 100 years ago at Woolwich and Greenwich.

### 3. Construction disruption, 'Local' people and consultation

- 3.1 Apart from pollution, noise and extra CO<sub>2</sub>, the main harms to 'Local' people will be:
- the construction programme across presently a large area of mainly open land north and south of the Thames.
  - The interface with other routes during construction
  - Any extra congestion after construction at or near the junction points
  - Extra traffic and congestion on roads feeding into the Lower Thames Crossing over virtually the whole of Kent, Essex and the eastern part of London.
- 3.2 For the last two bullet points '**local' people** should properly include anybody using the Strategic roads towards these areas (including Dover port from anywhere in the Country). NH certainly haven't properly consulted with such 'local' people let alone painted a realistic picture of the likely future situation.
- 3.3 **Congestion points** at major junctions on the Strategic Road Network are evident for all. While I have not got the resources to properly investigate individual junctions, I fairly regularly use the A2/M2/A289 junction. An extra 4-6000 vehicles per hour disgorging through this junction in each direction to and from the LTC is likely to create major delays and seriously affect the 'local' people. (Note 4000 vehicles per hour per direction on the LTC represents only 1333 per lane per hour – new roads in the London area often carry up to or exceeding 2000 vehicles per hour for each lane - a large part of the traffic being generated by the new road itself).
- 3.4 In the development of the **construction processes** for schemes, the promoter normally *tries* to assess how they could be constructed and minimise any congestion. However recent practical experience of new NH schemes show an incredible level of **disruption** and massive congestion and delays. During the implementation process contractors can regularly make cases for different methods and road and lane closures not least for 'safety' reasons. The construction disruptions probably totally undermine any so-called economic benefit from the construction of NH schemes certainly in the southeast region. The 'economic benefits' are largely *modelled* future time savings of car users in the immediate area of the scheme, neglecting new congestion points that inevitably occur outside the 'study area'.

3.5 The most notorious recent case in the south east is probably the M25/A3 junction. This has caused massive delays on the A3 from the west and the M25 from the south over at least two years. It has also resulted in the total closure of the M25 on several weekends. I am not sure that the 'local' or the driving public, freight organisations, Surrey County Councillors or even Ministers were aware of the extent of such appalling congestion before the scheme was given the go ahead. Highways Magazine have carried out a detailed analysis and reported that the cost of delays due to construction was substantially underestimated in the project appraisal for the M25 / A3 scheme.



3.6 A similar case applied at the A249/M2 junction works and indeed for just one specific closure example the last 3 km of a journey to Sittingbourne from the west was signposted for a diversion route of over 30 km. Almost similarly, the hard shoulder running schemes haven't even given minor traffic benefits once the works started to provide additional laybys. On the M25 southern arm the inside lane has been lost, there is no hard shoulder and the speed limit has been reduced to 50mph!

#### **4. Any benefits and overall value for money of the LTC and link roads**

- 4.1 As above there are many **costs** which have not been included in NH's evaluation of the scheme in construction, potential enormous construction delays, construction harms to 'local people' (over very large areas of the southeast), extra carbon, and increased pollution, noise and congestion throughout very large areas of the south-east during operation.
- 4.2 My evidence to the inquiry showed that the so called economic benefits calculated by the NH are artificial at best and have been roundly criticised by the main institutions for Transport Planners (CIHT, RTPI, TPA and LGTAG). Nevertheless if the present methods are to be used as any benchmark the benefits (largely resulting from theoretical time savings for car users over the next 30 years) would be illusory as there would be substantial extra delays outside the modelled study area.
- 4.3 Even from the NH's clearly optimistic calculations of the benefit/cost ratio, the resulting figure is close to the situation where the costs exceed the benefits. With the inclusion of the above considerations it is more than likely that any so called economic benefits will be substantially less than the costs. This makes the scheme very poor value for public money compared with many other pressing needs nationally and locally.
- 4.4 There are virtually no other benefits except perhaps a more robust network when things go wrong. These could be much more easily solved by further congestion charging and even one more /replacement bore at the existing crossing. Relief at Dartford except in such situations would be illusory.

This additional response from John Elliott refers to and uses submissions to the hearing.

These are:

1. TR010032-002507 DL1 --- Rep1 – 364 21<sup>st</sup> July 2023
2. TR010032- 03620 Rep 3-175 30<sup>th</sup> Aug 2023
3. TR010032-003885 DL4 Rep4 377 22<sup>nd</sup> Sept 2023
4. TR010032- 004368 DL5 Rep 5 118 5<sup>th</sup> Oct 2023
5. TR010032- 004918 15<sup>th</sup> Nov
6. TR010032 – 006196 DL10 21<sup>st</sup> Dec 2023
7. TR010032 - 006415 (enquiry on further action) 24<sup>th</sup> July 2024

Most of the points and issues raised in my submissions were not queried or covered by NH in any responses.

John R Elliott BSc, CEng, MICE, FCIHT, MCM

