

## **Written evidence submitted by the Thames Crossing Action Group (MTP0030)**

### **Introduction**

We represent thousands of people who are opposed to the proposed Lower Thames Crossing (LTC). More info if desired can be found on our website

[www.thamescrossingactiongroup.com](http://www.thamescrossingactiongroup.com)

### **Reason for submitting evidence**

As a group we feel very strongly that there is much evidence of inadequacies in the process of major infrastructure projects, and also particularly in Highways England (HE) and their actions. We feel it important that we take advantage of this opportunity to submit the evidence and opinions we have to the Transport Committee, in the hope it will help with the inquiry, and ultimately may help improve major transport infrastructure projects moving forward for the benefit of the people and our country.

### **Summary**

We hope that this paper will be deemed acceptable. We have kept it as concise as we can, which has been no easy feat considering the volume of evidence and experience we have acquired and experienced over the years of dealing with HE on LTC. The actual Evidence section is less than the 3000 words requested, but alongside the Intro and Reason for submitting evidence it pushed it over the 3000 mark, so we have added this short Summary which we hope will be helpful.

Much of our evidence is from direct experience over many years now of dealing with Highways England/LTC and others with regard to the proposed Lower Thames Crossing. We and many others have experienced the inadequacies of not only the LTC project and consultations, but also of Highways England as a Government company.

We feel that addressing so many of the issues we have been raising over the years would be extremely beneficial in improving major infrastructure projects moving forward. There needs to be more listening and consideration given to the people, especially those who live in the areas to be impacted by infrastructure projects, instead of tick box consultations. Highways England and others responsible for these types of projects need to be held more accountable for their inadequacies and actions.

There needs to be far more joined up thinking and action from the Government, with real actions put into place to back up the talk. More importance needs to be given to the impacts such projects will have on people, their lives, health, homes, communities, and of course the environment. We can't continue with a Government that says one thing and acts and allows others to act in a way that doesn't back up the talk with positive action.

Also importantly the cost of these projects needs a lot more consideration, as to the true costs both monetary and from its impacts to people and the environment. HE need to be seriously reviewed on not only how they are presenting the cost of these projects, but ultimately in how

they are operating, with serious and proper consideration given as to whether they are truly fit for purpose, as we are afraid in ours and many others experience they simply are not and that carries through and is reflected in the projects and the public's dealings with them via consultation and day to day life when using the Strategic Road Network. We deserve better, our country deserves better, our environment deserves better. Now more than ever is the perfect time to create a new and better 'normal' that we keep being told about.

We would thank you for the opportunity to present our evidence, and hope that you find it helpful, and we would of course be more than happy to discuss further.

### **Evidence**

From the start consultation on the LTC has been full of inadequacies. Most importantly in the start of these inadequacies was the fact that despite the Department of Transport (DfT) asking HE to consult the public on Locations A and C in 2016, HE then proceeded with a completely biased consultation purely on Location C options alone. More evidence of this fact, along with many of the other huge amount of inadequacies of consultation can be found in our '*Inadequacies of LTC Consultation*' report <sup>1</sup> This report, along with Local Authorities Adequacy of Consultation responses, were accepted by the Planning Inspectorate (PINS) prior to the LTC DCO application being withdrawn due to HE's failure to provide adequate info to PINS.

Since the report was submitted to PINS for consideration, other matters have arisen that will be added to the document before resubmission of the LTC DCO as evidence of inadequacies, which include HE failing to release available information under the Freedom of Information Act that was only released following a request for a review of the decision by TCAG. We are happy to share evidence of this if required.

We know that we are not alone in experiencing inadequate consultation by HE, other projects have experienced issues also. Neither are we alone in HE refusing to share available info under FOI, others have also experienced this. This is why we, and others, believe that HE as well as their consultations are simply not fit for purpose.

Consultations are also heavily biased in favour of LTC, and have completely ignored the negative impacts and opposition. With a project of this scale it is inevitable that there will be negative aspects, to believe anything else would be completely unrealistic. Yet none of the negatives are highlighted in consultation, instead favouring what HE consider to be the positives. Also Government and HE press releases are hugely biased in favour of LTC and do not include negatives of the project or opposition opinions. An example <sup>2</sup>

The original task for HE set by the Government for this project was to solve the problems we all suffer with due to the Dartford Crossing. Yet HE's own data proves that the Dartford Crossing will remain over capacity even if LTC goes ahead. <sup>3</sup>

The cost of the proposed LTC has risen considerably over the years, and is now predicted to be between £6.2bn-8.2bn. At the time of the preferred route being announced the predicted

economic benefit of LTC was around £8bn. No further updated figure for economic benefit has been provided by HE, despite being asked on more than one occasion. This is a significant change to the project, yet HE seem to be avoiding sharing the latest figures publicly, and have not consulted on the rising cost. There is no mention at all of the cost on the official HE/LTC website, and many mainstream media/press outlets are still reporting on LTC with old cost figures, because HE have not made it clear that the costs are now up to £8.2bn. More expensive per mile than HS2, which as we all know has been hugely controversial. If it is taxpayers money being used on such projects then we all deserve to know exactly what the latest cost is, and have a chance to have our say. This is something that needs more attention and commitment to from Government, rather than allowing the likes of HE to simply get away with pushing costs up with no consequences, or opportunity for the public to respond.

With further regard to the rising cost of LTC, as an example of cost issues of such large projects, HE removed the Tilbury Link Rd and Rest & Service Area from the LTC, thus reducing the overall outlay of the project. However, both are still being discussed and progressed as separate stand-alone projects. In our opinion this is a false economy. Add to this the additional £143m predicted cost of the Blue Bell Hill Improvements, which are needed due to the LTC, along with other similar improvements that would need to be carried out as a direct result of LTC, and the cost rises even more.

Local Authorities have also released documents outlining the negative impacts to local economies that HE seem to be ignoring. For example Thurrock Council predict at least £150m in loss to Thurrock as a direct result of LTC if it goes ahead. <sup>4</sup>

All of these additional costs must surely also impact the Benefit Cost Ratio, another reason we suspect they are being side-lined as separate projects in an attempt to try and make LTC look better than it is. This also goes towards safe guarding future work for HE.

In keeping with that theme, HE are not considering or planning how traffic will migrate between the two crossings, if LTC goes ahead, when there are incidents at either crossing, and there aren't adequate connections, which will result in more congestion and pollution. As one simple example, if the LTC goes ahead, when there is an incident at the Dartford Tunnels and traffic needs to migrate to the LTC to cross the river, there is just one single lane from the A2 coast bound onto the LTC. When Local Authorities have raised such issues HE simply say that any issues will be up to the Local Authorities to deal with. Again more expense allegedly "saved" by HE on the LTC project, again more false economy, and false expectations in any Cost Benefit Ratio since these things will not officially be taken into account.

More consideration also needs to be given to the costs that will arise from projects such as the LTC, to our NHS due to air pollution related illness, a very realistic outcome of these types of large road projects.

Also the cost to the environment needs to be taken a lot more seriously. HE showing a solar farm they propose on demolishing for LTC, as environmental mitigation on a map, is completely non-sensical.

The Government allocating £640m for the Nature for Climate Fund announced in the March 2020 budget which is said to provide significant funding for tree planting, far less than what is being allocated for RIS2, yet RIS2 will destroy huge amounts of trees and other environment/habitat. So with one hand and lot of money you are proposing to plant more trees, and then with the other larger more destructive hand and amount of money, you are destroying trees and the environment.

In a similar vein the Government has legally committed to Carbon Net Zero, but then the LTC alone is predicted to create over 5m tonnes of Carbon Emissions. We need the Government to back up their words with actions, and to do the right thing, and ensure procedures are in place to ensure the environment is saved and protected.

The National Policy Statement for National Networks needs to be reviewed and updated as a matter of urgency too, as amongst many things it doesn't reflect the legal obligations of the UK Government on Carbon Net Zero etc. All policies should be reviewed and updated to ensure they are kept up to date and in line with all legal commitments of the Government, and ensure that actions back up all the talk.

Talking of things being outdated, we have heard from people knowledgeable and experienced in the industry that tell us that WEBTAG that HE use to projects like LTC are outdated. Yet HE wait for the Government to realise and make any updates. HE are supposed to be a Government Company, and should have the best interests of the people of our country at heart. If that were true and they were performing within best business practices, surely they should come to you and advise of issues and make suggestions to ensure the best results and value for money are fulfilled. This is not what is happening.

HE often also don't take things into account, purely "because it's not industry standards/guidelines"! despite it making much more sense and would be far more beneficial. A prime example of this is how they are not considering or planning for how traffic would migrate between the two crossings, if LTC goes ahead, and that as planned there are not adequate connections which will cause further chaos and problems, and all in the name of a project that is supposed to fix the problems that already exist without them creating more.

People will assume that solving the problems due to the Dartford Crossing, and how traffic will migrate between two crossings should be a standard part of planning such projects, but we have learnt that this is clearly not the case.

Another factor that people assume will happen is that other large projects in the vicinity of LTC (or other projects) will be taken into account during planning. Yet this is not the case either. Is it any wonder that there would be more traffic problems for instance, if LTC goes ahead, when the London Resort theme park opens (if that goes ahead, which has now already submitted their DCO)? Or even more surprisingly that the Local Plans are not being seriously

taken into account with LTC, despite the fact it is, we have learnt, the Government who dictate how many new homes and associated infrastructure is built. But these kind of factors are ignored, only to mean that if LTC goes ahead the problems it will face, that we the public can clearly see right now, won't be considered before it is too late. This should also be considered another example of false economy, and false expectations.

We know that the whole LTC route would fail against World Health Organization (WHO) standards on PM2.5. There is a distinct need, and a large demand for WHO standards on PM2.5 to be enshrined into UK law. Yet HE will continue to try and push LTC ahead, simply because at this time it is not a standard/guideline that they have to work to. Regardless of the fact the Mayor of London has committed London to WHO standards on PM2.5 by 2030, and that the northern end of the route is in the London Borough of Havering. Or that people along the entire proposed route deserve the same right to have cleaner air to breathe.

HE use the excuse of Electric Vehicles being the answer to pollution problems whenever the topic is raised, but that simply isn't the case, with PM2.5 being a prime example of this, amongst many others.<sup>5</sup>

There are many examples of HE and the Government not giving full consideration as to how things will progress moving forward when making decisions about major transport infrastructure, which has resulted in problems and inflated expense at later dates one way of the other.

Lack of inclusion for Non Motorised Users and public transport options for LTC is another example of poor planning and lack of interest in anything other than roads for motorised vehicles. Especially at a time when we are supposed to be building greener, these options need to be taken into account.

Lessons need to be learnt from previous mistakes, such as not windproofing the QE2 Bridge which causes it to be closed in high winds, causing chaos on roads. Not to trust HE to do the right thing, take a look at the serious concerns over 'Smart' Motorways after HE did not stick to what was presented and planned, causing our motorways to become death traps. Something HE continue to move forward with on projects like LTC where they are not committing to best standards, purely the basic distance guidelines. Safety should be such an important factor and aspect of these large projects, yet it has been an absolute battle trying to get adequate info about Emergency Areas on the LTC. The lack of transparency and acknowledgement of people's serious concerns of this aspect of LTC has been astounding. They went from calling it a motorway, until the time they started introducing terminology like 'smart technology', most likely due to the fact they knew 'smart' motorways have been getting bad rep and so many people have serious concerns, that all of a sudden they started referring to it as an all-purpose trunk road, rather than motorway.

Another thing that needs to be taken into account and reviewed is the fact that HE present and provide different information, depending on who they are talking to. They would come to meetings with us and local authorities one day, and tell us certain info was not available, and then we would learn that the next day the info we had requested was being shared at business

events. They have a different sales pitch depending on who the audience is, and present the info in whichever way suits them best to get the results they want. An example of this was when they added the Tilbury Link Rd to the LTC project to get the backing and support of the Port of Tilbury, as they said they would only support Option C3 if they had a direct connection. As soon as HE got the Port's support they removed the Tilbury Link Rd. More transparency and equality and fairness is needed, and HE do not seem capable of doing that.

We are aware of the acceleration programme/department that has recently been announced and we would point out and stress that it is more important to ensure that what is being done is adequate and efficient, and not harmful to the environment etc than purely to be pushing things through as quickly as possible.

More people have changed to working from home long term now due to COVID, even if they partake in part time hours in an office. COVID and Brexit could lessen the amount of vehicles on our roads, due to people living and shopping more locally moving forward.

When such large amounts of money are being spent on such large projects that can have such impacts on so much, it needs to be ensured that things are done properly and in a transparent way, without being misleading and biased, and to have full and proper adequate consultation with the public, that is given genuine consideration, and not just a tick box exercise as HE see it at present.

We have noted that HE puts too much into the hands of the contractors, rather than taking responsibility and then just using contractors to do what is needed to fulfil the project plans. Especially when you consider that from what we have seen and experienced, nobody at HE is actually in place and seeing the whole project through from start to finish with a complete oversight of the whole project, and taking responsibility for it.

There seems to be so many different people and teams working on the different aspects of the project, which is understandable and needed as they should all be experts in their own fields, and that should build a strong team to ensure a good result. However, that will only happen if there are at least a couple of people overseeing the project as a whole with good overall knowledge and understanding of the whole project, and that is not the case with HE and LTC. For over a year there wasn't even an LTC Project Director, after Tim Jones resigned. Not even a Deputy Project Director to step up and fill the void while the position was filled. The staff seem to chop and change frequently, and this means that continuity of what has and is happening as a complete image of the project has been lost, which is no way for a project, especially of this kind of scale, to operate efficiently and effectively.

Other countries seem to spend less money and get better results with projects completed in a more effective and efficient manner than the UK.

How can it be considered worthwhile spending so much of taxpayers money on Highways England, with a CEO on a salary of £456,727 – three times that of the Prime Minister, and who knows how much more is spent on the rest of Highways England? Especially when they are not even doing an adequate job, and doing what is best for the people and our country?

The DCO process needs to be reviewed too, as it is far too biased in favour of the applicant. The bar is way too low. Legislation needs to be updated to ensure a more realistic and genuine process is put in place that offers a level playing field that should result in the best results for our country and it's people.

More consideration should be given to the recommendation of the Planning Inspectorate too. For a Secretary of State to make a decision that goes against the recommendation of PINS should have to provide in depth evidence as to why the decision has been made, and show evidence that the SoS has thoroughly examined all available evidence before making such a decision.

January 2021

### **Endnotes**

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<sup>1</sup> <https://www.thamescrossingactiongroup.com/wp-content/uploads/2020/11/Inadequacies-of-the-Lower-Thames-Crossing-Consultation-Process.pdf>

<sup>2</sup> <https://www.gov.uk/government/news/new-lower-thames-crossings-to-cut-congestion-and-create-thousands-of-jobs>

<sup>3</sup> <https://www.thamescrossingactiongroup.com/lower-thames-crossing-is-not-fit-for-purpose/>

<sup>4</sup> <https://www.thamescrossingactiongroup.com/impacts-to-thurrock/>

<sup>5</sup> <https://www.thamescrossingactiongroup.com/electric-vehicles-argument/>