

Following communication with Ryan – please see covering e-mail I am making this submission by word document following as closely as I can the format as described in the link: [Lower Thames Crossing | National Infrastructure Planning \(planninginspectorate.gov.uk\)](http://planninginspectorate.gov.uk)

### Lower Thames Crossing

**Planning Inspectorate Reference: TR010032**

Examination deadline submission 24<sup>th</sup> Aug but please see Ryan's e-mail

Name/Organisation

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Are you an interested party?  Yes

What is an interested party?

Deadline

Deadline 3 (D3)

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Item

Responses to comments on WRs

This is largely based on NH's comments on my written representation. My main submission did include some fundamental criticisms of the modelling and assessment process in particular how the value for money or benefit cost ratio is certainly not a reliable figure and this is probably the view of most professional transport planners who have been through the processes. This uploaded document shows the submission made to DfT by the main professional transport planning associations in 2020. Further comments below on this issue.

It is noted that at the meeting with the DfT and Treasury, following the Professional bodies written submission, we experienced resistance from very bright young economists who seemed to be defending the present DfT methods. Our team has had extensive experience of actually using the methodology in promoting Local Authority Schemes, as consultants to DfT/NH and its predecessors on Strategic Road schemes and as objectors to some

Strategic Road schemes. We were not able to 'break through' the DfT officials to really explain our position, however the single Treasury representative seemed more willing to understand even if we all had insufficient time to properly explain the issues.

As mentioned we are trying again with the DfT initially after my discussions with Steve Norris an ex Transport Minister. We had provisionally arranged a meeting with another DfT official and his colleagues - my illness has delayed this  
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This is a Letter and supporting Position Paper to:  
Stephen Fidler ([REDACTED] [@df.gov.uk](mailto:[REDACTED]@df.gov.uk)) Director DfT Local Schemes  
Tom Aldred (c/o [REDACTED] [@hmtreasury.gov.uk](mailto:[REDACTED]@hmtreasury.gov.uk))  
Combined with Appendices from LGTAG, CIHT, TPS and RTPi

Sorry I was not able to copy the file link on this letter etc into this document so it is attached separately to the covering e-mail

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## About this project

The Lower Thames Crossing will be a new road crossing connecting Kent, Thurrock and Essex. Approximately 14.5 miles (23km) in length, it will connect to the existing road network from the A2/M2 to the M25 with two tunnels (one southbound and one northbound) running beneath the River Thames. The scheme also includes improvements to the M25, A2 and A13, where the scheme connects to the road network, new structures and changes to existing ones (including bridges, buildings, tunnel entrances, viaducts, and utilities such as electricity pylons) along the length of the new road and a free-flow charging system through the tunnel.

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## Email updates

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## Project location

East of Gravesend and Tilbury

## Contact information

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Deadline 3 (D3)Submission  
item

Responses to comments on WRs

Representation Re REP1-364

Page 47

Their overview misses two points in particular:

- The local residents likely to be affected by construction works are likely to include businesses and transport operations throughout the UK from particularly the international ports but also the 'real' economies of all the significant towns in Kent (and Essex). This is certainly the experience of how the much smaller scheme at the A249/M2 junction is being managed at present.
- As new Smart motorways have been ruled out by the government, the M2 would get no extra capacity without massive costs of widening fully between at least Gillingham and including the M2/A299 junction. This may (conveniently) be outside the LTC chosen Study Area but would be very seriously congested as a direct effect of the LTC. I contend that even if all the other factors are insufficient to reject the LTC, the LTC should certainly not be started until that issue is resolved.

On the more detailed matters raised by NH:

First detail comment pages 47 and 48

1. As mentioned in my written submission and as outlined in more detail in the Professional Institutions 2020 approach to the DfT (separately attached) there are major flaws in present modelling and assessment processes. The BCR as claimed by NH is certainly not robust or real and measurable. Please see professional Institutions submission to the DfT separately attached, sorry this is rather long but the first part the covering letter and paragraph 5.1 of the Concluding Comments in the Position Paper part would hopefully provide a part summary. I did mention this in my Written Representation but that submission had to be made by my son due to my serious illness at the time – I would not have been able to help him find it and attach as an Appendix to my WR.
2. As explained in my written representation, LGTAG and our professional team have not given up despite the difficulty of moving some DfT officials from their long held bias towards their analysis process and big road building. Part of my/ our diagnosis of the problem was that the whole process was too complex to be understood by the public and even Transport Ministers – this seemed to be confirmed in my recent discussions with Steve Norris. We had a programmed meeting with DfT officials on a new approach to the DfT on this subject. However, due to my hospitalisation for most of July this has had to be postponed - hopefully to be refixed in September.
3. On the rest of NH's first point, it appears to be a defence of the existing systems of modelling and assessment using approved methods. These are just developments (and complications) of the methodology used for at least

50 years with all the flaws as described in the Professional Institutions comments.

4. I have referred to para 5.1 of the above position paper (item e of 5.1) which states: (A scheme should) “Be part of a package that is known to deliver the sort of improvements required on the basis of real evidence”. I have covered this real evidence in my written representation - the NH seem to have followed only ‘process’ rather than using real evidence on past schemes to evaluate the real effects of their LTC..

Second point in NH’s detail comments – page 48/9

1. NH are only claiming a relatively minor relief of Dartford Crossing but as explained this is based on their modelling not on the basis of past real experience particularly for Thames crossings!
2. It is noted that NH’s quoted increase in kilometres driven is very small compared with real life. Mode change also does not appear to have been properly considered and that can be very significant in or close to London.

Third point in NH’s detail comments

1. Making the concrete for the road and tunnels would be a significant part of the CO2 emissions and it is understood that NH’s client work is trying to ensure that new methods of concrete making minimise the CO2.
2. The likely major increases in total traffic in East London, the M25 itself, Essex and Kent will contribute very significantly to the total CO2, rather than decreasing it as government policy and our international commitments require. Even when and if the vast majority of cars are electrified there will still be substantial particulate emissions which can be very damaging to health.