



Mr Bartkowiak (Case Manager)
The Planning Inspectorate
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Sent by email to: LowerThamesCrossing@planninginspectorate.gov.uk

13th March, 2025

Dear Mr Bartkowiak,

Lower Thames Crossing – interim response to 28 February 2025 consultation

Please find attached two reports that we would like to submit in response to the Secretary of State's tenth consultation letter dated 28 February 2025 on the Lower Thames Crossing. The first is the Roberts Report, produced by Jonathan Roberts Consulting for Transport Action Network (TAN) to explore alternative and cheaper solutions for the Lower Thames Crossing.

We were shocked to learn that no proper assessment of alternative options has been done since 2009 and even then it was little more than a superficial review of the situation as it was then. The Roberts Report demonstrates what the civil servants should have done back then, that there is likely great demand for a new rail link in the Dartford area, to provide a new public transport link between Kent and Essex.

In our report 'Essex-Kent Superlinks' we set out the case for doing something different and highlight how it would be cheaper, more inclusive, improve road safety and be better for the economy. We hope these reports will be an important consideration when deciding whether to approve the Lower Thames Crossing or not.

As we have previously stated, for such a small organisation, two weeks is not enough time to respond to these post-examination consultations. We don't have the spare capacity to reassign people or stop doing our other work to prioritise this.

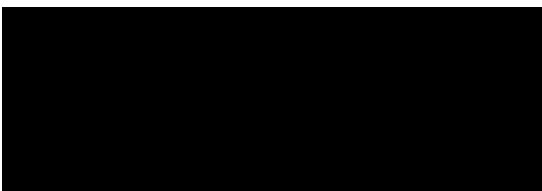
We believe that having such short consultation periods is contrary to the UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (commonly known as the "Aarhus Convention"). This is an important safeguard for democracy, and allows meaningful public participation in the decision making on major projects that have a significant impact on the environment. We also believe that it is unfair to allow National Highways three weeks to submit evidence to the 5 February consultation letter, but to give interested parties less time to respond to that evidence.

Given the huge resources at National Highways' disposal, if it requires three weeks on this topic, that would suggest much smaller and less resourced interested parties would require even more. This disparity between the length of response time has created an inequality between the Applicant and interested parties, giving the Applicant an advantage in an arena that is already heavily weighted against interested parties.

We will do our best to respond by the end of next week, but in the meantime please note that for all the funding scenarios set out in National Highways evidence, none are certain or guaranteed. We would also like to point out that the costs being mentioned are for a radically scaled back Lower Thames Crossing and if approved it would require many billions more to pay for these additional schemes to make the LTC function properly.

Given the 35% hike in costs for the M3 Junction 9 scheme revealed today, we don't believe that National Highways can be trusted to deliver reliable cost estimates for its developments. The funding statement for the M3 scheme was just two years old and supposedly accounted for risks and inflation. That can only mean that National Highways was hiding the true costs of the scheme to bolster its business case or it is incompetent. Either way its estimates for the Lower Thames Crossing need to be approached with a large dose of scepticism.

Yours sincerely,

A large black rectangular box redacting the signature of Chris Todd.

Chris Todd
Director
Transport Action Network