

**From:** Chris Todd [REDACTED] >  
**Sent:** 26 September 2024 18:19  
**To:** [REDACTED]  
[REDACTED]  
**Subject:** Lower Thames Crossing - independent expert report  
**Attachments:** 260924 TAN Letter to Secretary of State for Transport.pdf; TAN LTC iPDF.pdf

[REDACTED]

Dear Secretary of State,

Please find attached a copy of a letter about our report (also attached) on the Lower Thames Crossing, written by an independent expert, Dr Colin Black.

If we can be of further help, please do not hesitate to get in touch.

Yours sincerely,

Chris Todd  
Director  
**Transport Action Network**  
*providing grassroots support*

[REDACTED]

[REDACTED]

Please [REDACTED] for a legal challenge of the previous Government's funding cuts for walking and cycling

[REDACTED] for our monthly newsletter and for the latest actions and events

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Rt Hon Louise Haigh MP  
Secretary of State  
Department for Transport  
Great Minster House  
33 Horseferry Road  
London SW1P 4DR

26 September 2024

Dear Secretary of State

**Ripping-up the Roots of Thatcherism by Cancelling the Lower Thames Crossing**

On 17 September, Transport Action Network (TAN) delivered our submission to your urgent review of the Department for Transport's infrastructure capital spend portfolio, entitled '[Cancel New Roads to Boost Growth](#)'. The largest road scheme within that portfolio is the Lower Thames Crossing (LTC) which requires an investment of at least £9bn. Like all too many National Highways' schemes, it represents poor value and undermines Labour's missions and wider ambitions.

We now have pleasure in enclosing an independent expert report dealing specifically with the flaws in the proposed LTC. Summarising this project as "a dinosaur scheme from another era that really should be extinct", Dr Colin Black served as the strategic lead for Thurrock Council prior to and during the scheme's Development Consent Order (DCO) examination. The aim of Dr Black and ourselves is to avert a costly mistake for taxpayers throughout the UK.

Your speech to the Labour Party Conference was a source of great encouragement to TAN and others who have campaigned for many years to see sustainable transport put at the heart of economic growth. We noted in particular your declaration that the Government is "not just cleaning up the mess of the last fourteen years – we are ripping up the very roots of Thatcherism that have undermined and run down our transport system for decades".

There is no more tangible manifestation of Thatcherite ideology than the bloated programme of new roads inherited from the Conservatives. The LTC is also one of those "easy answers that may well move a crowd but do not move a nation forward" to which the Prime Minister referred in his own speech. We urge you to seize the opportunity to consign the LTC to being a footnote of history.

Local Transport Today suggested on 18 September that the LTC has been excluded from scrutiny by your capital spend portfolio review panel led by Rachel Skinner. In addition to urging you to read our submission as a source of external expertise, we know of other highly qualified advisers who would be pleased to provide you with further independent and objective advice on the scheme.

Yours sincerely

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# Lower Thames Crossing

a dinosaur scheme from another  
era that really should be extinct

Dr Colin Black, a highly experienced transport consultant, led the charge in scrutinising the Lower Thames Crossing (LTC). As the strategic lead prior to and during the 2023 LTC Development Consent Order (DCO) examination for Thurrock Council, he played a pivotal role in reviewing its potential impacts. In this brief report, he lays out compelling evidence and crucial arguments against the £9 billion LTC project, aiming to avert a costly mistake being made.

## Access is Not Just a Road Traffic Problem

National Highways is a government owned organisation responsible for the strategic roads network. It has spent a decade on what it wrongly perceived only to be a road traffic problem, egged on by the previous Conservative government. LTC was the flagship scheme for its 'Motorists Manifesto'<sup>1</sup> – designed to cater only for drivers, not for the people living in the deprived areas of south Essex, Thurrock and north Kent who can't afford a car. It is no wonder that the constituency MPs for these areas have consistently opposed LTC, regardless of their party affiliation.

## Better Design Options Ignored

The previous government simply ignored obvious opportunities to increase public transport use by extending the successful Kent Fastrack bus rapid transit scheme to north of the river. Approval of the LTC by Labour would dismiss a once in a generation opportunity to create a viable and sustainable local public transport network which could service communities both sides of the river in an inclusive and affordable manner.

## Local Bus Services Excluded by Design

LTC has in fact been deliberately designed to exclude the ability to run viable local bus services across the estuary. Local authorities pleaded with National Highways to provide dedicated bus access to serve local communities either side of the Thames, but it refused. Retrospective amendments to the design of LTC are not achievable without incurring



Aubrey Morandarte from Coventry/London, United Kingdom - Arriva Southern Counties 4306 on Fastrack A, Bluewater.  
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prohibitively high costs simply making it unviable. All buses will be forced to take long detours. Each bus has the potential to take up to 100 cars off the road – but less cars would further undermine the already weak business case for LTC. Instead, the LTC has been controversially designed to Smart Motorway standards, which are overwhelmingly unpopular.

We can and should demand better – this approach should be considered unacceptable. According to established government transport policy, it should already be extinct.

## Mis-aligned with Government Policy

National Highways has determined that traffic across the Thames estuary at Dartford and to the east needs to increase massively by circa 50% and has attempted to design a scheme to provide for it. It makes tenuous claims that this is line with government policy<sup>2</sup> - despite the National Policy Statement clearly stating<sup>3</sup> that schemes are not intended to meet unconstrained traffic growth (i.e. predict and provide): “The Government’s policy on development of the Strategic Road Network is not that of predicting traffic growth and then providing for that growth regardless.” Labour has since reaffirmed its commitment to a vision-led<sup>4</sup> approach to local transport planning that prioritises sustainable transport interventions.

The brief for LTC has been wrong from the start, with all the consultations focussed only on which ‘highway’ solution to progress. LTC is the testament to the failure of a siloed and institutionalised Department of Transport (DfT) unable to countenance the notion of an integrated transport scheme. We would not let an oil company lead our energy strategy, so it beggars belief that we let a highways company lead our sustainable (multi-modal) transport strategy.



## Value for Money Claims Misleading

From the beginning government was misled by advice from those desperate to continue building big highways. It was originally promised that LTC would deliver very good value for public funding. Without this misplaced optimism, it would not have been possible to progress with scheme design. The current reported return on investment for LTC is 91% less than predicted just 6 years ago for the selected LTC option<sup>5</sup>, and is now at a derisory 22p per £1 – less than a tenth of what was originally promised.

### Successive outline appraisals of the Lower Thames Crossing by the Promoters

2010 Prices, £m	2016 Summary Business Case - Route Consultation Favoured scheme R3ESL	2020 Core growth ComMA Appendix D Economic Appraisal Report 2020	2022 Central Case ComMA Appendix D Appraisal Summary Table (APP-524)
Initial Present value benefits	3,856	1,946	1,296
PV Costs	1,656	2,877	2,700
<b>Initial BCR</b>	<b>2.3</b>	<b>0.68</b>	<b>0.48</b>
WEBs	1,677	1,657	1,517
Reliability	147	545	487
<b>'Adjusted' BCR</b>	<b>3.4</b>	<b>1.44</b>	<b>1.22</b>
Carbon by value fm	288	122	528

## Need for Additional Highway Investment

National Highways has manipulated the LTC scheme carving it up to make it look more affordable. This masks the fact that it will need very expensive additional highways infrastructure to be funded. This includes major upgrades to the M20-M2 Bluebell Hill link in Kent (which was originally included as part of the scheme and later removed) and the A13 Orsett Cock, and A13 Manor Way junctions in Thurrock, and the Tilbury Link Road (which would be part of the Strategic Road Network). All of this additional infrastructure would be needed if LTC is to provide improved highway access promised to the Ports.

This is in addition to work that will be needed on the wider local road network to cope with the extra traffic, increasing by 10% to 30%<sup>6</sup> in sensitive residential areas including local villages. Apart from the Tilbury Link Road, significant expenditure would fall on local authorities and hence to a large extent on local taxpayers. Government is being asked to approve the LTC without understanding the totality of additional public funding needed to make the LTC work and to address the issues it will cause.

## Don't Throw Good Money After Bad

Whilst huge amounts of time and money have been wasted developing LTC – this is no justification for throwing even more money at a scheme for which reported costs have escalated to unprecedented levels and are set to continue increasing. There is clear precedent for cancelling big infrastructure even at a late stage, such as A303 Stonehenge and A27 Arundel, and there is a very clear case for cancelling LTC.

## Highly Dubious Business Case

Very serious concerns have been raised<sup>7</sup> about the manipulated methodology used to justify even the very weak business case for LTC. This echoes previous concerns made to Treasury<sup>8</sup> and the DfT by Thurrock Council and its then Conservative MPs. National Highways did not update the LTC Outline Business Case it used for its first DCO submission in 2020<sup>9</sup> which it later aborted. As the scheme's value for money decreased it has failed to answer important questions<sup>10</sup>. It refused to update the Business Case for its second DCO submission in 2022, so its application lacked important detail. This severely undermined the ability to scrutinise its claimed 'wider benefits', without which the scheme is expected to lose 52p from every £1 spent - creating unprecedented burden on taxpayers.

## Real Cost Undeclared

Concerningly, the December 2022 Accounting Officer Assessment for the LTC<sup>11</sup> used figures that were even more outdated, citing a BCR of 1.46 which dates from the Outline Business Case in 2020, rather than the 1.22 BCR in the October 2022 DCO application. Even those at the highest levels of DfT and National Highways do not have accurate and up to date information on the costs and benefits of this hugely expensive project.

























# LTC Fails to Meet Its Own Objectives

National Highways paid international consultants Stantec to provide independent advice to Thurrock Council. Stantec highlighted very serious concerns about the technical work undertaken by National Highways and, following forensic review of the scheme, reported that LTC failed<sup>12</sup> on every objective set.

 	<b>Relieve Congestion</b> Dartford Crossing - back to existing conditions in only five years Journey time savings only c1min per vehicle Additional local queuing and delays 	 	<b>Minimise Environmental Impact</b> +6.6million tonnes of CO <sub>2</sub> Biodiversity net gain target not met 
 	<b>Affordable and Value for Money</b> Costs £8bn-£9bn & costs going up Latest analysis: costs > benefits More expensive per km than HS2 	 	<b>Support Growth</b> Only 5% of wider economic benefits in Thurrock - and only increases economy by 0.03% - poor return given level of costs and impacts LTC impedes delivery of Local Plan 
 	<b>Improve Safety</b> +26 fatalities (8 in Thurrock) +182 seriously injured Only major highway scheme to increase fatalities and serious injuries 	 	<b>Improve Network Resilience</b> Local road network resilience eliminated No modelling tests undertaken to provide evidence for resilience 

Stantec emphasised that: "It would normally be entirely possible and reasonable to agree on transport modelling matters. It is, however, the serious implications of doing so that has required the applicant to resort to technical trickery and distraction." At public examination the consultants provided a grave warning that the traffic assumptions for LTC are a "structural crack in the foundations of the application, which has ramifications for the scheme and all technical work based on it."



Queen Elizabeth II bridge - current Dartford Crossing

## Dartford Traffic Congestion Returns within 5 Years

It is futile to predict future traffic demand and try to cater for it, but this is basis of LTC. Consequently, the consultants highlight<sup>13</sup> that “any ‘resilience’ provided at the Dartford Crossing is quickly eroded through the induction of new traffic to the network”.

LTC would take at least 7 years to construct. National Highways’ own traffic model shows that relief at Dartford Crossing would last only 5 years until congestion returns to current levels<sup>14</sup>.

## Causes Serious Local Traffic Congestion

National Highways recognises that LTC will create very significant increases in traffic on the local road networks. They argue that this is an unfortunate consequence and not their problem. They have adopted a bullish stance maintaining that local authorities will have to apply for more cash to deal with the problems created by LTC, because that is just the way it is.

LTC is a highways scheme that has been clearly demonstrated to create severe adverse long-term local impacts for communities affected, promoting car dependency and inequality, causing safety and health issues, for generations to come. In response to such serious concerns, National Highways has hidden behind tenuous legal argument to argue this is not their problem – they are simply implementing policy.

## Exacerbating Local Deprivation

Thurrock is a region of national deprivation previously identified as a priority for investment. The Local Authority commissioned independent research<sup>15</sup> to demonstrate the devastating impact LTC will have on the local economy and community. The Conservative government repeatedly declined to engage and modify the scheme to provide local benefits and to compensate for the negative impact it will have on already deprived areas.

## Public Sector Lobbying Government

The last business case is now 4 years old (and will have been negatively impacted by recent rampant inflation). Even so, it suggests that LTC will generate only £1.22 of benefit for every pound spent. This is in marked contrast to the £4 benefit for every pound spent that National Highways has been claiming in its expensive PR campaign<sup>16</sup>. Not only is this misleading, but it is creating widespread confusion and is highly irresponsible. It is highly likely that an updated business case will show that LTC makes a loss for every pound spent, negatively impacting the British economy.

The Government has committed to instil a stronger commitment to public service and transparency. We are badly in need of a more honest conversation about the impacts of LTC and the realism of claimed benefits. It is highly unusual for National Highways, a publicly owned organisation, to engage public relation agencies to promote a particular road scheme to influence perceptions ahead of a government decision. This follows a controversial and much-contested planning examination and is a desperate action from an organisation resistant to modernisation.

## Limitations of Private Finance

There has been some speculation of using private finance for the scheme. The ability to raise revenue from crossing changes is highly constrained. The traffic modelling and the DCO application is based on parity of charging between LTC and Dartford. Any changes to charges will significantly change the modelling (with fewer or more trips being taken depending on the charges), and therefore the business case, and likely make LTC even less economically viable, and trigger the requirement for a third costly and time-consuming DCO application.

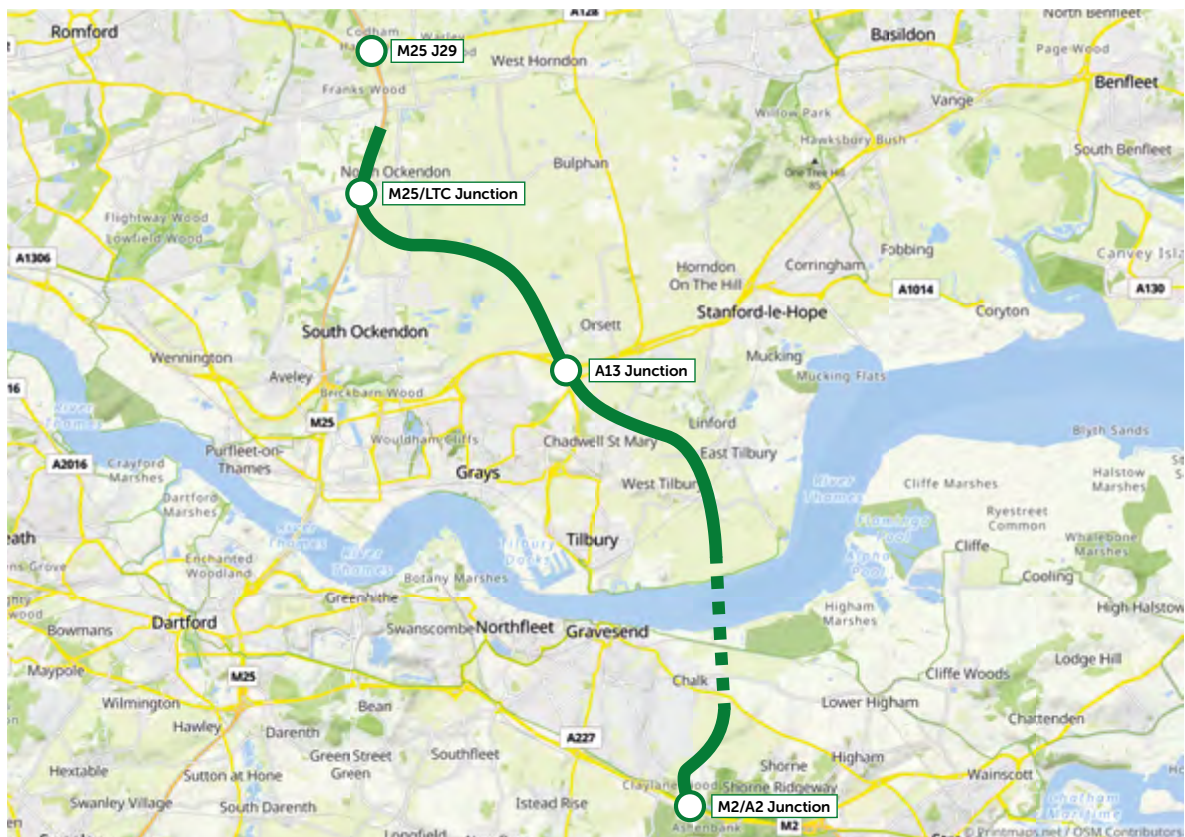
## Making Tough Decisions

Government will have very strong technical and political grounds to reject the LTC if it wishes to. Clearly traffic at the Dartford Crossing needs to be addressed. This proposed scheme has been 10 years in its gestation and has cost circa £1bn to date. Rejecting this version of LTC will understandably create some frustration by people believing the claims made by National Highways.

There is no denying that LTC would further increase our already unprecedented dependency on cars and lock in unsustainable travel behaviours for generations - making already highly challenging transport decarbonisation commitments and net zero even less achievable. It will also come with a huge opportunity cost, diverting funding away from public transport. This is why Labour in Wales scaled back its highways programme. LTC is clearly not the right scheme for a plethora of compelling reasons. There are viable, more effective, less expensive alternatives for the area that should be taken forward. Much of the traffic is not in fact 'strategic' and there are clearly other ways to cater for local travel demand that align better with local transport policy. But these alternatives will require government to provide strong leadership and commit to a new vision-led approach to deliver integrated and inclusive regional transport.

This government has shown appetite to make tough choices to unpick poor decisions made in the past. Now Labour needs to grasp the nettle and reject this LTC scheme in favour of a commitment to develop a better option.

### Approximate Route of Lower Thames Crossing





## About the Author

Dr Colin Black is a respected transport planning professional who has provided specialist policy advice for over 30 years. He was a Partner and Senior Director responsible for technical teams at multi-disciplinary international consultancies working on LTC and other highway projects. For the 2 years leading up to the submission of the second DCO submission of LTC he was appointed to Thurrock Council and led the Council's response on LTC. His experience provides unique insight into the behaviours of National Highways as a supposedly publicly accountable body, and the tactics and techniques it deploys. He has previously expressed serious concerns about the engagement and approaches adopted before and during the DCO application, particularly with regards to objectivity, accountability, and openness of the scheme promoter.

## References

- <sup>1</sup> [Conservative-Manifesto-GE2024.pdf \(conservatives.com\)](#)
- <sup>2</sup> [National Networks National Policy Statement - GOV.UK \(www.gov.uk\)](#)
- <sup>3</sup> Para 2.24 NNNPS 2014 (in place at time of DCO application) [National Policy Statement for National Networks \(publishing.service.gov.uk\)](#)
- <sup>4</sup> Q69 [Proposed reforms to the National Planning Policy Framework and other changes to the planning system - GOV.UK \(www.gov.uk\)](#)
- <sup>5</sup> [Thurrock Council \(2023\) LTC: Local Impact Report](#), Section 7.7 – Poor Value for Money, 18 July
- <sup>6</sup> [Thurrock Council \(2023\) LTC: Local Impact Report](#) para 10.15.20, 18 July
- <sup>7</sup> [Council letter to Treasury outlines Lower Thames Crossing concerns - BBC News](#)
- <sup>8</sup> (Public Pack) [Letter to the Treasury Agenda Supplement for Lower Thames Crossing Task Force, 20/06/2022 18:00 \(thurrock.gov.uk\)](#)
- <sup>9</sup> [ltc-obc-2022-foi-3385-ic-182335-r3f3\\_redacted.pdf \(nationalhighways.co.uk\)](#)
- <sup>10</sup> [‘Release Thames Crossing business case.’ National Highways t \(transportxtra.com\)](#)
- <sup>11</sup> [Accounting Officer Assessment for Lower Thames Crossing](#), December 2022
- <sup>12</sup> [Thurrock Council \(2023\) LTC: Comments on Applicant's Submissions at Deadline 9](#), Figure 1-3, 15 December
- <sup>13</sup> [Thurrock Council \(2023\) LTC: Comments on Applicant's Submission at Deadline 9](#), Para 7.6.20, 15 December
- <sup>14</sup> [Thurrock Council \(2023\) LTC: Local Impact Report](#) para 7.1.7, 18 July
- <sup>15</sup> [Regeneris Report \(thurrock.gov.uk\)](#) Hatch October 2020
- <sup>16</sup> [Lower Thames Crossing: Tackling congestion and a £40bn economic boost to the UK \(youtube.com\)](#)

Images on the front cover and page 6 are National Highways' photomontages of sections of the Lower Thames Crossing  
Infographic on page 7 is adapted from Thurrock Council's Deadline 9 submission to the LTC examination

