

Transport East Strategy Consultation Response

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Introduction

Thames Crossing Action Group represent thousands of people who are strongly opposed to the proposed Lower Thames Crossing (LTC). The £8.2bn LTC would be hugely destructive and harmful, it would not meet the project objectives, and is not fit for purpose.

Our response to the Transport East Strategy Consultation is based on issues we feel relevant to our representation of those opposed to the proposed Lower Thames Crossing (LTC).

We understand that while the proposed LTC is not a Transport East project, you still work with partners including those involved in the proposed LTC.

Comment on conflict of interest concerns

We would like to begin by questioning and expressing our concern that the Transport East Consultation is being handled by Jacobs.

We feel this is a conflict of interest, since Jacobs are involved in projects on which you are consulting, such as the proposed LTC.

We again stress that we understand that Transport East are not responsible for delivering individual transport infrastructure projects, like the proposed LTC for example, and as stated in your consultation materials:

"Although we will not be directly responsible for delivering individual transport infrastructure projects, we will support local authorities, Government, national agencies and private sector partners to prioritise projects, build the case for more investment and speed up the processes involved to get projects delivered on the ground"

This means that the consultation covers the strategy of things like support or opposition of projects, such as the proposed LTC, which Jacobs have a vested interest in.

We know there has been controversy over Jacobs in regard to conflict of interest previously.¹

We therefore find Jacobs involvement with this consultation questionable to say the least.

¹ <https://www.standard.co.uk/business/conflicts-row-as-engineer-jacobs-controls-ps200-billion-of-uk-projects-a4040406.html>

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Challenges

Rising Emissions

We agree that rising emissions are a serious issue and concern in the area.

We agree that emissions are an issue in regard to environment and climate emergency, and also to air pollution, and our health and well-being.

Not only carbon emissions, but others too. One particular notable concern is PM2.5.

We have particular concerns on this matter in regard to the proposed LTC, since it is estimated to create over 5 million tonnes of carbon emissions. It would also fail on World Health Organization (WHO) guidelines for PM2.5. This was true before WHO updated their guidelines last year, so now with the new levels it is even more of a concern.

We know there are no safe levels of PM2.5, and we hope that the new UK Government legal levels for air pollution, including PM2.5, which will be set by the end of October this year, will be set to the highest level possible to protect people's health and well-being.

In regard to Transport East we would call on you to stop supporting projects, like the proposed LTC, that only contribute to the serious issues of carbon emissions, PM2.5, and other emissions that are harmful to the environment and our health and well-being.

Dispersed Communities

We agree that the East has many different communities with different needs.

We would comment that consideration needs to be given to the fact that transport infrastructure can add to the division and issues communities experience. It should not be assumed that all transport infrastructure solves the issue of dispersed communities.

The proposed LTC again is an example of this, as it would destroy communities if it goes ahead.

We agree that car dependency can be an issue in many areas. But when considering transport options, firstly communities need to be properly consulted, and secondly possible solutions cannot and should not always be roads.

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For those in the East to travel south of the River Thames we often have to travel all the way into London and then back out again to reach a destination south of the river. The proposed LTC options should at very least have included options to incorporate public transport (trains, buses, trams etc). Yet it didn't, and doesn't offer any options for anyone other than those who are legally entitled to use motorways².

The proposed LTC is not viable for public transport routes due to the lack of adequate connections. There have been other proposals for crossings by others that incorporate rail and road in a double decker style tunnel that would offer both options of travel.

If you truly wish to address the issues of dispersed communities, then please stop supporting projects like the proposed LTC that would destroy communities, and does nothing to support more sustainable transport options.

More focus needs to be put on local communities and creating local opportunities for services, products, food etc. We cannot continue to destroy communities further in the name of growth and so called progress.

Growth and Congestion

We also like to comment that we do not believe that growth should always be considered a good or essential thing. Growth can cause more harm than good.

There is evidence to show that more roads equates to more traffic. More traffic means more congestion. We cannot simply continue to try and build more roads to build our way out of congestion. Especially when the road projects, like the proposed LTC are simply not fit for purpose³.

National Highways own data proves that the Dartford Crossing would still be over capacity even if the proposed LTC goes ahead. National Highways admit that they are not considering or planning how traffic would migrate between the two crossings, if LTC goes ahead. Evidence shows that there are not adequate connections between the proposed LTC and the existing road network regardless of incidents. The proposed LTC would result in more congestion, pollution, and chaos.

² <https://ltcconsultation.highwaysengland.co.uk/wp-content/uploads/2021/07/Operations-update.pdf> - Page 14/206

³ <https://www.thamescrossingactiongroup.com/ltc-not-fit-for-purpose/>

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If our economy requires us to push ahead with hugely destructive and harmful projects in the name of growth, and to stop the whole economy failing, we need a different economy.

Growth is destroying too much of our environment, our food security, and harming our health and well-being, and potentially our very existence on the planet. We cannot build our way out of congestion by keep building more and more roads, and we cannot build our way out of climate emergency.

Accessing International gateways

You state that accessing International gateways, yet what we need is to support local communities and services to reduce the need for international imports wherever possible. We need more self-sufficiency as an area and as a country.

We need to reduce carbon emissions, we need to save and protect the little greenbelt, ancient woodlands, nature etc that our country has. We need to improve our food security. We have to stop destroying more and more of our natural assets in the name of growth and development.

Instead of looking for ways to make it quicker, easier to import supplies/services we need to start investing in self-sufficiency. Grow our food locally and reduce food miles, better for us and better for the environment. Promote sustainable options for products locally (even if to a certain extent locally means within the UK) rather than importing more and more products from overseas, which again adds to carbon footprint.

The other aspect of international gateways for imports, in regard to the environment, is that in many situations the carbon emissions associated with products and services does not get counted in the UK, it falls to the country that produce/supply it. We need to be taking more responsibility to our own actions to ensure we do more for the environment.

The more you keep looking to grow international gateways the worse it gets for the environment, more imports results in more traffic movements. A vicious circle of more congestion, more pollution, more emissions, more damage to the environment, our communities, and natural assets.

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Strategic Priorities

Net Zero

We are of course supportive on reducing carbon emissions and protecting our environment and planet. However, it seems to us, reading the various key points of your strategy, that there is a great deal of contradictory goals and information.

- **Goal 1 - Zero carbon growth – Support authorities and developers to plan new development that reduces the need for people to make carbon-intensive transport trips.**

We also believe that the goal should include opposing developments that do not reduce the need for people to make carbon-intensive transport trips. A perfect example would be how you set this goal yet Transport East supports⁴ the hugely destructive and harmful proposed Lower Thames Crossing, which is estimated to create over 5 million tonnes of carbon emissions.

- **Goal 2 – Reduce demand for carbon intensive trips. Make it easier for people to access services locally or online.**

You say about making it easier for people to stay local, yet another of your strategies is about global connections! Also again by supporting the proposed Lower Thames Crossing you are supporting the destruction of local communities, and large areas of agricultural land (including grade 1 listed land). How can this be deemed a believable goal if you are supporting the destruction of local self-sustainability?

- **Goal 3 - Shift modes – Support people to switch their journeys from private car to walking, cycling and passenger transport.**

We again support more sustainable travel, but there is not adequate provision in place in the East to do so, whether it be active travel or public transport. Again Transport East need to stop supporting projects like the proposed Lower Thames Crossing. It does very little to improve active travel, with no active travel options on the actual LTC possible at all. Neither is the LTC viable for public transport use either. There are not adequate local connections to allow it to be a viable option.

⁴ <https://www.transporteast.org.uk/wp-content/uploads/2018.12.20-Transport-East-LTC-Response.pdf>

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- **Goal 4 - Switch fuels – Support residents and businesses to switch all private, passenger transport, fleet and freight vehicles to net zero carbon fuels as quickly as possible.**

We raise the issue that if this goal is suggesting the move to electric vehicles as an alternative, EVs are not the panacea some like to believe and make out. We highlight there is a distinct difference between zero emissions from the tailpipe and zero emissions.

The energy to power EVs still has to come from somewhere and we certainly don't have enough green clean energy to support all vehicles moving to EV power. There are enough energy supply issues already, and that's with only a small percentage of people using EVs.

The production of the vehicles is not zero emissions either. Nor the construction of the road network.

EVs also still create emissions such as PM2.5 etc which are extremely harmful.

Connecting growing towns and cities

In regard to connecting communities, especially when you are referring to its need for access to jobs, supplies, services, learning etc. We call on you to seriously consider the impacts of connectivity too. For instance new roads, and road 'upgrades' lead to not only environmental destruction, but also harm to our health and well-being. New connections are no use to people who are too ill, from air pollution related illnesses, to work and learn, and so the attempt to achieve your goal fails.

- **Goal 5 – Enhanced sustainable transport – Improved access and connectivity for walking, cycling and passenger transport to enable sustainable travel for education, training, employment, leisure and access to services.**

We support sustainable travel options. However, we voice concerns that it is not purely about the availability of passenger services (public transport) that should be addressed. The reliability, safety, and cost also need to be taken into account.

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- **Goal 6 – Faster and more reliable transport connections – Deliver improved transport connections between our growing towns, cities and corridors, and the rest of the UK to support business growth, skills development and employment.**

This goal cannot put local communities and the environment at risk. We draw attention to the fact that the proposed LTC is supposedly about making journeys faster and connecting ports in the South East/East to the rest of the country. Not only would it fail on these aspects, since the proposed crossing is simply not fit for purpose, but it would be at great cost and harm to, and without any benefit for, the impacted communities and environment.

Also if you intend to attempt to fulfil your goal of reducing demand for carbon intensive trips, then focus needs to be locally, and not growth and connectivity on a national scale.

We have to weigh up speed and connectivity against the cost to environment, communities, and our own health and well-being.

- **Goal 7 – Fully integrated transport – Fully integrate transport networks, services and operations through a customer-focused approach, enabling seamless and safe end-to-end journeys by sustainable modes of transport.**

We would like to see "affordable" mentioned in this goal too please. Cost is a big factor in people's choice on travel modes.

Energising coastal and rural communities

- **Goal 8 – Increase access to education, training, service and employment for rural communities – Support residents and businesses travelling in rural areas to switch modes or fuels. – Support communities to make more local trips by encouraging goods and services to be provided locally. – Support partners to**

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provide alternative options to travel through better access to ultrafast broadband and digital communications.

We again highlight that your goals to encourage more local trips, and more goods and services to be provided locally, when your goals for international gateways are destroying local communities and local food security etc.

Broadband is an issue in many areas in the East, and improvements in this area could definitely help reduce the need to travel by allowing better digital communications for online meetings/work etc. One positive thing we have learnt from the COVID pandemic is that it is possible to work productively from home in many cases. People have enjoyed and appreciated the difference working from home has made to their lives in reduction of time and expense of commuting to work. This is good for the environment and also people's health and well-being.

- **Goal 9 – Improve connectivity along our coastline – Connect our coastal communities to the rest of the region and the UK to support levelling-up and boost our coastal industries, such as energy, shipping and tourism.**

Our coastline could definitely benefit from more sustainable green connectivity. We have the River Thames to the south of the region that is generally under used when it comes to public transport connections.

However, we do also note that all too often ports in the South East/East see deliveries that then are being put onto road freight to often be taken much further afield. There are other ports around the country that are probably better placed to accept the ships in the first place, thus reducing the impact to the East/South East. Even if that is loading cargo onto smaller ships when needed (ie due to deep water ports etc).

Rail freight should also be given more consideration, instead of the constant obsession with road connectivity. Our ports and coastlines are busy, much of it from imports from overseas. That needs to be reduced, but we also need to look at the onward journeys once it arrives into the UK. Improving railway lines/service would be beneficial for both rail freight and also public transport.

We have a lot of lovely coastline in the East, and a lot of historic sites and buildings along the coast too. Any plans for connectivity in coastal regions needs to take this

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into account to avoid destruction or negative impacts to these natural and historic assets. In regard to the proposed LTC we question such a destructive and harmful project cutting between the historic forts (Tilbury Fort and Coalhouse Fort) and negatively impacting the costal path.

We support improvements to the costal path in the region, but they need to be able to be enjoyed and used without risk to our health and well-being from pollution from the likes of projects like the proposed LTC.

Unlocking global gateways

Ports

We note that in this section of goals, unlike in the airports section, there is no mention of ambition to reach net zero in regard to ports, and question why this is the case.

We also draw attention to the fact that National Highways added the Tilbury Link Road to the proposed LTC plans, only to remove it after garnering the support for the route from the ports and others.

We know that Tilbury Port said they would only supported Option C3 of the LTC if it included a junction for them⁵.

Whilst the proposed LTC is now being progressed without the Tilbury junction/Link Road, there are plans to progress the Tilbury Link Road as a separate stand-alone project. We consider this to be an attempt to manipulate the cost of the proposed LTC, by removing the Tilbury Link Road whilst it is still being progressed as a separate project in this way.

We note there is just one very general mention of the Tilbury Link Road in the IDP. We question how Transport East intend to move towards and support more sustainable transport for ports, when you are apparently supporting the Tilbury Link Road, which can only be progressed if the hugely destructive and harmful proposed LTC goes ahead?

⁵ <https://www.forthports.co.uk/wp-content/uploads/2018/03/3661.pdf>

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- **Goal 10 – Better access – Improve road and rail capacity, journey times and reliability for freight and passengers accessing our ports.**

We feel there is a definite need to consider rail freight options for ports. In the instance of the proposed LTC we know that rail improvements between Ashford in Kent and Reading would negate the need for the LTC.

We also question why more and more development and growth is being pushed into areas that are already very developed and suffering from congestion. Greed cannot be given priority over the health and well-being of communities, or the environment.

- **Goal 11 – Alternative fuels – Support our ports and freight sector to increase their use of alternative fuels.**

We know that a lot of port traffic is using dirty fuels. Also that there is often not portside power, meaning that dirty ships are producing yet more harmful pollution.

All fuels will have some kind of impacts somewhere, and we again address the need to move towards local self-sufficiency rather than focusing on investment into further imports through ports, at a cost to our environment, health and well-being.

- **Goal 12 – Shift modes – Modal shift of freight from road to rail or short sea shipping and increase the use of sustainable transport by port employees and passengers.**

As we have mentioned previously we welcome moves to more sustainable travel, and consideration of rail freight, in addition to moving away from global imports towards local self-sufficiency.

However, we do take exception in this goal, that it appears the onus is being put on port employees and passengers. The reality is that the onus also needs to be put on the ports and companies using the ports, not just members of the public who work at the ports, or are using them as a travel option.

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Airports

We note that this section of goals does not cover the aspect of international cargo, instead focusing on employees and passengers.

Again if we are to fulfil the goal of supporting local self-sufficiency it cannot be helped with emissions and pollution from air cargo. The onus cannot simply be on airport staff and passengers, all parties need to take responsibility for their actions.

- **Goal 13 – Enhanced connectivity to airports – Improve connectivity to airports for passengers and employees through better connected and more sustainable transport options.**

Again we support sustainable transport options, yet we take exception again to the fact the onus is again being put on airport employees and passengers. The onus also needs to be on the airports and companies using them, rather than dumping all responsibility on the general public.

- **Goal 14 – Net zero aviation emissions – Support the Government and aviation industry to deliver net zero emissions by 2050.**

We support the move to net zero. This must be the case for all means of transport/business, not limited to aviation. It also needs to take into account the means of travel to and from the airports (and other ports).

Again we will use the proposed LTC as an example. It is reported that the proposed LTC will improve connections for the airports/ports etc. So if the airports are to deliver net zero emissions they need to also take into account factors such as the over 5 million tonnes of carbon emissions for projects like the proposed LTC. The buck should not be passed because it is not emissions directly from an airplane, because the passengers and cargo coming into the airport are reliant on other means of transport for connectivity.

- **Goal 15 – Support passengers and employees to access our airports by sustainable transport, such as by bus or train.**

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Yet again we support sustainable transport options, yet we take exception again to the fact the onus is again being put on airport employees and passengers. The onus also needs to be on the airports and companies using them, rather than dumping all responsibility on the general public.

Investment and Delivery Programme

References to the proposed LTC

Firstly in regard to the IDP, we seriously question and have concern that Transport East are choosing to list the proposed LTC as a Committed Project. Especially when your own summary of the category states:

“CP – Committed projects. These have been identified to be at the delivery stage. They are well developed and already has some delivery funding certainty and commitment from national government.”

The proposed LTC is not at delivery stage, as National Highways/LTC have not even managed to submit an acceptable Development Consent Order (DCO) application yet, let alone be granted a DCO. It would be illegal for construction, ie delivery to begin without a DCO having been granted, therefore how can the proposed LTC be at delivery stage?

We also seriously question your listing the proposed LTC as having a timescale of 0-5 years. As you will be aware the DCO process alone can be approx. 18 months if not longer, and there is not even a confirmed date of when they will attempt to resubmit the DCO application. There is going to be at least one more consultation before they can resubmit the DCO application too, which means it won't be any time soon that they attempt to resubmit.

In addition even if they do end up being granted the DCO, the estimated construction period of the proposed LTC is 6-7 years. The proposed LTC is not predicted to open until at least 2030 if not later, depending on how things develop, or if it is even granted the DCO.

We also question that it doesn't appear that the proposed LTC has been subject to any assessment by Transport East on the grounds detailed in Appendix A and B. We again stress that the proposed LTC is not at delivery stage, and is in fact still in consultation stage, so we would hope that Transport East would have, and should assess it against the strategy goals.

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Additional Comments

We do not feel that the information in this report provides adequate detail. For instance E1 - A1306 improvements and bus priority; the A1306 is a long road and there is no clear indication as to whether this refers to the whole route or only a section of it.

We draw attention to the fact that the Tilbury Link Road is only mentioned in passing, but is yet greatly lacking in detail for those you are consulting.

There are plenty of other projects listed where adequate detail is not provided. If you wish to receive meaningful engagement with people adequate information really should be shared.

Consultation materials should be clear and informative, and we certainly don't feel that this consultation is adequate in providing clear and informative material on a number of occasions.

Considering the claims of wanting to progress and support more sustainable travel options in the East, the IDP seems to greatly lack in urgency to address this. We are living in times of climate emergency, yet the focus of the projects in this report seem to be largely focused on road projects, and with many of the more sustainable projects still being at idea stage and therefore would not be delivered for some time.

We need to see ambition and actions to make the difference and back up the talk. We need to see the priority and support of hugely destructive projects withdrawn and instead directed to better solutions.

Working with partners

We again acknowledge Transport East's position in regard to support for partner projects.

"Although we will not be directly responsible for delivering individual transport infrastructure projects, we will support local authorities, Government, national agencies and private sector partners to prioritise projects, build the case for more investment and speed up the processes involved to get projects delivered on the ground"

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We seriously question the above statement copied from the consultation materials in regard to Transport East's position on working with partners. Support of infrastructure projects regardless of apparent consideration is not something we can support. We call on Transport East to give serious consideration as to any infrastructure projects they support, rather than blindly supporting them, just because.

How can you suggest that you will support partner projects without consideration of whether they would fulfil the sustainable ambitions of your goals? We have to wonder whether that is why some of your goals contradict themselves so as to allow for support of controversial and unsustainable projects, at a time when the focus should be on more sustainable options.

We call on Transport East to give serious consideration in their support for the proposed Lower Thames Crossing.

It fails to meet any of your goals, and as a project in general is not fit for purpose.

As already highlighted it would not solve the problems associated with the Dartford Crossing, which would still remain over capacity even if the LTC goes ahead. There would not be adequate connections even during normal operation.

In particular focus should be given to the fact that National Highways/LTC are not considering or planning how traffic would migrate between the two crossings (if LTC goes ahead) when there are incidents, and there would not be adequate connections⁶.

Integrated Sustainability Appraisal

We note that in this report there seems to be very little consideration to the hugely destructive and harmful impacts of the proposed Lower Thames Crossing.

Considering it is one of the largest proposed road projects in the country in decades, and it falls largely within the Transport East region, we would hope that more attention and consideration was displayed in regards to the true impacts of the scheme.

⁶ <http://www.thamescrossingactiongroup.com/incidents-ltc-dartford-crossing/>

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We do not consider that the ISA have adequately assessed the cumulative effects of the proposed LTC.

Firstly, it is only mentioned in the Population section of the cumulative effects assessment. The comment suggests that it would be positive in regard to port access. However, this is questionable when you consider that you are stating this based on the combination of the project and the Ports Access Package. We do not feel this is an acceptable way to assess this, since it is dependent on at least two separate permissions being granted, the LTC and the Tilbury Link Road. If you take it based purely on the LTC then it fails completely.

We also question whether you have taken the Stanford Detour aspect of the proposed LTC into account when making your assessment.

The Stanford Detour, as it has become known, is where LTC traffic needs to detour to the A13/A1014 junction to use the traffic lighted roundabout junction to u-turn back along the A13 to access the proposed joint LTC and A1089 (south) junction⁷. Thus not only impacting Tilbury Port traffic that needs to use the A1089 southbound, but also the DP World/London Gateway traffic using the A13 and A1014/Manorway route.

We seriously question how you are not assessing the proposed LTC for cumulative effects in regard to Equalities, Health, Safety, Water, Natural Capital, Biodiversity, Landscape, Climate, Air, Noise/Vibration, Heritage, Soils/Geology, or Material Assets.

The proposed LTC would have a huge negative effect on all these aspects on its own, therefore the cumulative effects would be even more severe.

We most definitely believe that a cumulative Health and Equalities Impact Assessment that includes the proposed LTC should be carried out.

Cumulative Safety Assessment should also include the proposed LTC. It is being designed to Smart Motorway standards, would use Smart Technology, and would only be able to be used by vehicles that can legally use motorways. It would therefore be a Smart Motorway bar everything but name, due to its questionable All-Purpose Trunk Road classification.

We know that Smart Motorways have been paused due to serious safety concerns, whilst 5 years of safety data is collected and analysed. We have called on the

⁷ <https://www.thamescrossingactiongroup.com/the-stanford-detour/>

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proposed LTC to be paused on the same grounds, since all the same standards, tech, and risks apply.

We all know the serious dangers of Smart Motorways. More and more people are choosing to use local roads in order to avoid the dangers and risks of using Smart Motorways. If the proposed LTC were to go ahead, then safety effects would also impact local roads, thus the need for the LTC to be included in cumulative safety assessments.

We also note in the ISA that Thurrock already has the highest number of KSI at 49.5.

We note that in the population projections in the ISA, Thurrock is predicted to have the largest % increase. If we are to believe Transport East's goals of being more sustainable then serious consideration needs to be given to the support Transport East is offering development and infrastructure projects.

Areas such as Thurrock which are already suffering huge scale development and suffering illegally high levels of pollution, do not need more thrown at us. The more development and growth, the more negative impact to the environment and our health and well-being. It will also result in the need for more transport options, and since it seems your focus is predominantly on roads, this will lead to more hugely destructive and harmful road projects, in the never ending cycle of trying to build your way out of congestion.

We again note reference in the ISA to air and noise pollution and the fact Thurrock already have at least 4 exceedances of air pollution PM10. As already stated we know the whole proposed LTC route also fails on WHO guidelines for PM2.5 too.

Thurrock also have above England average hospital admissions for COPD.

We again ask how if Transport East are genuinely concerned about air pollution and community health and well-being, how they can support the proposed LTC?

The ISA also lists Thurrock as having high flood risk. We have concerns over the flood risk aspect of the proposed LTC. Predictions show that the area proposed for the northern tunnel portals would actually be under water before too long ^{8 9 10}.

⁸ <https://flood-map-for-planning.service.gov.uk/>

⁹ <https://coastal.climatecentral.org/mapview/11/0.4608/51.4678/5b0f33ee72d5b8da1eef7e4cca53c0546a25104b529fec93cb6af8aef97708c8>

¹⁰ https://consult.environment-agency.gov.uk/london/thames-estuary-2100-updating-the-plan/supporting_documents/Thames%20Estuary%202100%20Plan.pdf

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Many of the areas that would be impacted by the proposed LTC are flood plains.

There is also the question over the proposed Tilbury Fields area near to the northern tunnel portal, which would raise flood plains by up to 22.5m. It is obvious that such a change to flood plains will have consequences, and also see the water that would flood the flood plains without the LTC and associated land forms, will have to find alternative areas to flood.

There are also concerns over the PM2.5 contamination from the proposed LTC into our watercourses to consider, as much of the route is in flood plains and across agricultural land and fens.

It is therefore important that Transport East include the proposed LTC in cumulative Water Assessment.

In regard to contamination risk to soil/geology, as detailed Thurrock have 4 SSI. The proposed LTC route would also damage and impact large amounts of agricultural land, including grade one listed land at various locations along the proposed route.

Yet more reason why Transport East should included LTC in the cumulative assessments on soil and geology as well as material assets.

In regard to carbon emissions and Transport East's ambition to meet government carbon reductions and net zero targets, we again have to seriously question the support of the proposed LTC, which would create over 5 million tonnes of carbon emissions¹¹.

We also draw attention to the fact the government's own Climate Change Committee have reported¹² that:

"New roads should only be built if they can be shown not to increase emissions."

With regard to biodiversity and environmental mitigation in relation to the proposed LTC, we have to draw attention to the fact that National Highways/LTC have only shared very limited information on these aspects. They are refusing to share adequate information, instead stating it will be made available in the Environment Statement (ES) when the DCO application is accepted.

It is impossible to offer meaningful responses to consultation on these aspects when adequate information and detail has not been shared.

¹¹ https://www.whatdotheyknow.com/request/carbon_assessment_of_lower_thame#incoming-1687136

¹² <https://www.theccc.org.uk/publication/2021-progress-report-to-parliament/>

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We do however raise the serious concerns over the attempted greenwashing that National Highways/LTC have attempted when presenting information about Hole Farm Community Woodland.

They state it would be alongside the proposed LTC route, which is incorrect it would be alongside the M25. They suggest it is part of the LTC mitigation and project. Yet at the same time admit it will go ahead regardless of whether LTC goes ahead or not. This is because it is a separate National Highways project as opposed to being directly part of the LTC project and does not completely fall within the LTC order limits.

So yet again we call on Transport East to include LTC in cumulative assessments for biodiversity and natural capital, if you are able to obtain genuine and complete information/detail from National Highways/LTC.

To conclude on the ISA aspect of the Transport East Strategy Consultation we are extremely disappointed and do not feel that adequate consideration has been given to the effects of the proposed LTC, and call on Transport East to reconsider and withdraw your support of the proposed LTC.

Conclusion

Whilst we can definitely see the benefits of some of the proposals/goals within the Transport Strategy, we do have to question how realistic it is to believe that there is any genuine intention or ability in some cases, to fulfil the goals/ambitions.

Due to the contradictory information and goals, it is hard to have confidence that there is true intention to fulfil the goals, especially the more sustainable goals.

We simply cannot see how you can genuinely commit to sustainable transport goals when also supporting such hugely destructive and harmful projects as the proposed Lower Thames Crossing.

We would ask that Transport East seriously consider withdrawing support for such destructive and harmful projects, and instead direct support to more sustainable and fit for purpose projects and goals.

We would like to thank you for the opportunity to take part in the consultation, and hope you will find our responses helpful. Should you wish to discuss any of our comments, or indeed our opposition to the proposed Lower Thames Crossing, please do not hesitate to contact us – admin@thamescrossingactiongroup.com