

THAMES CROSSING  
ACTION GROUP

www.tcag.info

**TCAG call for 'Smart' LTC to be paused**

**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.

**This document contains evidence that proves our claims that we have been told by National Highways (or Highways England as they were formerly known)/LTC that the proposed Lower Thames Crossing is being designed to Smart Motorway standards, using Smart technology, and would only be able to be used by vehicles that can legally use motorways.**

**It not only highlights the info that we have received via email from HE/NH/LTC, but also references various consultation materials and other documents, all of which we believe provide evidence to back up our claims and the need for answers to the following:**

**Why is different information being shared with different parties in regard to the proposed LTC?**

**What standard is the proposed LTC being designed to?**

**Why are National Highways responsible for setting their own standards with the DMRB? Do they not have a vested interest in controlling the standards?**

**Why has the proposed LTC designation changed from a motorway to APTR?**

**In regards to safety how is the proposed LTC any different from the paused Smart Motorways?**

**Will the Government pause the proposed LTC in line with the pause of Smart Motorways?**

THAMES CROSSING  
ACTION GROUP  
www.tcag.info

**Contents**

|  |           |
|--|-----------|
| <b>Introduction.....</b>   | <b>1</b>  |
| <b>Questions to be answered .....</b>  | <b>3</b>  |
| <b>Q1. Is the proposed LTC being designed as a smart motorway? .....</b>   | <b>3</b>  |
| <i>What TCAG have been told by National Highways/LTC? .....</i>  | 3         |
| 10 March 2020 email titled - Outstanding questions .....   | 3         |
| 17th March 2020 email titled - Highways England response - Your enquiry about the Lower Thames Crossing - ref 01921-Z4R4Y5 ..... | 3         |
| 1 April 2020 email titled - Highways England response - Your enquiry about the Lower Thames Crossing .....                       | 4         |
| 9 April 2020 email titled - Outstanding questions .....  | 4         |
| <i>What are the DfT being told by National Highways/LTC?.....</i>  | 5         |
| <i>What standard do the Local Authorities think LTC is being designed to? .....</i>  | 6         |
| <b>Q2. Why are NH responsible for setting their own standards with the DMRB? .....</b>   | <b>7</b>  |
| <b>Q3. Why has the proposed LTC designation changed from a motorway to an APTR? .....</b>  | <b>8</b>  |
| April 2017 .....   | 8         |
| December 2017.....   | 8         |
| 2018 .....   | 8         |
| Jan 2020 .....   | 10        |
| March 2020.....  | 10        |
| March/April 2020 emails .....  | 10        |
| July 2020 .....  | 11        |
| July 2021 .....  | 11        |
| Conclusion.....  | 13        |
| <b>Q4. What is the difference safety wise between LTC and the paused Smart Motorways? .....</b>                                  | <b>14</b> |
| <b>Conclusion .....</b>  | <b>15</b> |

# THAMES CROSSING ACTION GROUP

www.tcag.info

## Questions to be answered

### Q1. Is the proposed LTC being designed as a smart motorway?

#### What TCAG have been told by National Highways/LTC?

TCAG as members of the public have been told that the proposed LTC would be an all-purpose trunk road, designed to Smart Motorway standards, using smart technology, and that only vehicles that can legally use a motorway would be able to use it. Also that the only difference the road user would notice between it being a motorway or all-purpose trunk road would be the colour of the signs, either blue for motorway or green for an all-purpose trunk road.

We have highlighted the relevant sections of the email here for ease of reference, but also attached the original emails and proof of evidence.

#### 10 March 2020 email titled - Outstanding questions

In this email it is clearly stated ***"It will however be designed to Smart Motorway standards including the provision of emergency refuge areas a minimum of 1.6km apart and lane detection technology. The design also provides Stopped Vehicle Detection systems, incident detection and automatic signals, in line with Government regulations"***.

##### LTC Smart Motorway/Hard Shoulder/Emergency Refuge Areas

We are designing the Lower Thames Crossing to the highest safety standards and in accordance with Government safety design regulations. The LTC is not currently designed as a motorway, but as an All Purpose Trunk Road such as an A Road. It will however be designed to Smart Motorway standards including the provision of emergency refuge areas a minimum of 1.6km apart and lane detection technology. The design also provides Stopped Vehicle Detection systems, incident detection and automatic signals, in line with Government regulations.

The route will not have a hard shoulder along the majority of the route. Should a vehicle need to stop before it reaches a refuge area, technology used along the route will detect the stopped vehicle and change the over-lane signals to indicate that the affected lane is closed to traffic.

#### 17th March 2020 email titled - Highways England response - Your enquiry about the Lower Thames Crossing - ref 01921-Z4R4Y5

In this email it is again stated ***"It will however be designed to Smart Motorway standards including the provision of emergency refuge areas and lane detection technology"***.

The designation of the road will be submitted as part of our Development Consent Order application. It is not currently designed as a motorway, but as an All-Purpose Trunk Road such as an A Road. It will however be designed to Smart Motorway standards including the provision of emergency refuge areas and lane detection technology.

# THAMES CROSSING ACTION GROUP

www.tcag.info

1 April 2020 email titled - Highways England response - Your enquiry about the Lower Thames Crossing

In this email it is stated that **there is no material change to the design between either motorway or A-road, other than the colour of the signs.**

## Road Designation

The scheme is being designed to latest standards and the current design would be appropriate for motorway or A-Road designation. From a customer's point of view the key difference will be the sign colour of blue for motorway or green for A road and the vehicle types which can use the road. Although if the route is an A-Road, there would be vehicle prohibition on the tunnel section similar to motorways.

The designation of the road is currently under review and will be agreed with the Department for Transport and presented in the DCO submission documentation. There is no material change to the design between either motorway or A-Road, other than the signage. We are however also in the process of reviewing the government's 'Evidence Stocktake and Action Plan' for Smart Motorways published in March 2020.

9 April 2020 email titled - Outstanding questions

This email states that safety measures for the LTC would include technology provision such as **"variable mandatory speed limits, stopped vehicle detection, message signs, advance motorway indicators, CCTV, enforcement cameras"**, which is all in keeping with **smart motorway technology.**

## LTC Smart Motorway/Hard Shoulder/Emergency Refuge Areas

Had been hoping for more precise info the amount of ERAs (northbound and southbound), distances between ERAs, and distances of connecting roads, including locations of ERAs! Can one of you also please send me details of where I can find the most recent data on predictions of accidents for LTC and anything relating to safety of LTC. Also please can someone clarify what safety measures will be put in place specifically on stretches of viaduct on the LTC.

As regards safety measures for LTC these will include technology provision such as variable mandatory speed limits, stopped vehicle detection, message signs, advance motorway indicators, CCTV, enforcement cameras, increased traffic officer patrols, off-network access & limiting assets such as signs, gantries and lights within the verges.

# THAMES CROSSING ACTION GROUP

[www.tcag.info](http://www.tcag.info)

## What are the DfT being told by National Highways/LTC?

It appears that Baroness Vere of Norbiton and the DfT are being told something very different to what we as members of the public have been told as to how the proposed LTC is being designed.

In Baroness Vere of Norbiton's letter dated 1st Feb 2022 (see attached) it is stated:

*“National Highways has confirmed that the LTC is being designed as an All-Purpose Trunk Road in line with the principles set out in the Design Manual for Roads and Bridges (DMRB), specifically the ‘Requirements for new and upgraded all-purpose trunk roads (expressways), GD300. As set out in the DMRB, an expressway is a high-speed dual carriageway that has at least two lanes in each direction, grade separated junctions, and uses technology to support operational regimes. The LTC has not been designed to the DMRB design requirements for smart motorways, GD301.”*

In document *DMRB-GD300*<sup>1</sup>, smart motorways are referenced numerous times. For example:

E/2.14 – E/2.16 Note states that the resource requirements, service level, procedures, work instructions and processes for traffic officers on APTR expressways are expected to be similar to those for **smart motorway** all lane running schemes.

E/4.8 Note states that **smart motorway** criteria and methodology would apply to expressways.

E/7.2 –E/7.3 Note states the measurement of emergency area set-back for expressways aligns with **smart motorway** requirements.

E/8.1 Note 1 states that requirements and advice for places of relative safety for **smart motorways** also applies to expressways.

E/9.9 – E/9.10 Note states that **smart motorway** requirements and advice for no hard shoulder info signs also applies to expressways.

E/9.11 Note states that **smart motorway** requirements and advice for emergency area surfacing, road marking and signing also applies to expressways.

E/9.12 Note states that **smart motorway** requirements and advice for variable speed limit and enforcement camera signing also applies to expressways.

E/10.5 states that control signals and VMS shall be provided in accordance with **smart motorway** control signal requirements

E/10.5 Note states that **smart motorway** requirements and advice for control signals and VMS also applies to expressways.

---

<sup>1</sup> DMRB – GD300 - <https://www.standardsforhighways.co.uk/prod/attachments/1223f3d1-5dd8-4afd-a2e8-0367f70b8652?inline=true>

# THAMES CROSSING ACTION GROUP

[www.tcag.info](http://www.tcag.info)

E/10.7 Note states **smart motorway** requirements and advice for entry slip signals apply to expressways.

E/D2 states that the approach being used for expressways is built upon experience gained through **smart motorways**.

E/D2 also states that it should be clear to road users when they enter and exit expressways. **How will LTC define that it is an expressway and that only vehicles that can use motorways can use it?**

E/D7.3 states that expressways are subject to the same requirements for calibration and ongoing optimisation as **smart motorways**.

Table E/F.20 Clause E/2.17 again makes association between expressway and **smart motorway** agreements.

Table E/F.63 Clause E/10.5 states that control signals and VMS shall be provided in accordance with **smart motorway** control signal requirements.

## **What standard do the Local Authorities think LTC is being designed to?**

We actually approached Thurrock Council to ask if they could advise us which design level within *GD300* they believed the proposed LTC fell into. We felt this would help us better understand *GD300* since different parts are applicable to the different design levels.

However, Thurrock Council have advised us that their understanding is that the proposed LTC is being designed to *CD109 (Highway Link Design)*<sup>2</sup> as an all-purpose trunk road, and not as an Expressway as Baroness Vere has been told.

---

<sup>2</sup> DMRB CD109 - <https://www.standardsforhighways.co.uk/prod/attachments/c27c55b7-2dfc-4597-923a-4d1b4bd6c9fa?inline=true>

# THAMES CROSSING ACTION GROUP

[www.tcag.info](http://www.tcag.info)

## Q2. Why are NH responsible for setting their own standards with the DMRB?

In an October 2019 update<sup>3</sup> it is stated that Highways England (now obviously known as National Highways) are leading the transformation of the DMRB. It goes on to say that refreshing the DMRB by March 2020 was a requirement of Highways England's Licence and Protocol Agreement.

Surely it should be considered that they have a vested interest in setting the DMRB standards to suit their own wants/needs?

Especially in light of all the issues and serious concerns over road standards, particularly Smart Motorways.

The update also goes on to state *"The new documents have been written in a style that clearly states what shall be done, following drafting rules that have been developed from internationally leading research on excellence in standards development. They are much easier to read and understand, and vague or ambiguous phrasing is not permitted."*

We feel this is very relevant to the fact that clearly there is much vagueness and ambiguity over exactly what standards the proposed LTC is being designed to. Also the content of DMRB documents is vague and ambiguous.

Just one example of this would be 'GD300 - Requirements for new and upgraded all-purpose trunk roads (expressways)', where a document that refers to requirements for all-purpose trunk roads includes a level that covers all-purpose trunk roads that have motorway designation!

Please see from page 52/108 (*pdf numbering*) of GD300<sup>4</sup> for outlines of the 4 delivery levels.

How can that be deemed anything other ambiguous? Is it an all-purpose trunk road, and expressway, or a motorway?

We understand these are considered technical documents. However, when sections of the DMRB are being referred to in response to public consultation questioning, things need to be a lot less ambiguous and technical and clear and informative materials shared with the public.

We find it shocking that the very standards that National Highways have to work to with all their work is actually set by them. We would ask why this is deemed acceptable and whether it would be wiser that standards be set independently rather than those who are governed by them?

---

<sup>3</sup> DMRB Oct 2019 Update - <https://nationalhighways.co.uk/industry/design-manual-for-roads-and-bridges-dmrb/about-the-new-design-manual-for-roads-and-bridges-dmrb-and-what-s-new/>

<sup>4</sup> DMRB GD300 - <https://www.standardsforhighways.co.uk/prod/attachments/1223f3d1-5dd8-4afd-a2e8-0367f70b8652?inline=true>

# THAMES CROSSING ACTION GROUP

[www.tcag.info](http://www.tcag.info)

## Q3. Why has the proposed LTC designation changed from a motorway to an APTR?

### April 2017

In April 2017 at the time of the Preferred Route Announcement HE had assumed the LTC would be an All-Purpose Trunk Road (APTR) although it was acknowledged in the Post-Consultation SAR that the Project could be designed to emerging 'expressway' standards (introduced in the Road Investment Strategy). This is referenced in 10.1.7 and 12.1.1 in the *Approach to Design, Construction and Operation*<sup>5</sup>

Following on from the PRA three road standards were considered, APTR, Expressway, and Conventional/Smart Motorway. In Dec 2017 HE proposed that expressways could be classified as motorways, creating a new type of motorway standard for new motorways or upgraded A roads.

### December 2017

In the Dec 2017 Highways England document *Strategic Road Network Initial Report Evidence*<sup>6</sup>, (page 82/108 pdf numbering) - 5.3.6 Developing Expressways closing statement clearly states that **expressway operational and safety standards would be consistent with smart and conventional motorways.**

### 2018

In 2018 at the time of the Statutory Consultation HE decided that the LTC should be designed to this new type of motorway standard, as per 12.1.4 of the *Approach to Design, Construction and Operation* document within the consultation materials.

It clarified "As an official standard has not yet been issued for this, it means that the Project will be designed to conventional motorway standards but with departures from standard for the **omission of the hard shoulder, the provision of emergency areas and the provision of traffic control technology like that used on smart motorways including lane signals and variable mandatory speed limits (VMSLs)**".

It was even stated in point C of 12.1.5 of the same document that **HE considered this to be a more appropriate solution than an APTR.**

---

<sup>5</sup> Approach to Design, Construction and Operation (2018) -

[https://highwaysengland.citizenspace.com/ltc/consultation/supporting\\_documents/LTC%204%20Design%20Consultation%20and%20Operations.pdf](https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/LTC%204%20Design%20Consultation%20and%20Operations.pdf)

<sup>6</sup> *Strategic Road Network Initial Report Evidence* (2017) -

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/666884/Highways\\_England\\_Strategic\\_Road\\_Network\\_Initial\\_Report\\_-\\_WEB.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/666884/Highways_England_Strategic_Road_Network_Initial_Report_-_WEB.pdf)

# THAMES CROSSING ACTION GROUP

[www.tcag.info](http://www.tcag.info)

Plus in the same document 21.4.1 states “*The provision of emergency areas will follow our latest design guidance (IAN 161/15) and be sited no more than 1,500m apart on the approach roads.*”

IAN 161/15<sup>7</sup> was titled Smart Motorways, and whilst now withdrawn was superseded by GD301 - Smart Motorways. We note that we can find no evidence in LTC documentation that superseded the *Approach to Design, Construction and Operation* (including the 2021 *Operations Update*) that clarifies any change to the original statement that emergency areas will follow IAN 165/15. Since that document was superseded with GD301<sup>8</sup> then it must therefore be assumed, in the absence of any other update that LTC emergency areas are being designed to GD301 – *Smart Motorways*.

With that in mind we would also express concerns in light of reports of the risk relating to Smart Motorway emergency areas due to the slip risks associated with the orange painted emergency areas.

Also just to point out that there are various references to the LTC being a motorway in the *Approach to Design, Construction and Operations* document. For example 1.1.1, 1.2.1, and 20.3.1.

It also highlights the timeline of the thought and decision process up that point.

Throughout the Statutory Consultation the LTC was referred to as a motorway. The *Consultation Guide*<sup>9</sup> stated the **LTC would have no hard shoulders in common with smart motorways**. It also had an info point stating “*Did you know? A smart motorway uses technology to manage traffic flow*”.

Just a couple of examples of motorway references, there are more to be found throughout the Statutory Consultation materials. In the *Consultation Guide* on page 8/144 (pdf numbering) it states that the proposed **LTC would be a motorway**.

It is again stated on page 28/144 that the LTC would be a **motorway**. Furthermore it goes on to state that it will have **no hard shoulders in common with smart motorways**.

Page 5/38 pdf of the *Case for the Project*<sup>10</sup> again states that the **LTC would be a motorway**.

Page 109/389 pdf *Traffic Forecasting Report*<sup>11</sup> states the LTC mainline is coded as a **3-lane motorway**.

---

<sup>7</sup> DMRB IAN 161/15 - <https://www.standardsforhighways.co.uk/dmrb/search/3b8dd1ea-fa40-41ec-b53a-dc5136387aa6>

<sup>8</sup> DMRB GD301 - <https://www.standardsforhighways.co.uk/dmrb/search/d908f9c2-cd47-4e96-b015-97b51e24c588>

<sup>9</sup> LTC Statutory Consultation Guide -

[https://highwaysengland.citizenspace.com/ltc/consultation/supporting\\_documents/LTC%208%20Consultation%20Brochure.pdf](https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/LTC%208%20Consultation%20Brochure.pdf)

<sup>10</sup> [https://highwaysengland.citizenspace.com/ltc/consultation/supporting\\_documents/LTC%205%20The%20Case%20for%20the%20Project.pdf](https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/LTC%205%20The%20Case%20for%20the%20Project.pdf)

<sup>11</sup> [https://highwaysengland.citizenspace.com/ltc/consultation/supporting\\_documents/Traffic%20Forecasting%20Report.pdf](https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/Traffic%20Forecasting%20Report.pdf)

# THAMES CROSSING ACTION GROUP

[www.tcag.info](http://www.tcag.info)

## Jan 2020

On Jan 27<sup>th</sup> 2020 *Panorama 'Britain's Killer Motorways'* first aired and coverage of the dangers of Smart Motorways escalated and become more prominent in the public domain.

In Jan 2020 at the LTC Supplementary Consultation<sup>12</sup> the references to Smart Motorways had all gone. The LTC was being referred to as a road in consultation materials. However, there was no clear and informative detail that the road was no longer a motorway, and neither was it detailed as an All-Purpose Trunk Road.

## March 2020

In March 2020 the *Road Investment Strategy 2 – 2020-2025*<sup>13</sup> was released. In the Road Standards section on page 42/131 of the document it states *“There are two principal road standards operated by Highways England: motorway and all-purpose trunk road (APTR). It is important that drivers remain clear and confident about the rules that apply on the roads that they use. Consequently, we do not intend to create additional standards with separate branding, signs or rules that have the potential to confuse or overload drivers.*

*Within these two standards, Highways England has defined specific sub-products with their own technical definitions. These include smart motorways and expressways(GD300). Defining products in this way is helpful for decision-makers, procurers and suppliers, but it is not necessary for road users. As more roads are upgraded to improved standards more users will simply experience the benefits they bring in an easy and intuitive way.”*

There certainly seems to be a lot of confusion in regard to the standards of the proposed LTC. We are being told the LTC would be an All-Purpose Trunk Road designed to Smart Motorway standards, using smart technology, and that only those who can legally use a motorway would be able to use it. Along with Baroness Vere advising us National Highways have confirmed to her that it is being designed as an All-Purpose Trunk Road (Expressway), and we've seen that the design level on those in GD300 can include motorway designation.

## March/April 2020 emails

Also see the 2020 emails TCAG received regarding there being no real difference to road users other than

---

<sup>12</sup> LTC Supplementary Consultation - [https://highwaysengland.citizenspace.com/ltc/consultation-2020/supporting\\_documents/Guide%20to%20Consultation%20digital%20version.pdf](https://highwaysengland.citizenspace.com/ltc/consultation-2020/supporting_documents/Guide%20to%20Consultation%20digital%20version.pdf)

<sup>13</sup> Road Investment Strategy 2 – 2020-2025 - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/951100/road-investment-strategy-2-2020-2025.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/951100/road-investment-strategy-2-2020-2025.pdf)

# THAMES CROSSING ACTION GROUP

[www.tcag.info](http://www.tcag.info)

the colour of the road signs. What would there be to differentiate between say the A2 heading coast bound from the M25 that uses green signs going on to the LTC/A122 which would be green signs to alert non-motorway users that they would not be able to use the LTC? Similarly from the A13 onto the LTC if users wanted to use LTC to connect to the A2 westbound or A127 (via the new parallel road)?

## July 2020

In July 2020 at the LTC Design Refinement Consultation the LTC is now referred to as an All-Purpose Trunk Road. But there would be a restriction **so only vehicles allowed on motorways would be able to use the LTC**. They said it was because it connects into existing roads on the strategic road network that can only be used by motorway traffic. However, that is not technically true as it could be accessed via the A2 in the south, the A13 is not restricted to motorway vehicles, and to the north access can be gained to the A127 via the new parallel road without the need to go on any motorways. How would it be identified to users that motorway restrictions apply on an A road? With yet more signs on routes/junctions that would already be overloaded with signs about directions, speeds, user charges etc?

In this consultation it was also stated that *"The route would be designed to the latest standards and use **smart technology** and signalling to help manage traffic"*.

## July 2021

In July 2021 at the Community Impacts Consultation, the *Consultation Guide*<sup>14</sup> states "It would use technology for incident detection, lane control and variable speed limits" (page 58/96) This is 'smart' technology. In the description of the LTC it again refers to it as a road and tunnel the A122.

In the *Operations Update*<sup>15</sup> that is another document from the consultation materials, page 14/206 states:

- The LTC would not have a hard shoulder
- It would feature technology including stopped vehicle and incident detection, lane control, variable speed limits and electronic signage and signalling.
- The design includes emergency areas spaced at intervals between 800 metres and 1.6km (less than one mile).
- The Lower Thames Crossing would be defined as an 'all-purpose trunk road' with green signs.

---

<sup>14</sup> Community Impacts Consultation Guide (July 2021) - [https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting\\_documents/LTC%20Summary%20Guide\\_3.pdf](https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting_documents/LTC%20Summary%20Guide_3.pdf)

<sup>15</sup> LTC Operations Update (July 2021) - [https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting\\_documents/Operations%20update.pdf](https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting_documents/Operations%20update.pdf)

# THAMES CROSSING ACTION GROUP

[www.tcag.info](http://www.tcag.info)

- It would also have additional restrictions so only vehicles allowed on motorways would be able to use it. All features that are associated with Smart Motorways, except the mention of APTR and green signs neither of which make the road any safer.

In the *You Said, We Did*<sup>16</sup> document that was also part of this consultation one of the key feedback themes identified from the previous consultation was concerns over safety and the use of smart motorway technology. This is a document where NH are supposed to provide feedback on their response to our concerns/feedback. Yet in response to the various mentions of smart motorway technology NH response in no way denied that smart motorway technology would be used.

It stated “*The new road’s safety features would include vehicle detection, emergency areas, variable mandatory speed limits and lane closure signals in the event of an incident, such as a vehicle breakdown or collision. Control measures across the route, including in the tunnel, would identify vehicles stopping in a live lane and allow for rapid changes of traffic management to avert danger. Vehicle recovery would also be provided in the tunnel for any stopped vehicles to escort them to a place of safety.*” So again confirming that smart technology would be used. You can find these references on pages 175/403, 197/403, and 245/403.

In addition and referring back to previous comments on RIS2 (March 2020) and the statement in it that NH “*do not intend to create additional standards with separate branding, signs or rules that have the potential to confuse or overload drivers*”. We draw attention to page 84/403 of the 2021 *You Said, We Did* document which states “*As with motorways, the new road would include a restriction on HGVs using lane three.*” We again question how this would not lead to further confusion and overload drivers with info and signs needed to alert road users to this fact. It also leads to the question on whether HGVs would be allowed to use the right hand lane on the long southbound section between the M25 until just past the A13 on the LTC that is only two lanes? Either way it would lead to congestion issues of all HGVs being stuck in lane 1, or HGVs trying to overtake using both lanes and causing general congestion. Congestion also leads to an increased likelihood of incidents occurring, and the associated safety risks especially with no hard shoulder meaning the LTC southbound on that 2 lane section could also easily be reduced to just one single lane if there is an incident resulting in lane closure.

Again we point out that it would be possible to use the LTC without having to use a motorway, and with the road identity being the A122 how would traffic know of the motorway restrictions on the LTC without additional signage on sections of road that would already have a considerable amount of road signage in regards the many various complex junctions, user charges info, speed limits etc.

---

<sup>16</sup> You Said, We Did (July 2021) - [https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting\\_documents/You%20said%20we%20did.pdf](https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting_documents/You%20said%20we%20did.pdf)

THAMES CROSSING  
ACTION GROUP  
[www.tcag.info](http://www.tcag.info)

**Conclusion**

As you can see from the above, we have gone from the proposed LTC being designed as and referred to as an All-Purpose Trunk Road, an Expressway, a Motorway, and back to an All-Purpose Trunk Road designed to Smart Motorway standards with smart technology and that can only be used by vehicles that can use motorways.

Why has the proposed LTC been changed so many times, and what reason is there for it now being considered an All-Purpose Trunk Road rather than being designated a Motorway?

Can someone please explain why the proposed LTC is now being referred to as an APTR? Why was this change made? Where is the data to back up the decision?

## Q4. What is the difference safety wise between LTC and the paused Smart Motorways?

A smart motorway has no hard shoulder, neither would the proposed LTC

A smart motorway uses smart technology to identify stopped vehicles, close lanes, change speed limits etc, so would the proposed LTC.

A smart motorway has emergency refuge areas, so would the proposed LTC.

A smart motorway is designed to smart motorway standards, so would the proposed LTC.

A smart motorway can only be used by motorway traffic, so would the proposed LTC.

### Road sign colour

The only difference we can see, and have been told of between a smart motorway and the proposed LTC is the colour of the road signs. Blue signs on Motorways, green signs on All-Purpose Trunk Roads.

(See attached 1 April email titled - Highways England response - Your enquiry about the Lower Thames Crossing or Evidence-1.3 below in the Supporting Evidence section of this document, or page 14/206 in the *Operations Update*<sup>17</sup> for references to colour of road signs on the LTC.)

Are we really supposed to believe that the signs being green rather than blue makes them safer for road users?

Can someone therefore please explain how the safety risks of the proposed LTC are any different from those of the smart motorways that have been paused whilst the 5 years of safety data is collected and analysed?

We again call for the proposed LTC to be paused in line with the pause of smart motorways.

---

<sup>17</sup> LTC Operations Update (July2021) - [https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting\\_documents/Operations%20update.pdf](https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting_documents/Operations%20update.pdf)

THAMES CROSSING  
ACTION GROUP  
[www.tcag.info](http://www.tcag.info)

## Conclusion

The evidence in this document shows that different parties have been told different information and given different understanding as to which standards are being used in the design of the proposed Lower Thames Crossing.

Ultimately it is vital that National Highways shares adequate information with all parties in a clear and informative manner.

We all have the right to fully understand the design of the proposed Lower Thames Crossing to allow us to take part in the consultation and Development Consent Order (DCO) process in a meaningful way. As is apparent from the information provided in this document this clearly has not been the case, since all three parties have different understandings based on the information that National Highways has shared with them.

We therefore call on the Office of Rail & Road and Transport Select Committee and respectfully ask you to kindly investigate this matter please. Firstly, so answers can be obtained, and secondly to ensure that this misleading behaviour from National Highways is not allowed to continue.

We consider initial questions that need answering are:

Why is different information being shared with different parties in regard to the proposed LTC?

What standard is the proposed LTC being designed to?

Why are National Highways responsible for setting their own standards with the DMRB? Do they not have a vested interest in controlling the standards?

Why has the proposed LTC designation changed from a motorway to APTR?

In regards to safety how is the proposed LTC any different from the paused Smart Motorways?

Will the Government pause the proposed LTC in line with the pause of Smart Motorways?

We thank you for your time and look forward to receiving your comments and answers to the points and questioned raised. Should you need any further clarification of the information in this document please do not hesitate to contact us.

Kind regards

Laura Blake

Chair – Thames Crossing Action Group

[www.tcag.info](http://www.tcag.info)

[admin@thamescrossingactiongroup.com](mailto:admin@thamescrossingactiongroup.com)