

## **Transport for South East Strategic Investment Plan** **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 for South East Strategic Investment Plan Consultation is based on issues we feel relevant to our representation of those opposed to the proposed Lower Thames Crossing (LTC).

## Response

We would like to begin by stating that as it stands we cannot support the draft SIP, and feel it needs to be reassessed and rewritten. Our response highlights the reasons why.

## TfSE SIP Strategic Objectives

In the consultation materials<sup>1</sup> SIP strategic objectives are detailed. Here we highlight why the proposed Lower Thames Crossing (LTC) alone fails on all of your SIP objectives.

## *Environmental*

### **Reduced carbon emissions**

In a time of climate emergency, and with our Government having legally committed to Carbon Net Zero we need to see the topic of carbon emissions taken seriously.

National Highways claims of reducing carbon emissions of the proposed LTC by 80% in July 2022 are misleading and highly speculative.

Their 80% reduction claim is based on government policies. A recent successful legal challenge, by Friends of the Earth, Client Earth, and Good Law Project, led to the High Court ordering the Government to outline exactly how its net zero policies will achieve emissions targets.

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<sup>1</sup> [Connecting the South East Webinars](#)

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Without definitive evidence to back up how the targets will be reached the carbon emission reduction claims of National Highways in regard to the proposed LTC cannot be guaranteed.

The reality of the situation is in fact that buried in the detail of those claims National Highways also tucked away the evidence that official carbon emissions predicted for the LTC has risen by a whopping 67% in regard to operational carbon emissions.

On top of the predicted carbon emissions for construction, if the LTC goes ahead, this would result in over 7 million tonnes of carbon emissions<sup>2</sup> for construction of and first 60 years of operation of the proposed LTC.

In regard to government policies, we also highlight that the National Networks National Policy Statement (NN NPS) is currently being reviewed, partly because it is outdated and not compliant with the UK's legal commitment to carbon net zero.

Also, in June 2021 the Climate Change Committee stated in their report<sup>3</sup>, New roads should only be built if they can be shown not to increase emissions. This therefore means that the proposed LTC should not be built.

Even just taking the proposed LTC carbon emissions into account for the South East, this must consume a huge, if not all the carbon emissions allowance for the region on its own. Similarly, for the East also.

LTC road to Net Zero, and the greenest road every built is purely speculative and greenwashing attempts by National Highways. There is no way a project so huge and destructive and harmful can be considered green or be carbon net zero.

## **Reduced need to travel**

Far from reducing travel, the proposed LTC would result in around 50% increase in cross river traffic. Induced demand is very real, and the more new roads you support to get built the more you are supporting an increase in traffic.

Also with the loss of thousands of acres of agricultural land, the proposed LTC would have a serious impact of food security. The loss of local farm land would result in more food needing to travel from further afield, increasing the miles travelled and all associated environmental impacts, and reducing our country's ability in regard to food security.

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<sup>2</sup> <https://www.thamescrossingactiongroup.com/ltc-carbon-emissions/>

<sup>3</sup> <https://www.theccc.org.uk/publication/2021-progress-report-to-parliament/>

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## **Protected and enhanced environment**

There is no way you can say you have an objective for protected and enhanced environment, whilst supporting such a hugely destructive and harmful project as the proposed LTC.

It would destroy woodlands, including ancient woodland, ancient, veteran and notable trees, ancient hedgerows. It would impact Kent Downs Area of Outstanding Natural Beauty. It would destroy and negatively impact so much greenbelt, countryside, wildlife and habitats.

Nitrogen deposition from the proposed LTC would negatively impact designated sites.

## **Biodiversity net gain**

Again with such a hugely destructive and harmful project as the proposed LTC there is no way it can be considered to create a biodiversity net gain.

Just consider the loss of land and habitat. The impact that loss would have on wildlife from not only the loss of habitat, but the severed territories, foraging and migration routes.

Every time they say they are translocating wildlife they are moving it into an area that already has its own ecosystem. The area in our country for wildlife and the natural environment in general is being constantly reduced. Our nature is being pushed into smaller and smaller pockets of land.

Imagine if more and more people came to live in your home. Imagine if more and more people came to shop at your regular supermarket but the store wasn't able to get any more stock in.

We cannot keep pushing ahead with hugely destructive and harmful projects and expect a biodiversity net gain, because it just can't happen, especially when nobody is monitoring the cumulative impacts and the surveys and assessments that are being carried out are far from adequate.

## **Lower levels of consumption**

This objective is simply contradictory to your other objective '*Better connectivity between major economic hubs*'. Your focus with these plans is largely based on

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economy and economic growth. This is not in keeping with lowering levels of consumption.

We hear with LTC about the need for economic growth and for better connections for more growth and routes for the ports and businesses. Try counting all the economic benefits when there is no clean air to breathe, clean water to drink, and food to eat, because it's all been lost and polluted by projects like the proposed LTC and the associated traffic from the induced demand.

## *Social*

### **Promote active travel, health, and well-being**

The proposed LTC makes no provision for cross river active travel. It is not even viable for public transport since there would be no adequate connections for a bus service.

Many of the 'new' routes for walking, cycling, and horse riding that National Highways claim in regard to the proposed LTC are in fact routes that are used now. We do not consider routes that would need to be realigned due to the proposed LTC to be new.

The amount of paths is also seriously questionable, since many paths spiral or zigzag to gain additional length for their claims, and some even run parallel so offer no real benefit.

In addition, much of what is being proposed for walking, cycling, horse riding is for leisure rather than offering means of alternative more sustainable travel for day to day travel.

There is also the concern that much of what is being proposed will suffer from pollution.

### **Improve air quality**

The proposed LTC would worsen air quality in areas already suffering with illegally high levels of air pollution.

National Highways (or Highways England as they were back then) appointed Professor Karen Lucas as Chair of the LTC Community Impacts Public Health

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Advisory Group. Whilst working on the social evaluation project for Lower Thames Crossing she publicly stated that the whole project exceeds WHO PM2.5 health guidance<sup>4</sup>.

That was what is now known as WHO10 levels, prior to them updating their guidance. It is WHO10 levels that are being proposed to be enshrined into UK law by the end of Oct this year, as part of the Environment Act.

PM2.5 comes from things like brake dust, tyre and road wear. Deadly particles so tiny they get into our organs via our blood stream.

PM2.5 can travel for many miles, yet National Highways fail to acknowledge the dangers when the topic comes up. It's like they are burying their head in the sand about it for as long as they can, and hoping they'll get away with it.

The air in the proposed LTC tunnels would not be filtered. It would be pushed through the tunnels and out into the communities. We are supposed to be grateful that National Highways would be dumping the tunnel spoil at each end of the tunnels and calling them public parks, with all that pollution spewing out.

Far from reducing traffic and improving congestion and pollution, the proposed LTC would see a large increase in traffic, and more chaos, congestion and pollution throughout the regions on both sides of the River Thames. Let's not forget that pollution doesn't know any boundaries.

We are concerned by the lack of reference to PM2.5 in the plan, and how with such an objective you can continue to support the proposed LTC.

## **Affordable accessible network**

The cost of the proposed LTC is now up to £8.2bn+ of taxpayers' money. That's more expensive per mile than the highly controversial HS2 project. Now more than ever as we are living through a cost of living crisis and at a time of climate emergency such an expensive, destructive and harmful project cannot be considered affordable, and the cost keeps rising.

In Feb 2022 , due to changes in the way the government now calculates carbon emission costs, the proposed Lower Thames Crossing carbon costs for construction alone rose by more than 230% to almost £500million. In an [article in industry publication, New Civil Engineer](#), New Economics Foundation senior researcher has

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<sup>4</sup> <https://www.thamescrossingactiongroup.com/ltc-toxic-triangle/>

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said “after factoring in the emissions over the scheme’s operational lifetime, the total climate cost is likely to rise over £1bn”.

The LTC project is based on a false economy too. National Highways have removed or avoided including key works that would need to be carried out as a direct result of the proposed LTC.

The Tilbury Link Road, Blue Bell Hill Improvements, A2 Dover Access, Gallows Corner improvements, and other works that would be needed to the local road network are all being considered as separate standalone projects, and not part of the proposed LTC.

The question that needs to be answered is, WHY?

Take a look at the Blue Bell Hill Improvements. When the proposed LTC was at route options stage the C variant option included the link between the M20 and M2/A2, yet it was ruled out as unnecessary. Yet now these improvements are being progressed as a separate standalone project.

The Port of Dover consider A2 improvements for Dover as essential if the proposed LTC goes ahead, yet it is not being included as part of the LTC project despite the fact it would be as a direct result that the work would be needed due to the lack of connection between the M20 and LTC.

We were told previously by National Highways that a Rest and Service Area would be needed for the proposed LTC as a matter of safety. Yet it has since been removed from the project and is yet again being progressed as a separate standalone project.

It is not just the financial cost that should be considered too, but also the cost to our health and well-being, and the environment. Plus all those aspects have a financial cost associated to them too.

The proposed LTC would incur user charges in a similar manner to those charged for using the Dartford Crossing. Yet the two would not be interchangeable for local residents. For example residents in Dartford would only be eligible for the Local Residents Discount for the Dartford Crossing, and not the LTC. Gravesham residents would be eligible for Local Residents Discount for the LTC, but not the Dartford Tunnel. This would mean that journey choices would be taken based on cost.

As well as lack of availability and reliability, cost is a major factor when it comes to people using more sustainable means of transport. This needs to be recognized

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and identified when it comes to future planning. Instead of spending £8.2bn on the proposed LTC that isn't fit for purpose and wouldn't solve the problems at the Dartford Crossing, other alternatives should be considered.

Rail improvements between Ashford and Reading at around £4bn improving rail connections for freight and passengers. £800m on Kenex Trams between Kent and Essex would be a more sustainable and affordable option.

## **Seamless integrated network**

The proposed LTC would not seamlessly integrate into the network. Far from it as firstly it would actually utilize the existing local road network, bringing new challenges and issues.

We highlight the fact that the A2 would drop from 4 lanes to 2 for sections in each direction if the proposed LTC goes ahead.

National Highways are not considering or planning how traffic would migrate between the two crossings when there are incidents at either crossing, and there would not be adequate connections.

Imagine when there's an incident at the Dartford Crossing and traffic needs to migrate to the LTC. It comes off the M25 onto the A2 coastbound, only to find there is just one single lane from the A2 onto the LTC. How can that be considered seamless integration?

## **Safely planned and operated network**

Whilst the proposed LTC is now being referred to as an All-Purpose Trunk Road, up until the time that the negative coverage of 'smart' motorways rose in awareness, the proposed LTC was being referred to as a motorway.

The difference between an All-Purpose Trunk Road and a motorway is one has green signs, the other has blue signs.

The proposed LTC is being designed to 'smart' motorway standards, and raises all the serious concerns that people have in regard to 'smart' motorways. The level of concern has led to government pausing the roll out of 'smart' motorways whilst 5 years of safety data is collected and assessed.



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When it comes to 'smart' motorways National Highways failed to deliver on what was actually signed off by Government. There have sadly been numerous deaths and many serious injuries.

There are forecast to be 2,147 additional accidents over 60 years, including 26 fatalities, 220 serious injuries and 3,122 slight injuries if the proposed LTC goes ahead.

We have serious concerns about the safety of the proposed LTC. And of course it is not just road traffic accidents that are a serious safety concern, but also the harm the proposed LTC would bring in regard to pollution of air, soil, water, noise and light, and the impacts to our health and well-being, and that of our natural environment.

## *Economic*

### **Better connectivity between major economic hubs**

As already mentioned the proposed LTC does not offer better connectivity between major economic hubs, like the ports, without extra cost and works being carried out, such as A2 Dover Access and Blue Bell Hill Improvements etc.

The Port of Tilbury said they would only support the LTC if they were given a direct link to the new road. The Tilbury Link Road was added and then removed once the much-needed port support had been garnered and used for National Highways needs.

The lack of adequate connections to the north of the river may not be thought of as relevant to Transport for South East, as it's "not in your region". However, we draw your attention to the fallout on both sides of the river any time there are incidents at the current Dartford Crossing.

National Highways have more recently added a new Operations and Emergency Access point near Tilbury, which is also said could accommodate further development in the future.

This 'junction' is very close to the tunnel portals, in a similar way to the junctions close to the tunnel portals in Dartford, part of what causes many of the incidents and issues.

Again we point out that this may be north of the river, but how long do you think it would take for traffic to start backing up through the tunnels into Kent as traffic builds up to come off the LTC at the future junction if to goes ahead?

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Also in regard to issues north of the river impacting south of the river. When there is an incident at the QE2 bridge and traffic wants to migrate to the LTC. It would come off the M25 onto the A13 eastbound, only to find there is no access to the LTC from the A13 eastbound. Instead it would have to go all the way down to the Stanford A1014 junction, up around the already busy traffic lighted roundabout alongside DP World, London Gateway, Thames Enterprise Park etc traffic, then back westbound on the A13 until the LTC slip road which would be just past (but not accessible from) the Orsett A128 junction.

The A13 would also see a drop to just 2 lanes for sections in each direction in a similar way to the A2 lane drops.

If instead traffic attempted to come off the M25 directly onto the LTC, the M25 at this point would be 5 lanes going onto just 2 lanes southbound on the LTC until past the A13. How long before the M25 is backed up to junctions 29 and 28? Clogging up not only the M25 but also the A127 and A12 access.

How does this improve connectivity, especially for major economic hubs or anyone?

### **More reliable journeys / More resilient networks**

We will respond to these two objectives as the comments are the same. The proposed LTC would not improve journey reliability or improve network resilience.

The original task of a new crossing was to solve the problems at the Dartford Crossing. The Dartford Crossing has a design capacity of 135,000 vehicles per day, yet regularly sees 180,000 per day.

That means we'd need to see a reduction of more than 25% to bring it back below capacity. Yet the proposed LTC would take as little as 4% in the am peak hour and 11% in the pm peak hour<sup>5</sup>. Not to mention the 50% increase in cross river traffic, if the LTC goes ahead.

This means that the current Dartford Crossing would still be over capacity and suffer the same issues and incidents.

We have already highlighted above the fact that National Highways are not considering or planning how traffic would migrate between the two crossings when

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<sup>5</sup> <https://lowerthamescrossingthurrock.co.uk/wider-debate-is-needed-on-the-merits-of-ltc-creating-a-new-m25-outer-orbital-route>

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there are incidents and that there would not be adequate connections. The result would be more chaos, congestion and pollution.

## **Integrated land use and transport planning**

As highlighted in other sections of our response, the proposed LTC would be hugely destructive and harmful. It would not be good use of land, would not improve integration, reliance or resilience.

When considering the fact and evidence for the proposed LTC there is no real way to honestly consider the project LTC as good or acceptable transport planning.

It is purely focused on motorised vehicle use, makes no provision for active travel, and is not viable for public transport.

## **A smart network that uses tech to manage demand**

Please see our comments on the 'smart' aspect of the proposed LTC above. We do not consider any means of 'smart' in regards to the proposed LTC to actually be smart.

In addition, far from managing demand the proposed LTC would add to the chaos, congestion and pollution, and increase cross river traffic by around 50%.

## **Additional comments**

We acknowledge that this consultation is a Transport for South East consultation. Yet as already mentioned above we draw attention to the fact that with the proposed LTC consideration should be given to the project as a whole, not just the Kent section, as the whole project is relevant.

Not only that, it should be considered and addressed that the Kent section of the proposed LTC is not possible without the north section, and vice versa.

Our point here being that if you support the LTC in Kent you are also supporting the LTC north of the river and all the associated destruction, harm, and issues. Therefore you should be taking all aspects into account cumulatively, including carbon emissions, land use loss, environmental impacts, costs, impacts, issues.

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## Your LTC specific consultation content

We question the LTC specific content detailed within the consultation materials. For example the info provided in the tables.

Packages of Interventions*	Kent, Medway, and East Sussex (KMES)	S. KMES Rail	U. KMES High Speed Rail East	U. KMES High Speed Rail North	V. KMES Mass Transit	W. KMES Active Travel	Y. Lower Thames Crossing	X. KMES Highways
Implementation Timeframe		Short – Medium	Short – Medium	Medium – Long	Short – Medium	Short	Medium – Long	Short – Long
Capital Construction Cost in £millions*	19,400	3,700	1,000	7,300**	700	100	2,800***	3,800
Annual Capital Maintenance and Renewal Costs	865	95	25	190	55	5	290	210
Gross Value Added (GVA) in £millions per annum in 2050	750	140	125	225	45	15	90	105
Additional new local residents by 2050 (Compared to Do Nothing Scenario in 2050)	28,400	6,150	5,800	11,700	1,550	450	1,200	1,600
Additional full time-equivalent jobs by 2050 (Compared to Do Nothing Scenario in 2050)	8,400	1,500	1,400	2,450	400	250	950	1,400
Change in Carbon Emissions in 2050 (Nearest 5,000 Kilo-Tonnes CO2e)	30,000	-15,000	-15,000	-15,000	-25,000	-10,000	65,000	45,000
Change in average weekday return trips	160,000	20,000	15,000	35,000	-	-	5,000	75,000
Change in average weekday return car trips	-	-	-	-	-50,000	-50,000	10,000	85,000
Change in average weekday return rail trips	65,000	15,000	15,000	35,000	-	-	-	-
Change in average weekday return bus, mass transit and ferry trips	75,000	-	-	-	85,000	-5,000	-	-5,000

Figures rounded to nearest: £50m for Capital Cost; £5m for GVA; 50 new residents /jobs; 5,000 kilo-tonnes CO2e; and 5,000 daily return trips

\*A full list of proposed interventions within each package can be found in Appendix A

\*\*Assumes High Speed Rail option goes via Chatham rather than Medway City Estate or Rochester

\*\*\*Assumes assignment of 40% of Lower Thames Crossing capital costs to Kent geographically

You are stating the capital construction cost in £millions as 2,800 with a footnote reference of *\*\*\*Assumes assignment of 40% of Lower Thames Crossing capital costs to Kent geographically.*

With the cost of the proposed LTC now at £8.2bn+ how do you get a figure of 2.8 million as being 40%?

Carbon emissions are stated as 65,000 yet the prediction is over 7 million tonnes.

This leads us to question not only the other LTC related info within the materials, but all other info too.

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## Conclusion

The evidence presented in our response shows that on the aspect of the proposed Lower Thames Crossing alone, which is a huge part of proposed transport plans for the South East (and East), it fails to meet a single one of your SIP objectives.

The proposed LTC would be hugely destructive and harmful, would not solve the problems at the Dartford Crossing, is highly likely to in fact create more chaos, congestion and pollution throughout the region, is not fit for purpose, and would be a complete waste of taxpayers' money that could be better spent.

We call on Transport for South East to please seriously reconsider your draft SIP and your support of the proposed Lower Thames Crossing, as it does not meet any of your SIP objectives. There are better alternatives, and everyone deserves better.

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](mailto:admin@thamescrossingactiongroup.com)