

## **Thames Estuary 2100 Consultation**

### Introduction

Thames Crossing Action Group (TCAG) represent thousands of people who are opposed to the hugely destructive and harmful, not fit for purpose £9-10bn+ proposed Lower Thames Crossing (LTC). More info on us and our concerns and issues with the proposed LTC can be found on our website [www.thamescrossingactiongroup.com](http://www.thamescrossingactiongroup.com).

Please consider the following our official response to the Thames Estuary 2100 Consultation<sup>1</sup>.

We feel it may also be helpful to read this response alongside our response to the Thames Vision 2050 consultation<sup>2</sup>, and also our update that highlights some of our key concerns regarding flooding in connection to the proposed Lower Thames Crossing<sup>3</sup>.

This response has been prepared on behalf of Thames Crossing Action Group by Laura Blake, Chair – [admin@thamescrossingactiongroup.com](mailto:admin@thamescrossingactiongroup.com)

Whilst we appreciate and understand that you prefer responses submitted using your online form, we are afraid we feel the need to respond by means of this document to ensure the views of our group are clearly represented. We have however endeavored to respond in a way that works alongside your format as closely as possible.

### About you, your understanding of the risk and awareness of Thames Estuary 2100

#### **1. In what capacity are you responding to this consultation?**

We are responding as an organisation (these are our organisation's views)

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<sup>1</sup> [Thames Estuary 2100 Consultation](#)

<sup>2</sup> [Thames Vision 2050 Consultation response](#)

<sup>3</sup> <https://www.thamescrossingactiongroup.com/flooding-and-the-ltc/>

**2. If you are responding on behalf of an organisation, please provide the name of your organisation and your role.**

Thames Crossing Action Group – Chairperson

**3. Can we publish your response? We will not publish any personal information, or any parts of your response which could reveal your identity.**

Yes

**4. How does rising sea level within the Thames Estuary impact you?**

Those our group represent own homes, businesses, land in the Thames Estuary floodplain, they use the river for recreation or commerce, they live and/or work within the flood zone.

Other – One of the many concerns our group has about the proposed Lower Thames Crossing is the impacts it would have on flooding. Obviously flooding within the Thames Estuary region on both sides of the river and surrounding areas will impact everyone on so many levels.

We're all aware that the proposed Lower Thames Crossing route would go through many areas that are flood plains, marshes and fenland. We believe the tunnel portals would be at risk of flooding. We believe that the construction of the proposed Lower Thames Crossing would increase the flood risks in areas along the proposed route and to surrounding property, land and wildlife and habitats.

If the areas around the tunnel portals are in any way protected by the dumping of the tunnel spoil it will destroy natural flood plains, and thus move the threat of flooding to other areas further up and down river.

We have seen so many different maps that show the areas in question are at risk from flooding, including your own maps.

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We also know that when flood prevention such as barriers are put in place and then used this causes water flow to take alternative routes, resulting in flooding of other areas that are not protected.

The natural flood plains and marshes in our area are known to flood, that is what they are for. So we take particular interest and have serious concerns about what the outcome would be if the proposed Lower Thames Crossing goes ahead in regard to future flood risks.

**5. Do you feel equipped to prepare for impacts of sea level rise in the estuary?**

No

As a group many of our supporters feel that we are not in control over our own communities because there are so many attempts to inflict things upon us that we do not want and will be destructive and harmful to us, our communities, and the natural environment.

We have concerns that infrastructure and development like the proposed Lower Thames Crossing would increase the risk and impacts of flooding, which could lead to damage to homes and businesses, risk to our lives, health and well-being, environmental impacts including to ecosystems, wildlife, and the natural environment, risk of pollution.

It is also apparent to us that not only would it impact and risk the above, but also the actual proposed Lower Thames Crossing would be impacted by flooding, which would not only cause damage and issues for the road as a piece of infrastructure, but also mean that if this hugely destructive and harmful project goes ahead and is impacted then all the destruction and harm of the project will be for nothing because the road is not fit for purpose.

**6. How do you benefit from the Thames Estuary 2100 Plan?**

We would hope that the benefit of the Thames Estuary 2100 Plan would ensure a safer and healthier future for us and the natural environment. We would hope that it would not support anything that could put us a serious risk either directly or by environmental impacts as a whole.

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That said we are afraid we find this consultation quite complex for most to be able to read, understand, and be able to give meaningful comment on.

**7. How important do you think it is to mitigate, and adapt to sea level rise?**

*How important is it to mitigate to sea level rise?*

Neutral

*How important is it to adapt to sea level rise?*

Neutral

We have chosen Neutral for both of the above questions because we feel the questions are written in a way to encourage response to support mitigation and adaptation rather than prevention and actions to stop and reverse the likelihood of flood and climate change. Prevention could be by ensuring opposition of projects like the proposed Lower Thames Crossing and other development along and in the vicinity of the Thames Estuary that would be destructive and harmful.

## Outcomes in the updated Thames Estuary 2100 Plan

Any plan should include actions to not only ensure a plan for the worst case scenario, but also actions to do all we can to reduce to the likelihood of the worse case scenario.

For example, infrastructure and developments like the proposed Lower Thames Crossing should be opposed because of the negative impacts they would bring, if they go ahead.

A plan should not just go along with such projects and definitely should not support them. A plan should strongly oppose and take action to stop and prevent anything that would increase the flood risks in the Thames Estuary.

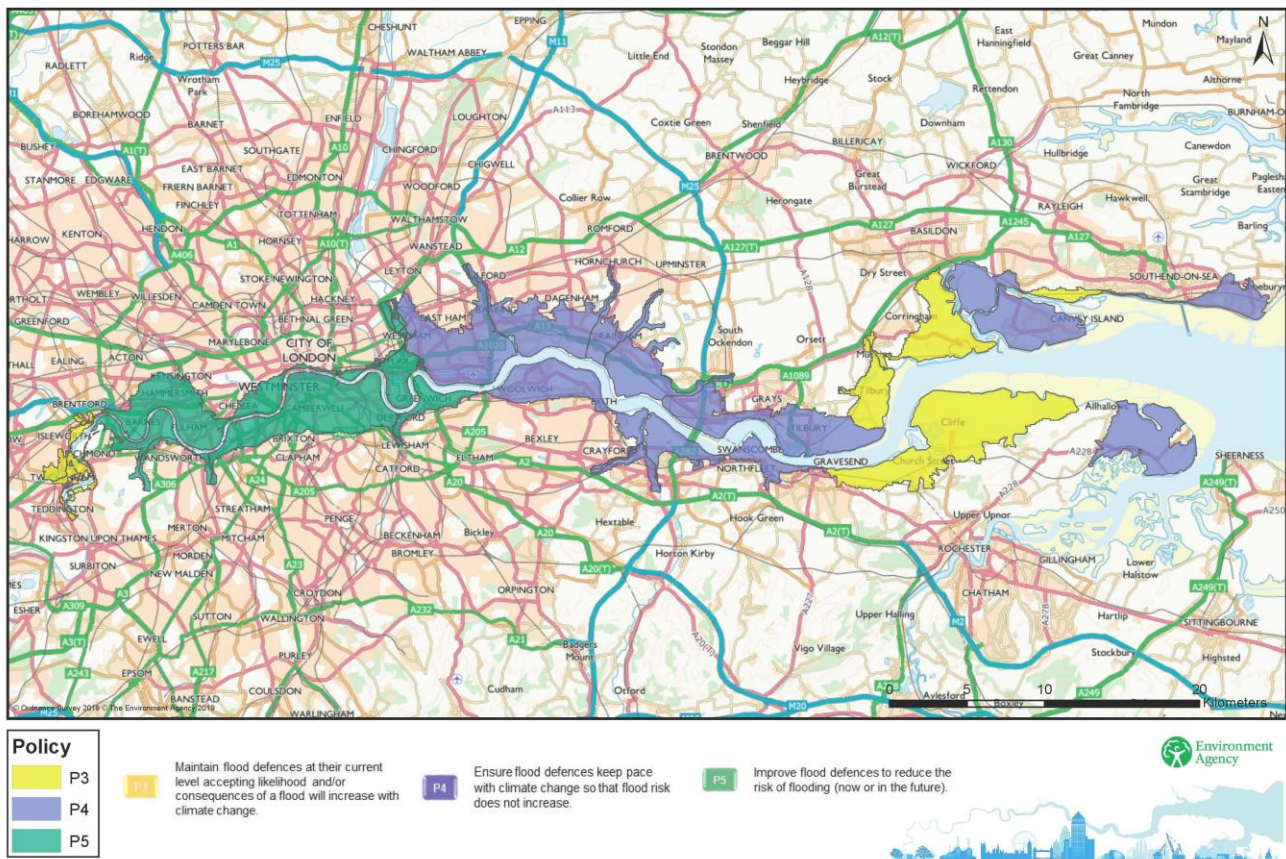
We need the best possible outcomes, not just a plan that attempts to mitigate the risks, whilst knowingly supporting things that add to those risks.

We need projects like the proposed Lower Thames Crossing stopped, and better more sustainable options put in place to ensure a health sustainable future for all.

## Flood & coastal risk management outcomes

We note that in this section of the consultation<sup>4</sup> your map shows the areas most impacted by the proposed Lower Thames Crossing marked as P3 or P4.

### Thames Estuary 2100 Policy Management Units



The information details the following:

Policy 3 (P3): Maintain flood defences at their current level accepting likelihood and/or consequences of a flood will increase with climate change.

Policy 4 (P4): Ensure flood defences keep pace with climate change so that flood risk does not increase.

We stress the importance and relevance of the fact that projects like the proposed Lower Thames Crossing would contribute to climate change, and worsen the impacts in these areas.

<sup>4</sup> <https://consult.environment-agency.gov.uk/london/thames-estuary-2100-shaping-the-future-of-the-tham/consultation/subpage.2022-08-26.3841308195/>



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Whilst we understand and appreciate the need to keep reviewing and updating the Plan accordingly, it is vital to ensure that the Plan does not support projects that are worsening the risks.

How can a Plan ever be expected to keep up with climate change if the Plan itself is supporting projects that increase climate change?

We need to be adapting how things are done on a daily basis, and ensuring we find ways to make changes to reduce the risks, not support projects that increase the risks.

At very least our natural flood plains and marshes should not be destroyed, as that only increases the threat and risk too.

### **Flood and coastal risk management outcomes continued**

We are afraid we see very little if anything within the Plan to try and reduce the risks, only talk of how to keep reviewing the risks, and adapt to them. This is not a satisfactory approach and it needs to be improved upon please.

Whilst our comments largely voice concerns in regard to the proposed Lower Thames Crossing, we also know that many of our supporters have serious concerns about building on flood plains and greenbelt.

We are therefore concerned to read in your consultation information<sup>5</sup> that “we are likely to see nearly double the number of properties in the floodplain over the next 50 years”.

Flood plains are not for development, they are to accommodate flooding. It is a vicious circle if we continue to destroy and impact our natural flood plains. It is beyond us how any Plan can support such development.

Again, it should not be about pushing ahead regardless and constantly reviewing and adapting, it needs to be about adapting our behaviour now to ensure we don't reach worst case scenario.

If the Plan is purely going to be about constantly reviewing and adapting to flooding and climate change, then with respect why not just start building The Ark now?

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<sup>5</sup> <https://consult.environment-agency.gov.uk/london/thames-estuary-2100-shaping-the-future-of-the-tham/consultation/subpage.2022-09-23.0134787596/>

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History has proven to us, in instances like Easter Island, that we cannot as a society keep pushing ahead with things regardless of the consequences. They chopped all their trees down to move their huge statues across the island, the result being the island could no longer sustain life for them.

Yet as a society it seems many humans are oblivious to such risks and want to keep pushing ahead with the destruction. We need and deserve better than simply keep monitoring the flood risk and how we can adapt, because it's a never-ending spiral to a point of no return.

As a community group we represent thousands who are aware of the risks of flooding and climate change, and the risks of the hugely destructive and harmful Lower Thames Crossing project.

We don't want to, and shouldn't have to, be constantly fighting for what we need and deserve. We shouldn't have to be fighting such a hugely destructive and harmful projects as the proposed Lower Thames Crossing, because of all of it's serious threats and risks.

We need and want a Plan that protects us and includes measures to ensure the best sustainable and healthy future for us all.

## Delivering the Thames Estuary 2100 Plan

You ask if we understand our responsibilities to deliver the Plan, and what we are already doing to deliver on these responsibilities. You want to know what the biggest challenges are to delivering the Plan.

As a group we are doing all we can to raise awareness of the threat and risks that the proposed Lower Thames Crossing would bring, if it goes ahead. We feel it is essential to oppose such a destructive and harmful project, and take all actions we can to try and stop it.

We feel our actions are part of our responsibility to help deliver the Plan. Ultimately everyone has to take responsibility for their actions and to ensure a sustainable, safe and healthy future for all.

The biggest challenge we have is people and organisations blindly trusting that National Highways are doing the right thing, and not realising that National

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Highways are attempting to mislead people and greenwash such a hugely destructive and harmful project.

We need a Plan that identifies such risks from inappropriate development like the proposed Lower Thames Crossing. We need to see actions to slow down and reverse climate change, not a Plan that just has to keep being updated to reflect the risks from yet more actions that just accelerate and heighten the risks.

### **Place-making and climate resilient growth**

There appears to be a complete contradiction when it comes to what is considered inappropriate development in flood risk areas, and what is considered major critical infrastructure projects.

The Thames Estuary 2100 Plan: 10-year review monitoring key findings<sup>6</sup> for example lists the proposed Lower Thames Crossing as major critical infrastructure.

The reality is that the proposed Lower Thames Crossing is inappropriate development in flood risk areas.

The proposed northern tunnel portals are definitely within an area that is a flood risk area. The proposal includes plans to dump spoil from the tunnelling in the area surrounding the portals. This is an area that is currently a flood plain. To be dumping such huge amounts of spoil would without doubt change the lay of the land, with seriously worrying consequences. It would destroy existing habitats, but also mean that flood water would have to find alternative routes and plains.

This would be bad enough for a project that truly could be considered as critical, but the proposed Lower Thames Crossing would fail against all scheme objectives<sup>7</sup>, and is not fit for purpose<sup>8</sup>.

The areas surrounding both tunnel portals would clearly be spoil dumping grounds, but are also being portrayed as public parks<sup>9</sup>. The reality is that people enjoy the current access along the river that we have, and the fact we have flood plains and marshes, with all the associated species in those habitats. These areas also offer protections to our homes and communities close to the river.

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<sup>6</sup> <https://www.gov.uk/government/publications/thames-estuary-2100-te2100/thames-estuary-2100-key-findings-from-the-monitoring-review#people-property-critical-infrastructure-and-policy>

<sup>7</sup> <https://www.thamescrossingactiongroup.com/ltc-project-objectives/>

<sup>8</sup> <https://www.thamescrossingactiongroup.com/ltc-not-fit-for-purpose/>

<sup>9</sup> <https://www.thamescrossingactiongroup.com/new-parks/>



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We have serious concerns about such projects being progressed for so many reasons. In regard to this consultation the key points would be that we don't want to see the destruction and loss of our flood plains and marshes, or the increased risk to our safety, lives, health and wellbeing, and the natural environment.

It should not be about pushing ahead with developments and projects like the proposed Lower Thames Crossing and then looking for ways to build higher and stronger flood defences, we need to stop allowing such destructive and harmful projects to be progressed.

We need to see a stop in the constant development in the name of economic growth, which often never materialises, especially with projects like the proposed Lower Thames Crossing that would do more harm than good.

We need to see genuinely sustainable and green plans that benefit everyone and our environment. We stress that the Plan should not and cannot purely focus on how we keep reviewing and updating our ways to adapt to climate emergency, we have to ensure we slow down and start reversing man-made accelerated climate change.

We cannot keep pushing ahead in the name of economic growth. Try counting your money when there is no clean air to breathe, clean water to drink, healthy food to eat, and/or you're homes and communities are under water.

## **Securing investment to deliver the Plan**

We recognise that investment would be needed to deliver a plan for dealing with the serious issue of flooding, and to help ensure the best outcome for all moving forward.

However, it is also essential that the focus isn't purely on constantly adapting to climate emergency and how we adapt. We need to see real actions to ensure that behaviour is not simply accelerating and worsening climate change.

We need to see sustainability, climate change, and our natural environment prioritised over economic growth.

We need to see communities being genuinely listened to and that their safety, health and well-being is prioritised. Also, that communities are not denied access and options to connect with and enjoy the river as part of our natural environment.

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All too often when it comes to climate change and the environment there is too much greenwashing going on.

Investment should not come from a place of companies trading investment in exchange for them being allowed to move forward with actions that increase impacts to the natural environment and speed up climate change. We need to hold people and companies responsible and accountable for their actions, and steps taken to stop and reverse man-made climate change and environmental destruction and harm.

A safe, health, sustainable future is essential for all. We need investment into genuinely green, sustainable, and circular progress, no greenwash, and no destructive and harmful actions allowed.

## **Sustainability and monitoring**

Carbon emissions need to be taken very seriously, especially the cumulative emissions and their impacts. All too often this is being ignored and overlooked. All too often there are too many attempts to greenwash.

The proposed Lower Thames Crossing is estimated to emit around 6.6 million tonnes of carbon, if it goes ahead. The Plan cannot be supporting such projects, we need to see actions taken to ensure the Plan and all partners are in no way directly progressing or supporting such projects. Carbon emissions will be a large part of what increases the risks of flooding and climate change moving forward. As the Climate Change Committee have stated, "New roads should only be built if they can be shown not to increase emissions".<sup>10</sup> It is therefore essential that the Plan take this into account and should include measures to ensure such projects are not encouraged and supported.

We need more than a Plan to deal with the worst case scenario, we need actions to ensure the worst case scenario doesn't keep worsening.

It is essential that our communities are listened to and heard. It is vital that our safety, health and wellbeing, and standard of living is always considered and actions taken to ensure the best outcomes for all.

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<sup>10</sup> <https://www.theccc.org.uk/publication/2021-progress-report-to-parliament/>

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It should always be remembered that the river is for all, and should not purely be treated as a means to economic growth. It is important that communities and the natural environment are not disconnected from the river.

Many areas along the Thames Estuary in particular have a lower standard of living, we live in areas with already illegally high levels of air pollution, higher numbers of cases of serious illness. It is essential that any plans ensure the best outcome for all moving forward.

Our country is one of the most nature depleted countries in the world. We need to be ensuring that no more habitat and no more species are impacted, put at risk, or lost. We need to be saving and protecting our natural environment, habitats and wildlife. There is obviously a very close link between climate change and the impacts to our habitats and wildlife depletion. Flood plains are of course habitats in their own right, as is the river. It is not just the marine/river habitat and flood plain and marsh habitats that we need to consider though, it is all habitats because everything is connected. With climate change and increases in things like flooding risks are increased everywhere.

We are also suffering with increasing amounts of water pollution because of water companies poor management and unacceptable behaviour. This needs to be recognised and considered in regard to flood risks, as it of course has implications to the natural environment and to our health and wellbeing.

We need a plan, but also importantly actions, to back up talk of saving and protecting habitats and species, and our natural environment as a whole.

We need independent monitoring and assessments being carried out, followed by actions to ensure the best outcome for all moving forward.

### Policy Unit specific outcomes

We understand there are differences in the many areas along the River Thames, and indeed in the river itself at various points. We also understand that it helps and benefits the process to consider each area separately.

However, we are also very aware that the impacts on any part of the river can result in implications to areas along the entire river, so an overall picture must also be considered.

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As we have previously stressed we have serious concerns that the Plan appears to focus on adapting for worst case scenario rather than also working to ensure actions to stop the worst case scenario worsening.

Our response to this consultation focuses purely on our position as a group representing those who are opposed to the proposed Lower Thames Crossing. We have serious concerns about the impacts it would have on existing flood plains, if the proposed Lower Thames Crossing goes ahead.

We need and want to see the Plan updated in a way that recognises the threat and risks of such projects, and measures put in place immediately to ensure such projects are not supported and progressed.

### **Structure of the updated Plan**

There appear to be some good aspects listed for the updated Plan in the consultation information. However, we do not believe that anything in this consultation has really been presented in a way that is clear and informative to actually be able to fully understand what is being proposed. It feels like a consultation about preparing for a consultation to plan a plan update.

The important thing with any and all of the Plan should be that as many people as possible are encouraged and able to take part, with clear and informative consultation and materials please.

Also, that any Plan needs to ensure it is not simply planning for the impacts of things that would increase the risk of flooding, when proper planning and opposition when necessary could do more to prevent the risks and impacts. We need a Plan that stops the risk level increasing, not just one that adapts as the threat level increases because necessary actions are not being taken to stop things getting worse.

### **70. How useful are these features when using the updated Plan?**

**(Rate 'Not useful at all', 'Somewhat useful', 'Neutral', 'Extremely useful', 'Very useful')**

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*Short video introduction, Links to relevant plans and strategies, Downloadable slide packs on key principles, Interactive map showing outcomes by location, Interactive map postcode search, Downloadable GIS datasets and map layers, Clear signposting to supporting information, A glossary of terminology, Email alerts for updated content*

Firstly, we comment on the fact that it is very misleading to have 'extremely useful' listed before 'very useful'. Most people would rate 'extremely useful' higher and of more importance than 'very useful'.

We would consider all the above options to be extremely useful moving forward for the kind of people who should be participating in such consultations. That said we are not entirely sure exactly what 'downloadable slide packs on key principles' would entail and whether they would be needed to be downloaded by most. Also, that the 'Downloadable GIS datasets and map layers would clearly be more aimed at those of a more technical mind.

We'd also comment that the above was not presented in a way, within the form, that allowed the whole thing to be clearly and easily viewed. The last column which appears to relate to email alerts cannot be scrolled across to view completely.

Finally, we do not feel this consultation and the questions really make it clear what you are consulting on, or what information is actually available now. It would be extremely helpful moving forward if there are to be more consultations or plans presented for it to be done in a way that is clear and informative, so that everyone has the opportunity to be able to view and understand it as easily as possible without being too complex. It would also be essential that any information is shared in a way to ensure as many people as possible are made aware of it. These kinds of things are often more geared up for businesses and local authorities rather than members of the general public.

**We would like to thank you for the opportunity to take part in the consultation, and hope you will find our response 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)**