

# THAMES CROSSING ACTION GROUP

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## 'Connecting the country: our long-term strategic plan to 2050' Consultation

### **Introduction**

Thames Crossing Action Group (TCAG) is a community action group who represent thousands of people who are opposed to the hugely destructive and harmful, not fit for purpose £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).

This paper was prepared and submitted by Laura Blake, Chair of TCAG on behalf of the group in response to the 'Connecting the country: our long-term strategic plan to 2050' Consultation<sup>1</sup> in August 2023. As Thames Crossing Action Group represents those opposed to the proposed LTC our consultation response will be in that regard. Our response is not confidential. TCAG can be contacted via email – [admin@thamescrossingactiongroup.com](mailto:admin@thamescrossingactiongroup.com).

### **Reason for responding**

As a community action group we have gained a lot of knowledge and experience, as well as now having had many years of dealings with National Highways and others.

Over this time we have managed to get a good insight into what's what and what a lot of people want and hope for when it comes to the future, particularly in regard to roads, transport and travel.

We know that more and more people don't want destructive and harmful road projects. Instead we want more sustainable options, more integrated travel, and less misleading propaganda and greenwashing from National Highways.

We want to see a future where roads are not the main priority, and that instead investment into transport and travel is put into sustainable integrated options. We want National Transport or National Travel, not National Highways.

This is why we felt it important for us to respond to this consultation.

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<sup>1</sup> <https://nationalhighways.co.uk/our-roads/future-roads/connecting-the-country/>

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## Response

*Do you feel that the Connecting the country: Our long-term strategic plan reflects your view of what the future of the Strategic Road Network should be?*

Not at all.

When we read that you identify the need for you to continually review societal challenges and your response to them, after commenting on the serious issues of climate change and decline in our natural environment, it concerns us. In our experience of dealing with National Highways over the years, it is perfectly clear to us that your response to such issues is to greenwash, which is unacceptable.

You go on to about your move to a 'decide and provide' approach, and state that you are increasingly proactive in shaping the future **you** want for your customers and network. NH need to remember that you are a Government company and work for the people of this country. It should not be what **you** want, it should be what **we** want. Sadly though, we do not believe you genuinely have any interest or care about what we want.

There seems to be way too much focus on supporting and thereby encouraging more road use moving forward, which is not sustainable, or acceptable at a time of climate emergency. More roads/lanes leads to more traffic, more traffic leads to more congestion, more congestion leads to calls for more roads, and so the vicious downward spiral goes. This has to change, and for that to happen the spiral needs to be stopped, we need to see investment, support and encouragement of modal shift away from unsustainable roads. Many travel by roads not because they particularly want to, but because there is no other viable option. We need safe, reliable, affordable integrated sustainable travel options.

In a similar vein, economic growth for the sake of it is not sustainable either, and what some consider to be levelling up many consider levelling down. Many of us prioritise saving, protecting and enhancing our natural environment, our right to breath clean air, for clean water, and healthy soil for growing the food we eat. Many of us want to enjoy our time outdoors, and value the health and well-being benefits that brings. Many of us would prefer to travel by safe, reliable, affordable public transport and active travel, instead of having to rely on driving since there is no other viable option.

Some things are more important than money. Try counting all that money without clean air to breathe, clear water to drink, and healthy soil to grow food.

The Climate Change Committee have called for an urgent review on current and future road building.

The Transport Select Committee have called on Government to reconsider expensive complex road projects.

And yet this plan reads as though it simply business as usual for NH and roads. We need and deserve better.

We need a future where NH is abolished and replaced by National Transport or National Travel that covers investment, management and maintenance of sustainable integrated travel/transport.

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## ***Do you feel that national corridors, inter-regional routes and regional connections are the correct categories for the Strategic Road Network?***

Not at all

There is actually no real information at all provided on these categories, you are just listing things without any level of detail or clarity of which roads would fall into which category, it's all open to interpretation of which category you would choose to place each road in, and we have no doubt that would be all about what suits your needs and wants at the time.

We cannot even trust you with classifying road types. The proposed LTC was always referred to as a motorway using 'smart' technology, until the dangers of 'smart' motorways came to the fore, then you backed away from referring to the LTC as a motorway. Now you are progressing it as a 'smart' motorway by stealth. Calling it an All-Purpose Trunk Road, but when you dig into the detail it is being coded as a 3 lane motorway (with the exception of the southbound section between the M25 and A13).

The information you provide gives no real information or clarity on what you propose with the categorisation, and for that reason we are unable to support the categorisation.

## ***Do the nine focus areas match your view of where we should focus the future of the Strategic Road Network?***

No

Firstly, even if we may agree and support some of the future focuses, we definitely do not trust NH to fulfil them in the way we would want, need and like.

There is also growing evidence that most people want better management and maintenance of our existing road network, and our local road network. We need better management of the SRN, better maintenance, and investment needs to be better balanced to also ensure our local road networks are better managed and maintained too. For too long too much investment has been made into NH and the SRN, and overlooking the impacts the SRN has on our local road network, if for no other reason that people use the local roads to get to and from the SRN.

To top it off there is also no focus at all that we can see on supporting and encouraging modal shift. But then we wouldn't expect anything else from NH, since your priority is roads and ensuring your own future and existence rather than what is best for everyone and the environment.

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*Growth & levelling up*

Do you feel the trends outlined for 'Growth and Levelling up' reflect your view of the future? (pages 17-20)

Not at all

Firstly, and very importantly, we do not believe that the SRN is vital to the success of the national economy. There are far better and more sustainable ways forward in regard to transport and the national economy.

NH projects, like the proposed LTC would waste huge amounts of taxpayers' money, since the project fails to meet scheme objectives, is not fit for purpose, and would not solve the very problems it is tasked with fixing. It would be hugely destructive and harmful which is a cost we ill afford at the best of times, let alone at a time of climate emergency. Not to mention the cost on our health and well-being, and the associated costs to NHS. It fails to offer any provision or support for modal shift, with no possibility of cross river active travel, and failing to be viable for public transport/buses due to a lack of adequate connections.

You quote the amount of people using their car to get to work as though it is a reason and excuse for more investment. The reality is that many people have to use their cars because there is simply no other option. We need more investment into more sustainable integrated transport options, not more focus and investment into roads alone.

We again stress that what some consider to be Levelling up others deem to be Levelling down, as highlighted previously.

Do you feel the vision outlined for 'Growth and Levelling up' reflects your view of the future? (Page 52)

Not at all

We do not believe that growth for the sake of growth is always a good thing, we question what is considered to be Levelling Up and often consider what is being claimed as Levelling Up to actually be Levelling Down. With NH proposing to spend such a huge percentage of the RIS2 funds in the South, South West and South East we have no reason to have confidence in NH delivering on what they present in regard to equal opportunity across the whole country/network.

Do you feel our delivery plan outlined for 'Growth and Levelling up' reflects your view of the future? (Page 56)

Not at all

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You say subject to the continued robustness of scheme business cases, you will progress identified enhancements, including the proposed LTC.

We have serious concerns that the business case for the proposed LTC is being presented in a misleading way. It is most definitely outdated, and does not include all works that would be needed as a direct result of the project, there are false economies.

The cost has already risen from £4.1bn up to £9bn, and the adjusted Benefit Cost Ratio dropped from 3.1 down to 1.22, and those are as at August 2020. The cost of everything has risen considerably since then and will continue to rise. The two-year rephasing will add to the cost further. This is a project that should and needs to be scrapped NOW.

You say equity and sustainability will be at the heart of the SRN at 2040, this is trying to close the stable door after the horse has bolted. The amount of destructive and harmful road projects you are attempting to push through before this, being the bolting horse.

You have the power to shut the stable door securely now and stop the bolting horse, yet instead you seem intent to just sit and watch the open door and ignore the horse bolting.

The reality of what we need in 2050 and sooner is a big move away from the predominant focus on roads and more investment into more sustainable integrated transport. We need levelling up of our options, we need levelling up of our air, water and soil quality, we need levelling up of environmental protections and safeguarding, we need levelling up that secures a sustainable healthy future for everyone.

## *Car travel*

Do you feel the trends outlined for 'Car travel' reflect your view of the future? (Pages 21-23)

Not at all

Why do you assume population growth has to impact demand for road travel? Why not demand for public transport, active travel, more sustainable options?

Plus, if the population grows they will need places to live, water to drink, food to survive, and a healthy environment to support their existence. More people using the SRN leads to more congestion, more congestion leads to calls for more roads. More roads leads to more loss of land, more destruction and harm.

Where will these people live with less and less land? Where will the clean water and healthy soil to grow the food come from when roads are destroying our agricultural land (not only in land take but also through pollution), and our water courses are being polluted by things like PM2.5 and nitrogen deposition?

With moves to Electric vehicles there is also the question of where the energy will come from for so many vehicles. Investment into more energy supplies just leads to even more loss of land and environmental

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impacts, which is already being seen with the amount of agricultural land being lost to solar farms, when there are other places to put solar panels that would be less impactful. Loss of agricultural land again leads to increases of food miles travelled, and all the associated environmental impacts of that.

On the topic of EVs, we do not believe they are the panacea many like to portray, and they are definitely not zero emission. We are concerned that one problem is being replaced with another, as EVs emit deadly PM2.5, and with some believing EVs are greener will be more likely to be inclined to drive more, further increasing congestion and pollution. EVs do not solve the issue of congestion, that is for sure.

Assuming it is ok to carry on as though it is business as usual is not sustainable, and it is not acceptable.

The reason why road travel remains the most common mode of transport is because it is the main focus for investment. If similar amounts of investment were instead made into public transport and active travel things would change, and that is a change we need to see for a sustainable future.

The Climate Change Committee have also called for an urgent review into current and future road building.

Many have concerns about new technologies, particularly for road use. 'Smart' motorways are anything but smart, they are dangerous, and the tech is not up to the job. Many have concerns about autonomous vehicles. If people don't want to actually be driving their vehicles there are options that don't involve having to actually drive, public transport!

In a similar way to investment into public transport and active travel would support and encourage modal shift, so could investment into national broadband to allow more people to work from home. COVID19 showed what is possible, and with improvements to broadband more people could efficiently and effectively work from home, thus reducing their need to use the SRN.

Changes in leisure trends caused by the pandemic have also seen the public's connection with the natural environment grow and strengthen more. We do not want to lose that connection or our natural environment to road building.

Do you feel the vision outlined for 'Car travel' reflects your view of the future? (Page 52)

Not at all

It is quite apparent from the proposed LTC that NH's plans for the future will not resolve current issues and concerns, it would actually be the reverse as things would worsen.

We do not believe that the future has to be, or should be, focused on roads. We want and need modal shift, and a future with focus, support and investment in more sustainable integrated transport.

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## Do you feel our delivery plan outlined for 'Car travel' reflects your view of the future?

(Page 57)

Not at all

The proposed LTC, if granted permission, would not be open until after 2030. It is therefore impossible to believe any of the claims being made for 2030, particularly in regard to modal shift. The proposed LTC would offer no provision for cross river active travel, and would not be viable for public transport/buses due to the lack of adequate connections.

The claimed walking, cycling, and horse riding routes, are often realignments of existing routes that would be needed due to the alignment of the proposed LTC.

If you can't lead the way and set an example with the largest most expensive road project in the country then why should we have any confidence in any of your claims? Such a huge investment should ensure a long shelf life of the infrastructure, and clearly that would not be the case of the proposed LTC, which is outdated and not fit for purpose now let alone once opened, if permission is granted.

## *Freight & Logistics*

## Do you feel the trends outlined for 'Freight & logistics' reflect your view of the future?

(Pages 24-27)

Not at all

There is no reason why the majority of future freight needs to travel on the SRN. The fact remains that as long as the focus and investment is on roads rather than alternatives nothing is going to change.

Why do we need a new road crossing, the proposed LTC, to provide another route for road freight between the South East and the Midlands and beyond? Why don't we instead invest in rail improvements between Ashford and Reading, to get more freight off roads and onto more sustainable rail?

It is not right that in this day and age the Port of Dover is not connected by rail. 70% of goods in and out of this port alone use the Dartford Crossing. 42% of traffic using the current crossing are goods vehicles. For far less money than the proposed LTC rail improvements could be made with a better and more sustainable outcome.

You talk about carbon emission reductions on roads, but we doubt that this includes the carbon emissions from construction of new roads, like the whopping 6.6 million tonnes of carbon estimated for the construction of the proposed LTC, if it goes ahead. There is also little if any evidence that the decarbonisation of road traffic will be met quickly enough.

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## Do you feel the vision outlined for 'Freight & logistics' reflects your view of the future?

(Page 52)

Not at all

Road freight is not critical to the national economy, in fact it is critical that we move away from road freight, and reduce miles travelled of our goods etc. Again, we need focus, support and investment into more sustainable alternatives instead of road. But NH continue to attempt to push ahead with road projects without any proper and adequate consideration of more sustainable alternative options, as has been seen with the proposed LTC.

## Do you feel our delivery plan outlined for 'Freight & logistics' reflects your view of the future? (Page 58)

Not at all

Again the proposed LTC would not be open by 2030, if it goes ahead. Yet you expect us to believe that you care and aim to develop multi-modal freight corridor strategies, when rail improvements between Ashford and Reading would negate the need for the proposed LTC, and get more freight off the roads and onto more sustainable rail, and cost far less than the proposed LTC.

Your focus throughout is to support and encourage road use, which we can only guess is so you safeguard your own future as an organisation.

## ***Safety***

## Do you feel the trends outlined for 'Safety' reflect your view of the future? (Pages 29-31)

Not at all

The fact that NH continue to recognise the dangers of 'smart' motorways gives us no confidence in any claims you make about safety. You failed to deliver on what was signed off by government in regard to 'smart' motorways, and continue to operate with zero duty of care for road users, this is unacceptable.

Neither can we take seriously claims of visions of there being zero harm on roads. Of course we don't want people being killed and injured on our roads, but the reality is roads are dangerous, and zero harm is completely unrealistic.

The proposed LTC alone, a NH project, is forecast to increase accidents, including fatalities and serious injuries. So again, how are we supposed to have any confidence or trust in any claims of safety from NH?

Whilst new 'smart' motorways have been scrapped, the existing ones are still dangerous. This needs to be addressed urgently, and could easily and quickly be rectified immediately by putting the red X above the

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first lane on 'smart' motorways, turning them back into a hard shoulder. A simple solid line painted back between lane 1 and 2, resulting in lane 2 becoming lane 1, and hey presto we have a hard shoulder again, increasing safety.

To look to autonomous vehicles as a way to 'improve' safety is not logical either, since they rely on technology that can easily be hacked or fail. Who sits there deciding who should live or die, be injured or protected when a car is in certain situations? How can a standard programme be expected to reliably make those decision when every incident will be unique?

A future with autonomous vehicles on 'smart' motorways with all the technology failings and risks is a scary one, that offers little if any confidence in improved safety on our roads.

## Do you feel the vision outlined for 'Safety' reflects your view of the future? (Page 53)

Not at all

As already mentioned we have no confidence in NH to deliver on safety, as you continue to fail to recognise the dangers of 'smart' motorways, fail to take responsibility for your failure to deliver what was signed off and the resulting dangers, fail to recognise the need to bring back the hard shoulder on existing 'smart' motorways. You continue to attempt to push ahead with the proposed LTC, a 'smart' motorway by stealth. And your vision of zero harm for the SRN is unrealistic, which does nothing to reassure us of your visions for the future and our safety.

## Do you feel our delivery plan outlined for 'Safety' reflects your view of the future? (Page 59)

Not at all

As we keep repeating we have no confidence in NH when it comes to road safety, so as long as the plan is being delivered by NH we have no confidence in the plan.

## *Digital*

## Do you feel the trends outlined for 'Digital' reflect your view of the future? (Pages 32-35)

Not at all

The initial part of this section seems to focus on construction of new roads, when we question the need for new roads. As we have stressed many times previously, we need to move away from a predominant focus and investment into roads, and move to more sustainable integrated transport.

The majority of people want to see maintenance of our existing roads, not more new roads.

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'Smart' infrastructure sounds similar to 'smart' motorways, and as already highlighted confidence in those is practically non-existent.

We have already commented on concerns about autonomous vehicles previously in regard to safety. We again stress if people want to travel but not physically have to drive themselves there needs to be better public transport.

We do not have any confidence in endorsements for autonomous vehicles and 'smart' technology on the SRN from an organisation that brought us the dangers and horrors of 'smart' motorways.

## Do you feel the vision outlined for 'Digital' reflects your view of the future? (Page 53)

Not at all

We do not believe a future with increasing digital technology will be a good idea or a safe one for all the reasons previously highlighted. We have concerns that far from improving the SRN, it would add risk, danger and further issues.

## Do you feel our delivery plan outlined for 'Digital' reflects your view of the future? (Page 60)

Not at all

There are better things to focus on and invest in than digital technology on our roads, especially when what NH are already using is failing and putting our lives at risk.

## ***Decarbonisation***

## Do you feel the trends outlined for 'Decarbonisation' reflect your view of the future? (Pages 36-38)

Not at all

It is quite apparent that NH just attempt to greenwash when it comes to decarbonisation and environmental issues.

Again, we stress that there is no reason for most journeys to be made by road in 2050, or even sooner. We need to see modal shift, not business as usual as previously stated.

There is no evidence that transport decarbonisation, particularly in regard to road transport, will be met quickly enough.

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It is also not acceptable for NH to make claims about net zero futures, while still progressing with projects like the proposed LTC, with an estimated 6.6 million tonnes of carbon emissions in the meantime. That is shutting the door after the horse has bolted.

We again stress the Climate Change Committee's call for an urgent review into current and future road building.

Moves to EVs and hydrogen just result in a need for more energy to be produced which has its own environmental impacts and implications. Not to mention the energy shortages we already face as a country being stressed further. Along with the fact that the supporting infrastructure is simply not there, and investment could be better placed in improvements to more sustainable public transport alternatives.

The resources needed for production of such vehicles is also not infinite, they also have negative impacts on the natural environment, and people's health and wellbeing.

Green hydrogen uses considerable amounts of electricity in production, compared to the actual resulting power.

Non-fossil fuel vehicles do not solve the issue of deadly PM2.5 either, as they still emit brake dust, tyre and road wear. PM2.5 can travel thousands of miles and are deadly, impacting not only our health, but also polluting the water we drink and the soil we grow our food in, as well as impacting the natural environment, wildlife and habitats.

## Do you feel the vision outlined for 'Decarbonisation' reflects your view of the future?

(Page 53)

Not at all

Trying to push ahead with a project like the proposed LTC, which is estimated to emit 6.6 million tonnes of carbon (if it goes ahead) shows just how little you are committed to Net Zero and decarbonisation. There is no evidence to back up any of the claims made about decarbonising the SRN, and it is clear that what NH propose for the future will not address climate change, rather it would very worryingly worsen and add to it.

## Do you feel our delivery plan outlined for 'Decarbonisation' reflects your view of the future? (Page 61)

Not at all

The claims being made are unbelievable. We state again that the proposed LTC would not be open by 2030, and that certainly isn't compliant with Net Zero. It is impossible to trust or have confidence in anything NH declare on decarbonisation. There is no evidence to back up claims, and way too much greenwashing.

## *Customer Experience*

### Do you feel the trends outlined for 'Customer Experience' reflect your view of the future? (Pages 40-42)

Not at all

It is quite apparent from looking at the proposed LTC project that NH are not serious about solving congestion on our roads.

The design capacity for the Dartford Crossing is 135,000 vehicles per day, yet it regularly sees 180,000 per day. That means we'd need to see a reduction of more than 25% to bring it back below design capacity. Yet the proposed LTC would take around 19%, dropping to 13% in 2045. This was the prediction before the two year rephasing of the LTC was announced. Since the reduction drops year or year, it would not even be 19% by the time it opens, if it goes ahead.

Independent analysis of the official NH traffic modelling also concluded that the reduction could be as low as 4% in the am peak hour and 11% in the pm peak hour.

If the LTC goes ahead it is predicted there would be around a 50% increase in cross river traffic further adding to traffic levels and congestion.

NH are not planning how traffic would migrate between the two crossings when there are incidents, if the LTC goes ahead, and there would not be adequate connections resulting in even more chaos.

For example, incident at the Dartford Tunnels, traffic comes off the M25 onto the A2 coastbound to get to the LTC, only to find there would be just one single lane from the A2 onto the LTC.

Similarly, incident at the QE2 Bridge, traffic comes off the M25 onto the A13 eastbound, only to find there would be no direct access to the LTC. Instead it would have to go all the way down to the A1014/Stanford junction, up around the already busy and traffic lighted roundabout (alongside Thames Freeport and other traffic) back westbound on the A13 to the LTC slip road just past, but not accessible from, the Orsett/A128 junction. If instead traffic came off the M25 directly onto the LTC, the M25 would be 5 lanes at this point going onto 2 lanes southbound on the LTC until past the A13. Again, resulting in chaos.

Of course, the lack of adequate connections also goes towards ensuring future work for NH, and securing their future existence. This cannot continue.

Failure to deliver the LTC successfully is actually an existential threat to NH as an organisation, which is why we believe you continue to try and push ahead with it, regardless of the fact it is not fit for purpose.

None of this shows any genuine consideration of improving customer experience.

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## Do you feel the vision outlined for 'Customer Experience' reflects your view of the future? (Page 54)

Not at all

Again our experience of dealing with NH for years in regard to the proposed LTC is reason enough that we do not feel that NH truly understand what offering good customer experience is, or that they genuinely care about road users, our safety, reliability, or our health and wellbeing and a sustainable future for everyone.

## Do you feel our delivery plan outlined for 'Customer Experience' reflects your view of the future? (Page 62)

Not at all

Again, it is quite apparent that there would not be reliable journey times on the SRN, particularly in regard to the Dartford Crossing and LTC, if it goes ahead, for all the reasons already highlighted. If NH can't get it right for the largest, most expensive project in the country there is no reason to believe they can get it right at all, now or in the future.

### ***Sustainable network development***

## Do you feel the trends outlined for 'Sustainable network development' reflect your view of the future? (Pages 43-46)

Not at all

We can in no way believe or trust NH when it comes to environmental issues and concerns, as we have experienced too many greenwashing attempts in regard to the proposed LTC.

Ambitions, aims, targets etc are all speculative and come with no guarantees, we cannot afford to be taking such a gamble on our future when clearly NH have no evidence to back up reaching their visions, aims, targets etc.

Roads negatively impact the natural environment. Species are in decline it is true, but NH still attempt to push ahead with hugely destructive and harmful projects like the proposed LTC, and others, that would destroy valuable habitat and impact protected species.

There is no proven mitigation for the bats when it comes to new roads.

NH are proposing translocating water voles to new habitat that is known to have a presence of their main predator, mink.

There has also been creative accounting for environmental mitigation and compensation with the proposed LTC. Hole Farm Community Woodland is being progressed by NH to 'improve' biodiversity along

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their major routes, and this will be progressed regardless of whether the proposed LTC goes ahead or not. Yet NH are also trying to claim Hole Farm Community Woodland as environmental mitigation and compensation for the LTC project. It's not on.

On the topic of woodland and tree planting, evidence shows that large percentages of the trees NH have planted have failed because they are not being managed and maintained adequately. This shows that NH have no real commitment to a sustainable network or the natural environment.

New Biodiversity Net Gain requirements come in for NSIPs in Nov 2025, prior to the start of LTC construction, if it is granted permission. A project that NH like to claim is leading the way, a path finder, the greenest road ever built. Yet far from best practice, the LTC would fail against the new requirement.

Spending time in nature is beneficial for our health and wellbeing, but our ability to enjoy our local communities and natural environment is being reduced due to roads and projects like the proposed LTC.

It is not only the environmental impacts, and impacts to our health and wellbeing, but the associated costs too. You state such a cost at up to £18.6bn, yet again you are still happily trying to push ahead with the proposed LTC at what is predicted to be a cost of £10bn+++ by many including some MPs.

The whole proposed LTC route would fail against newly set legal targets for air pollution PM2.5. It is ludicrous that NH are proposing spending such a large amount of public money on a project that would worsen air quality and contribute towards rising costs of the NHS.

Nitrogen deposition from the proposed LTC would not be able to be mitigated, instead poor compensation is being proposed, that Natural England are not happy about.

## Do you feel the vision outlined for 'Sustainable network development' reflects your view of the future? (Page 54)

Not at all

It is quite clear that NH focus on environmental matters is to attempt to greenwash. If you in any way truly valued our natural environment you would not continue to be pushing a road focused future, and definitely would not be attempting to push ahead with hugely destructive and harmful projects like the proposed LTC.

## Do you feel our delivery plan outlined for 'Sustainable network development' reflects your view of the future? (Page 63)

Not at all

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As already highlighted, the proposed LTC would not be open by 2030, and since it would be such a hugely destructive and harmful project we can in no way trust, believe, or have any confidence in anything NH say in regard to sustainability, there is way too much greenwashing and way too many adverse impacts.

## *Asset Resilience*

Do you feel the trends outlined for 'Asset Resilience' reflect your view of the future?

(Pages 47-50)

Not at all

We agree that there is a need for renewal/maintenance of the aging SRN. However, we question how NH predict they can adequately manage and maintain the SRN with these renewals when they are attempting to blow a huge budget, covered by public money, on new road projects. The priority needs to be on taking care of the existing road network, not new roads.

It is true that the SRN will be impacted by climate change, as will everything, but NH again continue to attempt to push ahead with hugely destructive and harmful projects, like the proposed LTC, that will only add to the problem. Not only directly from environmental destruction and harm, and huge carbon emissions, but also from things like the land take. Loss of agricultural land, including grade 1 listed land has knock on effects of greater food miles being needed, thus putting more pressure on the environment and further contributing to climate change.

Mention of cyber risk is concerning when NH are looking to move more and more towards being technology enabled, 'smart' technology, and supporting autonomous vehicles. Is knowingly moving towards a future with such risk really wise and viable? What would the impacts be on safety? Since NH have proven that they cannot be trusted in regard to road safety and technology, with everything relating to 'smart' motorways this is not something we have confidence in NH to deal with moving forward.

Do you feel the vision outlined for 'Asset Resilience' reflects your view of the future?

(Page 54)

Not at all

Whilst we want to see the existing SRN better managed and maintained, we do not feel that NH will go about it in the right way, it would not be sustainable, and is too focused on digital technology, which they have already proven in regard to 'smart' motorways is not effective or efficient and puts people at risk.

Do you feel our delivery plan outlined for 'Asset Resilience' reflects your view of the future? (Page 64)

Not at all

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Where do you think you would be getting funding for all the renewals you need to do, especially if you continue to push ahead with projects like the proposed LTC and others? We need a stop to new roads and instead invest in the required renewals, and support for modal shift to more sustainable alternatives.

## **Other comments**

The opening sentences of the Foreword of *'Connecting our country: our long-term strategic plan to 2050'* just about sums up what is wrong with this plan, and what is.

*"Roads will continue to be the most common mode of travel through to 2050 and beyond. They provide a convenient and practical way to see family and friends, commute to work and deliver goods across the UK. They are fundamental to our economy and the wider transport system, hosting almost nine out of ten passenger miles and 79% of freight travel."*

The main reason why roads are the most common mode of travel is because there is far more investment into roads, than other modes of travel.

Many would like to be able to use public or active travel options, but the options are not there, are not reliable, not safe, not affordable.

Roads are not sustainable, and this is a major issue that needs addressing immediately. There is no way we should be continuing with this focus moving forward, let alone as far ahead as 2050.

One of the major problems is National Highways. The clue is in the name, Highways. We need sustainable integrated travel/transport. We need National Travel or National Transport. National Highways needs to be abolished and replaced with an organisation that covers all modes of transport equally.

Evidence shows that building more roads does not solve the issue of congestion. More roads lead to more traffic, induced demand. More traffic leads to calls for more roads. It's a vicious downward spiral that needs to be stopped now.

Road building is also hugely destructive and harmful, something we cannot afford at a time of climate emergency.

Taking more and more land for roads is not sustainable. For projects like the proposed LTC much of that land is agricultural land, including some grade one listed land. At a time of food security issues we cannot afford to be losing valuable agricultural land. We need to be focusing on sustainable farming, and local food supplies. The more land we lose the more we will have to rely on imports which increases food security risk, and increases the miles our food has to travel, putting further pressure on our environment.

Again, the focus of freight is on roads, when we need to be seeing a move to more sustainable rail freight. For too long everything has focused on London, and with it being at capacity for rail it has been all too easy to use this as an excuse. This cannot continue.

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In this day and age, why is the Port of Dover, for instance, not connected by rail?

In conclusion, whilst we recognise some of the challenges and issues, and agree that they need to be resolved, we simply do not trust NH are genuinely capable of adequately identifying and rectifying our concerns and the challenges ahead.

The best plan for the future in regard to National Highways and the Strategic Road Network is to abolish NH and replace them with an organisation that focuses on more sustainable integrated transport and travel, we need National Transport or National Travel.

**We thank you for the opportunity to comment in response to this consultation. Should you wish to discuss our comments, or the topic with us further, please do not hesitate to contact us.**