

THAMES CROSSING ACTION GROUP

www.tcag.info

Route Strategies Initial Overview Reports 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.

This paper was prepared and submitted by Laura Blake, Chair of TCAG on behalf of the group in response to the Route Strategies Initial Overview Reports Consultation¹ 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.

Reason for responding

Since we represent those opposed to the proposed Lower Thames Crossing, we will be responding to this consultation on the three Route Strategy StoryMaps and Reports which cover the areas the proposed LTC would pass, if it goes ahead, *London Orbital and M23*^{2 3}, *East of England*^{4 5} and *Kent Corridors to M25*^{6 7}.

We note the online form has a number of confusing errors:

In each form in the section 'Please select which chapters you would like to comment on for the selected route: INSERT ROUTE', under (6) Initial Route Objectives, you request feedback on Chapter 6 objectives. However, you label the objectives by number, when in the reports in Chapter 6 the objectives are labelled by letter.

Also, in the forms for East of England and London Orbital and M23 routes, you have duplicated Chapter 6 – Objectives 6 for Objective 7, thereby not including the wording for the actual Objective 7.

We have therefore chosen to respond via email to ensure the correct info can be submitted without any confusion or misunderstanding.

We have broken our response into the three different Routes, in keeping with the request for submission of one form per Initial Overview Report to avoid any confusion as to which Route we are responding to.

¹ <https://nationalhighways.co.uk/our-roads/our-route-strategies/>

² <https://storymaps.arcgis.com/stories/314e92b887ab4e4cad6c20996fe2c6f0>

³ https://nationalhighways.co.uk/media/zoqp53rx/r16-london-orbital-and-m23_acc.pdf

⁴ <https://storymaps.arcgis.com/stories/1f982ac2c17e41588744195235158285>

⁵ https://nationalhighways.co.uk/media/aofgdtcp/r12-east-of-england_acc.pdf

⁶ <https://storymaps.arcgis.com/stories/09193216e0e04ac09a0f0c6df61975ac>

⁷ https://nationalhighways.co.uk/media/jbgh5ham/r14-kent-corridors-to-m25_acc.pdf

Contents

Introduction	1
Reason for responding.....	1
Response for <i>London Orbital and M23</i>	4
General comments on the selected route	4
Objective: Improving safety for all	4
Objective: Network Performance.....	4
Objective: Improved environmental outcomes	7
Objective: Growing economy	8
Objective: Managing and planning the SRN for the future.....	9
Objective: A technology-enabled network.....	10
Selected chapters we would like to comment on for the selected route	10
Chapter 1: Introduction	10
Chapter 2: The Route.....	11
Chapter 3: Engagement with Customers and Neighbours.....	11
Chapter 4: Network Integration	11
Chapter 5: Challenges and Issues	12
Chapter 6: Initial Route Objectives.....	14
Chapter 7: Locational Areas for Consideration	15
Chapter 8: Next Steps.....	16
Considering the route selected, London Orbital and M23, to what extent do you agree with the located areas identified for further consideration in Chapter 7?	16
Considering the Initial Overview Report for London Orbital and M23, how well does this report consider your needs?	16
Response for <i>East of England</i>	18
General comments on the selected route	18
Selected chapters we would like to comment on for the selected route	19
Chapter 1: Introduction	19
Chapter 2: The Route.....	19
Chapter 3: Engagement with Customers and Neighbours.....	20
Chapter 4: Network Collaboration	20
Chapter 5: Challenges and Issues	20

THAMES CROSSING
ACTION GROUP
www.tcag.info

Chapter 6: Initial Route Objectives.....	21
Chapter 7: Locational Areas for Consideration	23
Chapter 8: Next Steps.....	23
Considering the route selected, East of England, to what extent do you agree with the located areas identified for further consideration in Chapter 7?.....	23
Considering the Initial Overview Report for East of England, how well does this report consider your needs?.....	24
Response for <i>Kent Corridors to M25</i>	25
General comments on the selected route	25
Objective: Improving safety for all	25
Objective: Network Performance.....	25
Objective: Improved environmental outcomes	27
Objective: Growing the Economy.....	27
Objective: Managing and planning the SRN for the future.....	28
Objective: A technology-enabled network.....	28
Selected chapters we would like to comment on for the selected route	28
Chapter 1: Introduction	28
Chapter 2: The Route.....	29
Chapter 3: Engagement with Customers and Neighbours.....	29
Chapter 4: Network collaboration.....	29
Chapter 5: Challenges and Issues	30
Chapter 6: Initial Route Objectives.....	31
Chapter 7: Locational Areas for Consideration	33
Chapter 8: Next Steps.....	34
Considering the route selected, Kent Corridors to M25, to what extent do you agree with the located areas identified for further consideration in Chapter 7?	34
Considering the Initial Overview Report for Kent Corridors to M25, how well does this report consider your needs?	35

Response for *London Orbital and M23*

General comments on the selected route

Objective: Improving safety for all

We question how the iRAP star rating map doesn't show lower ratings for the eastern section of the selected route, particularly around the M25/A282 section and junctions with the A13 and A2.

This particularly doesn't add up when you also then review the info provided in STATS19 which highlights that sections on the network in proximity to Dartford have concentrations of collisions, sections of the route where people were killed or seriously injured.

Your StoryMap also states that *'The highest rate of collisions for motorcyclists is also found at Dartford...'*

We also know from our campaigning against the proposed Lower Thames Crossing (LTC) that there are over 3000 incidents per year at the Dartford Crossing A282.

We also have serious concerns about 'Smart' Motorways and how dangerous they are. We welcome the Government announcement that new 'smart' motorways have been scrapped. However, we still have serious concerns about the ones already in existence, and the proposed LTC which would be a 'smart' motorway by stealth⁸.

There are also concerns about safety when it comes to electric vehicles, particularly fire risks. An EV fire takes longer to put out, as well as more water, and the pollution to nearby watercourses. EV fires can reignite days after being 'extinguished'. A growing number of fire services are now sending two engines to EV fires whether they'd normally send one for a fossil fuel vehicle, due to the issues with EV fires. This further stretched an already stretched fire service, and could put others at risk, if there are not resources for them to then also be attending other incidents/fires.

NH have also publicly stated they have committed to targets that mean by 2040 nobody will be killed or seriously injured on their roads and motorways. Whilst nobody wants deaths and serious injuries, we have to question how this target can ever be considered attainable, due to the very nature of how dangerous being on roads can be. We also note that in regard to the proposed LTC it is forecast in a 60 year period there would be an additional 26 fatalities and 220 serious injuries. How can such a project be considered in keeping with safety aims and targets?

Objective: Network Performance

Again, we are surprised that your StoryMap for this route section is not highlighting the Dartford Crossing A282 amongst the sections of the route experiencing the lengthiest delays.

⁸ <https://www.thamescrossingactiongroup.com/ltc-smart-motorway-by-stealth/>

THAMES CROSSING ACTION GROUP

www.tcag.info

There is mention of congestion at Dartford in regard to 'junction hopping'. Yet again this is a surprising comment considering that the proposed LTC, which is supposed to be about solving the problems at the Dartford Crossing, is about providing a route for ports in the South East through to the Midlands and beyond. 70% of goods in and out of the Port of Dover alone cross the Dartford Crossing, and around 42% of traffic using the current crossing are goods vehicles.

You even then go on to say delays at the A2 near Dartford are amongst those most notable. As well as mentioning that the route is also subject to delay on approaches to Dartford.

The information you are providing is contradictory from one paragraph to the next.

You then go on to state that 'The Lower Thames Crossing will provide relief to the eastern section, as well as increasing the resilience of the network in this location. By increasing the capacity across the River Thames east of London by more than 80%, it will improve journey times across the Dartford Crossing and provide relief for strategic freight movement from the coastal ports in Kent and the Thames Gateway.'

Firstly, the proposed LTC has not been granted permission so there are no guarantees it will go ahead, to word this statement in such a way that suggests it is definitely going ahead is disingenuous to say the least.

Secondly, the LTC DCO applications state that proposed LTC would bring the Dartford Crossing traffic back to 2016 levels. See A.2.7 in Annex A of 9.10 Post-event submissions, including written submission of oral comments, for ISH1 [REP1-183]⁹. As also screen captured and pasted below for ease of reference.

- A.2.7** There are two aspects to the impact of the Project on trips using the Dartford Crossing:
- a. First, for a considerable time into the future, the forecast journey times for longer distance trips using the Dartford Crossing, going from junction 2 to 29, are similar to the to 2016 journey times, and are significantly lower than the forecast journey times would be were the Project not provided (the Do Minimum scenario). There are few other, if any, busy sections of the Strategic Road Network that would see similar journey time improvements in 2045 when measured against 2016.
 - b. Second, more local trips are able to use the Dartford Crossing to make short distance trips across the river, using the capacity released as some longer distance traffic from Kent uses the Project. This is a benefit for local residents who wish to travel to the other side of the river, for example to take advantage of a job opportunity.

⁹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-002966-National%20Highways%20-%20Applicant%E2%80%99s%20submission%20of%20documents%2064.pdf>

THAMES CROSSING ACTION GROUP

www.tcag.info

We draw attention to paragraph 1.15 of Chapter 1 – Executive Summary – Dartford River Crossing Study¹⁰ into capacity requirements published by the DfT in April 2009, which states ‘The Dartford Crossing experiences high levels of flow and congestion on a daily basis, with typical traffic flows in the order of 145,000 to 150,00 vehicles per day.’

This clearly confirms that in 2009 the Dartford Crossing was 10-15 thousand vehicles per day over the design capacity of 135,000 vehicles per day.

We then draw attention to paragraph 2.2.6 of the Summary Business Case from the 2016 Highways England LTC Public Consultation¹¹ which states, ‘At present the crossing handles an average daily traffic flow of about 141,000 vehicles (2014) which is greater than the design capacity of 135,000 vehicles’.

As a final reference on this, we draw your attention to paragraph 3.1.1 of the Case for the Project¹² from the 2018 Statutory Consultation, which states, ‘Even though it was designed for 135,000 vehicles per day, it carried over 180,000 vehicles on some days in the year to September 2017.’

The above clearly shows that as early as 2009 reports were showing the Dartford Crossing was considerably over design capacity, and that things were even worse by 2016.

If National Highways are stating that the proposed LTC would bring the Dartford Crossing back to 2016 figures, it is admitting that the Dartford Crossing would still be over design capacity.

Design Capacity for the Dartford Crossing is 135,000 vehicles per day, yet it is regularly seeing 180,000 per day. This means we’d need to see a reduction of more than 25% to bring it back below capacity. Yet the proposed LTC is estimated by National Highways to take 19% of traffic away in the opening year, dropping to 13% by 2045.

It should be noted that these figures were presented prior to Government rephasing the start of construction of the proposed LTC by two years, if permission is granted. This means that the opening year would also be pushed back two years and the amount of traffic reduction at the current crossing in the opening year of LTC would have dropped further, as it decreases year on year.

We additionally note that independent analysis of the level of traffic reduction by Thurrock Council concluded that the proposed LTC would take as little as 4% of traffic away from the Dartford Crossing in the am peak hour, and 11% in the pm peak hour.

The proposed LTC is also estimated to result in around a 50% increase in cross river traffic, due to induced demand.

¹⁰

<https://webarchive.nationalarchives.gov.uk/ukgwa/20100513192540mp/http://www.dft.gov.uk/about/strategy/capacityrequirements/dartfordrivercrossing/chap1execsummary.pdf>

¹¹ https://highwaysengland.citizenspace.com/ltc/lower-thames-crossing-consultation/user_uploads/lower-thames-crossing-consultation-summary-business-case.pdf

¹²

https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/LTC%20The%20Case%20for%20the%20Project.pdf

THAMES CROSSING ACTION GROUP

www.tcag.info

Not only that but National Highways are not considering and planning for how traffic would migrate between the two crossings, when there are incidents, if the proposed LTC goes ahead, and there would not be adequate connections¹³.

There are currently over 3000 incidents per year at the Dartford Crossing, with it remaining over capacity it is highly likely that the number of incidents would remain high.

When for instance, there is an incident at the Dartford Tunnels and traffic tried to come off the M25 onto the A2 coastbound to reach the LTC, there would be just one single lane from the A2 on to the LTC.

Or when there is an incident at the QE2 Bridge and traffic tries to come off the M25 onto the A13 eastbound to get to the LTC, only to find there would be no access to the LTC from the A13 eastbound. Instead traffic would have to travel down the A13 eastbound to the Stanford A1014 junction. Go up and around an already busy traffic lighted roundabout, alongside DP World, London Gateway, Thames Enterprise, Thames Freeport and other traffic. Then 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 on to the LTC, the M25 would be 5 lanes at this point, going onto 2 lanes southbound on the LTC until it passes the A13 junction.

Does any of this really sound like it offers a solution or resilience?

Objective: Improved environmental outcomes

The proposed LTC would destroy and negatively huge amounts of greenbelt¹⁴, and impact the Kent Downs AONB¹⁵, if it goes ahead. It would also be hugely destructive and harmful.

The StoryMap comments on air quality receptors within 100 metres of the Strategic Road Network (SRN). It is concerning to us if you are only considering within 100 metres. National Highways state that air pollution disperses within 200 metres of a road, which is double the distance from the road you are commenting on here.

We are also concerned that there is no apparent recognition or considering that air pollution PM2.5, the tiny deadly particles from things like brake dust, tyre and road wear, so small it gets in to our organs via the bloodstream, can travel thousands of miles, so certainly more than 100 metres.

As already mentioned above the A282 Dartford Crossing would still be over design capacity, still suffering from congestion and pollution, even if the proposed LTC goes ahead.

Not only that but Professor Karen Lucas has commented that the whole proposed LTC route would fail against what is now the legal target for PM2.5¹⁶. To date NH have not published or updated the DCO

¹³ <http://www.thamescrossingactiongroup.com/incidents-ltc-dartford-crossing>

¹⁴ <https://www.thamescrossingactiongroup.com/ltc-greenbelt-destruction/>

¹⁵ <https://www.thamescrossingactiongroup.com/ltc-impacts-to-area-of-outstanding-natural-beauty-aonb/>

application to reflect any analysis of the proposed LTC against new legal targets within the Environment Act.

We have concerns in regard to both air and noise pollution. We note that in regard to noise pollution we have been told that it is standard practice for the noise barrier design to be left to the contractor, which we find unacceptable, as this will likely result in the quickest and cheapest option to the contractor.

Congestion and pollution of all sorts from roads negatively impacts quality of life for local communities, their health and well-being. But not only to humans but also wildlife, habitat, and the natural environment as a whole.

There is comment on certain parts of the route to inclement weather, including QE2 Bridge closures on the A282 at Dartford being caused by high winds. This is something that was identified as a risk before the bridge was built, but a decision was made not to windproof the bridge to reduce cost.

There are concerns about risks of inclement weather impacting traffic and safety on the proposed LTC, such as wind across the Mardyke Valley viaducts, fog is also an issue across the fens and marshes. We are also not convinced that flooding would not be an issue. Plus, such a hugely destructive and harmful project will have a negative impact on the environment, including our weather, at a time of climate emergency, so will further accelerate weather changes too adding to the issues not only locally but globally.

The proposed LTC is estimated to emit a whopping 6.6 million tonnes of carbon, if it goes ahead. This is not in keeping with to our legal commitments to Net Zero.

There is also no mention of Biodiversity and the negative impacts roads have on wildlife and habitats. The proposed LTC would fail against the new Biodiversity Net Gain regulations. Our country is one of the most nature depleted countries in the world. We need to be doing more to save, protect and enhance our natural environment, not destroying and impacting it with roads.

Many trees are being destroyed by road building, and there are growing instances of the trees and other environmental mitigations not being provided. Trees dying through hot weather and lack of watering.

When it comes to roads, consideration also needs to be given to the impacts electric vehicles have on the environment, in production of these vehicles, and what happens to the old fossil fuel vehicles, how the electricity to power them is produced and what impacts that may have on our environment.

Objective: Growing economy

Growth for the sake of growth is not always a good thing, and can do more harm than good. When it comes to levelling up there are other factors rather than the main focus of economy that need to be given more consideration, such as health and well-being, and our natural environment.

**THAMES CROSSING
ACTION GROUP**
www.tcag.info

All too often economic growth is having a negative impact on these factors, and this is not right or sustainable.

Rail is an important part of a bigger picture, and certainly hasn't been given adequate consideration as an alternative to the proposed LTC¹⁷.

Why in this day and age is the Port of Dover, for example, not connected by rail? Why is the focus always on more roads for freight, instead of rail improvements, such as between Ashford and Reading that would negate the need for the proposed LTC, with a better and more sustainable solution by getting more freight off the roads and onto more sustainable rail.

Remember 70% goods in and out of the Port of Dover alone cross the Dartford Crossing. Around 42% of vehicles using the current crossing are goods vehicles. Why not get more of that onto more sustainable rail? We believe a large part of the problem is that we have National **Highways**, and not National Transport. We need better and more integrated sustainable transport.

Consideration also needs to be given to the fact that economic growth generally results in yet more traffic, which then adds to congestion and pollution, as well as other environmental impacts. Induced demand is real, and is another reason why new roads are not the solution.

Try counting your money when there's no clean air to breathe, clean water to drink, and healthy soil to grow food.

As already highlighted above the proposed LTC would not address the pressures stated, in fact quite the opposite they would have a negative impact and worsen people's quality of life and well-being, as well as not solving the issues, all at a huge cost to taxpayers'.

The cost of the proposed LTC has risen from £4.1bn up to £9bn as at August 2020. The adjusted Benefit Cost Ratio has dropped from 3.1 down to 1.22, again as at August 2020.

With the cost of everything rising since August 2020, and the two year rephasing (which would add to the cost) the proposed LTC is sure to rise further.

Many including some MPs now state publicly that they believe the cost would be £10bn+++. This for a project that fails to meet scheme objectives¹⁸, and is simply not fit for purpose.

Objective: Managing and planning the SRN for the future

We do not know how you work out your assessments on things like road surface, bridges and structures, drainage etc. A large proportion of the public have concerns about the potholes and bad road surfaces.

¹⁷ <https://www.thamescrossingactiongroup.com/rail-and-tram-alternatives/>

¹⁸ <https://www.thamescrossingactiongroup.com/ltc-project-objectives/>

**THAMES CROSSING
ACTION GROUP**
www.tcag.info

The Dartford Crossing, particularly the tunnels are coming to their end of shelf life, with serious consideration and works needed. You only have to drive around the M25 when there is heavy rain to know that the surface and drainage has issues.

Objective: A technology-enabled network

There are very serious concerns regarding 'smart' motorways, and we welcome the scrapping of new 'smart' motorways. But as previously stated we still have serious concerns about the existing 'smart' motorways, and the proposed LTC which would be a 'smart' motorway by stealth, if it goes ahead.

NH failed to deliver on what government signed off on 'smart' motorways, and continue to fail to recognise the dangers, leaving the public with little if any confidence in NH or 'smart' motorways.

The technology is simply not fit for purpose. The stopped vehicle detection tech doesn't work efficiently or effectively. CCTV is often not correctly positioned, or not working. When there is weather like fog or snow the cameras cannot offer a clear picture. Similarly at night time many cameras offer no real picture at all. The software at the control centres fails, leaving stressed staff powerless to do anything.

If NH trust and believe their dangerous 'smart' motorways and associated technology then why are they not willing to put their money where their mouth is and assume a duty of care for those using the SRN?

What other business is allowed to put people's lives at risk with no consequences for negligence?

Selected chapters we would like to comment on for the selected route

Chapter 1: Introduction

We believe that there should be more consultation on the RIS once there is some actual detail, instead of being asked opinions of vague reports that offer no real detail in what the RIS would actually contain, or how much it would cost.

As public money is being spent on RIS, we the people should be given opportunity to have a say on how it is spent, rather than decisions be made with no option for us to comment on what is within the RIS.

We also believe that RIS is no longer relevant anyway, and that whilst some funding would be needed for ongoing maintenance, the focus on roads needs to be stopped. Instead we need Sustainable Integrated Transport Investment Strategies (SITIS) to ensure a healthy and sustainable future for all.

It is apparent in the report that concerns and issues were identified as being related to safety, congestion, and the environment or carbon. You talk about engagement with customers and neighbours, yet

THAMES CROSSING
ACTION GROUP
www.tcag.info

regardless of these detailed concerns and issues, you continue to attempt to push ahead with the proposed LTC. A project that would be a 'smart' motorway by stealth, and which people have serious concerns about in regard to safety. It would not solve the congestion at the Dartford Crossing, and would highly likely worsen congestion throughout the region, if it goes ahead. It would be hugely destructive and harmful, and is estimated to emit 6.6 million tonnes of carbon, if it goes ahead. If you are truly listening and wishing to engage then the proposed LTC needs to be put out of its misery now. We need and deserve better.

In keeping with our comment about changes needed relating to the RIS, we also need to see changes in regard to who is responsible for the road network. The focus can no longer be on roads, as already mentioned we need sustainable integrated transport. We therefore also believe that we no longer need National Highways, whose only focus is roads, we need a new organisation to replace NH, National Transport, or National Travel.

Chapter 2: The Route

Economic growth for the sake of economic growth is not sustainable. We cannot continue to have more and more growth leading to calls for more and more roads, it is not sustainable. More roads lead to more traffic, that is a proven fact. This is just one of many reasons why the proposed LTC needs to be scrapped. It would not solve the problems, and fails to meet all scheme objectives.

Chapter 3: Engagement with Customers and Neighbours

As already mentioned, we do not believe that NH listen to any feedback that they are presented with, whether it is this consultation or any other. There has been a distinct lack of meaningful engagement in regard to the proposed LTC. Not only between NH and the public, but also between NH and Local Authorities, businesses, NGOs, organisations etc.

You fail to acknowledge the public's concerns about things like 'smart' motorways, and still deny the dangers. Whilst new 'smart' motorways have now been scrapped, we still have concerns about the existing ones, which need to be taken seriously and addressed as a matter of urgency. 'Smart' motorways by stealth, like the proposed LTC also need to be scrapped.

You mentioned support of modal shift, yet the proposed LTC offers no provision for cross river active travel, and would not be viable for public transport/buses, due to the lack of adequate connections.

You try to tell us that your roads are in good condition, yet clearly feedback shows different, and people are not satisfied.

Chapter 4: Network Integration

The proposed LTC would negatively impact other road networks, if it goes ahead. The project actually utilises the local road network in order for it to operate, such as the A13/LTC junction that greatly impacts the Orsett Cock junction for instance.

**THAMES CROSSING
ACTION GROUP**
www.tcag.info

We have already highlighted our concerns that NH focus is purely roads, and that we do not believe that you have any interest in integrated transport at all.

Sub-national transport bodies are also focused on growth, business, and NH needs and wants, rather than showing any real interest in the opinions and wishes of the general public. This needs to change.

You talk about integration, yet the proposed LTC (if it goes ahead) would pass through the London Borough of Havering, but would not be subject to ULEZ. Traffic using your roads would be adding pollution to an area that is subject to ULEZ, this is not integrated transport, and also shows the inequality of such a matter.

We have little if any confidence in your statement regarding NH proposing a Wider Network Impacts Management and Monitoring Plan providing Local Authorities with data. Local Authorities such as Thurrock and Gravesham are strongly opposed to the proposed LTC, and there has been a distinct lack of meaningful engagement to date between NH and the councils. We do not believe NH have any genuine intentions to change and improve this working relationship.

We need to see freight included in modal shift requirements. We cannot simply continue to increase the amount of road freight regardless of the consequences. We need proper and adequate consideration and actions in regard to rail improvements to allow more rail freight. Also, more support and encouragement of buying local, to reduce miles travelled.

We consider diversionary routes as just a fancy title for rat running that you encourage. NH need to take more responsibility, and industry standards and guidelines need to take into account what happens when there are incidents. We have been told that you don't have to plan how traffic would migrate between the two crossings, if LTC goes ahead, when there are incidents. It is quite apparent that there would not be adequate connections, and that the resulting chaos would only worsen the situation throughout the region.

There also needs to be consideration of the impacts the SRN have on our already stretched emergency services. Meaningful engagement and proper consultation with emergency services is needed.

We continue to be frustrated with your mention of rail within the report, as quite clearly National Highways have no genuine interest in rail at all, the clue is in your name, National **Highways**.

Chapter 5: Challenges and Issues

Please refer to our previous comments in regard to improving safety for all.

Our previous comment in regard to network performance stand, plus we take exception to outdated/incorrect information being presented in the report in regard to the proposed LTC.

The LTC would NOT take around 22% of traffic off the Dartford Crossing. The LTC Development Consent Order application states it would be around 19% dropping to 13% by 2045.

THAMES CROSSING ACTION GROUP

www.tcag.info

The level of reduction drops year on year, and since the figures in the DCO application do not take the government's decision to rephase the LTC by 2 years, does not take into account that opening year would not be until at least two years later than for the figures provided, so the reduction would be less from opening year, and is certainly not 22% regardless.

The proposed LTC would not solve the problems at the Dartford Crossing, which would still remain over capacity. This fact is proven in NH official documents too. In the DCO application it is stated that the Dartford Crossing would be back to 2016 traffic levels, and in 2016 the crossing was already way over capacity. The poor design means that it would not improve resilience either. It would also result in around a 50% increase in cross river traffic, induced demand. As already mentioned it would also be a 'smart' motorway by stealth too, when new 'smart' motorways have been scrapped. The project would be hugely destructive and harmful, is not fit for purpose, and would be a complete waste of taxpayers' money. There are better and more sustainable alternatives, which have not been given adequate consideration. We need and deserve better.

As for improved environmental outcomes, the Climate Change Committee has called for an urgent review of current and future road building. With projects like the proposed LTC estimated to emit 6.6 million tonnes of carbon, if it goes ahead, we agree that there is an urgent need to review and reconsider such a project.

The LTC would be hugely destructive and harmful, and would fail to meet new biodiversity net gain requirements. It would also fail against the newly set legal targets for air pollution PM2.5.

For a project that you promote as a pathfinder project, and claim to be the greenest road ever built in the UK, the fact you are not attempting to lead the way and follow best practice to comply with the new BNG requirements says it all in regard to NH position on environmental outcomes.

The continued greenwashing from NH is unacceptable, and needs to stop.

Please refer to our previous comments on growing the economy. We cannot continue to push economic growth for the sake of economic growth, it is simply not sustainable. It should not be a case of building new roads, like the proposed LTC to accommodate growth, again this is not sustainable growth. Plus the proposed LTC would not address the pressures, it would just add to the growing levels of traffic, congestion and chaos throughout the region.

We don't know how to make it any clearer, we do not believe that NH have a place in the future of our country. We need to stop the predominant focus on roads, and move to sustainable integrated transport, with an organisation that reflects this, ie not NH.

We have already commented previously on a technology-enabled network, and our concerns in regard to the dangers of 'smart' motorways, and 'smart' motorways by stealth.

Chapter 6: Initial Route Objectives

Objective A – Promote the safe and reliable strategic function of the London Orbital

If NH are serious about promoting the safe and reliable strategic function of the London Orbital, and their vision of zero harm, then take responsibility for your claims and actions. You should have a duty of care to road users and be held accountable for your failings, particularly when it comes to safety and more particularly 'smart' motorways.

We welcome the scrapping of new 'smart' motorways, but it is critical that the existing 'smart' motorways are made safer immediately. Put the red X on the first lane and turn it back into a hard shoulder. A line of paint then put in place to permanently secure and identify the hard shoulder.

The proposed LTC would see an increase in accidents, including fatalities and serious injuries. It would be a 'smart' motorway by stealth. It would not be safe or offer any reliability to the network. It needs to be scrapped now.

Objective B – Support sustainable development in London and the wider South East region

Economic growth and development is rarely sustainable currently, far from it. It is hugely controversial and hypocritical to suggest that growth and development can be sustainable when at the same time you are promoting projects like the proposed LTC to support such growth. 6.6 million tonnes of carbon, and all the other environmental destruction and harm that would be inflicted can in no way be considered sustainable.

We again stress the proposed LTC would not solve the problems associated with the Dartford Crossing. It would result in more traffic, more congestion, more pollution, and more chaos.

Objective C – Encourage sustainable access to London's International Airports

If you truly wish to encourage sustainable access to London's International Airports then modal shift is needed, not a focus on roads by NH.

Objective D – Address severance between the SRN and urban environments within and around London

Why does this objective focus particularly in and around the M1, M11, M3 and M4? What about the rest of us? Clearly you have no interest in addressing issues for those of us under threat of the proposed LTC. That much has been obvious from our dealings with you, and the lack of genuine care or consideration. We need and deserve better.

Objective E – Improve transport connections into the Capital

When was this report written, as it is clearly out of date, highly unacceptable for such a report, particularly when you are asking for opinions on it for future planning.

ULEZ is being expanded to cover all of London, and will kick in very soon.

THAMES CROSSING
ACTION GROUP
www.tcag.info

We need a focus on modal shift in and out of London, and all areas, not more focus on roads. Many of us drive into London because there is not a reliable, affordable alternative. Rail stops early, meaning if you want an evening out in London then you need to drive to be able to get home after. We need investment into more sustainable transport, with support and encouragement for modal shift.

Our country being so London-centric is an issue too. For example, to get a train to Kent from Essex we have to travel all the way into London to come all the way back out on the other side of the river. Projects like Kenex tram would play a part in modal shift and be a better investment than the proposed LTC.

Objective F – Support UK economic growth with safe and efficient freight connections to international gateways

Again, the focus on road freight, when there are better and more sustainable alternatives, like investment into rail improvements between Ashford and Reading that would negate the need for the proposed LTC, and improve rail for both freight and passengers.

Yet again we stress that the proposed LTC would not solve the problems, it fails to meet scheme objectives and is not fit for purpose. We need and deserve better.

Objective G – Support the London Orbital being a better neighbour

We begin by highlighting that the official response form has an error for this question, and repeats Objective 6 as Objective 7. We are replying as per Objective 7 in the report.

The proposed LTC would destroy and impact large amounts of greenbelt, habitats including ancient woodland, and would impact the natural environment in a huge way. Nitrogen deposition associated to the LTC project would impact places like Epping Forest, so we do not have any confidence in you meeting this objective. We also note that on the topic of impacts to Epping Forest, NH didn't even consult Epping Forest 'neighbours' in that area in regard to the LTC and its impacts.

You mention QE2 Bridge closures due to wind, which just goes to highlight that wind barriers should have been installed on the bridge. We have highlighted many concerns and issues with the LTC, but you continue to ignore them.

We know from years of experience that we as an SRN neighbour are not listened to, and that NH fail to have, in our opinion, any genuine wish or intention to be a better neighbour. We have no confidence in your ability to meet this objective.

Chapter 7: Locational Areas for Consideration

We hope that our commenting makes it perfectly clear that even when we may agree with the need for some of the objectives set, we have absolutely no confidence in NH ability to meet the objectives. This feels just like most NH consultations, a tick box exercise to suit your own needs, wants and agenda.

RIS Funding needs to be replaced with funding of Sustainable Integrated Transport.

NH needs to be replaced with National Transport or National Travel.

The proposed Lower Thames Crossing would be the biggest waste of taxpayers' money in the RIS, it would not solve the problems it is tasked to solve. It fails to meet all scheme objectives, and is not fit for purpose. It would be hugely destructive and harmful. The info you have shared in this report about the proposed LTC is out of date, incorrect, and misleading.

The Tilbury Link Road should, if anything, be part of the LTC project, not a separate standalone project. You cannot have a link road if there is nothing to link to. We believe the TLR was removed from the LTC project in an attempt to reduce cost and improve value for money. This is a false economy, and the LTC is poor value for money regardless.

Chapter 8: Next Steps

Considering that this step has been inadequate with errors and outdated information in this consultation, this issue needs to be addressed prior to any next steps, otherwise you risk building progression on a poor foundation of the position we are now in.

It is not good enough that you simply identify challenges, voice that they need to be solved, throw some vague suggestions on what might be done, without any real information, and consider this to be a genuine and valid consultation.

The public need and deserve to be consulted on the actual detail, rather than what is being presented in this consultation. It is public money that would be used to fund any future works, so we should get a say on how much and what it might be spent on.

Considering the route selected, London Orbital and M23, to what extent do you agree with the located areas identified for further consideration in Chapter 7?

Strongly disagree.

We would hope that if you have read our previous comments the answer to this question should be very clear!

Considering the Initial Overview Report for London Orbital and M23, how well does this report consider your needs?

Not very well.

As highlighted in our previous comments, we need and deserve better than what is being proposed. This consultation has been inadequate, with errors and out of date information. We should get a say on exactly what is being proposed both ideas and financials.

THAMES CROSSING
ACTION GROUP
www.tcag.info

We also have little if any confidence that NH would deliver what it sets out, especially since so much of what is being proposed as solutions to challenges in theory, contradicts the actions we are seeing and experiencing.

Focus needs to be moved away from roads being the priority in this country, and instead we need a sustainable integrated transport body and investment plan, to ensure a healthy and sustainable future for everyone.

Response for *East of England*

General comments on the selected route

The proposed Lower Thames Crossing would definitely have a negative impact on traffic flows in this region and others, if it goes ahead.

The proposed LTC would not solve the problems associated with the Dartford Crossing, which would remain over design capacity, even if the proposed LTC goes ahead.

It is therefore also highly likely that the amount of incidents at the current crossing would remain high. When there are incidents it impacts not just the immediate vicinity, but also through the region, including the East of England route since it comes as close to the Dartford Crossing as the A12 (junction 25 on the M25).

Not only that but National Highways are not planning for how traffic would migrate between the two crossings when there are incidents, if the LTC goes ahead, and there would not be adequate connections. For instance, when there is an incident at the QE2 Bridge and traffic comes off the M25 onto the A13 eastbound to get to the LTC. However, there would be no direct access to the LTC from the A13 eastbound. Instead traffic would have to come along the A13 to the A1014 Stanford junction, up around an already busy traffic lighted round about, alongside DP World, Thames Gateway, Thames Enterprise Park, and other traffic, before heading back westbound on the A13 to the LTC slip road, just past (but not accessible from) the Orsett A128 junction. If instead traffic comes 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 just past the A13. It would not take long before congestion spread throughout the region, and with the LTC junction being so close to junction 29 it certainly wouldn't take long before junction 28 traffic for the A12 was also impacted, along with many other routes.

You state that *"The A12 acts as the key conduit for travel towards London and onwards to other international gateways in the South East from East Anglia. With the development of the Lower Thames Crossing, we expect the role of the route in facilitating movements between these gateways will become even more vital."*

This is concerning because as we have already highlighted, the proposed LTC would not solve the problems at the Dartford Crossing, and would in fact add to traffic problems, as we as resulting in around a 50% increase in cross river traffic, induced demand, further adding to problems throughout the region.

Suggesting that economic growth in this way is a good thing is ludicrous. More growth, leads to more traffic, leads to more congestion and calls for more roads, in a downward spiral impacting not only the road network, but also the environment, and our health and well-being. It is time to recognise the true costs of economic growth and to realise it is not what it is often cracked up to be.

Part of the need for more and more renewable energy is to supply power for electric vehicles. This is resulting in more and more land being lost and impacted due to the need for more energy. Much of the land is also agricultural land, which of course then also impacts food security.

**THAMES CROSSING
ACTION GROUP**
www.tcag.info

Loss of agricultural land is also one of the many concerns in regard to the proposed LTC, and other road projects. At a time of climate emergency and food security issues we should be encouraging and supporting sustainable farming, not destroying and impacting our agricultural land. The environmental impacts of this are also of concern as our food needing to travel more miles results in further impacts to the environment, and also has implications on our health and well-being, as well as the country's food security.

The state of roads in the UK is getting worse and worse, and it has been identified that future road investment strategy needs to focus on fixing the existing road network and infrastructure as a priority. We do not believe the figures being quoted by you in regard to the condition of our roads. Also, there is only so much public money to be spent, and so whether it be the SRN or the rest of the road network, investment into fixing our existing roads needs to be a priority over building new roads, like the proposed LTC.

We have serious concerns about NH use of technology, especially when it comes to things like 'smart' motorways and technology, that we consider to be dangerous. NH is also unreliable in their use of overheard gantry signage, which is often not accurate, and/or provides little if any helpful information.

We are supportive of reducing environmental impacts, including emissions. However, electric vehicles and other non-fossil fuel vehicles are not the panacea many like to believe. They are not zero emission as they still emit deadly PM2.5 pollution, that not only pollutes the air we breathe, but also our water and soil, impacting us and the natural environment. Neither do they assist in reducing congestion, in fact if people believe they are greener they are more inclined to use them more, leading to more congestion.

We need to see more sustainable integrated transport options and the predominant focus and investment on roads reduced, so that people have better and more sustainable travel options.

Selected chapters we would like to comment on for the selected route

Chapter 1: Introduction

We were surprised that this Route did not include the A13 and A1089 considering that these routes fall under the East of England in regard to Sub-national transport bodies, with Transport East covering the Thurrock area. We can only question why it has been presented in this way, as it is confusing and makes no sense.

Chapter 2: The Route

Please see previous comments in regard to what is included in The Route for East of England, and why routes that fall within Transport East region have been instead placed in Kent Corridors to M25 for this consultation.

Chapter 3: Engagement with Customers and Neighbours

Again, the fact you have not included the A13 and A1089 which fall within the Transport East region, leads us to continue to question why, and how this may influence the outcomes of any engagement.

We also draw attention to the fact that in our own experience of dealing with NH, the lack of adequate consultation and engagement has been a concern for years. We have little, if any confidence in NH as an organisation, and particularly in their ability to engage efficiently and effectively. The lack of meaningful engagement in regard to the proposed LTC has been commented on by members of the public, Local Authorities, NGOs and more.

The satisfaction scores appear to show low confidence in NH's work and network, and we are not surprised.

Chapter 4: Network Collaboration

We highlight that the online response form titles Chapter 4 as 'Network Integration' when the Report titles it 'Network Collaboration'. Another example of inadequacies from NH, and the lack of attention to detail, which leads you to wonder what other errors and aspects might be overlooked and what impacts these things can have at other levels.

It is our observation that the Sub-national Transport Bodies largely serve themselves, NH, and businesses rather than the general public. Their own consultations are also often misleading and inadequate. This doesn't surprise us when the likes of Jacobs are running the consultations for them, as clearly Jacobs stand to benefit from NH projects.

Again, you comment on the importance of rail and modal shift, yet fail to practice what you preach, when you are not recognising and voicing the need for rail improvements instead of roads like the proposed LTC. But is it any wonder when failure to deliver the LTC successfully, is by your own annual reporting, an existential threat to the organisation. It actually works in NH favour if you can get away with pushing projects through that don't do the job they are supposed to, because you just end up with more work fixing the problems you help create, it's diabolical.

Chapter 5: Challenges and Issues

In regard to improving safety for all, and in addition to our general comments on this aspect, we also voice serious concern that the proposed LTC would be a 'smart' motorway by stealth, if it goes ahead.

We do not buy into the NH propaganda that it would be an All-Purpose Trunk Road, when evidence shows it is being coded as a 3-lane motorway (with the exception of the southbound section between the M25 and A13. It would have no hard shoulder, would use 'smart' technology, and is being designed to 'smart' motorway standards.

We welcome the scrapping of new 'smart' motorways, but still have concerns about the existing ones and their dangers, this is something that needs urgent attention and to be rectified quickly. It is as simple as

**THAMES CROSSING
ACTION GROUP**
www.tcag.info

reverting the left lane back to a hard shoulder by switching the red X on that lane on immediately, with white lines painted back along to formally segregate the hard shoulder again.

Please see our previous comments in regard to network performance.

In regard to improved environmental outcomes, see our previous comments. Plus it is not good committing to net zero carbon construction by 2040, if you are also proposing to push ahead with projects like the proposed LTC in the meantime, that would emit a whopping 6.6 million tonnes of carbon.

Again, we have issue with the fact you are quoting Transport East on carbon emissions for the region in this report, but failing to include the A13 and A1089 in this Route, instead placing it strangely in the Kent Corridors to M25 Route.

In regard to growing the economy, and in addition to our previous comments, we again reiterate that not all economic growth is good. It can actually inflict negative impacts and is not always as good as it is made out to be. Try sitting counting all that money when there is no clean air to breathe, clean water to drink, and healthy soil to grow food in.

In regard to managing and planning the SRN for the future, you state your road surface condition report as being high, which doesn't appear to match the satisfaction analysis mentioned previously.

Please see our other comments about concerns over the use of 'smart' technology, particularly in regard to 'smart' motorways.

Chapter 6: Initial Route Objectives

Objective A – Provision of a safer, more resilient and consistent network

It is hard to trust or believe NH genuinely have an objective to make our roads safer with all that has happened in regard to 'smart' motorways, and the fact they still deny how dangerous they are. We also have issue with the fact that they do not have any actual duty of care to road users. What other business can get away with taking no responsibility for their actions when it comes to health and safety?

In regard to resilience and consistent networks, building new roads and adding more lanes largely results in induced demand, and thus doesn't solve the problems. We need to be looking to more sustainable options.

Objective B – Support accessibility and connectivity across the route

We do not believe that NH genuine consider walkers, cyclists and horse riders as road users, instead they appear to be an inconvenience to NH. It is clear with projects like the proposed LTC that NH avoid dealing with such provision whenever they think they can get away with it.

Objective C – Improve conditions and facilities for freight drivers travelling between the region's international gateways.

More focus and consideration needs to be put on options to get freight off our roads and onto more sustainable alternatives. We also need to reduce the miles things travel when it comes to freight, moving to more local supplies, and ensuring when essential, that things take the most effective and efficient

THAMES CROSSING
ACTION GROUP
www.tcag.info

journey instead of just taking for granted that it is ok to keep putting more and more freight onto our roads, it is simply not sustainable.

Objective D – Improve Communications to better inform drivers

Many people simply do not trust NH when it comes to technology and/or signage. There needs to be more focus on genuinely reducing traffic on our roads, instead of encouraging more growth and traffic, we need to see more support and encouragement of modal shift to resolve issues, instead of more tech to advise people of the problems.

Objective E – Support sustainable growth of the East Anglia Coast and International Gateways

Growth for the sake of growth is not usually a good thing. It is also questionable how much growth is and can be genuinely sustainable, by the very nature that growth is usually destructive and harmful.

We take exception to mention of the proposed LTC within a section on sustainable growth, as there is simply nothing sustainable about the proposed LTC, it would be hugely destructive and harmful, and is not fit for purpose.

Objective F – Support sustainable growth and levelling up for deprived areas and coastal communities.

Please see above for comments on sustainable growth. Additionally, interpretation of Levelling Up varies depending on who you speak to. Local communities need to be asked and consulted on what they consider to be genuine levelling up, as often what government and NH consider to be levelling up is what communities consider to be levelling down.

Objective G – Be a better neighbour by protecting environmentally sensitive sites and improving environmental conditions for residents impacted by the SRN

We begin by highlighting that the official response form has an error for this question, and repeats Objective 6 as Objective 7. We are replying as per Objective 7 in the report.

NH cannot be trusted to protect the environment, as has been shown time and time again, along with all the greenwashing attempts. More evidence is being exposed on things like the amount of trees that you plant along the SRN failing as you are not managing and maintaining them, such as watering saplings.

The best way to protect and enhance the natural environment is to stop new road and lane projects, and focus on more sustainable options and encouraging modal shift, both for the public but also for freight.

Objective H – Increase the resilience of the A47 and A12 to adverse weather events on the route.

Flooding and climate impacts will only worsen as long as we continue to invest and push unsustainable travel options, like roads, instead of looking to support and encourage modal shift to more sustainable options. Never ending cycles of road building and widening is not sustainable, and just adds to the worsening of climate change.

Chapter 7: Locational Areas for Consideration

NH long term aim/vision of zero harm on our roads is not realistic. Roads are dangerous places to spend time and accidents will always happen. To present zero harm as though it is actually attainable is unrealistic and shows the level of propaganda NH will use to try and make themselves look better.

More roads and lanes is not sustainable and will not solve network performance issues, neither is it improving environmental outcomes. Growing the economy usually results in more traffic and congestion and more environmental impacts.

None of this is sustainable and is not the right way to progress in regard to managing and planning the SRN for the future. We need more sustainable alternatives and modal shift.

Investment focus should move away from being predominantly about road investment, and move to more sustainable alternatives. Any future RIS needs to focus on better managing and maintaining the existing road networks, and all current and future road building/projects needs to be reviewed and reconsidered, with an immediate pause at least placed on every single current and future project whilst the review and reconsideration takes place.

There needs to be an immediate pause on all new road building. There needs to be an urgent review of current and future road projects, as per the Climate Change Committee. Government need to reconsider expensive complex projects, like the proposed LTC, as per the Transport Select Committee.

Chapter 8: Next Steps

Considering that this step has been inadequate with errors and outdated information in this consultation, this issue needs to be addressed prior to any next steps, otherwise you risk building progression on a poor foundation of the position we are now in.

It is not good enough that you simply identify challenges, voice that they need to be solved, throw some vague suggestions on what might be done, without any real information, and consider this to be a genuine and valid consultation.

The public need and deserve to be consulted on the actual detail, rather than what is being presented in this consultation. It is public money that would be used to fund any future works, so we should get a say on how much and what it might be spent on.

Considering the route selected, East of England, to what extent do you agree with the located areas identified for further consideration in Chapter 7?

Strongly disagree.

We would hope that if you have read our previous comments the answer to this question should be very clear!

Considering the Initial Overview Report for East of England, how well does this report consider your needs?

Not very well.

As highlighted in our previous comments, we need and deserve better than what is being proposed. This consultation has been inadequate, with errors and out of date information. We should get a say on exactly what is being proposed both ideas and financials.

We also have little if any confidence that NH would deliver what it sets out, especially since so much of what is being proposed as solutions to challenges in theory, contradicts the actions we are seeing and experiencing.

Focus needs to be moved away from roads being the priority in this country, and instead we need a sustainable integrated transport body and investment plan, to ensure a healthy and sustainable future for everyone.

Response for *Kent Corridors to M25*

General comments on the selected route

We begin by stating our surprise that the Thames ports (London Gateway and Tilbury, which form part of the Thames Freeport, and the A13/A1089 section of the SRN, and Thurrock are considered within the Kent Corridors to M25 Route since they are all in Essex/East of England, not Kent.

Not only is this misleading in general terms, but also they fall within the East of England region when it comes to Sub-national Transport Bodies, as they come under Transport East, not Transport for the South East.

Plus, London Gateway is not accessible via the SRN as the A13 is only SRN up to the A1089, and London Gateway is further east, accessed by the A1014 off the A13.

Titling this Route Kent Corridors to M25 is incorrect and misleading.

Objective: Improving safety for all

We have concerns that with roads like the A1089, M20, M2 and A2 all having poor safety levels National Highways are looking to encourage more traffic and accidents to these routes if the proposed Lower Thames Crossing goes ahead.

It is estimated that the proposed LTC would result in around a 50% increase in cross river traffic, with much of this using these routes that are already suffering with bad safety records.

We also note the reference to safety issues due to sun glare, and again note our concern that we believe there would also be glint and glare issues with the proposed LTC, specifically to the north of the route as it would wind through the solar farms.

Objective: Network Performance

We again voice concerns that the proposed LTC, if it goes ahead, is estimated to increase cross river traffic by around 50%. This would just add to the levels of congestion and delays.

This concern is only strengthened further by your highlighting that these routes are also exacerbated by seasonality due to travel to coastal destinations and Europe via the Port of Dover and the Channel Tunnel.

It again seriously concerns us that you go on to clarify that forecast freight usage is increasing, and freight traffic queues can extend to the local roads and communities.

Yet again, the proposed LTC would increase the amount of cross river traffic, including freight. However, the increase in freight is not calculated in the modelling data for induced demand, which is disingenuous

THAMES CROSSING
ACTION GROUP
www.tcag.info

and ludicrous, especially for a road project that is about providing a new route for port traffic in the South East through to the Midlands and beyond.

We also have to seriously question why, in this day and age, and at a time of climate emergency, the Port of Dover is not connected by rail.

70% of the goods in and out of the Port of Dover use the Dartford Crossing, which means they also use the routes that this Route covers to reach the Dartford Crossing. 42% of the vehicles using the Dartford Crossing are goods vehicles. It is disgraceful that rail improvements are not being given proper and adequate consideration, so that more freight can be taken off the roads and put on more sustainable rail. Rail improvements between Ashford and Reading for example, this would not only serve freight but also improve rail for passenger services.

It is a big problem that National Highways focus is highways, when the reality is we need a sustainable national integrated transport focus.

We also stress that since NH are not planning how traffic would migrate between the two crossings when there are incidents, if the proposed LTC goes ahead, and there would not be adequate connections, the congestion and chaos would only worsen.

Imagine how routes would suffer when there is an incident at the Dartford Tunnels, and traffic comes off the M25 onto the A2 coastbound to migrate to the LTC, only to find there would be just one single lane from the A2 onto the LTC.

Or when there is an incident at the QE2 Bridge and traffic comes off the M25 onto the A13 eastbound to try and migrate to the LTC, only to find there would be no direct access. Instead traffic would have to go down the A13 eastbound to the A1014 Stanford junction, up around the already busy traffic lighted roundabout, alongside London Gateway and other traffic, then back westbound on the A13 to the new LTC slip road just past (but not accessible from) the Orsett A128 junction. If traffic instead came off the M25 directly onto the LTC, the M25 at this point would be 5 lanes, going onto 2 lanes on the LTC southbound until just past the A13. It would be chaos.

On top of that, despite the Port of Tilbury stating publicly at route option stage that they only support this version of a new crossing, if they got their own junction/access, the Tilbury Link Road has been removed from the LTC, and is being progressed as a separate standalone project as a RIS3 pipeline project. However, there are now question marks on what will be included in RIS3 with evidence showing that the focus needs to be on maintenance of the existing road network, not new roads.

There would also be disruption to connectivity of the A1089 as the current A13 westbound junction would be severed, and replaced with a complex alternative that would be a slip road off of a slip road from the Orsett Cock roundabout to the A13 westbound. This roundabout is already a busy roundabout.

Additionally, if the proposed LTC goes ahead, it would reduce the recently widened A13 from 3 lanes back to 2 lanes for a section in each direction, that has in part been widened to improve connectivity to the

THAMES CROSSING
ACTION GROUP
www.tcag.info

A1014 for access to London Gateway. Also, the A2 which was widened to improve congestion would be reduced to 2 lanes for a section in each direction.

The proposed LTC would also put additional pressure on Blue Bell Hill/A229. It is particularly disgraceful that improvements to Blue Bell Hill/A229 were included in one of the route options, Option C Variant, but it was ruled out as deemed not essential for a new crossing and that the cost both financially and to the environment was too high. Again, these improvements are now being progressed as a separate standalone project by KCC.

The Port of Dover have also publicly stated that if the LTC goes ahead they want the A2 dualled, as it would be needed as a direct result of the LTC. Yet such work is not being included as part of the LTC project, despite it quite clearly being called for as a direct result of LTC.

Objective: Improved environmental outcomes

To open this objective section in the StoryMap by stating 'We will protect environmentally important locations and reduce air quality, and noise impacts on communities served by the route' is questionable to say the least when you are also proposing such a hugely destructive and harmful project like the proposed LTC.

The proposed LTC would impact Kent Downs Area of Outstanding Natural Beauty, as well as ancient woodlands, and other valuable habitat. The whole proposed route would fail against newly set legal targets for air pollution PM2.6, and a major route like the proposed LTC compared to open fields and woodlands would of course increase noise pollution for nearby communities too.

It would also negatively impact walking, cycling, horse riding routes, and would offer no cross river active travel provision. Plus, the LTC would not be viable for public transport/bus routes due to the lack of adequate connections.

It is misleading and completely disingenuous to suggest that the LTC in any way relates to Net Zero or low carbon when it is estimated to emit a whopping 6.6 million tonnes of carbon, if it goes ahead. You have no evidence to back up claims of low carbon, it is all just highly speculative propaganda and greenwash.

Objective: Growing the Economy

Economic growth usually leads to increase in traffic, which in turn leads to more congestion, more pollution, more environmental impacts, and more impacts on our health and wellbeing, along with all the associated costs from those impacts.

There are growing numbers of people who are concerned and campaigning against not only road projects but also housing and other developments due to the impacts they inflict upon us.

The idea that economic growth is the solution to levelling up, is short sighted and can often actually result in levelling down rather than up. Gravesham and Thurrock Councils are both strongly opposed to the proposed LTC, as are many of the residents in these areas. We don't want economic growth for the sake of

**THAMES CROSSING
ACTION GROUP**
www.tcag.info

economic growth, largely serving the already rich. We want a healthier more sustainable future, with a natural environment we can enjoy, not more roads and development.

As already covered, the poor east-west connectivity via rail etc, is no surprise when focus and funding is being endlessly poured into NH and roads, instead of investing in more sustainable rail options.

Objective: Managing and planning the SRN for the future

The state of roads in the UK is getting worse and worse, and it has been identified that future road investment strategy needs to focus on fixing the existing road network and infrastructure as a priority. We do not believe the figures being quoted by you in regard to the condition of our roads. Also, there is only so much public money to be spent, and so whether it be the SRN or the rest of the road network, investment into fixing our existing roads needs to be a priority over building new roads, like the proposed LTC.

Objective: A technology-enabled network

There are better and more sustainable alternatives than road that would not need road diversions, such as rail improvements as we have already mentioned. As we have also already mentioned, the proposed LTC is not fit for purpose and would only add to the congestion and problems. We have also mentioned the Blue Bell Hill/A229 aspect of our concerns.

Rail improvements to get more freight off roads and onto more sustainable rail would also help solve the issue of lorry parks/services.

Investing, supporting and encouraging modal shift in general would also reduce the impacts on the energy network and need for increasing amounts of electricity for EVs.

Selected chapters we would like to comment on for the selected route

Chapter 1: Introduction

As per our general comments above, we consider much of the content of the Introduction to be propaganda and greenwashing attempts.

Mention in the report of your 'customers' and neighbours, highlighting Sub-National Transport Bodies, when you can't even get the Routes for this consultation in the correct Sub-National Transport Body areas is ridiculous.

As is the fact that in the Report for Kent Corridors to M25 under 'Introduction' – 'Purpose of the report' you state "This report is the route strategy for East of England". You can't even get the Route area correct in the report!

There is talk about the importance of the RIS and planning for it, as well as working with customers and neighbours. Yet there is a distinct lack of consultation being proposed on the actual details of RIS3. There are consultations about the strategies, but when it comes to letting us have our say on the detail of how

much would be spent and exactly what it would be proposed to be spent on, we don't get an opportunity. That is wrong on so many levels.

We shouldn't have specific RIS, we need Sustainable Integrated Transport Investment Strategies (SITIS) to ensure a healthy and sustainable future for all.

As per the Climate Change Committee, we need an urgent review of all current and future road building.

As per the Transport Select Committee, Government needs to reconsider expensive complex road projects.

In regard to engagement with customers and neighbours, we know from experience of dealing with NH/LTC in regard to the proposed LTC that consultations and engagement is inadequate, communications are greatly lacking, as is the level of information shared, and just how much important information is withheld. It is not just the public either, the same applies for Local Authorities, businesses, NGOs etc.

Many people are fed up with the bad state of our roads, and the lack of reliable, affordable, alternatives such as public transport and active travel due to too much focus and investment into roads all the time.

You refer to findings from the Transport Focus survey, which we'd be interested to learn more about because we don't believe many people would be familiar with Transport Focus, so we have to question how reliable their input is, and whether they are really in touch with the general public to any real extent.

This consultation is full of errors, has not been well promoted to the public, and is quite a full on task for most to try and undertake, due to the complexity and repetitiveness of the information which is hindered by the inadequate and erroneous consultation materials.

Chapter 2: The Route

Please see our General Comments

Chapter 3: Engagement with Customers and Neighbours

Please see previous comments, we do not believe that NH communication, engagement, and consultation is adequate.

Chapter 4: Network collaboration

We highlight that the online response form titles Chapter 4 as 'Network Integration' when the Report titles it 'Network Collaboration'. Another example of inadequacies from NH, and the lack of attention to detail, which leads you to wonder what other errors and aspects might be overlooked and what impacts these things can have at other levels.

It is our observation that the Sub-national Transport Bodies largely serve themselves, NH, and businesses rather than the general public. Their own consultations are also often misleading and inadequate. This doesn't surprise us when the likes of Jacobs are running the consultations for them, as clearly Jacobs stand to benefit from NH projects.

Again, you comment on the importance of rail and modal shift, yet fail to practice what you preach, when you are not recognising and voicing the need for rail improvements instead of roads like the proposed LTC. But is it any wonder when failure to deliver the LTC successfully, is by your own annual reporting, an existential threat to the organisation. It actually works in NH favour if you can get away with pushing projects through that don't do the job they are supposed to, because you just end up with more work fixing the problems you help create, it's diabolical.

Chapter 5: Challenges and Issues

In regard to improving safety for all, and in addition to our general comments on this aspect, we also voice serious concern that the proposed LTC would be a 'smart' motorway by stealth, if it goes ahead.

We do not buy into the NH propaganda that it would be an All-Purpose Trunk Road, when evidence shows it is being coded as a 3-lane motorway (with the exception of the southbound section between the M25 and A13. It would have no hard shoulder, would use 'smart' technology, and is being designed to 'smart' motorway standards.

We welcome the scrapping of new 'smart' motorways, but still have concerns about the existing ones and their dangers, this is something that needs urgent attention and to be rectified quickly. It is as simple as reverting the left lane back to a hard shoulder by switching the red X on that lane on immediately, with white lines painted back along to formally segregate the hard shoulder again.

In regard to network performance, and in addition to our general comments, it is clear that the proposed LTC would add to the congestion and problems. The design capacity of 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 is estimated to take 19% of traffic away in the opening year (quoted as 2029/30), so not taking the two year delay announced by government in March into account. This drops further by 2045 when it is estimated to be 13%. Independent analysis of official traffic modelling concluded that the reduction would actually be as low as 4% in the am peak hour and 11% in the pm peak hour. Either way the Dartford Crossing would still be over design capacity.

The statement on page 64/134 of the report saying the LTC would take around 22% of traffic off the Dartford Crossing is outdated and incorrect. It is very concerning that such important information like this is wrong and being used for a future planning report and consultation.

In fact NH state in the LTC DCO application that the aim is to bring it back to 2016 traffic levels, and evidence shows that in 2016 the Dartford Crossing was already way over capacity.

Add in the induced demand, bottlenecks, and fact that there are not adequate connections, as well as the destruction and harm the project would inflict, and it is clear the proposed LTC is not fit for purpose and fails to meet its own scheme objectives, let alone help solve any of the other route issues.

In regard to improved environmental outcomes, and in addition to our previous comments. Not only would the LTC be hugely destructive and harmful, fail against new legal targets for PM2.5, but they would also fail against new requirements for Biodiversity Net Gain. Whilst technically for NSIPs this may not

**THAMES CROSSING
ACTION GROUP**
www.tcag.info

come in until Nov 2025, NH brag about the LTC being the greenest road every built in the UK, so it would be good practice to follow the new requirements sooner rather than later, particularly when construction would not start until at least 2026, if permission is granted. We live in one of the most nature depleted countries in the world. We need and deserve better.

We also need NH to stop greenwashing attempts and start being more honest and transparent about the impacts of the SRN.

In regard to growing the economy, and in addition to our previous comments, we again reiterate that not all economic growth is good. It can actually inflict negative impacts and is not always as good as it is made out to be. Try sitting counting all that money when there is no clean air to breathe, clean water to drink, and healthy soil to grow food in.

We also note that there is no mention of the economic benefits of the proposed LTC in this section, not that we believe they would be as good as NH like to make out, otherwise you'd be shouting the figures from the rooftops, which you don't. Considering it is supposed to be one of the scheme objectives and a benefit you like to promote, the fact it is not mentioned in this section speaks volumes.

In regard to managing and planning the SRN for the future, we strongly believe that NH are not fit for purpose in a sustainable integrated transport future. We need to abolish NH and replace with a better and more sustainable integrated transport organisation instead.

In regard to a technology-enabled network, and in addition to previous comments, we identify and highlight the connection between 'smart' tech and dangers on our roads, in regards to 'smart' motorways and safety concerns.

Chapter 6: Initial Route Objectives

Objective A – Promote safe and efficient freight movement to and from air, sea, and freeports in the Kent Corridors.

Please see our previous comments, we do not believe that roads should be the priority on solving any such issues

Objective B– Support sustainable development within Kent and Thurrock

Please see our previous comments. Plus, we agree that there needs to be a more integrated approach, and for there to be a reduction in road use, it should not just be a focus on reducing private cars from our roads, road freight is a serious issue that needs to be addressed sooner rather than later, and action taken now.

It is also ludicrous to think that you can have economic growth and developments without that having implications and impacts on traffic levels and congestion worsening.

Interpretations of levelling up priorities of government and NH are often different from those of the general public for whom government and NH work. Highlighting that both Gravesham and Thurrock

**THAMES CROSSING
ACTION GROUP**
www.tcag.info

councils are opposed to the proposed LTC, who had identified that it would have negative impacts rather than any real benefits to the areas and communities.

Objective C – Promote the Kent Corridors as a region that sets the standard in supporting the use of technology

Please see our previous comments, particularly in regard to concerns about ‘smart’ tech and motorways.

EVs are not the panacea many like to believe, and still emit deadly PM2.5, they are not zero emissions as often claimed. They do not solve congestion issues. They do put additional pressure on energy supplies, at a time when we have supply issues.

Hydrogen is also not there yet either. Green hydrogen is in very limited supply, and is also energy intensive.

As well as getting more freight off roads and onto rail, we need to address the fact that often freight is not taking the most efficient and effective routing. If technology is to be used, it should be for these kinds of aspects. We have heard of companies importing from overseas, where their warehouse is in the South East, but often their freight comes into ports out of the area, resulting in more road miles being racked up when more efficient planning could have had the imports arriving at the closest port.

We again stress, since it is mentioned again, the proposed LTC would not be low carbon, it is estimated to emit a whopping 6.6 million tonnes of carbon, if it goes ahead.

Objective D – Improve resilience of routes from Dover, Sheerness, Tilbury and Thames Gateway Ports to the M25

Please see our previous comments. Plus we reiterate that the proposed LTC would not improve resilience of routes. Dover needs to be connected by rail instead of purely relying on unsustainable road freight. Thames Gateway is not connected directly to the SRN, and both Tilbury and London Gateway would be negatively impacted by the proposed LTC due to inadequate connections and increases in traffic, as well as lane drops on the A13 due to the proposed LTC, if it goes ahead. You recognise this in the comment about interested parties identifying concerns around the potential impact of LTC, yet continue to promote the LTC as a solution to everything, despite concerns and evidence saying otherwise.

The concerns that have been voiced about LTC impacts on Blue Bell Hill/A229 are valid, and as already stated NH ruled out the LTC route option that included improvements to Blue Bell Hill/A229, which just goes to show how out of touch and wrong NH have been in their work on the LTC from the start.

Objective E – Promote sustainable connectivity in region

Please see previous comments. We do not trust NH to have interest in anything other than roads, as they have no interest in more sustainable options. NH have also proven time and time again that they try to greenwash, which is underhand and unacceptable, particularly at a time of climate emergency.

THAMES CROSSING ACTION GROUP

www.tcag.info

Objective F – Be a better neighbour by safeguarding the environment and reducing the impact air quality and noise on local communities including Dover, Maidstone, Aylesford, Ashford and Canterbury.

Please see our previous comments. We also fail to see why some areas have been mentioned and not others, everyone everywhere deserves the right to breath clean air and not have their health and wellbeing put at risk from air and noise pollution.

It also fails to identify and address the fact that deadly PM2.5 pollution can travel thousands of miles, so the distance from the SRN is less relevant, as what happens on the SRN in regard to PM2.5 has far greater consequences as PM2.5 impacts far and wide.

To be claiming an objective to safeguard the environment whilst continually greenwashing and promoting such a hugely destructive and harmful projects as the proposed LTC is wrong and hypocritical.

Chapter 7: Locational Areas for Consideration

Again, investment in the network doesn't always benefit locally, regionally, nationally, or internationally. Growth, developments, and more roads just results in more destruction, harm, and induced demand. Interpretations of what is considered Levelling Up vary greatly.

NH vision/aim of zero harm on the network is unrealistic by the very nature of how dangerous driving/using roads can be.

We have repeatedly expressed concerns and highlighted that there is evidence to show projects like the proposed LTC would not improve network performance, rather that it would worsen it. The same goes for environmental outcomes, growing the economy, managing and planning the SRN for the future, and technology-enabled networks.

Investment focus should move away from being predominantly about road investment, and move to more sustainable alternatives. Any future RIS needs to focus on better managing and maintaining the existing road networks, and all current and future road building/projects needs to be reviewed and reconsidered, with an immediate pause at least placed on every single current and future project whilst the review and reconsideration takes place.

Your statement about the proposed LTC in the RIS2 section is again outdated and incorrect, as government have announced a two year rephasing of the project, so construction would not start until 2026 at the earliest, if permission is granted. This delay also means that opening would be pushed back into RIS4, rather than RIS3.

It appears that you are confirming that the Tilbury Link Road has been moved from being a RIS3 pipeline project into RIS4 pipeline projects. We reiterate that while we do not support the TLR or the LTC, the Tilbury Link Road should be considered part of the LTC scheme and included in its costing and evaluations as it is a direct result of the LTC. After all you cannot have a link road without something to link it to!

**THAMES CROSSING
ACTION GROUP**
www.tcag.info

Similarly, the Blue Bell Hill/A229 improvements should be considered part of the LTC project for cost and evaluation purposes too.

Failure to include these projects within the LTC project is a false economy, and would further increase the cost and reduce the already low benefit cost ratio/value for money status.

In the Areas of interest for further investigation you mention the A1089 and A13 to M25 due to safety concerns and delays. We note that in this section the Tilbury Link Road is referred to as a RIS3 pipeline project, which is again outdated and incorrect, if other information in the report is accurate whereby it states TLR is now a RIS4 pipeline project.

We additionally voice concerns that if these aspects need further investigation then it needs to be done prior to the proposed LTC being progressed any further, due to the interactions and impacts they have on each other. To be investing billions on a project that has such implications and impacts in this way is a false economy and in no way efficient or effective.

Similarly the A2 near Dover, which the Port of Dover has called on to be dualled as a direct result of the proposed LTC should be considered in the same way, if there are safety and other concerns. This goes for any of these investigation locations that would be impacted by the proposed LTC, if it goes ahead.

Chapter 8: Next Steps

Considering that this step has been inadequate with errors and outdated information in this consultation, this issue needs to be addressed prior to any next steps, otherwise you risk building progression on a poor foundation of the position we are now in.

It is not good enough that you simply identify challenges, voice that they need to be solved, throw some vague suggestions on what might be done, without any real information, and consider this to be a genuine and valid consultation.

The public need and deserve to be consulted on the actual detail, rather than what is being presented in this consultation. It is public money that would be used to fund any future works, so we should get a say on how much and what it might be spent on.

Considering the route selected, Kent Corridors to M25, to what extent do you agree with the located areas identified for further consideration in Chapter 7?

Strongly disagree.

We would hope that if you have read our previous comments the answer to this question should be very clear!

Considering the Initial Overview Report for Kent Corridors to M25, how well does this report consider your needs?

Not very well.

As highlighted in our previous comments, we need and deserve better than what is being proposed. This consultation has been inadequate, with errors and out of date information. We should get a say on exactly what is being proposed both ideas and financials.

We also have little if any confidence that NH would deliver what it sets out, especially since so much of what is being proposed as solutions to challenges in theory, contradicts the actions we are seeing and experiencing.

Focus needs to be moved away from roads being the priority in this country, and instead we need a sustainable integrated transport body and investment plan, to ensure a healthy and sustainable future for everyone.

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.