

## Kent County Council's Emerging Transport Plan Consultation

### Introduction

Thames Crossing Action Group (TCAG) 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 Kent County Council Emerging Transport Plan Consultation<sup>1</sup> in September 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, representing those who are opposed to the proposed Lower Thames Crossing (LTC), we feel it important to make representation in the Kent County Council Local Transport Plan, because obviously the proposed LTC would impact the region if it goes ahead, and we feel it is therefore important to highlight our concerns to you as part of this consultation.

Our representation will be based on our position in regard to the proposed LTC, and as such our comments will all focus on anything relevant and related to that.

### Response

#### *Q. Do you support our new ambition?*

Partly

#### **Please tell us the reason for your answer**

We support improving the health and wellbeing of those living and visiting Kent, and welcome the support of delivering a safe, reliable, efficient and affordable transport network across the county. We welcome supporting and encouraging public transport and active travel.

However, whilst we acknowledge that the proposed Lower Thames Crossing (LTC) does not fall within the remit of KCC or the emerging transport plan as a KCC project we do have concerns that KCC support the LTC in principal.

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<sup>1</sup> <https://letstalk.kent.gov.uk/local-transport-plan-5>

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We also have concerns about the additional and considerable adverse impacts the proposed LTC would bring to the KCC road network, and the negative impact it would have on your ambitions to improve public transport and active travel options, if the LTC goes ahead.

***Q. Our emerging draft Local Transport Plan described nine challenges concerning transport in Kent that we intend to address. Please tell us if you agree or disagree with us focusing on these challenges.***

- 1. Our highways assets are in a phase of managed decline which in turn makes them less resilient to new pressures**  
Agree
- 2. Following a decline in the number of injuries and fatalities on Kent's road, these levels have risen in 2021.**  
Agree
- 3. Traffic is causing congestion, poor air quality and impacting Kent's economy**  
Agree
- 4. Transport challenges in Kent arise from how the existing population of 1.6 million people and 70,000 business in the county choose to travel, as well as traffic generated by new developments being built**  
Agree
- 5. Some indicators of public health, such as obesity and life expectancy, are worsening.**  
Agree
- 6. The financial viability of the public transport service has declined due to cost pressures and changes in passenger demand**  
Don't know – see further comments below

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- 7. Kent's international gateways need government leadership – the impacts which arise and affect our local communities and the national economy cannot be resolved entirely by ourselves.**

Agree

- 8. Carbon dioxide (CO<sub>2</sub>e) emission reductions from management and use of the road network are forecast to go off-track, compared to the levels of reduction needed to contribute towards reducing the worst effects of climate change.**

Agree

- 9. We need more funding and need to know what funding we will have over the next few years so we can improve transport in Kent.**

Don't know – see further comments below

### ***Q. If you would like to make any comments on the challenges or would like to suggest any others that we should consider, please tell us***

At the end of the day funding for the transport network all comes from taxpayers' whether that be from a local level or government level, and this funding pot is not bottomless. In this regard proper and fair analysis needs to be carried out to ensure the best way to spend such funds, to ensure a healthy and sustainable future for all.

Quite clearly our existing road network for example is in a terrible state and in desperate need of maintenance, as much of it is being used by higher volumes of traffic than would ever have been imagined when many of them were built, and we are now at a time where much of our infrastructure is aging to the extent that works are needed to avoid deterioration to a level that would see the need to close roads due to safety issues.

Additionally, public transport and active travel funding is being cut, with services and support being cut, which goes completely against local and national ambitions to support and encourage more public transport and active travel options and use.

The proposed LTC is now estimated to cost £10billion+++. Think what that amount of money could be better spent on.

It would not solve the problems at the Dartford Crossing. The current crossing has a design capacity of 135,000 vehicles per day, yet regularly sees 180,000 vehicles using it per day. That means we'd need to see a reduction of more than 25%, but the proposed LTC would take as little as 4% in the am peak hour and 11% in the pm peak hour according to Thurrock Council independent analysis of official NH traffic modelling. Even NH own estimate of a 19% reduction in opening year (as at 2030 before the 2 year delay

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was announced), and dropping to 13% by 2045 is not enough to bring the current crossing back below design capacity.

NH admit in the LTC DCO application documentation that the aim is to bring the Dartford Crossing journey times back to 2016 levels. We all know that the Dartford Crossing was well over capacity and journey times were shocking in 2016.

There would also be an increase of around 50% extra cross river traffic, if the proposed LTC goes ahead, induced demand. It is also worth noting that official estimates for induced demand is based purely on cars and does not include HGVs or LGVs, which is concerning, particularly as the LTC is to provide a route for ports in the South East through to the Midlands and beyond. The project is being promoted as bringing new opportunities and growth to companies that would equate to more HGVs on our roads as a direct result of the LTC, if it goes ahead.

NH 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 example, if the LTC goes ahead, when there is an incident at the Dartford Tunnels and traffic attempts to migrate to the LTC. They would come off the M25 onto the A2 coastbound, only to find there would be just one single lane from the A2 onto the LTC. Imagine the chaos, congestion and pollution. How long before traffic is trying to cut through and find a different route to the LTC by rat running any which way they can? That is just one example, there are plenty of other instances <sup>2</sup>.

Considering the Dartford Crossing currently experiences more than 3000 incidents per year, largely related to congestion in the area, and the fact that it would still be over capacity and congested if the proposed LTC goes ahead, as well as the current crossing needing to be closed more for the ageing infrastructure of the crossing, the number of incidents at the crossing would likely remain high.

As well as traffic flow issues when there are incidents there would also be limited connectivity for certain journeys, and the A2 would be reduced down to just 2 lanes for a section in each direction, if the LTC goes ahead. That's right, after money being spent on widening the A2 from 3 lanes to 4 due to congestion and safety issues, the LTC would result in the A2 being reduced to 2 lanes for a section in each direction.

The proposed LTC is being designed to offer an alternative route for port traffic in the South East through to the Midlands and beyond. It is unacceptable that in this day and age the likes of the Port of Dover is not connected by more sustainable rail.

70% of goods in and out of the Port of Dover alone, use the Dartford Crossing. Around 42% of traffic using the current crossing are goods vehicles.

As already mentioned NH are not including HGVs and LGVs in their predictions for induced demand for the LTC, and clearly there would be an increase in new traffic of those categories, if LTC goes ahead.

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<sup>2</sup> <http://www.thamescrossingactiongroup.com/incidents-ltc-dartford-crossing>

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Rail improvements between Ashford and Reading<sup>3</sup>, also connecting the Port of Dover, would be a better solution, as it would take more freight off the roads and onto more sustainable rail. The cost of such improvements is far less than the cost of the proposed LTC. This means that as well as the rail improvements there would be funding left over for other things too.

The proposed LTC would not be viable for public transport, such as buses, due to the lack of adequate connections. Neither would it offer any provision for cross river active travel. The active travel routes that NH are promoting often lack any real connectivity, instead appearing to just be a tick box exercise to include some active travel regardless of whether they are of any genuine value. Many routes that NH have referred to as 'new' routes are actually realignments of existing routes, that would need to be realigned purely due to the LTC.

There are forecast to be 2,147 additional accidents over 60 years, including 26 fatalities, 220 serious injuries and 3,122 slight injuries, if the proposed LTC goes ahead<sup>4</sup>. This is not in keeping with KCC or the nations ambitions to improve road safety.

The LTC would fail against all scheme objectives<sup>5</sup>, which is something KCC should be aware of and considering in regard to their support of the proposed LTC, and the impacts it would have on the existing road network, environment, communities, health and wellbeing etc.

As already highlighted, the proposed LTC would not improve congestion, it is actually likely to make it worse. It would not improve air quality, it would actually fail against the newly set legal targets for PM2.5<sup>6</sup>. It would be a complete waste of taxpayers' money that could be better spent on other things.<sup>7 8 9</sup>

The proposed LTC is estimated to emit a whopping 6.6 million tonnes of carbon emissions<sup>10</sup>, if it goes ahead. This is not in keeping with local or Government ambitions and targets. With the 2 year rephase, the data in the LTC DCO are already outdated, and not a true reflection of reality against the year by year targets for carbon emissions. Neither do they take into account the cumulative emissions from other works that would be needed as a direct result of the LTC, if it goes ahead.

Electric Vehicles (EVs) are not the panacea that many like to believe, and would still emit deadly PM2.5 and add to congestion. In turn this leads to calls for more roads/lanes, which adds to the destruction, harm, pollution, emissions, environmental impact. This would definitely also impacts local roads, and not just be specific to the proposed LTC as a road.

So, whilst we acknowledge that the proposed LTC is not a KCC project, we do consider it is something that KCC (and indeed Transport for South East (TfSE)) should be strongly opposing because the evidence shows

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<sup>3</sup> <https://www.thamescrossingactiongroup.com/rail-and-tram-alternatives/>

<sup>4</sup> <https://www.thamescrossingactiongroup.com/serious-concerns-over-ltc-road-safety/>

<sup>5</sup> <https://www.thamescrossingactiongroup.com/ltc-project-objectives/>

<sup>6</sup> <https://www.thamescrossingactiongroup.com/environment-act-targets-set/>

<sup>7</sup> <https://www.thamescrossingactiongroup.com/cost-of-the-proposed-ltc/>

<sup>8</sup> <https://www.thamescrossingactiongroup.com/ltc-value-for-money-issues/>

<sup>9</sup> <https://www.thamescrossingactiongroup.com/ministers-are-being-misled-on-lower-thames-crossing-costs/>

<sup>10</sup> <https://www.thamescrossingactiongroup.com/ltc-carbon-emissions/>

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just how destructive and harmful it would be, and the adverse impacts it would have on both KCC and TfSE future ambitions and plans.

In addition to our comments and representation in regard to the KCC Emerging Local Transport Plan, we would welcome and encourage your reconsideration of support in principal of the proposed LTC. We would be more than willing to discuss this, and/or send further info, please do not hesitate to contact us.

To conclude we support a healthier more sustainable transport plan and future for all, and call upon KCC to do everything they can to ensure the emerging local transport plan reflects this, and does not include support for projects that go against this like the proposed LTC.

If KCC and others truly wish to have a healthier more sustainable future, and funding to be available to support such ambitions, the £10billion+++ for the proposed LTC could be far better spent, you need to say NO to LTC, and yes to better more sustainable travel and transport options.

**As part of our Local Transport Plan, KCC is required to present the level of carbon emissions generated by transport use on the Kent network and demonstrate how we think that will change in the future if we do not take any new actions.**

***Q. To what extent is lowering the carbon emissions of travel and helping to reduce the severity of climate change, important to you?***

Very important

***There are a range of actions that could be taken to help reduce the carbon emissions from journeys. Please note that we are not proposing any of these actions as part of our new Local Transport Plan at this stage – they are based on ideas which have been tried elsewhere and which could be considered for areas of Kent in the future.***

***Q. Please select from the list below those actions that you think we should consider taking if funding were available.***

As a group we can only comment on aspects that relate and are relevant to the proposed LTC, and the suggested actions would likely generate different responses from our various supporters, so we will not comment on any specifically.

However, we would comment that as a group we have concerns that the dangers/risks of Electric Vehicles are not yet being recognised and taken seriously, and that they are not the panacea that many like to believe.

EVs still emit deadly PM2.5 (Particulate PM2.5) particles so tiny they get into our organs via the bloodstream.

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EVs do not solve the problem of congestion on our roads, this in turn leads to calls for more roads/lanes which leads to more destruction and harm.

These are a couple of the concerns we have, more info can be found on the EV update on our website<sup>11</sup>.

Generally, as already mentioned we support improving air quality, health and wellbeing, saving, protecting and enhancing the natural environment, public transport and active travel options, a more sustainable future for all.

**In response to the transport challenges we face, and to help us deliver our overall ambition for transport in Kent, we have identified nine proposed Policy Outcomes that we want to achieve in Kent.**

***Q. Do you support or oppose each proposed Policy Outcome?***

***Q. If you would like to make any comments about the Policy Outcomes or would like to suggest any other outcomes we should consider, please tell us.***

1. Our group generally support ensuring existing transport networks are well managed and maintained over funding being put into new projects like the proposed LTC, that is not fit for purpose.
2. Our group supports ensuring our roads are as safe as possible, noting that roads are by nature dangerous/high risk environments. We do not support 'smart' motorways as we believe them to be killer motorways, and whilst new 'smart' motorways have been scrapped existing 'smart' motorways needs to be made safe as a matter of urgency.
3. Our group would state that when it comes to international travel, whilst we of course identify that there are some benefits to international travel/transport, it also needs to be monitored and managed to ensure that the benefits are not outweighed by the negative impacts. Moves, where possible, to support more localisation are favoured, when it comes to things being imported that could be grown/produced locally, for example.
4. Whilst we can't comment specifically on this, we support more sustainable public transport.
5. As a group we have concerns that too much development is resulting in adverse impacts on our roads, transport options, communities, and the natural environment. We also have serious concerns about the adverse impacts of disruption from incidents etc to our roads and transport options. As already highlighted this includes the fact that the proposed LTC would not solve the problems experienced due to the Dartford Crossing, to the extent that we believe evidence shows that the LTC would actually worsen the chaos and congestion.

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<sup>11</sup> <https://www.thamescrossingactiongroup.com/electric-vehicles-argument/>

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6. We support Kent's historic and natural environments being saved, protected and enhanced, and for them to be as accessible as possible in a sustainable way for all.
7. Our group completely support improving air quality and reducing carbon emissions. Again as already highlighted this is just one of many reasons why we cannot understand KCC's support of the proposed LTC that would emit a whopping 6.6 million tonnes of carbon, if it goes ahead.
8. Our group supports improving sustainable public transport. Another concern we have in regard to the proposed LTC is the lack of adequate connections to make the LTC viable for public transport such as buses.
9. Our group supports a sustainable healthy future for all, and welcomes opportunities for moves towards this kind of future. This could be by means of supporting active travel, but also ensuring communities ability to enjoy the great outdoors and enjoying our natural environment for our health and wellbeing, rather than it being destroyed and adversely impacted by development and projects like the proposed LTC.

***Q. We would like to know which of our proposed Policy Outcomes are more important to you. Please select the three most important from the list below.***

As the list is open to interpretation, rather than select three, we will simply comment that we wish to see a prioritising of ensuring a safe, reliable, efficient, affordable and sustainable transport network is supported and encouraged, and that anything that goes against this is opposed.

**For each of the nine planned policy outcomes we have proposed Policy Objectives to help us target our work to improve transport. We will measure the proposals we develop for our full draft Local Transport Plan against these.**

***Q. Do you support or oppose each of these proposed Policy Objectives?***

***Q. If you have any comments on the Policy Objectives or would like to suggest any more objectives, please tell us.***

1A. If by this you mean ensuring there is funding to ensure that the existing transport network is properly managed and maintained, we generally support this if it is done sustainably.

2A. As previously commented, we support improving safety for all who use the transport network. We note mention of zero fatalities and serious injuries by 2050, which whilst in an ideal world would be great, we acknowledge that this is not really realistic in the real world sadly, by the very nature of how dangerous the transport network can be.



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3A. We oppose this as we feel there are better options, and that there is an urgent need to reduce road freight, and get more freight onto more sustainable rail. It is shocking that in this day and age the Port of Dover for example is not connected by rail. Rail improvements should be considered and supported to create a more sustainable option, instead of prioritising the continued support of road freight.

70% of the goods in and out of the Port of Dover alone use the Dartford Crossing. 42% of vehicles using the current crossing are goods vehicles. This needs to change. Not only because we need freight being transported in a more sustainable way, but also because this would improve congestion and air quality on the existing road network.

3B. We do not support the KCC bifurcation strategy, particularly to support connections to the proposed LTC.

Whilst KCC and the Port of Dover see a need for further roadworks in this regard, there are better and more sustainable options, such as the Port of Dover becoming connected by rail, and getting more freight off our roads and onto more sustainable rail.

4A. Please see our previous comments about support of sustainable public transport and rail improvements.

4B. Please see our previous comments about support of sustainable public transport.

5A. We do not consider this to be a topic we should comment on specifically, but would comment that we feel KCC should oppose the proposed LTC based on the adverse impacts it would have on the existing road network.

5B. Please see our comment on 5A above. Additionally, we comment that we have concerns about the adverse impacts associated with future development, including the proposed LTC, on the transport network, the natural environment, and our communities, health and wellbeing.

5C. This is too open to interpretation for us to comment on, 'future transport' could be too many things. We again refer to our support of sustainable travel options that support a healthy and sustainable future for all.

6A. We support saving, protecting and enhancing the historic and natural environment 'destinations. This is yet another reason why we believe KCC should oppose the proposed LTC, because of the destruction and impacts it would have on historic and natural environments.

7A. We support the reduction of carbon emissions. We again stress this is one of many reasons KCC should be strongly opposing the proposed LTC and it's whopping 6.6 million carbon emissions, if it goes ahead.

It is not just the emissions from the LTC project that KCC should be concerned about but also the cumulative emissions from the induced demand traffic that the LTC would generate on our existing local road network, and the associated emissions from other 'improvements' that would be deemed necessary because of the proposed LTC, if it goes ahead, such as Blue Bell Hill Improvements, the A2

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dualling/bifurcation strategy etc, as well as fixing all the issues the proposed LTC would create to the network if it goes ahead.

7B. Please see our previous comments about our concerns in regard to EVs.

7C. Any air quality assessments need to properly and adequately consider the impacts of PM2.5 from EVs, and also the impacts of road building in the future, such as the worsening of air quality that the proposed LTC would create.

8A. Please see our previous comments in regard to supporting sustainable transport options, including public transport.

8B. Please see our previous comments in regard to supporting sustainable transport options, including public transport. We would add that the focus for rail improvements needs to be more than just for public transport options, it needs to consider and include rail freight improvements too.

9A. We support improvements to active travel options. We again draw attention to the fact that the proposed LTC offers not provision for cross river active travel and would have an adverse impact on active travel, if it goes ahead.

9B. We support representation and protection of Kent residents from impacts of noise pollution, but this should be for all noise pollution not simply focused on airports. KCC should be opposing LTC for all the reasons it opposes Gatwick expansion plans, and more.

***Q. If you have any other comments or suggestions on the emerging draft Local Transport Plan or its evidence base, please tell us.***

We note that in the Evidence Base you comment that you are incorporating the effects of LTC. We would question firstly, whether what scrutiny of the NH/LTC data and analysis has been carried out? Secondly, whether you have taken the two year rephase in account, since the LTC DCO application does not factor this in, and NH are so far refusing to reassess this. Many have genuine concern that this is not being done, and that the LTC should be examined and judged based on up to date and realistic analysis and data, rather than outdated documentation as it currently is.

We note that you also detail road schemes that remain undelivered but still in planning from Local Transport Plan 4, which includes Blue Bell Hill Improvements, and the A2 dualling near Dover. As both of these are schemes that would largely be needed as a direct result of the proposed LTC, if it goes ahead, we again suggest that these are further reasons for KCC to be opposing rather than supporting in principal the proposed LTC project.

Blue Bell Hill Improvements were actually part of the original LTC Variant C option, which was ruled out, yet is still being progressed as a separate stand-alone project by KCC. We believe this to be a false economy of the proposed LTC, both financially and in regard to environmental impacts. We also question the impact of the proposed LTC if it goes ahead, on KCCs ability to deliver what would be needed as

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environmental mitigation/compensation for the Blue Bell Hill improvements, as there can only be so many options in the area.

The A2 dualling is something the Port of Dover has specifically said they would expect as a result of the proposed LTC. Please see our previous comments in regard to rail improvements to get more freight off roads and onto more sustainable rail, and the lack of rail connection for the Port of Dover.

We object to the proposed LTC being defined as an 'improvement' in the Evidence Base document (and elsewhere), as the evidence is there to show that it would be hugely destructive and harmful, and is not fit for purpose. Far from being beneficial, the proposed LTC would have adverse impacts on the existing road network, as well as not supporting public transport and active travel, and negatively impacting the environment, communities, health and wellbeing. Not to mention the additional cost to KCC and taxpayers' in regard to other projects that would be needed as a direct result of the LTC, if it goes ahead.

Re 5.27 of the Evidence Base, we would again question what analysis has been carried out on the data provided by NH, and whether you have taken into account the 2 year rephasing of the LTC project? From what we can see it doesn't look like you have, as you are mentioning carbon emissions between 2024 to 2037, when construction of the LTC (if it goes ahead) would not start until 2026 at the earliest due to the 2 year rephase. The LTC DCO documents are out of date, that is a fact. Carbon targets obviously reduce year on year so this is very relevant when considering and analyzing carbon emissions. To not include carbon generated by earthworks, maintenance, operations, and loss of carbon sinks such as mature natural habitat is also unacceptable and not a realistic reflection of reality. At a time of climate emergency the issue of carbon emissions needs to be taken very seriously and everything needs to be calculated, we cannot afford to underestimate, because our very future existence relies upon the decisions we make now as well as moving forward.

Para 5.83 we again question calculations of estimated carbon in regard to the proposed LTC as previously mentioned.

Para 5.84 is another reason you should be opposing the proposed LTC, not supporting it in principal. Again noting the LTC DCO data is outdated and the 2 year rephase.

Para 5.118 – we strongly object to the delivery of the proposed LTC being a priority of KCC. We would ask KCC to reconsider your support of the LTC, due to the many many reasons why you should be opposing it, many of which we have highlighted in this representation, with more info available on our website. KCC have been voicing serious concerns about various adverse impacts of the proposed LTC at the DCO Examination hearings. It amazes us that KCC can have so many concerns yet still say you support the proposed LTC.

The proposed LTC and KCCs bifurcation strategy **would not:**

- Reduce the impact of travel
- Protect our natural, built and historic environments
- Improve air quality

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- Improve connectivity between major economic hubs, ports and airports. Besides there are more important things than a main focus and priority on money, like a healthy sustainable future for us all.
- Result in more reliable journeys
- Result in a more resilient network

We believe we have highlighted all the reasons why evidence shows that none of these objectives would be met, but are of course more than happy to discuss further if required. Please do not hesitate to contact us!

## **Section 3 – Equality and health analysis**

It appears that your analysis mentions the proposed LTC in regard to KCCs bifurcation strategy, and suggests that it would be 'slightly beneficial'. We would strongly argue this point as we believe evidence shows that this would have adverse impacts. Not only in its own right, but also as it specifically mentions the proposed LTC which would in its own right be hugely destructive and harmful. So by attempting to promote the bifurcation strategy by associating it to the proposed LTC, you are by association connecting it to a project, the LTC, that goes completely against your analysis of benefits regardless of how slight you may perceive them to be. There is no doubt in our mind that far from benefits this should be considered as a significant adverse impact.

**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.**