



*Response to:*

**Deadline 9A of the Lower  
Thames Crossing DCO  
examination 2023**

# 1. Introduction

1.1 Transport Action Network (TAN) would like to respond to the Applicant's Deadline 9 submission 7.19 Carbon and Energy Management Plan v4.0 [[REP9-240](#)].

## 2. Applicant's new Carbon and Energy Management Plan v4.0

We note that the Applicant has for some unexplained reason deleted the definitions of 'construction' and 'operation' from the glossary in the v4.0 version of the CEMP. There is no accompanying text to explain the reason for this important deletion.

In the CEMP v3.0, 'construction' is defined as:

*"Activity on and/or offsite required to implement the Project. The construction phase is considered to commence with the first activity on site (e.g. creation of site access), and ends with demobilisation"*

However, in CEMP v4.0 this definition is removed entirely from the glossary.

We are concerned that by removing this definition, the Applicant may be attempting to redefine construction emissions to include mitigation undertaken elsewhere, which are unrelated to implementation of the scheme, to offset the huge carbon emissions caused by the construction activities. We suggest that construction emissions should be defined as they were: emissions relating to activity required to implement the project, i.e. not offsetting.

We suggest the ExA asks the Applicant why they have removed the definition of 'construction' and 'operation' from the CEMP glossary.

## 3. Summary of TAN's position on carbon

- TAN supports the submissions made on carbon by Dr Andrew Boswell of CEPP
- TAN agrees with Dr Boswell that the CEMP can not be relied upon to secure the decarbonisation claimed by the Applicant
- TAN disagrees with the Applicant's assessment of the significance of the carbon emissions caused by the scheme. We believe the carbon emissions caused by the construction and operation of the scheme would have a **large adverse** affect and would have a material impact on the ability of the UK to meet its legal commitments under the Climate Change Act and the Paris Agreement.

15 December 2023

Rebecca Lush  
Roads and Climate Campaigner  
Transport Action Network

Transport Action Network provides free support to people and groups pressing for more sustainable transport in their area and opposing cuts to bus and rail services, damaging road schemes and large unsustainable developments

254 Upper Shoreham Road, Shoreham-by-Sea, West Sussex, BN43 6BF

Not-for-profit company limited by guarantee, registered in England and Wales: 12100114