

## **Transport Decarbonisation Plan Consultation Response**

**Thames Crossing Action Group** represents thousands of people who are strongly opposed to the proposed Lower Thames Crossing. We object to the proposed Lower Thames Crossing for many different reasons and do not consider the project to be in any way fit for purpose.

With regard to this consultation we begin by stating that we have only very recently learnt about the consultation, and we feel that more needs to be done to ensure better communication to ensure people are actually aware of consultations such as this. It is therefore in a very limited time that we send this response.

We also wish to comment that we have found the consultation materials to be quite un-user friendly. We feel many people would be put off taking part, if they are even aware of the consultation because of the way the info has been presented. Part of the requirement of a good consultation is that it should be clear and informative material. We believe the material for this consultation is quite intimidating with a lot of technical data and terminologies.

We also find it hard to believe things like how low HGV emissions are, according to your data, compared to cars. What does it mean when you say the data comes from selected sources too? Are these sources selected to suit your own needs? What are the sources, we would expect sources of all data to be displayed in an obvious manner near to the data.

### **Understanding the need for net zero**

We understand the importance of ensuring net zero as soon as possible. The £27bn Road Investment Strategy 2 (RIS2), which includes the proposed LTC, would make carbon emissions go up by 20MtCO<sub>2</sub>, when we need them to go down by 167MtCO<sub>2</sub>

### **Lack of carbon emission info**

One of our many serious concerns about the LTC project is the carbon emission aspect of the project.

Highways England has been very sparse on the info they will provide to the public in relation to predicted carbon emissions of the LTC project. We have asked for further details on numerous occasions, but the go to response is that details will be released at Development Consent Order (DCO) stage as part of their Environmental Statement (ES).

Since carbon emissions are such an important aspect of the impacts that any road has on the environment and the people and wildlife in the surrounding areas, we feel that it should be compulsory for Highways England (or any developer) to provide adequate info to the public during the consultation period, and not left until DCO stage.

### **Outdated industry standards**

On so many levels we have become aware of just how outdated industry standards and guidelines that HE work to are. We feel these standards and guidelines need a drastic overhaul to include a higher standard of acceptable practice.

We would ask you to ensure that the carbon emission aspect of road building is tightened up considerably.

We are aware of the 'The carbon impact of the national roads programme' report by Lynn Sloman and Lisa Hopkinson -

<https://www.transportforqualityoflife.com/u/files/The%20carbon%20impact%20of%20the%20national%20roads%20programme%20FINAL.pdf>

We find it totally unacceptable that HE are allowed to work to a standard of measuring the carbon emissions locally and then reporting them as insignificant because the percentage is worked out on a national basis.

It is also not acceptable when you are considering ways to inform the public of how many emissions each form of transport generates to not take into account the true environmental impacts of road building or indeed any form of transport development.

Are you aware that HE are not even considering, let alone planning, how traffic would migrate between the two crossings when there is an incident at either? Their reasoning is because they do not have to as part of road building planning, it's not an industry requirement/standard/guideline.

It is ludicrous that HE are not expected and made to consider each project as an individual unique project that it is, and adapt as necessary. Instead they simply bury their head in the sand and just follow industry standards. To us this stresses the importance of how out dated industry standards are.

In a time when congestion on our roads happens all too frequently, proper analysis of what the resulting consequences will be must be taken into account. Again this has a direct impact on the emissions levels.

We have also been told by professionals who are experienced in the industry that WEBTAG that is used for road projects is considerably outdated too.

HE will only work to the industry standards even if they know it will create issues, and will apparently happily sit and wait until such time that someone in Government realises and makes changes to the standards and guidelines, rather than being a responsible and ethical company and raising matters to the Government's attention so they can be considered and addressed. Put simply they cannot be trusted and their irresponsible actions are and will continue to add to the problems on roads rather than help improve them and the associated emissions etc.

### **Road Building**

More roads means more traffic that is a simply and proven fact. This is something the Government need to acknowledge and we need to stop with the incessant apparent need to keep building more and more roads in the UK.

Highways England need to be investigated fully and we propose abolished due to them not being fit for purpose. They are not even capable of keeping the roads we already have well managed and maintained, let alone be given the job of building more new roads.

Better general maintenance of roads, especially pot holes, more road markings, lighting etc would all help to reduce the amount of incidents on our roads that in turn cause much of the congestion which increases emissions.

Also HE cannot be trusted to carry out these projects in an ethical and realistic manner. They are either completely inadequate to do the job, or they are ensuring the future proofing of their own work/jobs by the way they fail to properly fulfil their obligations when designing new roads.

Take the proposed LTC as an example yet again. There are not adequate connections between it and the existing road network. This means if it were to go forward it would just create the need for more money to be spent on roadworks to improve these inadequacies of the current proposed design. This not only costs the country more money financially, but also increases emissions by way of it rising due to the congestion caused by this issue, and also during the roadworks themselves from construction emissions, reduced speed limits during works etc.

HE have 'removed' the proposed Rest and Service Area and also the Tilbury Link Rd from the LTC project. However, both aspects are still being discussed and considered as separate stand-alone projects. This means that not only is it misleading to the public who have been told they have been removed from the LTC scheme, and it is only when you dig deep enough in the documents you learn they are still likely to go ahead separately rather than being truly removed as plans. Also it is a false economy, no doubt to try and help improve the benefit cost ratio for LTC, but again it will cost both financially and to the environment and with emissions.

### **Acceleration Programme**

We are aware of the acceleration programme/department that has recently been announced and we would point out and stress that it is more important to ensure that what is being done is adequate and efficient, and not harmful to the environment etc than purely to be pushing things through as quickly as possible.

Even if you magically opened the proposed LTC overnight it would still not be fit for purpose. The Dartford Crossing will still be over capacity, fact proven using HE's own data. It will still also create a hugely destructive toxic triangle, and well as damage homes, lives, health, communities, ancient woodlands, agricultural land (including grade 1), the environment, wildlife and habitat and so much more.

### **Non Motorised Users (NMU)**

We note that the proposed LTC is being designed purely for motorised vehicles, and in no way considers or caters for non-motorised users (NMU). This in no way assists in providing any additional means for NMU to cross the River Thames, which could help in reducing carbon emissions.

At the current Dartford Crossing there is a free service whereby cyclist can for example phone and request a free transfer across the river. A vehicle arrives loads the cycles and riders and provides a safe passage through the crossing.

Highways England have refused to include such a service or any provision at all for NMU, and continually use the excuse that the road is restricted to users who can legally use the motorway. This is because the road has been designed in such a way as to create this negative legacy. To add insult to injury the actual LTC is being referred to as an all purpose trunk road and not a motorway. So whilst it is not being considered a motorway, it will only be able to be used by those who can legally use a motorway. We consider this to be terrible design and unethical.

We would call for you to consider all new road projects having to take NMU into account whenever possible, and that industry guidelines which as used all too often as excuses as to not use bog standard common sense to be updated to reflect the facility and encouragement of NMU options for all projects.

### **Public transport**

Currently public transport is considered by most to be unreliable, expensive and often unsafe. The Government needs to do more to ensure people have access to reliable, affordable, safe public transport.

As well as all the obvious emission benefits of public transport we question whether the impact of large road building schemes such as LTC and others in RIS2 to public transport is truly taken into account. We know for a fact the negative impact that will be forced upon local public transport during construction of LTC if it goes ahead. Are these negative impacts included in the data when emissions are being considered, we very much doubt it.

More needs to be done to ensure the data that is produced for these kind of projects, if they are allowed to continue, is a true reflection of emissions that would be generated.

### **Trees and planting**

We cannot continue to allow trees to be destroyed for transport development. We need more protection in place for existing trees, and we need legislation to cover the planting of new trees to help deal with carbon emissions.

Projects like LTC simply destroy trees, including ancient woodland and veteran trees without an apparent second thought. It seems that the economic benefits are currently considered more important, and now more than ever our environment needs to rate higher than the economy.

The so called environmental mitigation aspect of new road projects leaves a lot to be desired. Realistically you cannot just allocate another piece of land as environmental mitigation and consider that enough. At the end of the day with projects like LTC the land that is supposed environmental mitigation is actually already a nature rich and diverse piece of land, so we question how this actually brings any environmental mitigation, in fact it some cases we would go so far as to question whether it could be harmful to the existing habitats and environments.

More needs to be done to ensure real protection and improvements are created in favour of the environment. Trees and plants do so much in regard to carbon emissions. New roads should only be built in exceptional circumstances and in those situations a high level of environmental mitigation needs to be addressed, with guarantees and safeguarding of the planting of more trees which would be protected and taken care of ongoing for a long way into the future.

More restrictions and safeguards need to be put in place to ensure that native trees and plants are used. That they are not just planted and left, but instead taken care of and legally binding commitments have to be made to care for and protect these trees and plants long term.

### **Supporting local**

The Government needs to do more to ensure that supporting local is encouraged on a national scale. Much of the traffic on our roads are HGVs and this is another large factor that drives new road building. We need to ensure moving forward that we do more to support local to keep carbon footprints to a minimum where possible.

This also includes the fact of things like the huge negative impact road projects like LTC have on our farming community. We cannot continue to allow such projects to destroy our agricultural land, including some high quality grade 1 agricultural land. Again as a country we need to address the value of keeping our food miles as low as possible to help reduce carbon footprint. Supporting our farmers and encouraging local sustainability for our food is another part of how we can move towards net zero, this will not be helped by destroying our farming communities with projects like LTC.

### **Alternative energy**

In the area where most of our members live we are no strangers to how harmful power stations etc can be too. We do not buy into HE's regular excuse that Electric vehicles will be a solution whenever we bring up concerns over pollution and the environment.

A bigger overall picture needs to be looked at when considering EVs as a potential alternative. The emissions in producing new EVs definitely needs to be considered, as does the emissions from generating the electricity to power the EVs. Just because EVs may reduce some emissions as they are being driven does not mean that they are emission free, there are things like PM2.5 to take into account. The disposal of the batteries which don't have a particularly long life expectancy, as well as the production of EV batteries needs to be considered too. The overall impact everything has on the environment has to be considered, we cannot simply move away from one thing and onto another harmful option and pretend it is a solution.

With the proposed LTC in particular it would actually see one existing solar farm demolished, and two others put under threat and currently in limbo because the LTC has stopped their plans from going ahead already.

HE cannot be allowed to continue to act in this way without any real care of consideration of the consequences. They have the audacity to show the land where the existing solar farm would be demolished as environmental mitigation land on their plans. How can demolishing a solar farm then be labelled as environmental mitigation? There is no mitigation being put in place for the loss of the solar farm either. We need to ensure that things like this are not allowed to happen. They certainly need to be taken into account when considering the true impacts to our environment and more guidelines/laws put in place to ensure this happens.

### **Joint up thinking and action**

We do not believe that Highways England is fit for purpose, and especially at this time when we need to be moving away from simply investing more and more money into new roads.

We believe that HE needs to be abolished and instead something along the lines of Travel UK maybe could be created. A company/organisation that would be capable of joined up thinking, which takes into account how all modes of transport and travel take place. This way more could be done to ensure people are able to travel as sustainably as possible.

How many people would travel using public transport more if the options were there, reliable, affordable, and safe? We're not talking about railways that shave 20 minutes of journey times, such as HS2, here either. We're talking about ensuring that everyone throughout the country has access to a reliable and affordable safe means of sustainable travel when and where it is needed.

There is no way you can make a successful move from high carbon emissions with companies like HE having as much power as they have to keep building new roads that are not needed or fit for purpose.

The clue is in their name they are Highways England, they are all about Highways and they ignore any other considerations other than those that suit their own needs.

Another example of this in regard to the proposed LTC is that if people to the south or north of the River Thames want to make the journey to the opposite side of the river public transport is severely limited. To do the journey by train you have to go into London and then back out again, which is obviously time consuming and expensive. Yet no thought or consideration is being given to incorporating a train or tram connection within the remit of a new crossing, it is all purely about building a road which create more emissions.

It seems nothing is being done to bring all the various aspects together as a big picture.

More needs to be done to ensure the bigger picture of all transport and travel in the country works together to ensure everyone has the best chance and opportunity to travel as sustainably as possible.

We also need to Government to focus on all negative impacts of transport as a whole. It is unclear exactly what this consultation covers with regard to net zero and emissions. We need to ensure things like NO2 are taken into account, and that World Health Organisation (WHO) standards on PM2.5 are also taken into account and enshrined into UK law. Overall the negative impact of all these harmful emissions need to be addressed as a matter of urgency.

### **Environment and health v economy**

As mentioned previously the environment and societies health and well-being moving forward need to be prioritised over purely economic benefits. Not only because it is the right and ethical thing to do for the future survival of the world as we know it. Also because anything else would be a false economy.

We need to ensure that the Government and companies are not using the economy as a false benefit to override the negative impacts.

We have serious concerns about the emissions that the proposed LTC and all the other new road projects would bring. We also need WHO standards for PM2.5 to be enshrined into UK law and taken into account with any proposed road projects. We have been advised that the entire route of the proposed LTC would fail against WHO standards on PM2.5. This is a serious matter but HE refuse to take it into account because they don't have to. An ethical and responsible company would bring this kind of info to the attention of the Government, but HE simply knowingly ignore it. This has to stop; HE cannot be allowed to continue such unethical and irresponsible behaviour. We are never going to improve things so long as this kind of attitude is accepted by the Government.

It is not just the negative impacts to the environment, and the resulting impacts that will have on our lives and health, but also the immediate negative impacts things like this have on lives and health now. Plus the economic cost of the associate health care, loss in working hours or even ability to work due to poor health relating to poor air quality. Again something HE and by default that HE is a Government company seem to be ignoring. We need proper due care and attention given to these matters and the necessary action taken. Not only to

stop these harmful road projects progressing, but also to work towards improving the existing poor air quality.

The original aim of a new crossing was to solve the problems created by the Dartford Crossing, yet the proposed LTC will not solve those problems it will just make them worse because of the inadequacies in the way HE operate.

### **Other alternatives**

One of the few positives to come out of the COVID-19 crisis is that as a society we have seen that working from home is possible on a far greater level than previously thought or considered. Whilst we identify that working from home is not possible for absolutely everyone, there are indeed many occasions when this is most definitely an option.

Imagine the reduction this would have on transport and carbon emission impacts to the country as a whole.

Investment into things like more reliable broadband throughout the country could be far more beneficial than keep building more polluting destructive roads.

Working from home and having meetings online via suitable software/apps should, where possible, be encouraged to reduce the amount of business travel and commuting. This would reduce congestion, reduce the 'need' for more roads, and help meet net zero.

### **Conclusion**

We need to hit our target of net zero by 2050 or sooner if possible, and to do that we cannot continue with the transport model we currently have, especially in regard to roads and in particular new road building programmes.

We can no longer stick our head in the sand and continue as if it is business as usual.

Industry standards and guidelines need a complete overhaul as do the Government departments and companies that deal with transport in our country.

Now is the time for the Government to put its money where its mouth is. Committing to net zero means more than just signing a document to enshrine it in law, and brag to the world about what we are going to do. It is more than just a plan. We need action to back it up and that can't be done without change in the way we move forward in regard to transport.

We need a transport plan and network that offers the public ways to travel without causing unnecessary harm to our planet, the environment and ultimately our lives, health and well-being.

We need to enshrine WHO standards on PM2.5 into UK law immediately.

We need to plant many many more trees in the UK, and to save and protect those we have.



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The Government need to halt RIS2 immediately and instead invest the money into sustainable transport/travel options that will reduce emissions and help us achieve net zero as soon as possible.

We would of course be happy to discuss any of the points raised in this response further should you wish, please do not hesitate to contact us.

More info on our objections and opposition to the proposed Lower Thames Crossing can also be found on our website [www.thamescrossingactiongroup.com](http://www.thamescrossingactiongroup.com)