

THAMES CROSSING  
ACTION GROUP

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**Route Strategies RIS3 Consultation Response**

Thames Crossing Action Group represent thousands of people who are strongly opposed to the proposed Lower Thames Crossing (LTC). The £8.2bn LTC would be hugely destructive and harmful, it would not meet the project objectives, and is not fit for purpose.

Due to ongoing inadequacies of the project and the associated consultation process, the LTC is moving further and further into the RIS3 period, hence our response to this consultation.

**Our comments**

You state you want your next round of route strategies to *“establish a strategy for our routes that takes account of the performance of today as well as the challenges and opportunities of the future”*

Now more than ever it is time for Highways England/National Highways and the Government to address climate change issues. As a country we cannot simply continue to ignore the issue and associated concerns. If we do not give these kind of challenges the urgent attention and actions they need today there simply will not be a future of opportunities.

You also state that you want your next round of route strategies to *“meet wider connectivity needs of communities and economies as well as the significantly changing needs of people who use our network or live nearby”*.

It would be equally good to see you start to actually genuinely take into consideration the needs of communities who are both using and living nearby to the road network. Plus when considering economies it cannot just be the financial economy you also need to consider the health and well-being economy as a priority.

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It is a false economy to move forward without considering the environment and the health and well-being of people. Without a healthy environment that can support our existence on the planet, along with healthy (both physically and mentally) and happy society the economic growth is irrelevant and meaningless.

Our health and well-being also obviously has an impact on the financial economy. For instance walks taken by people in UK woodlands save £185m a year in mental health costs, as per the evidence presented in the Forest Research report.<sup>1</sup> In addition to this there are the associated costs of air, noise, and light pollution impacts to our health and well-being too. Not to mention the associated costs of impacts to industry when people need to take time off due to sickness and mental health issues.

There is a distinct lack of joined up thinking in our country when it comes to transport. The very fact we have Highways England, or National Highways as you have recently re-branded to, highlights this lack of joined up thinking. Not to mention the additional costs of re-branding, for apparently no real reason at all.

Highways being the common denominator in your various branding. Again, now more than ever we need to look at a bigger picture, rather than have a government company focusing purely on road networks.

We need National Transport, or even better National Travel that would incorporate all aspects of transport including sustainable travel.

Whilst addressing carbon emissions from transport, so called 'zero emissions' vehicles cannot be portrayed as the panacea that you and others often refer to. For example Electric Vehicles are not zero emissions, far from it with the associated carbon emissions from production and powering them, and PM2.5 pollutants etc that the vehicles create.

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<sup>1</sup> [www.forestresearch.gov.uk/research/valuing-the-mental-health-benefits-of-woodlands/](http://www.forestresearch.gov.uk/research/valuing-the-mental-health-benefits-of-woodlands/)

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Focus is needed on reducing road traffic with moves to more sustainable options.

This also ties in with considering the health and wellbeing economy and associated financial economy too. For instance inactivity costs the NHS £8.2bn per year, so by focusing on improving active travel options within future travel options there would be both health and well-being, as well as financial benefits. Yet HE/NH focus purely on road networks with very little if any genuine consideration to other means of travel.

There also needs to be consideration of the fact that more and more people are and can productively work from home, thus reducing the need for as much commuting, and this needs to be considered in future planning. Not only on the changes it will make to the road network traffic levels, but also the fact that whilst people are now spending more time at home and in their local communities the importance of getting outdoors in nature has become more and more apparent and appreciated. People do not want their local communities destroyed by more roads.

It is very apparent to so many that what you have been doing, especially in RIS2 is not working, so you need to seriously address the concerns and issues of the route strategies you have been working with to improve things moving forward.

There is a reason why your RIS2 projects are facing growing numbers of opposition and legal challenges, and that is because your strategies are inadequate, unacceptable and outdated.

The Government have a legal commitment to Carbon Net Zero, yet you continue to try and push ahead with projects that have huge carbon emissions. Surface transport is the largest sector in the UK, and accounts for 27% of carbon emissions.

RIS3 cannot simply carry on with the outdated standards, and RIS2 projects that are moving toward and into RIS3 should not be progressed with these outdated standards either.

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RIS3 should not rely on Electric Vehicles as an excuse to continue pushing ahead with road projects. As well as the points raised earlier, more roads means more traffic, and more traffic means more congestion. The theory of building our way out of congestion by building more roads is not only outdated, evidence shows it simply does not work. The more roads you build the more environmental damage and the worse the negative impacts are to both the environment and to people's health and well-being.

It would also be short sighted to consider EVs a solution, because even if you put all the other concerns to one side for a moment, the fact is there is not an endless supply of materials that are needed to produce EVs, just as there isn't an endless supply of fossil fuels.

HE/NH fail to identify the need for other forms of travel, and to include them as viable options into future planning, and that has to change.

The proposed LTC is the perfect example of this, as it is being designed so that it wouldn't even be viable for bus services across the river due to the lack of adequate connections.

To travel between Essex and Kent by train you have to go all the way into London and back out again, yet HE/NH failed to consider incorporating train options into a new crossing.

There are no options for active travel with the proposed LTC. The Dartford Crossing offers a free crossing service for cyclists, yet HE/NH refuse to incorporate such an option into the LTC. We can see easy safe solutions to make such incorporations into the design, but HE/NH focus is purely on roads and motorised vehicles, without considering other options. Options that would help reduce traffic on roads and be beneficial to the environment, health and well-being, and provide alternative travel options and connections for communities.

We are also aware that HE/NH attempt to manipulate the data in respect of PRoW. Claiming new cycle routes for example when in

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fact they are routes already being used for cycling, but their proposals may be to slightly widen them, or because a route is being realigned due to design, so they seem to think they can then claim it as a new route. We do not deem that HE/NH are doing an awful lot at all in regard to improving PRoW when it comes to LTC, it is purely a box ticking exercise without any real consideration or care.

From experience through the LTC consultation process we have learnt that HE/NH work strictly to industry standards and guidelines without any consideration of common sense, or the fact that some situations need alternative thinking. Again more joined up thinking is needed. And again the proposed LTC is another example of the problem with this attitude and way of working.

The initial need for a new crossing was because of the problems we all suffer with due to the Dartford Crossing which is over capacity. It began with one tunnel, it then went to two tunnels, then a bridge, all to keep increasing capacity across the river. But never enough forward thinking. The current Dartford Tunnels are old and small by today's standards, but rather than considering addressing that option and finally completing the M25 as a true motorway orbital by progressing one of the other alternative options for a new crossing, such as Option A14 (a long tunnel from around J2 on the M25 through to between J30/29) that would actually fix the current problems that create the issue HE/NH instead go with Option C3 a far more destructive and harmful project.

The reason we were given was because not enough traffic would use Option A14. We're talking about a section of road that would, if correctly designed, fill in and complete the section of the M25 that is currently the A282 and bypass the areas and problems that create all the congestion and pollution. We learnt that when modelling traffic HE/NH remove any data that reflects traffic incidents they consider to be out of the ordinary, when in reality that is the data that reflects the very problem you are supposed

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to be addressing and fixing. We are told this is industry standards and guidelines.

We are also told that it is industry standards that when building a road you don't have to consider how traffic would migrate between two routes. Yet the whole reason a new crossing is needed is because of the issues at the current Dartford Crossing, especially when there are incidents. So surely it is essential that consideration is given as to how traffic would migrate between the two crossings, if a new one is to go ahead, especially when there are incidents.

Particularly when you bear in mind that by HE/NH's own data the Dartford Crossing would remain over capacity even if the proposed LTC goes ahead. So it is highly unlikely that much change would be seen in the amount of incidents at the current crossing, which currently averages around 300 incidents per year.

There are not adequate connections between the two crossings, and that is because HE/NH simply ignore that aspect because industry standards and guidelines say they don't have to take it into account.

There is a huge difference between the theory of industry standards and guidelines and the reality of the real world.

No company worth their salt simply buries their head in the sand and ignores problems and issues that can quite clearly be seen, just because it is not part of industry standards and guidelines. At very least these issues should be raised to the Government so that a decision on how best to proceed can be made. Or even better potential solutions could and should be presented.

We have to question why HE/NH do not do this and can only assume it is because ignoring such issues acts to future proof your own jobs and work, as more problems results in future work, safe guarding your own jobs. This is an unacceptable practice and needs to be addressed moving forward with future plans.

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It is again a false economy to allow HE/NH to push ahead projects that do not meet project objectives, and are not fit for purpose, since it will result in the need for yet more money to be spent putting right the problems they create.

Another perfect example of this is the fact that HE/NH removed the Tilbury Link Road from the proposed LTC project. Yet the Tilbury Link Road is now being progressed as a RIS3 project in its own right. Why is it not being put back into the LTC project? You can't have a link road without something to link it to, so it is reliant on the LTC, otherwise it has nothing to link to, therefore it should form part of the LTC project.

The Tilbury Link Road was originally part of the LTC, we believe this was added to the project at a time when HE/NH needed and wanted the Port of Tilbury's support of Route C3 (the now preferred route that is being progressed as LTC). At the time the Port said they would only support C3 if they got their own junction on and off of it. Tilbury Link Road was added, but later removed. The associated junction and also the rest and service area that was also part of the junction have now also been removed.

When the junction was removed the nearby viaduct over the railway line was shortened and lowered as the junction was no longer part of the project.

How can this be considered good planning when the Tilbury Link Road and an associated junction with the LTC will, if both are granted permission, have to be incorporated back into the LTC route? Surely this means the viaduct would also then need to be adjusted to fit in with the junction requirements again.

There are so many instances of HE/NH failing to plan and design adequately with the strategic road network only for it to result in further work being needed at increased cost later on.

Also HE/NH need to stop planning projects to take advantage and use of the existing road network instead of planning adequately in attempts to reduce costs of projects. Again an

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example would be how they are attempting to use the A13 and other local roads to route traffic for the LTC, rather than designing it to work in its own right. We believe this is not only to do with cost manipulation, but also because of over space restrictions for junctions. Rather than admit it is not possible to adequately design and construct the proposed junctions, what they are proposing simply adds yet more traffic to the existing road network that is already stressed.

HE/NH also have a distinct lack of transparency on their proposals, as well as biased presentation of the projects. This again results in people, including we believe the DfT and others being misled.

Future plans must be more transparent and include honest and realistic details of the negatives of projects.

HE/NH need to be forced to take more responsibility for their actions, rather than continually being given free rein to keep pushing ahead with projects that are simply not fit for purpose and just create more work and cost, and future proofing HE/NHs jobs.

Again we stress RIS2 has not been successful, and there are obvious reasons as to why that is. All outstanding projects and future projects must be subject to adequate planning and consultations. And that planning must be in keeping with the country's legal commitments, and saving and protecting our environment and the health and well-being of the people.

HE/NH can no longer bury their heads in the sand when it comes to these issues. They need to be forward thinking and not wait for legal challenges to make the difference.

We are seeing no evidence of HE/NH taking air pollution into account when it comes to LTC and other road projects. Important issues like this cannot simply be ignored because the Government are still working on setting legally binding targets.

HE/NH are failing to provide adequate, timely and meaningful communication with everyone as RIS2 projects are being

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progressed, and this has to change immediately. It is not just at local community opposition level either, this is with Local Authorities and other organisations.

It is greatly concerning that in the supporting documentation you give the impression you feel that RIS2 is successful and that you are learning from feedback and experience, when the reality is completely different.

Public perception of HE/NH and your projects is at an all-time low. You need to do so much more than your proposed building on RIS2, you need to have a serious rethink and change in attitude both in the rest of RIS2 and moving into RIS3.

The Climate Change Committee also needs to be more involved in any future road strategies. Decisions cannot simply be left to HE/NH who continue to just push ahead as though it is business as usual, despite the fact we are living in a climate emergency.

There is also evidence that climate change is the biggest risk to UK and global food production. Along with the negative impacts from road building and road usage to the environment, consideration also needs to be given to the negative impact they have on farming. We cannot simply keep destroying acre upon acre of agricultural land to build more and more roads (or anything else). The proposed LTC would wipe out way too much agricultural land, some of it grade 1 listed land. Immediate action needs to be taken to stop roads destroying our food security as well adding to climate emergency.

National Highways cannot simply keep destroying and impacting greenbelt, woodlands (including ancient woodlands) wildlife and habitats, and other valuable natural assets.

Ancient woodlands are irreplaceable, and with such a small percentage of them left the destruction needs to stop as a matter of urgency. We note that in regard to the proposed LTC National Highways are avoiding a landfill site only to push the LTC route

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through an ancient woodland, things like this cannot be allowed to happen.

The Government are spending money on tree planting and rewilding, but the amount being spent in that regard is a small amount compared to the amount being spent on RIS projects that are destroying them. We need to save and protect what we already have as well as planting and rewilding, and that should mean that hugely destructive RIS projects like LTC should be stopped.

Safety needs also to be seriously addressed. HE/NH failed to deliver what was promised and signed off in regard to 'Smart' Motorways. This has resulted in deaths. Again HE/NH need to be held accountable for their actions. No future plans that include 'smart' technology should be progressed at all until at very least enough research and investigation is done into the dangers of 'smart' technology/roads.

We also have serious concerns that not enough importance is given to emergency services in regard to RIS projects, both in access for emergency vehicles, and also the additional pressure projects put on emergency services.

Sustainable travel/public transport options need to be improved, as currently as outlined previously HE/NH are failing to adequately take these essential options into account with their plans.

As a country we should not and cannot keep pushing ahead with a road network focused future. Instead investment needs to be diverted to improving public transport and sustainable travel options. Road traffic needs to be reduced. More consideration needs to be given to moving road haulage onto rail freight. Tesco's have made a huge move in this direction, showing that it is possible and should be given more genuine consideration and support instead of always looking to road freight. Investment could then benefit a much wider scope, improving reliability of both roads and other means of travel, as well as being better for the environment, health and well-being.

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HE/NH need to be doing all they can to improve air quality. With the proposed LTC they are failing to incorporate any air filtration into the tunnel section of the proposed route. This is a missed opportunity to provide the best possible option if a new road has to go ahead. Tunnels are perfect opportunities to filter air, so why are HE/NH failing to do so?

HE/NH are also proposing to create new 'parks' at either end of the proposed tunnel section of the LTC. Yet as mentioned there would be no air filtration for the tunnel, so pollution would be released into the atmosphere at the tunnel portals, the very area that is being proposed as new 'parks'. How can this be considered best practice or ethical? If you then look closer the creation of new 'parks' at the tunnel portals is actually more to do with manipulating the carbon emissions of the project, by using these areas to dump spoil from the tunnelling. These kinds of practices can simply not continue.

We have serious concerns that the DfT's paper 'Planning ahead for the Strategic Road Network - Developing the third Road Investment Strategy' (Dec 2021) states,

*"Any enhancement schemes that had funding approved in an earlier RIS, whose development has shown that they remain deliverable and value for money, and where construction has not concluded by 31 March 2025 will continue to be funded in RIS3 without additional assessment in the RIS-setting process."*

We find this contradictory and ludicrous, as RIS2 projects that have failed to conclude by 31 March 2025 are likely largely due to the inadequacies of HE/NH, thus the projects are clearly not genuinely deliverable or value for money, as they have failed to deliver them and therefore also pushed the costs up. All RIS2 projects should be carefully and independently assessed, rather than simply being progressed straight into RIS3.

We would also comment that outstanding RIS2 and future RIS3 project plans should all be at very least paused until such time as the NPS NN have been reviewed and updated. How can you

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consider developing any projects until you know what the policy that governs them will be?

More research should also be carried out in regard to developing 'smart' /digital technology into future plans. Far from being the solution, evidence shows that this kind of technology is dangerous and adds to stress for road users. What is needed in reality is efficient and effective management and maintenance of our SRN, with HE/NH being held accountable for their work.

## **In Conclusion**

As previously highlighted evidence shows that building more roads just leads to more traffic, and more traffic means more congestion, more congestion leads to more roads, in a never ending cycle of hugely destructive and harmful road projects.

If HE/NH and the Government truly want to move forward we need to move away from the mentality that building more roads is going to solve problems because the reality is that is actually just adds to the problems and makes them worse.

We need joined up thinking on all aspects of saving and protecting the environment, people's health and well-being, and adequate research and actions to ensure the best and most sustainable, environmentally friendly, and healthy options are considered and progressed.

Projects like the proposed Lower Thames Crossing are hugely destructive and harmful, and need to be stopped immediately.

*Should you wish to discuss any of the above Thames Crossing Action Group Chair, Laura Blake can be contacted via email – [admin@thamescrossingactiongroup.com](mailto:admin@thamescrossingactiongroup.com)*