

Evidence for the Joint Committee on the National Security Strategy's Inquiry: Critical National Infrastructure and Climate Adaptation

Submitted by Laura Blake, Chair of the Thames Crossing Action Group

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Introduction

My name is Laura Blake, I am Chair of the Thames Crossing Action Group (TCAG). We represent thousands of people who are opposed to the 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

Reason for submitting evidence

We have many concerns about the proposed Lower Thames Crossing, and we feel some of those concerns are relevant to this inquiry.

We understand that the inquiry is considering the resilience of UK's Critical National Infrastructure (CNI) to the effects of climate change, which is predicted to result in an increase in extreme weather events such as flooding, droughts, wildfires and heatwaves, as well as rising sea levels.

We believe that a number of the Critical National Infrastructure sectors are both under threat from climate emergency, but that some are also major contributors to the climate emergency.

For example National Infrastructure Projects like the proposed LTC are hugely destructive and harmful, and therefore are greatly contributing to climate change.

How can we keep pushing ahead with these kind of projects that have such a negative impact on the environment and not expect climate change consequences to these actions?

Whilst addressing the resiliency of the CNI we also need to consider and ensure that they are not also responsible for the climate emergency that this committee are trying to protect them from.

For that reason we feel it important that we take advantage of this opportunity to submit our response in the hope it will help with the inquiry.

Please note that our comments relate to our experience in regard to the proposed LTC, as obviously that is the focus and purpose of our group, rather than other areas/topics.

Evidence

We would like to comment on the following aspects of the inquiry:

Key vulnerabilities and levels of preparedness of UK CNI to extreme weather events and other effects of climate change, including:

- **The possible compound effects of such events;**
- **The interdependencies between different aspects of UK CNI;**
- **Supply chain vulnerabilities; and**
- **Recent ‘near miss’ scenarios**

The effectiveness of Government policy, legislation and implementation frameworks for managing national security risks arising from climate change, including those emerging within the private sector.

Allocation of roles and responsibilities at the national, devolved and local level, and the connections between them.

The role of the Government’s forthcoming National Resilience Strategy, particularly in addressing opportunities for (and obstacles to) improved resilience among CNI providers

We feel that our experience as a group may help highlight a slightly different angle to the inquiry.

As detailed in our ‘Reasons for submitting evidence’ section above we understand the topic of this inquiry, but we also believe that a number of the Critical National Infrastructure (CNI) sectors are both under threat from climate emergency, but that some are also major contributors to the climate emergency. So rather than seeing the CNI are the ‘victim’ to be protected, consideration also needs to be given to the fact it is also often the harmer.

There are so many reasons that the various CNI sectors contribute to the climate emergency as well as holding the risk from climate emergency. The challenge faced is to ensure that we do all we can to minimize the amount that these sectors contribute to climate change.

We currently have Government policies and legislation that is outdated, especially in relation to climate change.

Take the National Policy Statement for National Networks (NPS NN) which governs things such as Road Investment Strategy (RIS) projects like the proposed LTC. It doesn’t even cover the country’s legal commitment to Carbon Net Zero amongst other things. This means that the projects that are being governed by this policy are not necessarily compliant with environmental laws. Again the proposed LTC being the perfect example of this, since it is estimated it would emit over 5 million tonnes of carbon emissions in the first 60 years alone.

We need to address these issues to stand any chance of ensuring resilience in our CNI. Clearly allowing more projects like LTC adds to the problems should not continue as it would mean the CNI resilience is being weakened further by the CNI itself.

Consideration needs to be given to try and prevent the worsening of climate change, rather than seeking to address the impacts when it is too late. We need to find ways to lessen and reverse our impacts on the environment. That is why we should not simply continue pushing ahead with hugely destructive and harmful projects.

We will never find ways to safeguard our CNI if they are a major factor in what is causing the very issue you are trying to protect them from.

All developments including CNI sectors need to give serious consideration to climate change impacts.

Energy

When considering resilience we also believe that consideration should be given to the fact that building more roads is proven to create more traffic. More traffic means the need for more energy both to construct more roads if you continue with the dangerous and destructive pattern of trying to build your way out of congested roads. It also means more energy being needed for an ever growing amount of vehicles on the roads.

All too often Electric Vehicles (EVs) are portrayed as the panacea for 'green' transport, yet what happens as more and more people move to EVs? Where will all the energy come from?

And when considering resilience in regard to CNI and Energy specifically, what happens when there are power outages due to climate change? We know from recent storms that many areas have been without power, water etc. Who is considering the impact that would have on energy and transport, emergency services etc moving forward?

Finance

Instead of investing in destructive and harmful projects, like the proposed LTC, investment could and should be made in a green economy. Again, investing in destructive projects is just investing in the creation and worsening of the problem that you are trying to address. It is a false economy to invest in this way.

Consideration should also be given to the fact that for a healthy economy to exist it cannot purely be based on finances it has to take the environment, health and well-being into account. We need more joined up thinking about the consequences of what is being invested in, and avoid investment that further add to the climate emergency.

Food

Another example in regard to the LTC is the huge amount of agricultural land that would be destroyed and impacted if the LTC goes ahead. How can destroying such huge amounts of agricultural land, including grade 1 listed land be deemed acceptable?

Not only does it lessen the resilience of our country's food supply, it also adds to climate change. If the food is not available due to the destruction of the agricultural land then it has to be produced and distributed from further afield, thus increasing the carbon footprint thus adding to climate change further.

Climate change is already having an impact on farming and food supplies worldwide, we need to ensure that we do all we can to protect and build in resilience to our country's food supply, and that means we should definitely not be destroying agricultural land for roads and development.

Government

We feel the role at all levels should be to ensure that everything that can be done to add resilience to the CNI is done. However, we also strongly believe that there is also an essential need that responsibility is taken to ensure that the CNI and other developments are not adding to climate change. Also that they and all the policies that govern them are regularly reviewed and updated to ensure they reflect legal commitments, and protect our environment and the health and well-being of the public.

We would also like to see more weight given to the Climate Change Committee's recommendations.

More monitoring is needed of government companies such as National Highways(NH) to ensure they are taking their responsibilities seriously, and are held accountable for their actions.

It is our understanding that currently NH are likely to wait until Government take action to make changes, rather than NH going to Government and reporting concerns or presenting possible solutions to current or potential future risks and issues.

The case of Transport Action Network's (TAN) legal challenge eventually resulting in the Government reviewing the NPS NN shows the need for this kind of thing. It should not be up to the likes of TAN and others to ensure that the country's policies are reviewed and updated to reflect our country's legal commitments. Legal challenges also result in additional cost, at the taxpayers' expense, which is unacceptable.

To ensure better chance of finding resilience strategy for the CNI the Government needs to start backing up all the talk with actions when it comes to climate change, and it needs to happen as a

matter of urgency. We need reliable and efficient infrastructure not projects like LTC that are not fit for purpose¹ and just add to the problems.

Health

We also note the negative impact that projects like the proposed LTC have on people's health and well-being. Not only because of the direct health impacts such as from pollution related illness, but also the mental health impacts to people's well-being from living near to such destructive projects during consultation periods, construction, and operation, as well the associated climate change stresses and anxiety that many now suffer with.

Again this all puts extra pressure on health care in the country. If you are trying to add resilience to health as a sector then attention and consideration needs to be given to what is putting pressure on healthcare. This is another example of how CNI is again creating the extra pressures on itself by adding to the climate emergency.

Transport

This is a sector that definitely falls into the category of being hugely destructive and harmful, something we are acutely aware of through our experience with the proposed LTC.

It is ludicrous to think that we can continue to build more and more roads as a solution to congestion. Evidence shows this is not a viable option. By continuing to progress with more and more unfit for purpose road projects the issues you are trying to find a resilience strategy for will just continue to get worse and worse. Real sustainable options are needed.

We also believe that National Highways should be more closely monitored on their work on road design, and held accountable for their actions. It is becoming more and more apparent to us that NH are often creating futureproofing for their own jobs by progressing projects that are not fit for purpose and thus then need further work to be carried out. Resilience of the SRN should begin with adequate and efficient planning in the design from the very beginning.

A new crossing was initially needed due to the problems associated with the current Dartford Crossing. Historically the Dartford Crossing started life as one tunnel, demand then led to a second tunnel. This then led to the QE2 bridge. And now we are facing a further crossing, the proposed LTC. As previously highlighted NH/LTC data shows that the Dartford Crossing would still be over capacity even if the proposed LTC goes ahead. How can this be considered fit for purpose or adequate spending of £8.2bn of taxpayers' money?

¹ <https://www.thamescrossingactiongroup.com/ltc-not-fit-for-purpose/>

Let's talk about resilience that a new crossing should bring to the SRN. Are you aware that industry standards mean that NH/LTC do not have to consider how traffic would migrate between the two crossings when there are incidents?

There are currently on average around 300 incidents at the Dartford Crossing per year, many of which result in considerable delays, congestion and pollution. Since data shows that the Dartford Crossing would still be running over capacity there is no reason to believe that the number of incidents would change that drastically either, so it is clear that it would be wise to include plans for migrating traffic when there are incidents into the new crossing design. But this is not happening, and there would not be adequate connections². We would just end up with yet more chaos, congestion and pollution. Let us also not ignore the fact that with climate change weather impacts would add to the likelihood of incidents too.

To us this seems so obvious, and something that definitely needs to be considered as part of a resilience strategy for the CNI.

Let us also not forget that in addition to things like traffic incidents/accidents there are other problems suffered due to the Dartford Crossing. It is important to remember that the section in question is technically the A282 and not the M25 as sometimes wrongly believed. The M25 was supposed to be a motorway orbital, yet there is a missing part to the orbital (the A282). The tunnels are now over 50 years old and outdated for larger vehicles and in need of repair due to age. There are also issues from over development in certain areas, and poorly designed junctions in the vicinity of the tunnel portals.

Our preferred option for a new crossing was Option A14³, one of the official route options, but due to failings in consultation was never properly consulted on at the route options stage. This would be a long tunnel from around junction 2 on the M25 (the A2) coming up between junctions 30 and 29 on the M25. It would bypass the problem areas around the Dartford Crossing, and could finally complete the M25 as a true motorway orbital. It would be a far less destructive option if a new road crossing has to be built.

In regard to transport in more general terms we would also comment that more consideration needs to be given to the use of rail for freight and also to improve public transport to lessen the need for reliance on roads. With more and more climate change weather occurrences happening, surely it would be beneficial to make improvements to our rail network to allow other options for transport.

It would also be beneficial to improve public transport and active travel options, as if due to climate change there will be increasing issues with energy supplies alternative options will be needed to ensure resilience in regard to travel.

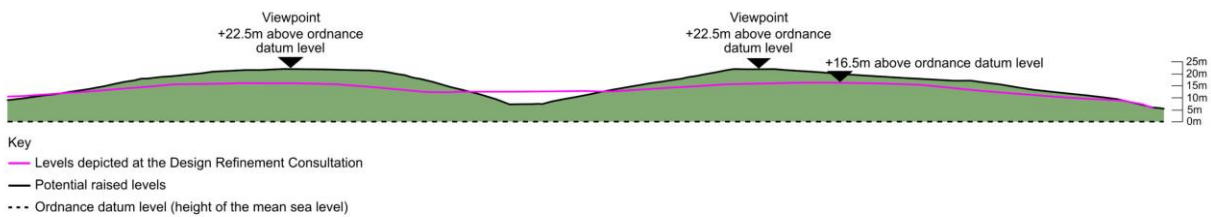
² <http://www.thamescrossingactiongroup.com/incidents-ltc-dartford-crossing/>

³ <https://www.thamescrossingactiongroup.com/alternative-route-option-a14/>

Water/Flooding

If given permission and built the proposed LTC would presumably become part of the CNI since it would be part of the Strategic Road Network.

However, we seriously question the impact such a project would have on the environment and how it would increase flood risk. As highlighted on our website⁴ we note that the area known as 'Tilbury Fields' is currently designed under the pretense of being a new park⁵, when the reality is that it is more to do with dumping spoil from the tunneling as close to the tunnel portals as possible in an attempt to minimize carbon emissions. The relevance of this to the inquiry is the fact that what this is actually doing is raising flood plains in places up to 22.5m.



How can it be deemed acceptable to raise flood plains in this way. If you block flood plains then flood waters will need to find other areas to flood. Flooding in the Thames Estuary and the need for another flood barrier were discussed in your oral hearing. Surely projects like LTC should not progress when they are clearly adding to already known problems and threats to the CNI?

We also draw your attention to the fact the Government's very own 'Flood map for planning'⁶ clearly shows areas at risk of flooding along the proposed LTC route, including around the tunnel portals.

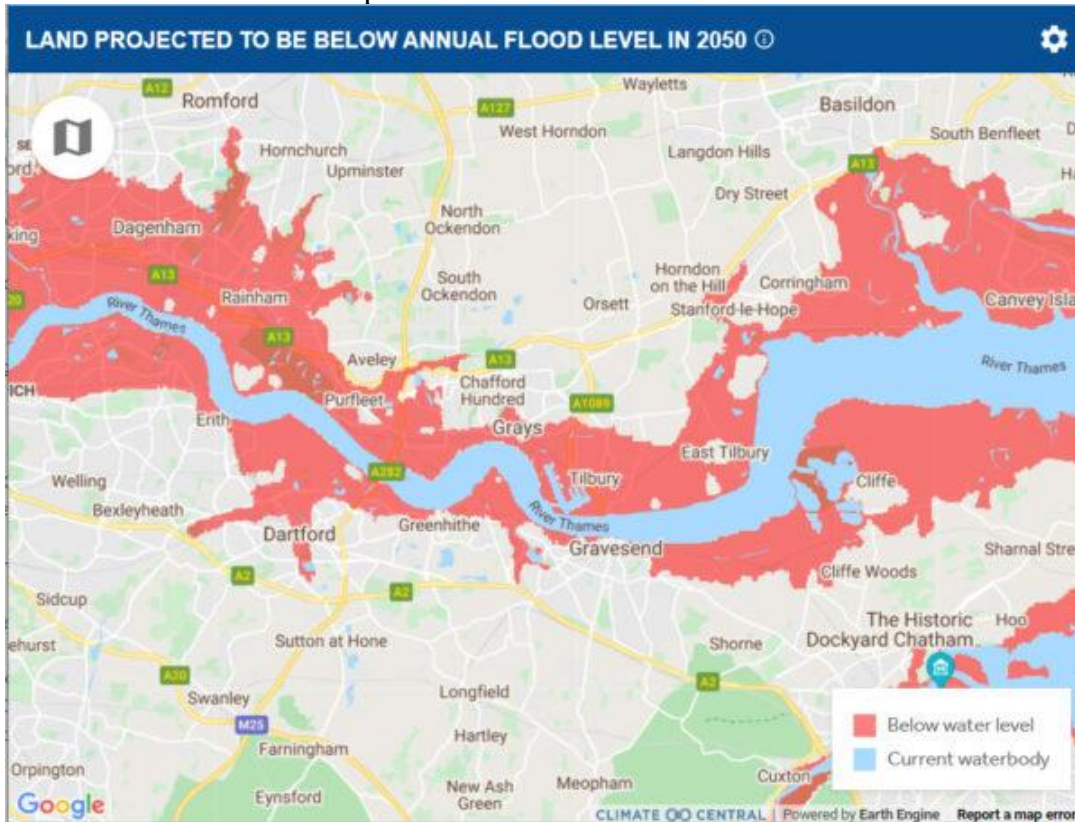


⁴ <https://www.thamescrossingactiongroup.com/flooding-and-the-ltc/>

⁵ <https://www.thamescrossingactiongroup.com/new-parks/>

⁶ <https://flood-map-for-planning.service.gov.uk/>

And we found similar on maps from Climate Central⁷



and in the Environment Agency's Thames Estuary 2100 Plan⁸.



⁷ https://coastal.climatecentral.org/map/11/0.4608/51.4678/?theme=sea_level_rise&map_type=year&basemap=roadmap&contiguous=true&elevation_model=best_available&forecast_year=2050&pathway=rcp45&percentile=p50&return_level=return_level_1&slr_model=kopp_2014

⁸ https://consult.environment-agency.gov.uk/london/thames-estuary-2100-updating-the-plan/supporting_documents/Thames%20Estuary%202100%20Plan.pdf

Surely the smart thing to do would be to future proof the CNI rather than knowingly create more problems that need addressing as a result of flooding. We get the impression that things are being progressed as though it is just business as usual, rather than the fact we are living in a climate emergency.

Conclusion

In conclusion we again stress that we believe that is essential when considering how to improve resilience of the CNI against climate change that the environmental impacts of the CNI also need to be reviewed and addressed to ensure that the CNI is not a major factor of why the solutions are needed. Prevention is better than cure.

Thank you for allowing us the opportunity to present our paper to you in relation to this public inquiry. We hope you will find it of interest and helpful to all aspects on which you were seeking evidence. Please don't hesitate to contact us should you wish to discuss further.