

Strategic road network and the delivery of sustainable development updates Consultation Response

Introduction

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.

Our response to this consultation is based on our experiences whilst representing those opposed to the proposed Lower Thames Crossing (LTC).

The Consultation

We would firstly point out that we feel the consultation could have been better promoted, we have only stumbled across it late this evening, after someone sharing it with us at the last minute.

The consultation webpage states the consultation ends at 11.45pm on 15th Sept 2022. Yet the response form states it ends at 23.59 on the 15th Sept.

Since it is very late in the day, and the consultation materials require a considerable amount of cross referencing between various documents/pages, our response provides feedback as best we can, which we hope will be useful.

Comments

We would like to start by stating that we feel the topic of how 'National Highways will fulfil its remit to be a delivery partner for sustainable economic growth whilst maintaining, managing and operating a safe and efficient strategic road network' to be very relevant and important.

In a time of climate emergency we would like to have seen this consultation much better promoted. We apologise that our response does not use the format in your

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response form, we simply did not have time, unless an extension can be offered, but we felt it far too important not to respond in some form.

We note the references to the DMRB and wish to state that we feel this document should not be prepared by National Highways. Allowing them to do is the equivalent of letting them mark their own homework. They should not be setting the standards that they have to work to, it should be set by an independent body, and National Highways compliance should be monitored and judged by an independent body too.

In our experience over a number of years now we are disgusted by National Highways behaviour and how they seem to believe and act like they are a law unto themselves.

In particular we find that National Highways are attempting to greenwash¹ the proposed Lower Thames Crossing, and other projects, at every opportunity, which is completely unacceptable.

The National Networks National Policy Statement is, as you will know, currently being reviewed, and will need to be updated, as it is not compliant with the government's legal commitment to net zero and other environmental aspects.

We also point out the recent successful legal challenge, made by Friends of the Earth, Client Earth, and the Good Law Project, where the High Court has ordered the Government to outline exactly how its net zero policies will achieve emissions targets is super relevant too.

National Highways are using the predictions in the policies for things like their recent highly speculative claims that the carbon emissions for the proposed LTC had been reduced by 80%

There is no evidence of how or if this prediction is achievable.

In fact when you actually review the latest estimated carbon emissions that NH released alongside their 80% reduction claim, the operational carbon emissions had actually risen by a whopping 67%.

This means the estimated carbon emissions for the proposed LTC is now around 7 million tonnes². This is of course highly unacceptable.

¹ <https://www.thamescrossingactiongroup.com/ltc-greenwash/>

² <https://www.thamescrossingactiongroup.com/ltc-carbon-emissions/>

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National Highways state the proposed LTC is a pathfinder project and will be the greenest road ever built. In our opinion this is just more greenwash.

It won't matter how you word such documents, like the one you are consulting on, as NH don't seem to adequately consider and abide by things, they just find ways to work around them.

With regard to new connections and capacity enhancements, we again believe that NH are avoiding doing the right thing.

The need for a new crossing was due to the problems at the Dartford Crossing. The Dartford Crossing has a design capacity of 135,000 vehicles per day, yet regularly sees 180,000 per day.

That means we'd need to see a reduction of more than 25%, yet the proposed LTC would take as little as 4% in the am peak hour and 11% in the pm peak hour. It would also result in around 50% increase in cross river traffic.³

The proposed LTC would be hugely destructive and harmful, wouldn't solve the problems suffered due to the Dartford Crossing, and is simply not fit for purpose.⁴

There is a distinct lack of adequate connections in the proposed LTC design.

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.⁵

The proposed LTC has no provision for cross river active travel.⁶ It would not be viable for public transport, as there would not be adequate connections for a bus service.⁷

The SRN is supposed to be for port connectivity, yet NH removed the Tilbury Link Rd⁸ which was put in to garner support from the Port of Tilbury, part of Thames Freeport. Again there would not be adequate connection. This would actually result in a lot of traffic needing to take what is now known as the Stanford Detour⁹, or use the

³ <https://lowerthamescrossingthurrock.co.uk/wider-debate-is-needed-on-the-merits-of-ltc-creating-a-new-m25-outer-orbital-route>

⁴ <https://www.thamescrossingactiongroup.com/ltc-not-fit-for-purpose/>

⁵ <http://www.thamescrossingactiongroup.com/incidents-ltc-dartford-crossing>

⁶ <https://www.thamescrossingactiongroup.com/ltc-for-walkers-cyclists-horse-riders/>

⁷ <https://www.thamescrossingactiongroup.com/ltc-public-transport-and-nmu/>

⁸ <https://www.thamescrossingactiongroup.com/operations-and-emergency-access-point-at-tilbury/>

⁹ <https://www.thamescrossingactiongroup.com/the-stanford-detour/>

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existing local road network.¹⁰ Instead of designing an adequate route NH are attempting to utilise local roads to support the LTC project, this is not acceptable.

When it comes to engagement, the consultation process for the proposed LTC has been completely inadequate.¹¹ NH withhold so much important and relevant info not only from members of the public and groups like ours, but also NGOs and host local authorities. The lack of meaningful engagement is disgraceful.

The info above is the tip of the iceberg, and we could share a lot more if time allowed. But the point of sharing some highlights of our experience is because there are currently standards and guidelines in place for National Highways to be governed by, yet in our experience they take little if any notice of them.

So in conclusion our feedback for you is that it is not necessarily down to the wording in these kind of documents that is relevant, but a problem that goes far deeper and needs to be reviewed as a matter of urgency.

We would like to thank you for the opportunity to take part in the consultation, and hope you will find our responses helpful. We agree for our answers to be quoted on an anonymised basis. Should you wish to discuss any of our comments, or indeed our opposition to the proposed Lower Thames Crossing, please do not hesitate to contact us – admin@thamescrossingactiongroup.com

¹⁰ <https://www.thamescrossingactiongroup.com/orsett-cock-a1089/>

¹¹ <https://www.thamescrossingactiongroup.com/inadequacies-of-ltc-consultation-process/>