

THAMES CROSSING ACTION GROUP

www.thamescrossingactiongroup.com

Thames Crossing Action Group Spring Budget 2023 representation

Introduction

Thames Crossing Action Group (TCAG) represent thousands of people who are opposed to the hugely destructive and harmful, not fit for purpose £10bn+++ 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.

This representation was prepared and submitted by Laura Blake, Chair of TCAG on behalf of the group in response to the call for suggestions for the Spring Budget 2023. TCAG can be contacted via email –

admin@thamescrossingactiongroup.com.

Spring Budget 2023 – At a time of climate emergency, cut spending on new roads and instead invest in more sustainable alternatives.

Effectiveness/Efficiency

New roads, like the proposed Lower Thames Crossing are simply not effective. There is plenty of evidence to prove that building new roads just leads to more traffic, induced demand.

The Dartford Crossing has a design capacity of 135,000 vehicles per day, yet regularly sees 180,000 per day¹. We'd need to see a reduction of more than 25% to bring it back below capacity. Yet National Highways predict that the proposed LTC would take around 20% dropping to 14% by 2044. Local Authority analysis of official NH data concludes that it would actually be as low as 4% in the am peak and 11% in the pm peak hour². Either way clearly not enough to bring it back below capacity. It is also predicted that the proposed LTC would result in around a 50% increase in cross river traffic, if it goes ahead. Further adding to existing issues, especially when you take into account the lack of adequate connections, and failure to plan for how traffic would migrate between crossings when there are incidents³, if the proposed LTC goes ahead.

It is often argued that road building is ok because 'people will all be driving electric vehicles soon'. Electric vehicles are not the panacea that many like to believe⁴. Not only are they not zero emission and still emit

¹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001291-7.1%20Need%20for%20the%20Project.pdf>

² <https://lowerthamescrossingthurrock.co.uk/wider-debate-is-needed-on-the-merits-of-ltc-creating-a-new-m25-outer-orbital-route>

³ <http://www.thamescrossingactiongroup.com/incidents-ltc-dartford-crossing>

⁴ <https://www.thamescrossingactiongroup.com/electric-vehicles-argument/>

THAMES CROSSING ACTION GROUP

www.thamescrossingactiongroup.com

deadly PM2.5 pollution, but also, they do not solve the problem of congestion. More congestion then leads to calls for more roads, which again leads to more destruction and harm and further cost.

Further review is also needed into the effectiveness of National Highways. A company that purely focuses on highways needs to ensure a demand for future road projects to secure their own future, this will not lead to a sustainable future. We will never get any other result as long as National Highways exists because they are there purely and simply for Highways, the clue is in their name!

When it comes to the proposed LTC there are better non-road alternatives, such as rail improvements⁵ that would negate the need for the proposed LTC. But of course, National Highways are not National Railways, their only focus will be on ensuring a future of more road projects to safeguard their own jobs.

All too often with projects like the proposed LTC provision is not being made for inclusivity of public transport either. There is an obvious lack of adequate connections to make it viable for bus routes⁶ across the proposed LTC for example. National Highways have been made aware of this, but have done nothing to address this important issue.

Equally they are not taking non-motorised users and active travel into account. They brag about lots of new routes for walkers, cyclists, and horse riders, yet there is no provision for any of those users to cross the river. A new river crossing purely for motorised vehicles, but with no bus route viability.

They also make misleading claims in regard to routes for walkers, cyclists and horse riders⁷. Many of the 'new' routes are actually existing routes that would need to be realigned if the LTC goes ahead, so claimed as 'new'. Many of them, such as those in the proposed Tilbury Fields (surrounding the northern tunnel portals) are extensively spiralling or zig zagging paths, or paths that literally run side by side offering no real benefit at all, other than to NH in upping their claimed miles of WCH routes.

We need to see actions from Government to back up the talk about moving forward in a sustainable way. Not road projects that clearly go against that ambition.

Policy changes

New road projects going through the Development Consent Order (DCO) process are Examined and judged against the National Policy Statement for National Networks. (NPS NN). As you will be aware this policy is currently being reviewed. A big part of why you are seeing a growing number of legal challenges against new roads, is because you are not judging them against a policy that includes the latest legislation. There were calls from many of us for the policy to be suspended whilst it is reviewed and updated, but Government instead chose to push ahead regardless.

⁵ <https://www.thamescrossingactiongroup.com/rail-and-tram-alternatives/>

⁶ <https://www.thamescrossingactiongroup.com/ltc-public-transport-and-nmu/>

⁷ <https://www.thamescrossingactiongroup.com/ltc-for-walkers-cyclists-horse-riders/>

THAMES CROSSING ACTION GROUP

www.thamescrossingactiongroup.com

This is not an effective or efficient way to behave, and just shows why it is so important that policies are monitored and reviewed and updated on a regular basis, particularly when there are so many changes in legislation.

It should also be questioned why National Highways are granted powers to mark their own homework when it comes to setting industry standards and guidelines for road building. More independent monitoring needs to be carried out on National Highways work, and they need to be held accountable for their actions.

Or more to the point the question needs to be asked why we have National **Highways**? In this day and age, at a time of climate emergency, when Government are talking about wanting to do the right thing and be world leaders in regard to climate change and the environment, we shouldn't have a government company focused purely on highways.

We need more joined up thinking in the way we and freight travel, to ensure more sustainable options and alternatives. It's time we had National Travel or National Transport, a government company that could oversee all options and ensure that the best and most sustainable options are considered and progressed when needed. We need policy to cover this important factor. Not only for the sustainability factor but also because it would benefit a greener economy. Too many Government policies need updating to reflect that, and this needs to be addressed urgently.

We need policies that are up to date, especially when it comes to new legislation, but also focus on ensuring a move to more sustainable options.

Value for money

Building new roads does not offer good value for money. Take the proposed LTC for example. Since Government asked National Highways to start consulting on route options for a new Thames crossing the estimated cost has risen from £4.1bn up to £10.1bn+++, and the adjusted Benefit Cost Ratio has dropped from 3.1 down to just 1.22.

These figures are based on info presented in the LTC Accounting Officer Assessment⁸ and the Nov 2022 National Audit Office report, the latter of which voiced concerns about value for money issues⁹.

The info presented in these two reports also shows that Ministers are being misled on the proposed LTC, since the figures used are two years out of date¹⁰. The Accounting Officer Assessment should offer guidance and transparency to Ministers making decisions about spending significant amounts of public

⁸ <https://www.gov.uk/government/publications/government-major-projects-portfolio-accounting-officer-assessments/lower-thames-crossing-accounting-officer-assessment-december-2022>

⁹ <https://www.thamescrossingactiongroup.com/ltc-value-for-money-issues/>

¹⁰ <https://www.thamescrossingactiongroup.com/ministers-are-being-misled-on-lower-thames-crossing-costs/>

THAMES CROSSING ACTION GROUP

www.thamescrossingactiongroup.com

money. More scrutiny is clearly needed to ensure Ministers are not being misled on these huge road projects, otherwise more and more public money is at risk.

It is not just the direct cost of the proposed road project that needs to be factored in when considering value for money and BCR. The adjustments and considerations given do not adequately take into account things like the cost to the environment and our health and well-being. This is again essential for a more sustainable future for all.

Evidence shows that the proposed LTC fails to meet scheme objectives¹¹, including solving the problem of congestion and pollution at the Dartford Crossing¹². To proceed with a project that fails to meet scheme objectives does not offer good value for money.

Too much money has already been wasted on this project, largely due to the inadequacies of National Highways. The whole consultation process was inadequate, and they continue to present misleading information, propaganda and greenwashing.

They continue to push ahead with the project in this way, because (as per their own annual reports)¹³ the failure to deliver the proposed LTC is an existential threat to the organisation. That is not a good enough reason to further progress a project that evidence shows is not fit for purpose. Too much public money has already been wasted on the proposed LTC, which is why it needs to be urgently reviewed and scrapped before more money is wasted that could be better invested on more sustainable and fit for purpose alternatives.

Growth/Levelling Up

Economic growth and benefits are often claimed by National Highways in regard to the proposed LTC. Firstly, even if there were growth it would not be sustainable growth. But secondly, there is no actual evidence of exactly what economic growth and benefit there would be, if any. We and others, including Local Authorities have been requesting a copy of the Outline Business Case for the LTC for years now. After a Freedom of Information request from a Local Authority and the Information Commissioners Office stepping in NH did finally release a copy of an out of date OBC¹⁴.

We have been asking NH to provide us with a figure of the estimated economic growth, but they refuse to share such a figure. We can only assume this is because it is not that good, otherwise they would be shouting it from the rooftops!

¹¹ <https://www.thamescrossingactiongroup.com/ltc-project-objectives/>

¹² <https://www.thamescrossingactiongroup.com/ltc-not-fit-for-purpose/>

¹³ https://nationalhighways.co.uk/media/baphtjxv/national_highways_ar22_interactive_final.pdf

¹⁴ https://nationalhighways.co.uk/media/w3rlnonz/ltc-obc-2022-foi-3385-ic-182335-r3f3_redacted.pdf

THAMES CROSSING ACTION GROUP

www.thamescrossingactiongroup.com

We believe there are serious issues that need to be addressed about the way NH are avoiding sharing critical info and are misleading Ministers.

Projects like the proposed LTC are a good example of how more money is being spent in the South East/East, as opposed to nationwide. Not only is it a case of the North South divide, but evidence shows that the LTC is simply not fit for purpose and would be a complete waste of taxpayers' money. Money that could be better spent.

The proposed LTC, and other road projects, are presented as a means of providing routes for ports, in the name of economic growth. 70% of all goods coming in and out of the Port of Dover go across the Dartford Crossing according to National Highways. 42% of all traffic using the Dartford Crossing is goods vehicles. Yet the Port of Dover doesn't have a rail connection.

We need to see more sustainable options. Firstly, to invest in our country being more self sufficient where possible, and supporting local businesses. Secondly, where we do need to transport goods to be looking at more sustainable options like rail. It is crazy at a time of climate emergency that the Port of Dover is not utilizing more sustainable rail. Rail improvements between Ashford and Reading, estimated cost £4.5bn, would take more freight off roads and onto more sustainable rail, negating the need for the proposed LTC, and contributing towards a more sustainable future.

The proposed LTC would also have a negative impact on businesses. Focusing on agriculture alone, we know since much of the land that would be lost, if the LTC goes ahead, is farmland (including grade 1 listed land) that farmers would be greatly impacted¹⁵. These are farms that have been in families for generations. These are farms that are already feeling the impacts of LTC due to preliminary investigative works that have been carried out on their land.

At a time when food security is a serious issue, we should be looking to save, protect and enhance more sustainable farming. Who is monitoring the cumulative impact of the lose of agricultural land due to roads and other developments? How does this help support economic growth and benefit, if we ended up having to import more and more essential food supplies moving forward?

It would also be a false economy to consider the cost of the LTC as it is being predicted, because there are lots of associated costs that would need to be covered as a direct result of the LTC, if it goes ahead. Things like the Tilbury Link Road¹⁶, Blue Bell Hill Improvements¹⁷, dualling of the A2 near Dover that would all be needed as a direct result of the LTC, but that are not being considered as part of the LTC project.

Blue Bell Hill improvements were actually included under the Variant C option at route selection for the proposed new crossing¹⁸. Variant C was ruled out due to the additional financial cost and environmental impacts, and was said to not be essential for a new crossing. Yet Kent County Council are now looking for

¹⁵ <https://www.thamescrossingactiongroup.com/ltc-impacts-on-farming/>

¹⁶ <https://www.thamescrossingactiongroup.com/tilbury-link-road/>

¹⁷ <https://www.thamescrossingactiongroup.com/blue-bell-hill-improvements-consultation-response/>

¹⁸ <https://www.thamescrossingactiongroup.com/ltc-route-options/>

THAMES CROSSING ACTION GROUP

www.thamescrossingactiongroup.com

funding for the Blue Bell Hill improvements as a result of the LTC. It is clear that if the proposed new crossing is about providing connections for the ports that most port traffic travels along the M20 and would need to use Blue Bell Hill to cut through to the LTC, if it goes ahead.

The Port of Dover have publicly stated that if the LTC goes ahead the dualling on the A2 near Dover¹⁹ would be needed.

The Port of Tilbury stated publicly that they would only support the C3 option (now known as the proposed LTC) if they got their own connection/junction. The Tilbury Link Road was for a while added to the design and then removed, but is still being progressed as a separate stand alone project. As is the Rest and Service Area that we were told at one point would be needed as part of the LTC due to safety standards and guidelines. All additional costs that funding would need to be provided for from somewhere if the proposed LTC goes ahead. This cost should fall within the LTC cost, anything else would be a false economy.

In addition to this, if the proposed LTC goes ahead further work would no doubt be needed to correct the lack of adequate connections, and negative impacts to the existing local road network that evidence has proven will become an issue from opening year, if the LTC goes ahead.

Despite requesting info regarding the so-called economic growth and benefits, we have to date not been provided with any evidence to back up the claims made by NH. Any economic growth and benefit must be sustainable green growth. Try sitting counting your money when there is no clean air to breathe, clean water to drink, or healthy food to eat, and the planet can no longer sustain our existence.

Health and well-being

The whole proposed Lower Thames Crossing route would fail against the newly set legal targets²⁰ for air pollution/PM2.5²¹. Electric and other non-fossil fuels will not help reduce deadly PM2.5 either, even if uptake of EVs is good. They still emit tiny particles from brake dust, tyre and road wear that are so tiny they get into our organs via the bloodstream.

Air pollution related illness comes with a huge price tag not only in regard to health care costs (the NHS), but also to the economy with people not being well enough to work, and when not working not having money to spend, as well as absence through illness impacting businesses operations too.

There are also the impacts to our health and well-being from the stresses of living with congestion and pollution. Whether it be from sitting in your vehicle in the congestion, or from having it next to your home on an ongoing basis.

¹⁹ <https://youtu.be/hylzZzY0Vgw>

²⁰ <https://www.thamescrossingactiongroup.com/environment-act-targets-set/>

²¹ <https://www.thamescrossingactiongroup.com/lower-thames-crossing-pm2-5/>

THAMES CROSSING ACTION GROUP

www.thamescrossingactiongroup.com

Evidence also shows that our health and well-being benefits from spending time in nature and outdoors. Whether that be a stroll, or more energetic exercise if the natural environment has been destroyed and negatively impacted it lessens the opportunity to spend our time in nature and benefit from some kind of exercise also.

NH are proposing new 'parks' near the LTC tunnel portals²². The reality is the 'parks' are actually about dumping spoil from the tunneling to try and reduce carbon emissions. The air from the tunnels would not be filtered, rather simply pushed through and out of the tunnels into the 'parks' and our communities, full of deadly pollution.

There are forecast to be 2,147 additional accidents over 60 years, including 26 fatalities, 220 serious injuries and 3,122 slight injuries as a result of the LTC, if it goes ahead²³.

The proposed LTC would be a 'smart' motorway by stealth²⁴. Whilst technically an All Purpose Trunk Road rather than a motorway, the proposed LTC would use 'smart' technology. NH only started referring to LTC as an APTR rather than a motorway after the public became more aware of the dangers of 'smart' motorways. We have been told the main difference between an APTR and motorway is the colour of the road signs. How can a green sign as opposed to a blue sign make a road any safer? It is the technology that is the issue when it comes down to the dangers of 'smart' motorways. Therefore if 'smart' motorway technology is being used on the LTC, the same risks apply.

Not only does this again negatively impact the economy through cost to the NHS, but also through the associated delays on roads when accidents/incidents occur.

The Dartford Crossing currently sees over 3000 incidents per year. Yet since the Dartford Crossing would remain over capacity even if the LTC goes ahead, it is highly likely that the number of incidents at the current crossing would also remain high.

NH are not planning how traffic would migrate between the two crossings, when there are incidents, if the LTC goes ahead, and there would not be adequate connections²⁵. This would lead to more congestion and pollution, further impacting health and well-being, and negatively impacting the economy.

Just a couple of examples of concerns in regard to incidents and migrating traffic:

An incident at the Dartford Tunnels would result in traffic attempting to come off the M25 onto the A2 coastbound to get to the LTC. Only to find that there would be just one single lane from the A2 onto the LTC.

An incident at the QE2 Bridge would result in traffic coming off the M25 onto the A13 eastbound to get to the LTC. Only to find out there would be no direct access to the LTC from the A13 eastbound. Instead

²² <https://www.thamescrossingactiongroup.com/new-parks/>

²³ <https://www.thamescrossingactiongroup.com/serious-concerns-over-ltc-road-safety/>

²⁴ <https://www.thamescrossingactiongroup.com/ltc-smart-motorway/>

²⁵ <http://www.thamescrossingactiongroup.com/incidents-ltc-dartford-crossing>

THAMES CROSSING ACTION GROUP

www.thamescrossingactiongroup.com

traffic would have to travel all the way down to the A1014 Stanford junction. Go up and around an already busy traffic lighted roundabout, alongside DP World, London Gateway, Thames Enterprise Park, and other traffic. Back down onto the A13 westbound to the LTC slip road, which is just past, but not accessible from, the A128 Orsett junction.

If instead the traffic attempted to come off the M25 directly onto the LTC, the M25 at this point would be 5 lanes of traffic, and the LTC southbound would be just 2 lanes until just past the A13.

This is not good for people's health and well-being, and would not be good for the economy either. We need and deserve better. We all deserve the right to breath clean air, and for our lives not to be detrimentally impacted by huge road projects like the proposed LTC.

Environmental Impact

The proposed Lower Thames Crossing would be hugely destructive and harmful to the environment. It would destroy greenbelt²⁶, agricultural land (inc grade 1 listed land), woodlands (inc ancient and long-established woodlands)²⁷, habitats and wildlife²⁸.

It is estimated it would emit around 6.6 million tonnes of carbon²⁹. A top National Highways/LTC boss has admitted that unless the carbon issues are resolved the proposed LTC would not go ahead. It would not be legally compliant with Net Zero³⁰.

National Highways and Balfour Beatty have both made claims regarding further slashing carbon. Yet when questioned by our group and an industry reporter they were unable to provide info or evidence about how those reductions could be achieved, and back away from their bold claims.

The LTC Accounting Officer Assessment, stated that the project aspires to achieve Net Zero position. Clearly 6.6 million tonnes of carbon is a long way off from Net Zero, and to claim anything else is again misleading and lacks transparency to those making important decisions on what to invest public money on.

We can no longer risk our future on speculation, propaganda, and greenwash. We need to invest in a sustainable and healthy future for all.

Conclusion

Now more than ever we need to be considering what is the right thing to be doing at a time of climate emergency, and when we are living in the midst of cost of living crisis. How Government spend taxpayers'

²⁶ <https://www.thamescrossingactiongroup.com/ltc-greenbelt-destruction/>

²⁷ <https://www.thamescrossingactiongroup.com/impacts-of-ltc-on-forests-and-woodlands/>

²⁸ <http://www.thamescrossingactiongroup.com/ltc-impacts-on-wildlife>

²⁹ <https://www.thamescrossingactiongroup.com/ltc-carbon-emissions/>

³⁰ <https://www.thamescrossingactiongroup.com/no-ltc-if-national-highways-dont-resolve-carbon-issues/>

THAMES CROSSING ACTION GROUP

www.thamescrossingactiongroup.com

money is more relevant than ever, and we need to see actions to show that those we have elected are acting in our best interest. We need a Government who review the evidence and are not afraid to make the changes that need to be made.

Evidence clearly shows that building new roads doesn't solve the problem of congestion. Far from it, building more roads just leads to induced demand, more congestion, more pollution, and is hugely destructive and harmful both to our environment and to our health and well-being. We can no longer afford a Government whose focus is purely on moving forward with things as they have always been. A greener more sustainable future not only possible but essential for the benefit of all.

We urge you to cut spending on new roads and to instead invest in more sustainable alternatives and options in this Spring Budget 2023 and beyond. To do anything else will be at a huge cost to the environment, our health and well-being, and a sustainable future existence for us all.

We thank you for this opportunity to make representation for the Spring Budget 2023. We would be happy to provide further info if requested.