

Evidence for the Work of Defra Inquiry

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 paper was prepared and submitted by Laura Blake, Chair of TCAG on behalf of the group in response to the Work of Defra Inquiry¹ in March 2023. TCAG can be contacted via email –

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Reason for submitting evidence

This inquiry looks into how well Defra are working.

Since the proposed Lower Thames Crossing (LTC) would have huge impacts to the environment, food, and rural affairs we felt it important to make a representation to share evidence of our experience and knowledge through our work over the years, which we hope you will find helpful.

Because as a group we represent those opposed to the proposed LTC our representation and evidence will focus on the LTC, but we know from our communications with other campaign groups around the country that many of the concerns and issues we have are not unique to the LTC, they are similar for most if not all projects.

Defra's website states that it's priority outcomes are to:

- improve the environment through cleaner air and water, minimized waste, and thriving plant and terrestrial and marine wildlife
- reduce greenhouse gas emissions and increase carbon storage in the agricultural, waste, peat and tree planting sectors to help deliver net zero
- reduce the likelihood and impact of flooding and coastal erosion on people, businesses, communities and the environment
- increase the sustainability, productivity and resilience of the agriculture, fishing, food and drink sectors, enhance biosecurity at the border and raise animal welfare standards.

¹ <https://committees.parliament.uk/work/6401/work-of-defra/>

Our evidence

Taking the above points into consideration, as being Defra's priorities we have to call in to question why they are not doing more to voice concern and call for hugely destructive and harmful road projects like the proposed £10bn+++ Lower Thames Crossing (LTC) to be scrapped, or at very least reconsidered.

We note that in general in Government it seems that there is too much disconnect between departments, when a lot of the time joined up thinking and assessment is critical. This needs to change.

There is evidence that the proposed LTC would fail to meet the newly set legal targets² for air pollution PM2.5³.

Deadly particulates from things like brake dust, tyre and road wear that are so tiny they get into our organs via the bloodstream. Despite growing evidence there seems to be very little if any acknowledgement or concern from government regarding the dangers of PM2.5 from traffic. All too often we hear 'zero emission vehicles', but they are not truly zero emissions. There seems to be either a distinct lack of knowledge or acceptance of this fact, and that is dangerous and worrying.

PM2.5 doesn't just affect our health and well-being either, but also impacts wildlife and the environment. It pollutes the water we drink, the soil we grow our food in, as well as the air we breathe. It can travel thousands of miles and does not just vanish into thin air!

Everyone deserves the right to breathe clean air, so why are we not seeing more support and awareness being raised by Defra on how bad our air quality is? Why are more MPs not supporting Ella's Law (Clean Air Bill)? Why are they not voicing concerns about a road project like the proposed LTC that would fail against the newly set targets? Why did those targets take so long to set? Why were those targets not more ambitious? Evidence shows that these levels are attainable by 2030⁴, so why were they set for 2040? Defra have been doing a terrible job in regard to air quality and other pollutions.

There is also evidence that spending time in nature is beneficial to our health and well-being, but nature is far more enjoyable with clean air to breathe, if the natural environment is healthy and thriving itself, and that we have it near to where we live.

Air pollution related illnesses also add to health care costs of the NHS, so by doing more to improve air quality, and certainly be ensuring additional pressures like new roads (the LTC) are not being encouraged and progressed, it can also benefit the country financially too.

We also question the lack of calculations of costs to the NHS being considered when adjusted benefit cost ratio for projects like the proposed LTC are calculated. These are the kind of things Defra should be aware of and pushing for changes on.

Especially since Therese Coffey MP has also confirmed that there would be no major new funding for achieving the targets. This means that government are providing no new funding to save, protect and enhance our natural environment, but are funding billions of pounds on hugely destructive and harmful projects, like the proposed LTC, where the costs keep rising and more evidence becomes available of how it fails to meet scheme objectives.

² <https://www.thamescrossingactiongroup.com/environment-act-targets-set/>

³ <https://www.thamescrossingactiongroup.com/lower-thames-crossing-pm2-5/>

⁴ <https://airqualitynews.com/2022/03/02/air-quality-in-uk-could-reach-who-targets-by-2030-if-reforms-delivered/>

The UK is one of the most nature depleted countries in the world, yet again our government are attempting to push ahead with hugely destructive and harmful projects like the proposed LTC. It would destroy huge amounts of greenbelt land⁵, woodlands (including ancient woodland)⁶, wildlife and habitats⁷, countryside (including an Area of Outstanding Natural Beauty)⁸, and so much more.

There are many protected species that under threat by the proposed LTC and other road projects.

National Highways have admitted during DCO examination for another road project that *“The evidence base for the effectiveness of the mitigation that we are recommending simply isn’t there and this is an industry-wide issue, not project specific.”*⁹

Why are Defra who sponsor Natural England not asking questions about why bat licences are granted when there are no proven effective mitigation measures for bats when it comes to road building? We know Natural England are under a lot of pressure and have limited resources, so why are Defra not stepping up on things like this?

As a country we are supposed to be planting more trees, yet the budget for tree planting compared to what is being spent on destructive projects is chalk and cheese.

It would also be interesting to know what analysis has been done on cumulative impacts of development on the natural environment.

Whilst projects like the proposed LTC have to provide environmental mitigation and compensation, the question has to be asked where does the vicious circle end? Land that is additionally taken to fulfil environmental mitigation results in further impacts.

Imagine if more and more people kept moving into your home, at what point does it throw the balance out? Same for wildlife, we can’t keep trying to enhance our natural environment and protect wildlife by continually trying to squeeze them in to less and less space.

How long would it be before your household cupboards ran out of food with all those extra people? What if when you and those people went to the supermarket the store only had the same amount of stock, how long before there wouldn’t be enough food? Yet we continue to reduce the space and habitat for wildlife, often even calling it environmental mitigation or compensation! Where are Defra to monitor and ensure our natural environment and wildlife are protected? Why is there such a delay for Biodiversity Net Gain for NSIPs to kick in? Nov 2025¹⁰ is not soon enough when nature is already drastically declining.

The amount of greenwashing on the proposed LTC project has been unbelievable¹¹. How can such a hugely destructive and harmful project be considered and sold as ‘the greenest road ever built’?

⁵ <https://www.thamescrossingactiongroup.com/ltc-greenbelt-destruction/>

⁶ <https://www.thamescrossingactiongroup.com/impacts-of-ltc-on-forests-and-woodlands/>

⁷ <https://www.thamescrossingactiongroup.com/ltc-impacts-on-wildlife/>

⁸ <https://www.thamescrossingactiongroup.com/ltc-impacts-to-area-of-outstanding-natural-beauty-aonb/>

⁹ https://youtu.be/Ri5s7_eIHlQ

¹⁰ <https://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-nsip-reforms-action-plan/nationally-significant-infrastructure-action-plan-for-reforms-to-the-planning-process>

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

National Highways announced the new Hole Farm Community Woodland as part of their plans to improve biodiversity alongside the existing major routes of the Strategic Road Network. They stated publicly that it would go ahead regardless of whether the proposed LTC was granted permission or not.

Yet they then soon started associating Hole Farm Community Woodland with the proposed LTC project in attempts to greenwash it. Hole Farm is now presented as part of the environmental mitigation and compensation for the LTC project. How can something that was going to happen regardless of the proposed LTC be considered environmental mitigation or compensation? Defra aren't doing anything to put procedures and guidance in place to ensure this kind of misleading, creative accounting greenwashing doesn't go on, especially by government companies like National Highways.

With so much greenwashing going on both with the proposed LTC and so many other companies what are Defra doing to bring in legislation to protect from greenwashing? We see no evidence of anything being considered let alone put in place.

We welcome the creation of the Office of Environmental Protection, and so far they are showing their worth. Yet we can only report things to them if there is a law being broken. Why have Defra not identified the need for legislation on greenwashing?

At a time of climate emergency Defra has a very important job to do, and frankly we see no evidence that they are taking their role seriously enough. The Environment Bill took way too long to become an Act, and Defra failed to set the legal targets by the date they were legally obliged to do so. Even when the targets were announced much later than they should have been they were weak and did not reflect what many had called for in the consultation period, which was very disappointing.

The proposed LTC is estimated to emit 6.6 million tonnes of carbon, if it goes ahead¹². Where are Defra advising the rest of government that such a project should not go ahead, and is not compliant with Net Zero?

Carbon is one of the things National Highways attempt to greenwash when it comes to the proposed LTC. They take full advantage of attempting to sell it as a 'path finder project' following the government's decision to award it such a title. Yet where is the evidence that being given such a title guarantees it is in any way environmentally friendly or sustainable? There is none.

National Highways attempted to claim that the LTC carbon emissions would be slashed by 80%. Yet when we ran the figures at the time, it showed the claim was highly speculative, and that the reality was a whopping 67% increase in emissions.

Bold claims by both National Highways/LTC and contractor Balfour Beatty on reducing carbon have also faded under questioning, as exposed in Highways Magazine in Jan 2023¹³. Just another example of more greenwash on the LTC.

In fact a top National Highways/LTC boss admitted at an industry event that unless the carbon issues for the LTC can be resolved the project would not go ahead¹⁴.

¹² <https://www.thamescrossingactiongroup.com/ltc-carbon-emissions/>

¹³ <https://www.highwaysmagazine.co.uk/Thames-Tunnel-carbon-claims-fade-under-questioning-/12083>

¹⁴ <https://www.thamescrossingactiongroup.com/no-ltc-if-national-highways-dont-resolve-carbon-issues/>

In June 2021 the Climate Change Committee stated in their report¹⁵, new roads should only be built if they can be shown not to increase emissions. Why are Defra not doing more to ensure government companies like National Highways take these things seriously?

Why are Defra not doing more to ensure environmental figures and data are being released when needed, such as the data to back up the Decarbonisation Plan?¹⁶. Yes it was the Department for Transport who initially refused to share the info, but being an environmental matter Defra should be on top of these things.

Why did Defra not identify that changes would be needed to National Policy Statements and call for them to be reviewed and updated accordingly? Why did it take the threat of legal challenges from the likes of Transport Action Network to get the National Policy Statement for National Networks (NPS NN) to be reviewed? Why are Defra not doing more to ensure members of the public and NGOs don't have to be the ones making legal challenges against our own government on environmental matters? The number of challenges and cases keeps rising and yet Defra are noticeable by their absence in trying to sort things out.

The proposed LTC would actually destroy a solar farm¹⁷, and have impacted others already. The land where the one that would be destroyed if the LTC goes ahead, is marked on maps as designated for environmental mitigation! You couldn't make it up, how can destroying a solar farm in this day and age be considered environmental mitigation?

Huge projects like the proposed LTC not only add to the risk levels of flooding, but also to pollution of our water.

Some areas of the proposed LTC route are flood plain. National Highways propose to add high landscaping around the northern tunnel portal for the LTC, between the portal and the River Thames on land that is a marsh/flood plain.

There is also evidence that much of this land is at high risk of flooding¹⁸. Yet we see no sign of Defra showing any real concern about the impacts this could have on local communities and those further up and down river.

Projects like the LTC that would negatively affect the ability of the River Thames to use the natural marshes/flood plain should be given a lot more consideration. It's like National Highways just push ahead because that's what they've always done. But with climate change we are already seeing and experiencing consequences with severe weather.

We need more forward thinking when it comes to planning. Defra should be doing more to ensure these things are considered and taken seriously, as well as doing all they can to ensure risk levels are reduced not increased, as would be the case if the proposed LTC goes ahead.

On the topic of sustainability and food security, we draw attention to the fact that at a time of serious food security issues, the proposed LTC would destroy and impact thousands of acres of agricultural land (including grade 1 listed)¹⁹.

¹⁵ <https://www.theccc.org.uk/publication/2021-progress-report-to-parliament/>

¹⁶ <https://www.theguardian.com/environment/2022/dec/19/co2-emission-figures-road-transport-uk-government-blocks-release>

¹⁷ <https://www.thamescrossingactiongroup.com/ltc-impacts-to-solar-farms/>

¹⁸ <https://www.thamescrossingactiongroup.com/flooding-and-the-ltc/>

This is not even just for the physical road, but also as environmental mitigation. How can this be considered sensible or right?

If we continue to destroy and impact our agricultural land we will be looking to import more of our food. This just leads to more food miles travelled and all the associated environmental impacts. We are not aware that anyone is even monitoring the cumulative impact of development on agricultural land for roads, houses, solar farms, other development.

Neither is it sustainable to allow these huge destructive projects to proceed knowing they add to the climate emergency. We need to be improving things, not adding to the problems. The worse climate change gets the more impacts there will be to our food supplies etc. We need a healthy and sustainable future for us all. We do not believe Defra are doing anywhere near enough to ensure that will happen. We need more ambitious plans, and more actions to back up all the talk.

In conclusion we have to ask why Defra are not stepping up and doing more to ensure their priorities are not being ignored and hindered by government's own proposals and plans? Why are they not taking action to back up all the talk? Why are they not setting ambitious targets in a timely manner? Why are the Department of Environment, Food and Rural Affairs not doing more to save, protect and enhance our environment, food and rural affairs at a time of climate emergency? Why are they not ensuring that government companies like National Highways are not proposing and progressing hugely destructive and harmful projects like the proposed £10bn+++ Lower Thames Crossing. We need and deserve better from Defra and our Government. We should not be having to fight our government so hard to ensure a healthy sustainable future for us all.

We thank you for the opportunity to present our evidence to you in this inquiry. Please do not hesitate to contact us if you have any questions or wish to discuss any of our evidence further.

¹⁹ <https://www.thamescrossingactiongroup.com/ltc-impacts-on-farming/>