

## **Shaping the future of England's strategic road Consultation**

### **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](http://www.thamescrossingactiongroup.com).

This paper was prepared and submitted by Laura Blake, Chair of TCAG on behalf of the group in response to the Department for Transport and National Highways' Sharing the future of England's strategic road roads Consultation<sup>1</sup> in July 2023. As Thames Crossing Action Group represents those opposed to the proposed LTC our consultation response will be in that regard. Our response is not confidential. TCAG can be contacted via email – [admin@thamescrossingactiongroup.com](mailto:admin@thamescrossingactiongroup.com).

### **Reason for responding**

Obviously as a group that represent those who are opposed to the proposed Lower Thames Crossing road project we have not only experienced dealing with National Highways over the years, but also have an understanding about the impact of NH projects and practices on us and others.

With the proposed LTC due to be pushed into RIS3, and RIS4 if it goes ahead, we feel it important that we have our say in this consultation.

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<sup>1</sup> <https://www.gov.uk/government/consultations/shaping-the-future-of-englands-strategic-roads>

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## Response

### *Question 1. What importance, if any, would you give to the following strategic objectives:*

- Improving safety for all - Very important
- Improved environmental outcomes - Very important
- Network performance to meet customer needs - this depends on who is being considered the customer
- Growing the economy – we do not feel economic growth should be prioritised over environment, health and well-being, and we believe there is a big difference between growth for the sake of growth and essential sustainable growth.
- Managing and planning the SRN for the future – of course the existing road network needs to be managed and maintained, but we have very little, if any, confidence in NH doing this.
- A technology-enabled network - Very unimportant

We find the above questions very difficult to respond to, because these objectives are so open to interpretation, and we simply do not trust and believe what NH propose, based on years of experience of dealing with them.

### *Question 2. What, if any, other specific roads do you think we should consider as:*

- trunking candidates?
- de-trunking candidates?

No comment, as we have very little, if any, confidence in NH ability to manage and maintain the SRN, so whilst we understand the principal of trunk roads in theory, the realities are very different.

### *Question 3. Do you think National Highways has identified the right focus areas?*

No

## The Nine Focus Areas

### **Growth and levelling up / Car Travel / Freight and logistic**

Growth for the sake of growth is not always a good thing, and definitely not when it comes at the cost of the environment, and our health and well-being.

At a time of climate emergency we need to be focusing on modal shift to more sustainable travel and transport. Encouraging and supporting growth largely leads to an increase in traffic, which leads to more congestion, more pollution, which in turn leads to calls for more destructive and harmful roads, and so the vicious circle spirals downwards.

Levelling up is of course open to interpretation as to what is deemed levelling up. To many levelling up does not include having hugely destructive and harmful road projects destroying and negatively impacting their lives, health and well-being, communities and the environment etc.

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Instead many would prefer that the natural environment is levelled up, by more protection and enhancement, with tree planting, habitat protection, enhancing, and rewilding, better provision and protection of biodiversity, less pollution, cleaner air to breathe, cleaner water to use, healthier soil to produce foods locally. In this regard new road projects are actually a form of levelling down.

We need more sustainable and integrated transport and travel, not a predominant focus on yet more roads that evidence shows just create more traffic and pollution.

Electric vehicles are not the panacea that many like to believe<sup>2</sup>, they do not solve the issue of congestion, and they still emit deadly PM2.5 (Particulate Matter 2.5), the tiny particles from things like brake dust, tyre and road wear that are so tiny they get into our organs through the bloodstream. Not enough importance is being given to the dangers of PM2.5, and it is concerning that EVs are referred to as zero emissions, because they emit these deadly particulates.

We hear talk about modal shift, and benefits of active and public transport. Yet NH all too often fails to adequately incorporate meaningful inclusion for active and public transport.

The reason so many people use cars is because they do not have a safe, reliable, affordable alternative. This will not change so long as government continue to keep wasting more and more money investing in roads, instead of investing in more sustainable alternatives to allow and encourage modal shift.

The proposed £10bn+ LTC offers no provision for cross river active travel<sup>3</sup>, and due to the lack of adequate connections would not be viable for public transport such as bus routes<sup>4</sup>. Instead NH complete an active travel tick box exercise by claiming a number of walking, cycling and horse riding routes that fail to offer any real connectivity. A considerable number of the routes are actually strange zigzag and spiralling pathways, or ones that run parallel to other paths practically side by side. They also claim many of these routes to be 'new' despite the reality being they are simply the realignments of existing routes that would be needed due to the proposed LTC route destroying and impacting the existing routes. Just imagine what could be done in regard to more sustainable travel and transport with the £10bn+ that is being proposed to be spent on the proposed LTC, if it goes ahead.

Freight should not rely predominantly on road, better and more consideration has to be given to rail freight. We also generally need a more local focus, instead of increasing miles travelled, which just adds to pollution and environmental impacts.

Freight that comes into the UK arrives at random ports instead of being planned to arrive in the most efficient location for its final destination. This can result in goods having to travel far more miles than would actually be needed if better planning was in place.

In this day and age of climate emergency, why are ports, like the Port of Dover not connected by more sustainable rail? 70% of goods in and out of this port alone use the Dartford Crossing. Around 42% of

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<sup>2</sup> <https://www.thamescrossingactiongroup.com/electric-vehicles-argument/>

<sup>3</sup> <https://www.thamescrossingactiongroup.com/ltc-for-walkers-cyclists-horse-riders/>

<sup>4</sup> <https://www.thamescrossingactiongroup.com/ltc-public-transport-and-nmu/>

traffic using the Dartford Crossing is goods vehicles. Why is the focus predominantly on road freight, with no proper consideration given to rail alternatives? <sup>5</sup>

### **Safety / Digital / Decarbonisation**

We can in no way trust National Highways when it comes to road safety. They have misled and failed to deliver what was signed off on for so long in regard to 'Smart' motorways. There is nothing smart about 'smart' motorways, they are killer motorways. The fact NH continue to deny this fact is a serious concern.

Yet at the same time when the dangers of 'smart' motorways became more acknowledged by mainstream media and the public became more aware and concerned, NH backed away from calling the proposed LTC a motorway, since it would use 'smart' technology.

Despite a re-branding of the LTC to be an All Purpose Trunk Road (APTR), the fact remains that when you look into the detail of the Development Consent Order (DCO) application documentation it clearly states that the proposed LTC is coded as a 3 lane motorway, with the exception of the southbound stretch between the M25 and A13. The proposed LTC would be a 'smart' motorway by stealth.

NH also has a long-term aim that no one should be killed or injured on the strategic road network by 2040. Whilst we of course support roads being as safe as humanly possible, it is completely unrealistic to believe that there can be no deaths or injuries on the SRN, as driving and roads will always hold a certain level of risk, that is the reality is that sadly accidents are a part of life.

In the same way that people are concerned about the dangers of 'smart' motorway, many are also concerned about the introduction of fully autonomous vehicles on our roads.

Who will be responsible in cases of accidents? Who will be held accountable for the programming of such vehicles deciding what action to take in serious scenarios that could result in death or serious injury?

To be talking about an aim of zero deaths and injuries alongside the proposition of fully autonomous vehicles seems a complete contradiction.

In regard to digital and technology advancements and changes, we also wish to draw attention to the fact that far more could be done to improve connectivity in many areas to enable more people to work from home and reduce the need to commute and use the road network, which would result in less traffic, congestion and pollution.

Of course decarbonisation is important. However, we have experienced NH greenwashing attempts first hand, and the proposed LTC is estimated to emit 6.6 million tonnes of carbon<sup>6</sup>, if it goes ahead.

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

<sup>6</sup> <https://www.thamescrossingactiongroup.com/ltc-carbon-emissions/>

Evidence and legal challenges show that government's decarbonisation plan is not fit for purpose, and we have concerns that NH rely too heavily of predictions about decarbonisation that cannot be backed by fact and evidence.

### **Customer experience / Sustainable network development / Asset resilience**

We get the impression that to NH customers doesn't really include the general public, or those who live and work near to the Strategic Road Network (SRN). For NH customers is probably more about relationships they have with construction companies, and stakeholders who benefit and support NH and the SRN.

This point is highlighted where it is said *"Our strategy is vision-led and we have moved to a 'decide and provide' approach. This means we are increasingly proactive in shaping the future we want for our customers and network"*

'The future we want for our customers and network', is precisely how they behave towards the public, attempting to inflict what they want upon us, instead of proper and adequate consultation and communications, whereby they actually listen and look to provide what people would like.

Many people would prefer to be able to travel by other means than road, but the options are simply not there, and/or are not safe, reliable or affordable. Continuing with a primary focus on roads does nothing to allow or encourage modal shift.

Over the years we have experienced a great amount of greenwashing attempts by NH in regard to the proposed LTC. We have learnt that very rarely do they actually have any genuine interest or evidence to back up claims when it comes to the environment and sustainability.

Doing no harm should be prioritised over just doing what you want and then pretending to offer environmental mitigation and compensation, the latter being our experience of NH behaviour.

If NH are genuine about sustainable network development then they should be doing far more than they currently are. They should also immediately adopt the new legal requirements for Biodiversity Net Gain, as a means of good practice. This is particularly relevant to huge projects like the proposed LTC. It is no good saying you want sustainable network development, but only put it into practice after pushing such destructive and harmful projects through, that is just shutting the door after the horse has bolted.

As for asset resilience, we have an aging network now that needs attention, which is a matter that needs to be prioritised over building new roads.

Any focus on roads should be to better manage and maintain what we already have. Many roads and associated infrastructure are at or near their expected shelf life and are in desperate need of attention.

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This also includes a very real need to repair potholes in our roads. With a growing number of incidents arising due to potholes and bad road surfaces, this impacts the economy due to incidents and congestion. It also poses a health and safety risk, since incidents with potholes increase the chances of accidents too.

More consideration also needs to be given to ensuring that if there is any investment in new roads they are fit for purpose and offer value for money.

The proposed LTC fails to meet all scheme objectives, would not be fit for purpose, and is poor value for money.

Not only that but sections of the proposed LTC would be built on flood plains, some close to the River Thames in areas that are predicted to flood. At a time of climate change this is not good planning and offers no long-term resilience for the road network. In addition, road building is so harmful to the environment that projects like LTC are just making climate change worse quicker. As weather patterns continue to become more erratic and unusual we need to ensure that our transport options are as sustainable and resilient as they can be, not more roads that add to the problem.

### **Alternative focus areas**

We believe there is an essential need for more joined up thinking, and integrated sustainable transport travel options in our country.

Having National Highways is a problem. Firstly, we believe they have become a law unto themselves through years of not being questioned and held accountable.

Secondly, their sole focus is on highways, which is no appropriate or acceptable at a time of climate emergency.

We would like to see National Highways abolished and replaced with National Transport or National Travel, a new organisation that would focus on integrated sustainable travel and transport for the country.

### ***Question 4. To what extent do you agree with National Highways' approach to improving safety on its network?***

Strongly disagree

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In addition to what we have already commented on in regard to safety above, we draw attention to the fact that when it has come to legal cases in regard to 'smart' motorways, National Highways have said that they have no duty of care to road users<sup>7</sup>.

If we are to even contemplate that they have our best interests at heart and truly want to be responsible when it comes to road safety and their outrageous claim of no deaths and injuries by 2040 then they should be held accountable and take responsibility for those who use the road network. What other business can simply operate and say they have no duty of care for their customers?

In addition, just take a look at the proposed LTC, there are forecast to be 2147 additional accidents over 60 years, including 25 fatalities, 220 serious injuries and 3122 slight injuries, if it goes ahead.

How are we supposed to believe the claims that NH make about safer roads, when the largest road project they are proposing alone would see an increase in fatalities and injuries?

We again stress concerns about the fact that NH failed to deliver what was signed off in regard to 'smart' motorways, and continues to admit how dangerous they are.

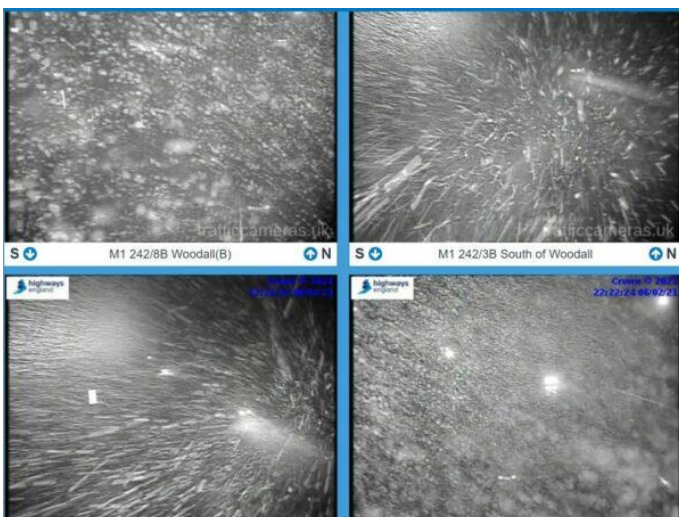
Whilst we welcome Government's decision to scrap new 'smart' motorways, this hasn't fully addressed the dangers.

What about the existing 'smart' motorways? What will be done to make those safer?

We see no sign of this being a safety priority for RIS3. The majority of the public has little or no confidence in 'smart' motorways. They have been proven to be more dangerous. The technology is not adequate and is unreliable at identifying stopped vehicles.

You only need to look at the NH camera feed for the SRN to see that they are often not working, not correctly positioned, or fail abysmally in the dark and/or bad weather.

For example



<sup>7</sup> <https://www.theconstructionindex.co.uk/news/view/does-highways-england-really-have-no-duty-of-care-to-motorists>

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The control room technology is also failing, with not enough staff to adequately monitor it, if it is actually working.

Emergency refuge areas on the SRN are often poorly maintained. Take a look next time your on a 'smart' motorway at how much debris and dirt is on these areas and then consider how helpful they would be if you need to use them in an emergency, that's if you can actually reach one.

The fact RIS3 priorities include, 'Investing more into safety communication campaigns...' is insulting, especially when you consider the atrocious and highly controversial 'Go Left' campaign for 'smart' motorways.

Another priority is detailed as 'Working with emergency services to identify how we can collectively improve response times to incidents on our network'. Yet with the proposed LTC, the emergency services steering group are continually struggling with communications with NH/LTC, and have concerns over the impacts of safety in regard to the LTC if it goes ahead.

As highlighted we have very serious concerns that the proposed LTC would be a 'smart' motorway by stealth<sup>8</sup>. NH underhand way of trying to hide this fact is seriously concerning and unacceptable.

Locals are voicing concerns over the fact the LTC would be a 'smart' motorway by stealth, yet NH continue to deny this fact. We voice concerns over other safety aspects of the proposed road, and construction (if it goes ahead), yet NH continue to fail to address these concerns.

Is it any wonder why people have no faith or confidence in NH?

Road safety should also include NH taking responsibility for pollution. Those using the road network are at risk, just as those in surrounding areas would be.

Pollution not only impacts humans directly, through the air we breathe, water we use, and soil we produce our food from, but also the natural environment. This needs to be considered part of road safety as it is the construction and use of the road that creates the risk.

We see mention of suicide prevention, but sadly know from first hand experience that NH do not take their own actions into consideration when it comes to the threat of new road projects on people's health and well-being. We know of people who have sadly been suicidal due to the threat of the proposed LTC. We are also sadly aware of the loss of life through health issues that have highly likely been contributed to by the stress of dealing with NH and the threat of the proposed LTC. NH need to take more responsibility for their actions and behaviour, and the impacts their projects have on people.

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<sup>8</sup> <https://www.thamescrossingactiongroup.com/ltc-smart-motorway-by-stealth/>



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### ***Question 5. To what extent do you agree with National Highways' priorities for making the best use of the existing Strategic Road Network?***

In general we agree that our existing road network needs to be properly managed and maintained.

We have already highlighted the need for investment into repairing the aging existing road network.

However, as we have and will continue to state, we have very little if any confidence in NH. The fact our roads are now in the state they are is due to poor management and maintenance, and too much focus on new roads instead of looking after what we already have. This has to change.

Urgent consideration also needs to be given to ensuring that our roads are capable of withstanding not only increasing amounts of traffic, but also the weight of heavier Electric Vehicles (EVs) and longer HGVs etc.

NH are very quick to say EVs are better for the environment, but they do not solve the problem of congestion, and may even worsen it if people believe EVs are greener, so think it is ok to drive more. EVs also still pollute, particularly PM2.5. The particles that are so tiny they get into our organs via the blood stream. These come from things like brake dust, and tyre and road wear. This increased road wear from heavier EVs needs to be taken into account.

NH should also be considering the impacts existing roads have on biodiversity and the natural environment, and ensuring that as works are carried out they do all they can to improve the environmental credentials of both the works and the road for the future.

Keeping roads and verges clean and healthy, with planting and management where needed to allow nature to thrive as best it can alongside busy roads, to better protect our health and well-being as well as the environment.

We also have serious concerns about the current usage of technology, as already highlighted 'smart' technology is not safe and reliable. Until and unless tech can be proven to be completely reliable and safe then its use needs to be very carefully monitored and should not replace safer methods and options.

If National Highways were truly serious about adapting to Climate Change, they would not be attempting to push ahead with hugely destructive and harmful projects like the proposed LTC. We need to see move away from roads and onto more sustainable integrated travel and transport. Plus of course more roads and more traffic just adds to climate change. Whilst to a certain level we need to ensure resilience, we also need to prioritise stopping and reversing climate change, this cannot be done with a primary focus on roads and road building. We need and deserve better.

**Question 6. To what extent do you agree that National Highways should evolve its:**

- **community offer** – again what they should do and what we believe they actually would do compared to what is being proposed are two different things
- **proposals for designated funds** – strongly disagree

It would be laughable, if it were not such a serious matter, that NH are talking about “*Continuing to work proactively with mayors, local authorities..*”.

We know from experience that NH fail to communicate adequately or proactively with host local authorities, and also NGOs, groups, communities and members of the public.

Local Authorities such as Gravesham and Thurrock have serious concerns over the impacts the proposed LTC would have on local areas and roads. The Planning Inspectorate have made it clear at a very early stage in the DCO examination that NH need to get the work done in regards to sharing data that local authorities and major stakeholders have been requesting for years in regard to traffic modelling.

Again, laughable if it were not so important, “*Developing new freight corridor studies for priority areas, continuing to conduct joint strategic planning with Network Rail.*” There has been no adequate consideration of rail improvements to serve rail freight in the South East, that would negate the need for the proposed LTC.<sup>9</sup>

Why is the Port of Dover not connected by rail in this day and age? It is clear when 70% of goods in and out of this port alone use the Dartford Crossing, and 42% of traffic using the current crossing being goods vehicles that there is a very real need to invest in getting more freight off our roads and onto more sustainable rail. But the clue is in the name, National **Highways**.

References to ‘*Increasing integration with local roads and other transport modes*’ with subheadings of ‘*Improving travel choice for our customers*’ and ‘*Improving active travel infrastructure*’ is completely unbelievable as an NH claim or aim.

As already highlighted, the proposed LTC offers no cross river active travel, would not be viable for public transport bus routes due to a lack of adequate connections. The LTC would really offer no alternative other than to drive. It would utilise the existing local road network in order to operate, adding pressure on already busy roads and cost on local highways authorities, along with associated pollution and adverse impacts on communities.

The active travel that forms the tick box exercise for the LTC project would be largely pointless paths that zig zag, spiral, and run parallel alongside other paths, in areas being claimed as parks, which in reality at spoil dumping grounds surrounding the tunnel portals where pollution would be spewed out.

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<sup>9</sup> <https://www.thamescrossingactiongroup.com/rail-and-tram-alternatives/>

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As with everything else we have no confidence in NH genuinely wanting to or actually fulfilling such aims. If they were genuine why are they not incorporating their proposals in the largest road building project in the country now?

Again, we have already commented in response to such claims as 'Unlocking growth of freight and logistics'. Why is the focus on freight having to be by road? Reminder, the clue is in the name, National **Highways**. There are better and more sustainable options, the obsession with roads has to stop.

NH should not be trusted with Designated Funds, and as we have seen and experienced<sup>10</sup> they are using them in very questionable ways to support and promote new road projects.

The original idea of Designated Funds was supposed to be a fund that communities and others can apply for funding for projects that benefit communities and environment if they are located near the Strategic Road Network (ie roads managed and maintained by NH).

So why are NH re-branding chunks of the Designated Funds as an LTC Community Fund, when the proposed LTC has not even been granted permission?

We also consider it to be deceitful to re-brand a section of Designated Funds, which in our case would largely have been available to the communities impacted by LTC, as most are already in close proximity to the SRN.

In one instance in relation to the proposed LTC the Designated Fund is being used for Hole Farm Community Woodland. NH originally declared publicly that this community woodland was part of improving biodiversity along their major road network. It was stated publicly that it would be progressed regardless of the proposed LTC. They very quickly attempted to then claim it and associate it as environmental mitigation/compensation for the proposed LTC.<sup>11</sup>

We consider this to be creative accounting and double counting the use of the same site.

It is unacceptable that NH are using Designated Funds in this way, it should not be a petty cash resource for trying to put a spin on new road projects, and funding associated with a new road project should form part of the overall project budget.

We completely object and oppose the use of Designated Funds in this way.

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<sup>10</sup> <https://www.thamescrossingactiongroup.com/ltc-community-fund/>

<sup>11</sup> <https://www.thamescrossingactiongroup.com/hole-farm-community-woodland/>

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### ***Question 7. To what extent do you agree with National Highways' approach for driving decarbonisation and environmental sustainability on the SRN?***

Yet again, whilst we of course believe there is a critical need for decarbonisation and environmental sustainability, we have no confidence in NH delivering on that.

The main two priorities for this are categorised as Carbon and Wider Environment. We have already covered both aspects, and have no reason to believe anything NH propose as evidence and experience through the proposed LTC shows the level of greenwashing that NH deem acceptable.

The proposed LTC is estimated to emit around 6.6 million tonnes of carbon, if it goes ahead. Of that nearly 5 million tonnes are for the first 60 years of operations.

There is no evidence to show that the carbon emissions can or will be reduced, and all the intentions of NH in their press releases etc do nothing to guarantee anything.

More recently NH have announced their aim to use hydrogen for construction machinery, if the LTC goes ahead. Only recently they told us they were exploring removing diesel from all work sites, and only using hydrogen and electric power plant. Yet the press release this week shows them putting out a Tender Opportunity Notice for hydrogen that would see them reduce diesel by around a third.<sup>12</sup>

There is also the question about the additional cost associated with greener construction, and where that funding will come from.

With the proposed LTC the cost has already risen. When questioned how much more the use of hydrogen for the LTC would add to the cost, the LTC Exec Director, Matt Palmer told ITV News Meridian that he didn't know! <sup>13</sup>

Not only that but hydrogen is also in short supply, and production uses a lot of electricity. At a time when we already have a shortage issue, further demand for electricity for production of hydrogen and indeed increasing amount of EVs is simply not viable or acceptable, particularly when there are more sustainable options.

As for wider environment, the proposed LTC would pollute the air we breathe, the water we drink, and the soil we grow our food in, and have huge adverse impacts on the natural environment, which would impact our health and well-being, and contribute to the climate emergency.

Do we believe NH are capable of misleading greenwashing and propaganda? Definitely. So how can we ever believe they genuinely would act in the best interest of us and the environment while they continue to act in this way and attempt to push ahead with such horrendous projects as the proposed LTC.

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<sup>12</sup> <https://www.thamescrossingactiongroup.com/ltc-and-hydrogen/>

<sup>13</sup> <https://www.thamescrossingactiongroup.com/media-coverage-in-july-2023/>

We question whether NH refer to renewables for their estate they are including the cash cow property portfolio they have as a result of purchasing properties and then no longer needing them for whatever reason when projects change or do not go ahead?

We wonder what environmental impact replacing their fleets of vehicles will have by means of how the old ones will be disposed of.

Also, the impacts of PM2.5 from their fleet as they move to heavier EVs. We strongly believe that PM2.5 pollution is being overlooked by way too many, and that we are going to see one serious issue, carbon, replaced by another, PM2.5.

### **In direct response to the LTC Case Study in this section of the report**

The introduction to the case study claims that the proposed LTC is 'an essential component'. This is simply not true, there are better and more sustainable alternatives.

The Dartford Crossing has a design capacity for 135,000 vehicles per day, yet regularly sees 180,000 per day. This means we'd need to see a reduction of more than 25% to bring it back below design capacity. Yet the proposed LTC according to NH would take just 19% of traffic away (Need for the Project DCO doc APP-494), dropping further by 2044.<sup>14</sup>

Analysis of official NH LTC traffic modelling by Thurrock Council came to the conclusion that the reduction would actually be as low as 4% in the am peak hour and 11% in the pm peak hour. Regardless of which analysis you consider, neither is enough to bring the current crossing back below design capacity.

Not only that but 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.<sup>15</sup>

With more than 3000 incidents per year currently at the Dartford Crossing, often as a result of the congestion, it is expected that there would still be a large number of incidents even if the LTC went ahead, so migration routes between the crossings would be critical.

For example, when there is an incident at the Dartford Tunnels (south to north crossing) traffic would come off the M25 onto the A2 coastbound, only to find there would be just one single lane from the A2 onto the LTC. There are similar issues north of the river too.

As previously mentioned cheaper, better and more sustainable rail improvement alternatives would better serve the ports in the South East through to the Midlands and beyond, and reduce congestion on the existing road network.

The carbon pathfinder project is a strange made up title to incorporate a lot of intentions and aims, with little to no evidence to back up any of it, it is just a form of greenwashing.

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<sup>14</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001291-7.1%20Need%20for%20the%20Project.pdf>

<sup>15</sup> <http://www.thamescrossingactiongroup.com/incidents-ltc-dartford-crossing>

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The creation of hydrogen industry in the region, encouraged by the use of hydrogen for LTC construction, if it goes ahead, is counterproductive since the LTC is supposed to be about reducing congestion not encouraging growth and more traffic. That said regardless of the hydrogen growth, it is estimated that there would be around a 50% increase in cross river traffic due to the LTC going ahead, if it does, induced demand.

Attempting to describe the proposed LTC as 'An exemplar for biodiversity' is another of those would be laughable matters if it weren't so serious and concerning.

The proposed LTC would be hugely destructive and harmful. It would have a significant adverse impact on biodiversity, and would fail against new legal requirements for Biodiversity Net Gain.

It would destroy woodlands, including ancient woodland and veteran trees. The claimed woodland planting would include Hole Farm Community Woodland, which as already detailed is creative accounting since the community woodland was being progressed regardless of whether the LTC goes ahead or not.

The claimed 'parks' in reality would be the dumping grounds for spoil from tunnelling.<sup>16</sup> They would surround the tunnel portals meaning anyone using the 'parks' would be subjected to pollution flowing out of the tunnels.

The spoil dumping would also raise ground level in what is important marsh and flood plains, which would have adverse impacts on flooding of the River Thames.

'Green' bridges are not what they are made out to be either. When 'green' bridges are mentioned many think of what are technically known as wildlife bridges, the reality of 'green' bridges is chalk and cheese.

The Thong Lane 'green' bridge actually stops at a T-junction with a busy road, thus meaning any wildlife that used the bridge would be put straight on a path to crossing a busy road. There is no way this can be considered 'green' or environmentally friendly.

Ecology surveys used in the LTC DCO application, are years out of date now. NH are proposing environmental mitigation of things like translocation of water voles, a protected species, into areas that are known for their main predator, American Mink.

The proposed route would destroy and impact bat habitat and roosts, again protected species, when NH admit there is no proven mitigation for the impacts of new roads on bats.

The proposed route would destroy a solar farm and has impacted other solar farms. The even more ironic thing is on the map the area where the solar farm would be demolished is shown as environmental mitigation. You really couldn't make us the greenwash and nonsense that NH are coming up with for the LTC.

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<sup>16</sup> <https://www.thamescrossingactiongroup.com/new-parks/>

## **Back to the report**

It is disingenuous for NH and others to refer to EVs as zero emission vehicles, as it is not true, they still emit PM2.5.

It is also said that a key barrier to EVs is charging points. As already covered a shortage of electricity is also an issue, which would not be helped by using electricity to produce hydrogen for use in construction machinery for projects like the proposed LTC.

In regard to EVs there is also the fact that there is not an unlimited supply of lithium for batteries. Research shows that there isn't even enough for batteries to replace every fossil fuel vehicle in use now, let alone growing numbers of vehicles moving forward. This is another reason why we should be investing in more sustainable transport options, rather than roads.

Further mention of 'We want to implement our plan to improve public transport on the SRN', again if this is true why not design the proposed LTC so that it can be viable for public transport?

Same goes for 'We also want to have a greater emphasis on purposefully supporting active travel'.

'Together with our aims for decarbonisation, we want to ensure we make decisions across all our activities today that do not compromise or 'mortgage our future' from an environmental perspective' all sounds impressive and good, but when it comes from NH who are pushing the proposed LTC which goes completely against what they are presenting, it becomes valueless and pointless.

As a recap of points already mentioned elsewhere in our response, the proposed LTC would negatively impact flood plains, have a negative impact on water and air quality, have adverse impacts on SSSI, and heritage sites.

The hypocrisy of this report is infuriating, but sadly what we have come to expect from NH.

## ***Question 8. To what extent, do you agree with National Highways' approach for its future enhancements programme?***

We most definitely and very strongly disagree

Evidence shows the inadequacies of the RIS programme to date. It should not be the case that project automatically get passed on between RIS.

The proposed LTC has been part of the original RIS1, and is now in RIS2, it looks like NH are keen to push it into RIS3, and if it goes ahead would also fall into RIS4.

The Transport Select Committee inquiries have highlighted the issues and concerns about the RIS and also about the NN NPS. The outcomes of these inquiries need to be considered.

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The Climate Change Committee (CCC) report has called for an urgent review of all current and future road building.

In the CCC Q&A session on 12th July 2023 Professor Corinne Le Quéré highlighted the importance of coherence across Government decisions, that issues need dealing with now, and we cannot be locking in problems now that will make it harder to solve the issues in the long term.

We agree and call for an urgent review into current and future road building, and that all projects should at very least be paused immediately until such a review has taken place.

Evidence shows that new road projects are not conducive to a sustainable future.

We believe the reason for NH continuing to push ahead with the proposed LTC is because failure to deliver it is an existential threat to the organisation, as outlined in their own annual reports.<sup>17</sup>

Also, that it doesn't matter to NH whether they get things right or not. In fact, it is better for them not to get it right, because that future proofs their existence, with the excuse that the problems still being faced still need 'fixing'.

For example:

- Building in bottlenecks to the LTC design would result in further works being needed to fix those issues in the future.<sup>18 19 20 21</sup>
- Not planning for how traffic would migrate between the two crossings when there are incidents at either crossing, if LTC goes ahead, and the fact there would not be adequate connections to allow migration<sup>22</sup>, again future proofing their own jobs, when those problems they have created need fixing, if LTC goes ahead.
- Not including certain aspects that would be needed as a direct result of the proposed LTC, if it goes ahead. Things like the Tilbury Link Road, A2 near Dover dualling, Blue Bell Hill Improvements, adverse impacts on the existing road network especially where it would be utilised in order for the proposed LTC to actually operate, such as the Orsett Cock junction of the A13.<sup>23</sup>

Sometimes these would be NH projects (including RIS3 pipeline projects) other times it would result in more work and funding being needed by local highways authorities, which again is unacceptable.

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<sup>17</sup> [https://nationalhighways.co.uk/media/baphtjxv/national\\_highways\\_ar22\\_interactive\\_final.pdf](https://nationalhighways.co.uk/media/baphtjxv/national_highways_ar22_interactive_final.pdf)

<sup>18</sup> <http://www.thamescrossingactiongroup.com/ltc-a13-bottleneck>

<sup>19</sup> <http://www.thamescrossingactiongroup.com/a2-bottlenecks>

<sup>20</sup> <https://www.thamescrossingactiongroup.com/widening-of-ltc-to-a13-orsett-cock-slip-road/>

<sup>21</sup> <https://www.thamescrossingactiongroup.com/ltc-m25-a127-j29-junction/>

<sup>22</sup> <http://www.thamescrossingactiongroup.com/incidents-ltc-dartford-crossing>

<sup>23</sup> <https://www.thamescrossingactiongroup.com/cost-of-the-proposed-ltc/>



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It is a false economy to push ahead with a project like the proposed LTC knowing that other works with additional cost would be needed as a direct result. The additional work/cost should be included in the LTC cost, and the value for money worked out based on that overall cost.

We again draw attention to the fact that evidence shows the proposed LTC would also be a 'smart' motorway by stealth, and should therefore be scrapped in keeping with the scrapping of all new 'smart' motorways.

Mention of *'Importantly, we would only progress new schemes if there is a strong case and ensure they can be delivered in a way that meets our environmental commitments.'* Is diabolical when at the same time NH are proposing pushing ahead with the proposed LTC, when evidence clearly states that the project would not meet environmental legislation.

### ***Question 9. To what extent do you agree with the insights in the SRNIR on the most important performance outcomes to measure?***

Strongly disagree

We believe that NH performance so far is more than enough to show that they are not fit for purpose, and have failed on many levels. From inadequate consultations<sup>24</sup>, to projects that are not fit for purpose<sup>25</sup>, attempting to mislead government and the public<sup>26</sup>, failing to deliver what has been signed off, having no duty of care to road users, wasting public money and incorrect use of contingency funds.

In regard to the proposed LTC, the first attempt to submit the DCO application in Oct 2020 ended up being withdrawn by NH, because PINS were due to refuse the application as it was inadequate.

We had been raising the inadequacies with NH and others for years, but NH were arrogant in their belief that they would just submit the application and it would be accepted. It wasn't.

Initially when they withdrew the application in Nov 2020 they said they would resubmit it in early 2021, that then became around Easter 2021, which then become later in the year, and on it went until eventually 2 years later it was resubmitted.

This goes to show the level of inadequacies with this project and consultation, and we know the LTC project is not unique in the aspect of inadequacies. Plus of course there have been a growing number of legal challenges against NH projects.

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<sup>24</sup> <https://www.thamescrossingactiongroup.com/inadequacies-of-ltc-consultation-process/>

<sup>25</sup> <https://www.thamescrossingactiongroup.com/ltc-not-fit-for-purpose/>

<sup>26</sup> <https://www.thamescrossingactiongroup.com/ministers-are-being-misled-on-lower-thames-crossing-costs/>

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Another thing that we and others find unacceptable is the awarding of contracts before the DCO has even been accepted for examination, let alone been granted permission. This is not efficient, and also gives the wrong impression that projects are done deals, when projects are still to be examined.

Take the proposed LTC for instance, the spoil contract has been awarded to a company that at the time of it being awarded it was said was the only company that put in a tender and NH felt had the experience to handle the work.

Government have since announced a two year delay in the start of construction, if LTC goes ahead. What's not to say that another company may have gained the necessary experience, or two years later be available to tender for the work?

The road to the north contract has been awarded, yet again with the two year delay what difference will this make to the cost. It has not been made clear whether contracts that have been awarded include provision for using hydrogen powered machinery or not. We know this kind of greener machinery is predicted to cost more than three times as much as more traditional machinery, so this could be very relevant now NH are saying they are aiming to use hydrogen fuel for machinery.

There is also the fact that new assessment needs to be carried out and outline business cases, cost, BCR etc needs to be re-evaluated to reflect the two year delay to the project, as it is already low value for money as it is with the costings being nearly three years out of date now and not taking the two year delay into account.

All too often it seems NH are marking their own homework, which is not acceptable, they need to be monitored and held accountable for their actions and lack of action.

Why are NH responsible for updating the Design Manual for Roads and Bridges (DMRB), when it is also the industry standard and guidelines they are supposed to follow for their work? Of course the standards will be set to suit their needs and wants if they are responsible for the DMRB.

The statement 'As we develop our plans for the third road period, we will build on the success of previous periods...' is a joke, the first two RIS have not been successful, they have been inadequate and wasted a lot of public money.

We believe NH are a bad investment that needs to be urgently reviewed, abolished and replaced with a more efficient and sustainable organisation if real progress is to be made.

***Question 10. What, in your view, could be done differently to meet the needs of people affected by the:***

- presence of the SRN?
- operation of the SRN?

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We need better, earlier, and adequate consultation on all levels and aspects. More weight needs to be given to communities that are near or would be near to the SRN with existing and proposed roads. Currently roads are being inflicted on people, with no duty of care, and with no real consideration of different and more sustainable alternatives.

We know from first-hand experience that when we read, *“Our strategy is vision-led and we have moved to a ‘decide and provide’ approach. This means we are increasingly proactive in shaping the future we want for our customers and network”* within section ‘working towards our long-term vision’ that what this really means is that National Highways (NH) want to decide what they want to best suit them and want to inflict that upon us regardless of anything else. This is a totally unacceptable approach.

At the route options stage of the LTC consultation Location C was the one with the most opposition, yet it was the one that was progressed.<sup>27</sup>

This is a clear example of NH doing what they want rather than meeting the wishes of the people.

We want and need better management and maintenance of the existing road network, and for it to genuinely be made as safe as possible, including reinstalling the hard shoulder to make ‘smart’ motorways safer.

We need NH to stop pushing hugely destructive and harmful projects like the proposed LTC, and to finally admit that evidence proves that roads are not sustainable, and modal shift is critical for a sustainable future.

We need NH to listen to the people more and to act in our best interest, rather than their own.

### ***Question 11. Do you think the approach to digital technology set out in the SRN Initial Report puts National Highways on the right track for meeting its vision for 2050?***

No

Too much emphasis is being put on technology in regard to the future of our road network. The introduction of ‘smart’ motorways has proven this is not safe or reliable.

There are occasions where technology can be beneficial, but it should only be utilised if and when it can be proven to be reliable and safe.

The introduction and encouragement of usage of autonomous vehicles on the road network is very concerning for many.

Reliability and sustainability should be priorities for NH moving forward.

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<sup>27</sup> <https://www.thamescrossingactiongroup.com/ltc-route-options/>

***Question 12. What, if any, evidence or other insights can you supply towards the development of the RIS3 equality impact assessment?***

After dealing with NH in regard to the proposed LTC for many years now we would be happy to discuss our experiences further, and in more detail, should you wish, please do not hesitate to contact us.

***Question 13. What, if any, other comments do you have on the analytical approach?***

We again stress that we have concerns that NH are saying all this when there is clearly evidence of what has happened to date that they cannot be trusted. Much of the content is open to interpretation, and goes against what NH are practicing in reality.

We feel that evidence presented in the Transport Select Committee inquiries into RIS and NN NPS needs to be considered and have some input into developing RIS3.

Also that the CCC should have input and comment on what NH are proposing as much of what NH feel is the way forwarded clashes with a sustainable future, and would be detrimental to decarbonisation and safeguarding a sustainable future.

***Question 14. Are there any other issues you think the government should consider as part of this consultation?***

We would firstly like to draw attention to the fact that this consultation greatly lacks in real detail as to what is being proposed for RIS3. It does not provide details of the schemes that are being proposed to be included. It gives no idea of how much would be invested in RIS3.

We find it ludicrous and frustrating that past this stage the public and others are not given any opportunity to actually be consulted on the draft RIS, in this instance RIS3.

Public money is being used to fund RIS, so therefore we should get a say in how much is being spent and what and how it is being proposed to be spent.

***Conclusion***

We have years of experience of dealing with National Highways, and as a group we have very little to no trust or confidence in them as an organisation, or that they would do the right thing.

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We feel that what is being proposed really is open to interpretation, and doesn't really provide adequate information and detail.

Since RIS3 would be funded by public money, we feel the public should be given more say in if and how it is spent, and therefore should be given opportunity to comment on the actual draft RIS.

Even if there are points we may on the surface agree with, we do not trust NH to mean what they say and to act to deliver. There are also way too many points that we completely disagree with.

We feel NH and proposals like this RIS are outdated and need a complete overhaul, especially at a time of climate emergency. We need plans and investment for integrated sustainable travel and transport options, not a predominant focus purely on roads.

We call for an immediate pause to all road building whilst a review as recommended by the Climate Change Committee is carried out. It is essential that this happens now, and that no more road projects are progressed in the meantime. It is clear from the evidence that we simply cannot continue to push ahead with things as though it is business as usual, as it will just lock in problems that will be harder to deal with moving forward.

RIS3 should focus purely on ensuring our existing roads are as safe and well managed and maintained. In regards to dealing with congestion, growth etc we urgently need sustainable integrated transport investment and plans that will ensure a healthier, safer, sustainable future for all.

**We thank you for the opportunity to comment in response to this consultation. Should you wish to discuss our comments, or the topic with us further, please do not hesitate to contact us.**