

# Evidence for the Strategic transport objectives 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](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 Strategic transport objectives Inquiry<sup>1</sup> in August 2023. TCAG can be contacted via email – [admin@thamescrossingactiongroup.com](mailto:admin@thamescrossingactiongroup.com).

## Reason for submitting evidence

As always, our focus relates to our experience as a community action group, and our focus on fighting the hugely destructive and harmful proposed Lower Thames Crossing (LTC).

Over the years we have gained a good insight from our dealings with National Highways, Lower Thames Crossing, various Government departments and representatives, Regional and Local Government, NGOs and others.

We represent those opposed to the proposed LTC, and as a community group we feel we can offer insights and details of experience from an on the ground community level that may otherwise be missed in such an inquiry since largely the public do not generally participate in such inquiries. We hope this representation will be helpful in this aspect.

We can see quite clearly that there is a need for change, and that a predominant focus on roads is never going to solve the transport, environmental, and health issues that are being faced and that need to be addressed as a matter of urgency, to ensure a healthy sustainable future for us all.

We want and need to see a future with actions to back up the talk, one where we have safe, reliable, affordable sustainable transport options for all.

**As always, we thank you for the opportunity to present our representation to you, and would be more than happy to answer any questions, provide any additional info, or discuss further with you, should you wish. Please do not hesitate to contact us –**  
[\*\*admin@thamescrossingactiongroup.com\*\*](mailto:admin@thamescrossingactiongroup.com)

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<sup>1</sup> <https://committees.parliament.uk/work/7794/strategic-transport-objectives/>

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# Requested Evidence

## *Defining objectives*

- 1. What is your understanding of the Government's strategic transport objectives? Are they the right ones, and if not, how should they be changed?**

We do not believe the Government have strategic transport objectives. When it comes to Government's planning and investment into transport it seems to us that there is too much focus on roads and huge vanity projects, instead of focusing and investing on sustainable integrated transport that supports and encourages modal shift that is needed for a healthy and sustainable future.

How can you expect anything other than more roads with so much investment into National Highways and the Road Investment Strategy periods? This needs to change urgently, before even more public money is wasted.

- 2. How well has the Government articulated the outcomes and objectives it seeks from the country's transport network? How could this be improved, and what impact would better-defined objectives have on transport planning and investment?**

There is far too little transparency and scrutiny of Government's plans and investment for transport. It is quite apparent to us that National Highways will do all they can to ensure their future existence, including manipulating and misleading when they can, and all too often they are being allowed to mark their own homework. This is not acceptable, and results in Government only being provided with biased and misleading information.

Just one example, National Highways work to industry standards and guidelines, such as the Design Manual for Roads and Bridges (DMRB). But they too are the ones responsible for setting those standards and guidelines.

We need transport objectives that ensure the best outcome and compliance with all legislation, policies, objectives of our country as a whole, there is too much division between the overall objectives on all levels and aspects.

For example, if we try to contact DEFRA regarding concerns about the environmental concerns in regard to the proposed LTC, they will simply say it is a matter for the DfT. However, the DfT's focus is clearly on roads and transport not the environment.

## *Using objectives to guide investment*

- 3. How well does the appraisal and decision-making process for new transport investment meet the Government's strategic transport objective? How should this be improved?**

The appraisal and decision-making process relies way too heavily on information provided by the likes of National Highways, who obviously have a vested interest in securing their own existence.

As already mentioned all too often NH are setting their own standards, marking their own homework, and misleading people on the outcomes of their projects.

For example, failure to deliver the proposed LTC successfully is detailed as an existential threat to NH in their own annual report. We don't believe there is any truly independent scrutiny of their work to ensure they are not simply attempting to push ahead with projects like LTC, by any means, simply to safeguard their own future.

How does Government ever expect to support and encourage modal shift to more sustainable options when the majority of focus and investment is into roads?

It is not acceptable to simply say that people are using cars not public transport, as often the reason people are using their cars is simply because there is no real alternative. Unless the investment is made into viable alternatives, modal shift cannot occur.

We need a national sustainable integrated transport network that is safe, reliable, affordable, connecting in ways that people need, at the times they need them, and organized in a way that is easy to use.

Have you tried to research and book public transport tickets in this country to try and plan journeys? It is sometimes near impossible to discover what options there are, how much it would cost, and secure a booking. This needs to be made easier, more user friendly, as well as ensuring it is affordable.

In regard to suggestion for improvements, we would ask if there has been any consideration given to double decker trains, like in Australia that increases capacity for passenger rail, without reducing the flow of trains on the tracks.

#### **4. How should wider economic, environmental and social impacts be appraised and valued, including when the gains will largely be felt in policy areas other than transport?**

Environmental and social impacts need to carry far more weight and value in appraisals. Currently it feels like the environment and social impacts are largely avoided as much as possible.

Government talk about things like investment into planting trees for instance, yet road projects are decimating huge amounts of trees. It is crazy that Government are investing with one hand to plant trees, when the other hand is investing in destroying trees. Even the trees NH plant are largely dying.

Government are introducing a new designation for Long Established Woodlands, those that may not qualify for Ancient Woodland status for various reasons, but are considered irreplaceable due to their longevity and environmental and biodiversity value. The

inventory of this new category is being prepared now. We know at least one Long Established Woodland, The Wilderness would be destroyed and impacted by the proposed LTC, if it goes ahead.

For reference, gaining Ancient Woodland status is near impossible due to the lack of available evidence dating back to 1600, a time when records and mapping were limited. As a community action group we managed to locate evidence of The Wilderness dating back to 1767. It was once owned by Sir Richard Saltonstall, Mayor of London in the late 1500s. Yet currently NH fail to recognize the value and Ancient/Long Established Woodland value of The Wilderness.

So again, whilst on one hand Government are saying there is a need to recognize and protect such woodlands, they are at the same time progressing with projects that would destroy and impact them. We need more scrutiny and monitoring of these kinds of things.

More roads and lanes, result in more traffic, induced demand. More traffic results in more pollution, including deadly PM2.5 which has not yet been recognized by Government for the deadly pollutant that it is. The cost to our health service as a result of such pollution should be taken into consideration when appraisals are valued and made.

More traffic also leads to calls for more roads, and so the vicious downward spiral continues. Further decimating our environment, further polluting the air we breathe, the water we drink and use, the soil in which we grow our food.

Loss of land and pollution also impacts food security. This also leads to the need for more miles travelled by our food further adding to climate change, congestion, pollution etc.

As we move away from fossil fuel vehicles and electric vehicle usage increases this further adds to pressure on our already stretched energy. This then results in not only cost, but also further destruction and impact to greenbelt, agricultural land, and our natural environment, as well as negatively impacting our health and wellbeing too, due to the creation of new energy sources.

We need Government to genuinely listen to communities more, instead of focusing on the needs and wants of businesses whose focus will be their profits. The focus of levelling up needs to move away from being about economic growth for the sake of economic growth, and instead focus on levelling up to sustainable healthy futures for all. All too often so called levelling up focused on economic growth is actually levelling down the standard of life for way too many. For instance, the proposed LTC does not level up for the communities impacted by it, it levels down. It also levels down Government's objectives on climate change and environmental targets.

**5. How can longer-term certainty in planning be achieved in order to promote greater private sector investment from a range of sources?**

It seems to us a lot of uncertainty in regard to road building in particular is as a result of the inadequacies of National Highways and their projects, particularly poor planning and consultation; and also because of the need of the public to be legally challenging projects and decisions that are not compliant with legislation, have been granted due to outdated policies, and because we need to step up and challenge decisions that threaten a healthy and sustainable future at a time of climate emergency because Government policy and decisions are not in place and acting in the best interest of the people and our future.

If private investment is to be sought, then it must be in a way that meets the requirements to ensure a healthy sustainable future for all. We cannot afford to continue with a business as usual approach whereby the companies and investors that currently benefit continue to do so out of habit rather than because it is considered to be the right thing to do for the majority to ensure a healthy and sustainable future.

*Improving coordination and alignment*

**6. How effectively is strategic transport planning and investment coordinated across and between transport modes, including with reference to achieving modal shift?**

Put simply, it is not! There is too much investment into NH and roads, particularly so called enhancement projects, and too many cuts to public transport and active travel. There is not enough consideration given to more sustainable alternatives. National Highways focus is purely on roads.

Back when the need for a new crossing was being assessed, to resolve the issues at the Dartford Crossing, there wasn't proper consideration of all modes of transport, the focus was too quickly and easily placed on another road.

Rail improvements between Ashford and Reading for instance were not even considered, the only rail option was across the river and London focused which would clearly fail due to London being at or over capacity for rail already.

Why is the Port of Dover for example reliant on road freight, why is it not connected by rail? 70% of goods in and out of this port alone use the Dartford Crossing. Around 42% of the vehicles using the Dartford Crossing are goods vehicles. Why are we not looking at getting more freight off the roads and onto more sustainable rail?

The need for freight interchanges has previously assessed that in the South East this is tricky because of the amount of congestion on our roads. Not all that traffic needs to be on the roads in the South East, it could be moved onto rail through to the Midlands and beyond.

Why is there no provision for cross river active travel in the LTC project? Why are many of the 'new' active travel routes of the proposed LTC actually realignments of existing routes that would need to be realigned as a direct result of the LTC?

Why is the LTC not being designed in a way that would make it viable for public transport options such as bus routes? The lack of adequate connections currently means it would not be at all viable for buses.

Why when consideration is given to alternatives has the focus been on whether one option is better than the proposed road connection? Why haven't multiple alternatives been considered that cumulatively would have better outcomes than what is being proposed? For the cost of the proposed LTC numerous other alternatives could be progressed with far better and more sustainable outcomes.

**7. How could planning for transport infrastructure across government and coordination of policy (for example, with policy on energy, digital or planning) be made more coherent and streamlined?**

As per our previous comments there needs to be far more joined up thinking and actions that ensure integrated assessments and decisions. As long as you segregate different departments, policies, targets, and planning they are always going to end up focused on their own agendas instead of working together for the bigger picture and a better end result for everyone.

**8. How effectively is strategic transport planning and investment coordinated between national, devolved, regional and local government and other public bodies? Do the current division and distribution of powers help or hinder?**

It is currently very apparent that there is not enough coordinated planning and investment. Government need to seriously and urgently reconsider investing in projects like the proposed £10bn+++ Lower Thames Crossing and other road projects, and instead look at ensuring the existing network is better managed and maintained, and support and encourage modal shift to more sustainable transport options.

We have potholed roads, and aging transport infrastructure that should be prioritized both on the Strategic Road Network and on the local road networks.

There is also a distinct lack of investment into public transport and active travel.

Relationships of regional bodies are too closely tied to companies, and not enough focus on the public and our communities.

National Highways projects, like the proposed LTC, would also need to utilize the local road network for it to be able to operate. This would put additional pressures, work and cost onto local authorities, if the LTC goes ahead.

The LTC would also create additional carbon emissions and pollution that impacts other devolved, regional, local government.

For instance, the LTC would pass through ULEZ but non-compliant polluting vehicles using the LTC or M25 would be exempt from paying ULEZ charges because the LTC and M25 are NH road rather than TfL. Yet our communities will be the ones suffering from the pollution and impacts of the proposed LTC if it goes ahead. We will have to pay to do our weekly grocery shop if we use a non-compliant vehicle, yet those using the destructive and harmful LTC that has adverse impacts on our health and wellbeing would pass through without having to pay ULEZ.

Regional and local government budget on carbon emissions for our areas would be used up with the impacts of the proposed LTC.

How are we supposed to improve air quality when projects like LTC are inflicted upon us? NH don't even plan on including air quality monitoring in the LTC once operational.

Those of us with local knowledge and interest can foresee the likely adverse impacts, but NH play the trump card of NSIP, which is wrong and unacceptable.

## **Conclusion**

Transport investment and planning in our country is disjointed, disconnected, and greatly lacking, without any proper consideration being given to what is actually needed to ensure the healthy and sustainable future that we all need and deserve.

We are living in a time of climate emergency, as is becoming more and more apparent day by day in increasingly obvious ways. Our country is one of the most nature depleted in the world. Our country is suffering from food and energy security issues. We have policies that are not fit for purpose and focus too much on economic growth for the sake of economic growth, when the real focus needs to be on ensuring healthy and sustainable future for us all. Try counting your economic growth money when there is no clean air to breath, no clean water to drink, and no healthy soil to grow food.

We need more joined up thinking and actions, and far more scrutiny including truly independent scrutiny, and a lot more transparency. Why do NH not have a duty of care to road users? Why were they allowed to fail to deliver what was signed off for 'smart' motorways? Why are they allowed to get away with so many retrospective planning applications? Why are they filling in bridges for no real reason? Why are they not being held more accountable for their actions? We



need actions to back up all the talk, and to act with the urgency that is needed right now, not talk of what we're aiming for in the future. We cannot afford to sit back and wait until it is too late.

The Climate Change Committee have called for an urgent review into current and future road building. The Transport Select Committee have called on Government to reconsider expensive and complex road projects. We welcome this, and we too call on Government to take these actions now, with an immediate pause on all road building projects, rather than keep pushing ahead on destructive and harmful projects that lock in yet more induced demand on the road networks, and conflict and oppose other objectives that the country has for our natural environment and health etc, and instead spend taxpayers' money on better and more sustainable options.

The future of transport cannot be predominantly focused and investing in National Highways and roads as it is now. National Highways needs to be abolished and replaced with National Transport or National Travel, an organisation that oversees all transport to ensure planning covers all aspects and results in a better planned and more connected and integrated transport network. We need to see big changes in attitude and the ways things are done. The current model is outdated and too set in it's ways of business as usual. Relationships between the likes of DfT and NH are too close and comfortable with not enough scrutiny. We need stronger and more thorough truly independent scrutiny, with genuine options for public and NGO input.

We need safe, reliable, affordable sustainable integrated transport that encourages and supports a healthy sustainable future for all, and we need it now.