

THAMES CROSSING ACTION GROUP

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Rail and Urban Transport Review

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.

We wanted to respond to this call for action as we know that there is evidence to show that rail and urban transport is not currently being adequately considered. We have experienced this in regard to the proposed LTC, whereby rail alternatives were not adequately considered, and what is being proposed offers no provision for cross river active travel, and would not be viable for public transport due to the lack of adequate connections. It is wrong that £10bn+++ of public money is being proposed to be spent on a hugely destructive and harmful project, that fails to meet scheme objectives, is not fit for purpose, particularly when there are better, more sustainable, and more affordable alternatives such as rail improvements. There rail improvements would not only get more freight off our roads and onto more sustainable rail, but also improve passenger rail.

This representation was prepared and submitted by Laura Blake, Chair of TCAG on behalf of the group in response to the Rail and Urban Transport Review call for evidence¹. TCAG can be contacted via email – admin@thamescrossingactiongroup.com.

Growth opportunity through unlock planning

What do you view as the current key challenges hindering the delivery of rail and urban transport networks and infrastructure?

There is too much focus on roads, and not enough consideration or investment into alternative means of travel.

We need to abolish National Highways and replace it with National Travel, or National Transport, because without sight and focus on an overall transport picture things will not change or improve.

Evidence shows that more roads lead to more traffic, more traffic leads to more congestion, and more traffic and congestion leads to more calls for more roads and so the vicious circle continues to spiral downwards out of control.

Nobody is truly monitoring, scrutinising, and holding National Highways(NH) accountable either.

¹ <https://urbantransportgroup.org/rail-and-urban-transport-review>

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The DfT and others seem to simply trust NH to do the right thing, and there is no truly independent review of them or their work, as any review is always based on evidence provided purely by NH.

There is no joined up thinking and consideration when it comes to travel and transport in this country.

What spatial planning and associated policy and legislative changes would help unlock the delivery of rail and urban transport projects?

Legislation needs to be updated to reflect climate change and the climate emergency. The Climate Change Committee (CCC) reported that new roads should only be built if they can be shown not to increase emissions. Yet still Government are pushing ahead with road project after road project, including the proposed LTC that is estimated to emit 6.6 million tonnes of carbon emissions, if it goes ahead².

There are also no safeguards required to be in place for projects like LTC in regard to carbon emissions. We have a Government with a Net Zero commitment, and the LTC project has been named a pathfinder project in regard to carbon emissions. Yet during the DCO examination it was confirmed that failure to reduce carbon emissions would be handled in the same way as any contract breach, which in no ways ensures a reduction in carbon emissions. The risk of failing on such important aspects needs to be better scrutinised and monitored, and as the CCC say, new roads should only be built if they can be shown not to increase emissions. That should be guaranteed, not just based on speculation and ambitions.

Legislation needs to be updated to ensure we all have the right to breathe clean air. Our air quality targets should be the same as the World Health Organization (WHO), or at very least should reflect the WHO-10 targets (for example 10 µg m⁻³ or below for PM_{2.5}) with immediate effect and definitely by 2030, not 2040³.

The proposed LTC would fail against such targets, and considering it would fail against the WHO-10 level⁴, even if the target doesn't have to be met until 2040 in UK legislation, the proposed LTC is not due to open until 2032-34, so really isn't that far off 2040 to be investing £10bn+ on a project that fails on such an important aspect is simply wrong.

Decisions around transport need to take these kind of things into account, and not use the excuse that Nationally Significant Infrastructure Projects (NSIPs) trump such matters as they

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

³ <https://www.thamescrossingactiongroup.com/environment-act-targets-set/>

⁴ <https://www.thamescrossingactiongroup.com/lower-thames-crossing-pm2-5/>

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are deemed in the public interest. Clean air and a sustainable future are essential for everyone and that is definitely more in the public interest.

Other modes of travel, and modal shift to more sustainable travel and transport is the way forward, and by prioritising that the modal shift should help to ensure delivery of rail and other sustainable transport is unlocked and supported.

As long as roads are a priority, nothing is going to change as nobody (Government, the DfT, and particularly National Highways) are adequately considering alternative options to roads.

Cuts are made to active and public transport, and investment seems to increase into roads, with National Highways blowing contingency funds before the end of each Road Investment Strategy.

With an aging road infrastructure any investment should be on maintenance and repairing what we already have, not on new roads.

In addition, better monitoring of all major infrastructure projects is needed regardless of mode. HS2 proved how costs can rise out of control, which of course has resulted in the northern section being scrapped.

Why is it with these major project decisions to sign them off are made without more scrutiny of the cost?

The proposed LTC alone has risen from an estimated £4.1bn up to £9bn (as at August 2020)⁵, with the adjusted Benefit Cost Ratio having dropped from 3.1 down to 1.22 (again as at August 2020). This is before Government announced the 2 year rephasing delay of LTC, before the cost of carbon emissions was increased, and doesn't take into account the ever rising and steep increase in the cost of everything in more recent times.

Yet with process as it stands a decision will be made without a Full Business Case being provided, and based on a Development Consent Order (DCO) application that uses information and data as at August 2020.

During the DCO examination one of the examiners voiced surprise when told (in answer to her questioning) at how low and unrealistic the inflation rate was that had been used in assessments.

Granting permission (DCOs) on major infrastructure projects with a Full Business Case is akin to signing a blank cheque, as once signed off the projects seem to just be progressed regardless of how the costs rise. This has to change.

⁵ <https://www.thamescrossingactiongroup.com/cost-of-the-proposed-ltc/>

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Are there best practice or wider international examples that could be adopted to support growth through unlocking transport network and infrastructure delivery?

We are aware that in countries like America and Australia double decker trains are used, this allows trains to carry more passengers, and ensures passengers can sit for their journey.

Trams are widely utilised in places like Melbourne, Australia, and are affordable, even free on some lines, which encourages public transport use and modal shift.

Clarity and certainty of policy and funding

What are the key tenets of a successful, strategic long-term policy for the delivery of rail and urban transport networks, taking into account wider decarbonisation and transport integration goals?

We need a focus on true sustainability, not just speculation and ambitions that may not reach fruition. We cannot focus on growth for the sake of growth, again any growth needs to be sustainable.

The RAC recently reported that 55% of drivers would drive less if public transport was better. We need better, more reliable, safe, affordable public transport.

We also have a very serious issue in regard to food security, again something that is essential to our existence. Projects like the proposed LTC would destroy and impact thousands of acres of agricultural land, some of it grade 1 listed land.

We need to ensure that any long-term policy for the delivery of transport is not having an adverse impact and loss in agricultural land. We need to be as self sufficient as possible when it comes to food security. Not only that but growing as locally as possible reduces the carbon footprint and miles travelled of our food. We need a sustainable farming future, not to be destroying our country's farming and food security, only to then have to resort to importing more and more, which is not economically beneficial or environmentally friendly.

Government have set the target to grow rail freight by 75% by 2050⁶, but talking and setting targets is not enough, we need a plan and actions to back it up.

⁶ <https://www.newcivilengineer.com/latest/government-sets-target-to-grow-rail-freight-by-75-by-2050-20-12-2023/>

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What reforms to current transport funding approaches would support the safeguarding and expansion of rail and urban transport networks and infrastructure? Does the Green Book allow for sufficient factors to be taken into consideration and what should any additional factors/consideration be regarding infrastructure?

Reviewing and stopping the incessant investment and focus purely on roads. As long as we have such a focus and a Government company, National Highways, with that pure focus we will never make a successful move to a fully integrated sustainable transport future.

What mechanisms are available to facilitate effective public/private relationships and funding?

Currently we would say that we are hard pushed to see any mechanisms in place to facilitate effective spending of public money. We have a Government who are spending public money to save, protect and enhance our natural environment with one hand, and then spending far more money on destructive and harmful projects from the other.

There is a distinct lack of meaningful engagement about these transport plans and projects between Government, their companies/bodies, departments, and the general public, whose money is being used to fund these plans and projects.

There are increasing amounts of people/groups, members of the public who are campaigning against Government decisions and plans, and even crowd funding for legal challenges.

It is not right or effective for us to be raising our own money from members of the public to try and stop public money being spent on hugely destructive and harmful projects.

It is not right or effective for public money to be spent on projects like the proposed LTC that would result in an increase in fatalities and serious injuries⁷, and have adverse impacts on our health and well-being. Not only due to the obvious reasons, but also because of the associated cost to the NHS. Why are such associated costs not considered in benefit cost ratio assessment? They need to be.

What role does the maintenance of existing transport assets play in harnessing growth and how could the current approach be improved?

There does not seem to be adequate monitoring and action when it comes to maintaining existing transport assets. Our roads are largely aged infrastructure that is desperately in

⁷ <https://www.thamescrossingactiongroup.com/serious-concerns-over-ltc-road-safety/>

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need of maintenance, rather than just adding more and more roads and lanes to the road network.

We should not allow the maintenance of our existing transport networks to be overlooked in favour of huge new infrastructure projects and investment, we need to take care of what we already have first.

It has been suggested that Road Investment Strategy 3 (the 2025-2030 road investment period) will focus on maintenance rather than new roads.

This should mean that projects like the proposed LTC are paused and reviewed at very least, if not scrapped.

Imagine what could be done with £10bn+ of public money instead of a hugely destructive and harmful, not fit for purpose road.

The South Eastern/Eastern region where the proposed LTC would be, if it goes ahead, experiences higher than average amounts of HGVs on our roads.

The DfT were assessing a new river crossing to the east of London in 2009⁸. In a 2011 Government statement⁹, it was stated in regard to strategic rail freight interchanges that: "Rail can deliver goods quickly, efficiently and reliably and help reduce both congestion on our roads and levels of carbon emissions. To secure this longer-term growth and modal shift, rail needs to be able to compete effectively with the use of road by heavy goods vehicles, and it is significant that in recent years our major retailers have been keen to choose rail over road for the long distance carriage of goods to market. However, this expansion in rail freight will be very difficult to deliver unless the industry is able to develop modern distribution centres linked into both the rail and trunk road system - 'Strategic Rail Freight Interchanges' (SRFI) - in appropriate locations to serve our major conurbations. To date, this has proved extremely problematical, especially in the south east where growing demand and increasing congestion on the road network are creating serious logistical challenges."

Yet there hasn't been adequate consideration of rail alternatives to the proposed LTC road project, despite there being rail improvements between Ashford and Reading that would negate the need for the proposed LTC. So long as more roads are built, induced demand will see congestion continue to rise. We need to ensure that modal shift and alternatives are properly and fully considered. We believe any consideration of rail alternatives have focused on cross river options, going through an already over capacity London rail network, rather than a London orbital as Ashford to Reading would be.

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<https://webarchive.nationalarchives.gov.uk/ukgwa/20100513123749/http://www.dft.gov.uk/about/strategy/capacityrequirements/dartfordrivercrossing/>

⁹ <https://www.gov.uk/government/speeches/strategic-rail-freight-interchanges>

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Consideration of management as well as maintenance therefore needs to be considered.

Devolution and sustainable partnerships

What role does devolution have in supporting and accelerating the delivery of rail and urban transport networks and infrastructure fit for the future?

Whilst it is important for regions to have their say in the developing of transport infrastructure and networks, for it to be a truly national and efficient and effective transport network there cannot be segregation.

One aspect of public transport now is the fact that it is so disjointed. Trying to book a train journey is not only expensive and questionable when it comes to reliability, but when the journey is in more than one region it can be complex to book.

Also, different authorities and/or companies operate differently so when they meet/overlap this can cause issues.

If we truly want a sustainable network and future we need a fully integrated sustainable network that is safe, reliable, affordable, and easy to plan, book and use.

How can effective relationships be facilitated between all tiers of government, to help accelerate growth and deliver rail and urban transport networks and infrastructure?

There is so much contradiction within Government policy, departments, and bodies.

Just one example from the proposed LTC. National Highways failed to carry out adequate ecology surveys, despite us submitting evidence to them that a particular woodland, The Wilderness¹⁰, was an ancient woodland.

During the LTC DCO examination National Highways categorically stated that their ecology surveys showed no signs of the woodland being ancient. Yet as a community action group we presented our evidence to Natural England, who in turn awarded The Wilderness ancient woodland status.

Government have introduced a new woodland status, Long Established Woodland, for woodlands that are old but not yet ancient, to help ensure their protection to eventually become our ancient woodlands.

Part of The Wilderness has been awarded Long Established Woodland status as not quite as old as the Ancient Woodland section. Both the ancient woodland and long established

¹⁰ <https://www.thamescrossingactiongroup.com/the-wilderness/>

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woodland at The Wilderness would be destroyed and adversely impacted if the proposed LTC goes ahead.

Our country is one of the most nature depleted countries in the world, and we are supposed to be saving, protecting and enhancing our natural environment.

Yet, on one hand we have Government and their bodies talking about saving, protecting and enhancing our natural environment, such as trees, woodland and wildlife and habitats, yet on the other the DfT and National Highways are spending huge amounts of money on hugely destructive and harmful road projects that are destroying and impacting our natural environment.

There is too much disconnect between Government dept and bodies, which does not lend itself to effective and efficient delivery of anything or of spending public money.

We also need to move away from such a focus on roads by abolishing National Highways and replacing with National Travel or National Transport to ensure a fully integrated sustainable travel/transport future.

How can the capacity of public bodies be enhanced to effectively partner, procure and deliver urban transport and rail networks and infrastructure and provide value for money?

See above.

Plus, it is pointless for Government to have bodies like the Climate Change Committee, and Transport Select Committee and to not really give real weight to what these committees are telling them.

We urgently need a review of major infrastructure, particularly roads and transport, and we need to see actions to back up talk about carbon emissions, and saving and protecting our natural environment.

All too often people talk about our natural environment as though we are not part of it, which is wrong.

If you want to talk about value for money and growth, consider trying to count the money made from growth, which let's face it is what is meant when growth is referred to, when you have no clean air to breathe, no clean water to drink, no healthy soil to grow food, and a climate that can no longer sustain our existence.

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Private Sector and Industry Capacity

How can effective private sector investment be best leveraged in the long term to unlock growth?

Sustainability has to be key to any investment to ensure because growth for the sake of growth is simply not sustainable.

Evidence proves with roads, that growth in roads, ie more roads, just leads to more traffic, induced demand, this is not sustainable.

Why in this day and age is the Port of Dover, for example, not connected by rail? Why are 70% of goods in and out of Dover crossing the Dartford Crossing by road? This is not sustainable. We need the private sector to take more responsibility for their actions and any growth must be sustainable, not simply for profit to benefit them and their share holders.

Tesco have started moving from road freight to rail, which has helped better ensure their shelves are stocked, and improves their sustainability as a company.

One of the examiners in the LTC DCO actually questioned a representative of Dartford Borough Council, as they had voiced support of the proposed LTC because it would support their future growth plans for Dartford. The examiner questioned this as the proposed LTC is supposed to improve traffic flow and reduce congestion in the Dartford area, so any growth would simply fill up any reduction in traffic that the proposed LTC might take away from the Dartford Crossing. Put simply growth for the sake of growth is not the way forward, and is certainly something that needs proper and adequate consideration in so many aspects, including transport and travel.

What can be done to build resilient and efficient supply chains and necessary skills to accelerate infrastructure delivery and maximise value/job creation to local communities?

Rather than focusing on accelerating infrastructure delivery, we need to ensure it is effective and efficient. What good is pushing ahead with infrastructure for the sake of acceleration if what is being delivered is not effective, efficient, and sustainable?

As for creating jobs in local communities, in regard to the proposed LTC we have been told there is a focus on local job creation. However, what NH consider to be local and what we and others consider to be local are completely different.

Three of the main contracts for the proposed LTC have been awarded (subject to permission being granted) to major international companies, so much for local jobs.

Plus, the other thing with major infrastructure projects like the proposed LTC is that the majority of the claimed jobs that it would create, are temporary. Once construction is

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complete on these road projects the number of jobs drops right off. Construction is not a sustainable industry, and neither is road freight or use. Whereas with investment into rail there should be potential for more jobs ongoing to manage, maintain and service the more sustainable freight and passenger services.

How to best harness the benefits and be adaptable to future technological trends in the sector?

We have seen how dangerous the use of technology is on 'smart' motorways, and how NH failed to deliver what was signed on in regard to 'smart' motorways.

The proposed LTC is a 'smart' motorway by stealth¹¹, and we believe that came about because of the coverage of the dangers of 'smart' motorways, as prior to that NH had referred to LTC as a motorway that used 'smart' technology.

It is essential that any technology needs to be used in a safe and sustainable manner, if used.

We also question not only the dangers of driverless vehicles, but also why increase the risk on roads with this when more can be transported on trains, particularly freight, which is akin to and more sustainable and safer than the proposed driverless convoys of HGVs for example. Trains allow for multiple containers to be moved with minimal drivers, in a safer manner so moving more freight off roads onto rail is not only more sustainable but safer too.

Conclusion

The amount of times growth is mentioned in this call for evidence concerns us. Growth for the sake of growth is not sustainable. Try counting your money from your growth when there is no clean air to breathe, clean water to drink, healthy soil to grow food, and a healthy planet to support our existence.

We need Government focus and investment to move away from destructive and harmful roads, and instead invest in more sustainable alternatives that offer real sustainable transport options.

We need to invest in supporting local, to reduce the miles travelled for the things we use and consume, including our food. This cannot happen if we continue to push ahead with

¹¹ <https://www.thamescrossingactiongroup.com/ltc-smart-motorway-by-stealth/>

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transport options that result in loss of land, loss of local businesses, and inflict adverse environmental impacts.

We need to ensure that sustainable transport and modal shift is prioritised and encouraged.

We need to remove the disconnect between our transport options, we need joined up thinking for an integrated sustainable transport network that is safe, reliable, affordable, and easy to plan, book and use.

We thank you for the opportunity to submit our representation, please don't hesitate to contact us if you wish to discuss further.