

THAMES CROSSING ACTION GROUP

www.thamescrossingactiongroup.com

Adapting the UK's transport system to the impacts of climate change 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.

This representation was prepared and submitted by Laura Blake, Chair of TCAG on behalf of the group in response to the DfT's Adapting the UK's transport system to the impacts of climate change Consultation¹. TCAG can be contacted via email – admin@thamescrossingactiongroup.com.

We have years of experience of dealing with National Highways in regard to the hugely destructive and harmful proposed Lower Thames Crossing project. One of our many concerns about the proposed LTC is the environmental impacts, including the estimated 6.6million tonnes of carbon, and other factors relating to climate change. We have also experienced first hand National Highways' attempts to greenwash the project. This is why we feel well placed to respond to this consultation.

Evidence

We would begin by commenting that we are surprised that Anthony Browne MP, Parliamentary Under Secretary of State, Department for Transport states that the Government are "committed to reducing emissions and limiting global warming to 1.5°C above pre-industrial levels, in line with the Paris Agreement".

The proposed £10bn+ Lower Thames Crossing alone is estimated to emit 6.6 million tonnes of carbon emissions, which is not in keeping with net zero.

To date it has also been ignored that the Climate Change Committee have stated that "New roads should only be built if they can be shown not to increase emissions". Also, their call for government to urgently review road building in England.

¹ <https://www.gov.uk/government/consultations/adapting-the-uks-transport-system-to-the-impacts-of-climate-change>

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The Transport Select Committee have also concluded² they believe it is time to reconsider expensive complex enhancement projects, like the proposed LTC; and that road investments could impact its ambitions to achieve net zero emissions by 2050.

More recently there have been legal challenges won by Client Earth, Friends of the Earth, and Good Law Project, which now means that the government will have to draw up a new strategy within 12 months.

We are pleased that the Foreword acknowledges that climate change is not a problem in the distant future, but is our reality now, and needs to be tackled sooner rather than later.

However, it is not a case of simply and purely ensuring we have a transport system that is resilient to climate change, but also that we don't worsen things with new transport projects. Also, that we need actions to back up all the talk. Scrapping projects like the proposed LTC would be a good start, so that public money can instead be invested into better, more sustainable alternatives.

It will be no good embedding climate risk in planning and operations unless it also, with immediate effect and with no exceptions, includes all transport projects regardless of whether permission has been granted or not.

It would be counterintuitive and a disgraceful waste of public money to push ahead with projects like the proposed LTC, whilst introducing such policies.

The proposed LTC would have a significant adverse impact environmentally.

If it goes ahead it passes through many areas that would not be resilient to climate change. The area surrounding the northern portal for example is in flood plains. Yet National Highways (NH) are proposing to build large and high landforms that would change how and where flood waters could flow. This would have a negative impact on not only our local area and communities, but also on the LTC if it goes ahead.

It has been reported³ in April 2024 that workers have had to pump more than 50 million litres of rainwater off a section of the A14 that has been continually flooded during the last couple of months, and has been causing much disruption.

We believe this goes to show how the risk of flooding is very real, and that flood and other resilience needs to be better considered in regard to any proposed project. It is not a case of if climate change is going to happen, it is happening now, and what is currently being described as unprecedented is likely to become more and more frequent, unless we start taking climate change seriously.

² <https://committees.parliament.uk/work/7088/strategic-road-investment/news/196794/prioritise-strategic-road-maintenance-over-new-enhancements-transport-committee-tells-dft/>

³ <https://highways-news.com/newmarket-fifty-million-litres-of-water-pumped-off-a14>

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In the instance on the A14 the flooding occurred in a dip in the landscape, with the LTC being proposed to run at a low level, and going through a tunnel and under other roads, through marshes, fens and flood plains this is something that needs to be better considered than it has been to date.

Adding to this concern is the fact that the Public Accounts Committee's Resilience to flooding report⁴, following on from the National Audit Office's report in December concluded that there is no effective strategy in place to make the UK resilient against extreme weather.

The LTC section between the A13 and M25 crosses fenlands that are susceptible to high winds, but NH are not taking that into account, neither the heavy fogs across the fens.

When the Dartford Crossing QE2 Bridge was proposed and built it was decided not to include wind barriers, to save money, as it was not deemed necessary. Yet with increasing frequency as we experience more unusual weather due to climate change the bridge is closed due to high winds. There is no provision to add wind barriers, as the bridge could not take the extra weight.

When the QE2 Bridge is closed one of the Dartford Tunnels is also closed to allow the continuation of two-way traffic at the crossing. NH have confirmed they would still do this, even if the proposed LTC goes ahead.

National Highways have not planned for how traffic would migrate between the two crossings when there are incidents, if the proposed LTC goes ahead, and there would not be adequate connections⁵.

For example, if the QE2 Bridge was closed and NH also then close one of the Dartford Tunnels, traffic south of the river experiencing congestion due to the tunnel closure would come off the M25 onto the A2 coastbound only to find there would be just 1 single lane from the A2 onto the LTC.

Similarly traffic north of the river unable to use the QE2 Bridge would come off of the M25 onto the A13 eastbound, only to find no direct access to the LTC. Instead having to travel down the A13 until the A1014/Stanford junction, up around an already busy traffic lighted roundabout (alongside port and other traffic), back westbound on the A13 to the new LTC slip road, which would be just past (but not accessible from) the Orsett/A128 junction.

If instead traffic came off the M25 directly onto the LTC, the M25 would be 5 lanes wide going onto just 2 lanes southbound on the LTC. How long before traffic starts coming off the M25 at Junction 29 (the A127) and junction 28 (the A12) trying to cut down the A128

⁴ <https://publications.parliament.uk/pa/cm5804/cmselect/cmpublic/71/report.html>

⁵ <http://www.thamescrossingactiongroup.com/incidents-ltc-dartford-crossing>

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through to the LTC? As already highlighted traffic attempting to reach the LTC from the A128/A13 junction would have to take the Stanford Detour.

Not only do these scenarios show the failings of the proposed LTC, but also show how it would increase traffic movements, congestion, pollution, and are not planning to offer any resilience.

All of these policies, by 2024/5 will not be enough if projects like the proposed LTC get a get out of jail free card if permission is granted prior to these policies coming into affect. This is even more relevant when you consider that even if permission is granted on 20th June 2024 (when a decision is currently due) the project has been rephased by 2 years meaning construction would not start until 2026.

We have witnessed time and time again, in regard to the proposed LTC, how NH have attempted to mislead people and greenwash the hugely destructive and harmful project.

We've also heard them try to wriggle out of current policy during the DCO examination due to their own interpretation of wording, since policy wording is often not strong enough and allows for conflicting interpretations of wording. This is something that needs to be better addressed in all policies, including those being proposed in this consultation.

As we've already covered, it cannot simply and purely be a case of adapting transport infrastructure to the impacts of climate change. We also need to see a change in transport to reduce and reverse climate change.

It would be an endless downward spiral to simply keep progressing more and more transport infrastructure such as the proposed LTC and other road projects and expecting climate change not to worsen. More and more resilience would need to be built in as climate change worsened at an increasing rate.

There are better and more sustainable alternatives to roads, especially projects like the proposed LTC.

Part of any transport infrastructure climate change resilience needs to be to ensure that transport does not continue to worsen climate change when there are more sustainable options.

Why in this day and age is the Port of Dover for example not connected by rail?

With 70% of goods in and out of the Port of Dover alone using the Dartford Crossing, and 42% of vehicles using the Dartford Crossing being goods vehicles why are we not doing more to get more freight off of roads and onto more sustainable rail?

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Rail improvements⁶ between Ashford, Kent and Reading, Berks, could help towards connecting the Port of Dover by rail, and also service places like Gatwick, and improve public transport.

Government have announced a target of 75% growth in rail freight, so why not use the money for the proposed LTC toward such a goal and work on solving two problems in one. It would be a better, more sustainable, and more affordable option than the proposed LTC.

The proposed LTC, and other road projects, would also destroy large amounts of agricultural land, including grade 1 listed land.

Not only are we already experiencing the impacts of climate change on farming, but we are also already suffering from food security issues. To be wiping out acre upon acre of agricultural land with road projects like the proposed LTC, which is not fit for purpose and would further worsen climate change would be ludicrous.

Saving, protecting, enhancing and encouraging sustainable farming is what is needed. This would assist in regard to reducing and reversing climate change, improve food security, and also reduce food miles travelled, because if we destroy our farmland our food supplies will need to travel further. We are losing too much farmland not only to roads but also housing, development, and solar farms.

More roads leads to more traffic on roads, and if drivers are being encouraged to move to electric vehicles (despite the fact they are not completely zero emissions and still create pollution) more electricity would also be needed, leading to more loss of land.

Why do we not look at investing in solar panels over roads to generate energy, and also offer some shelter and protection for our roads?

With the move to heavier electric vehicles it has been said that there is likely more damage to road surfaces, pot holes etc. Plus of course the general increase in traffic on our roads wears them down faster. With more severe and unexpected weather patterns from climate change cracks and damage to road surfaces worsens faster too. This is yet another reason why modal shift is needed.

A major step in the right direction when addressing the need to adapt the UKs transport system to the impacts of climate change, would be to abolish National Highways (whose sole purpose and focus is highways) and replace with National Transport or National Travel which would be better placed to take responsibility for a fully integrated and sustainable transport system in the UK.

It would also be highly beneficial for Government to better consider recommendations from the Climate Change Committee. To set the CCC up as part of the Climate Change

⁶ <https://www.thamescrossingactiongroup.com/rail-and-tram-alternatives/>

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Act 2008 and then ignore their recommendations does not show a Government who are taking climate change seriously.

We need an urgent review of road projects, and no new roads should be built unless they can be proven not to increase emissions. Adaptation will be needed, but changes are also needed to slow down and reverse climate change. We cannot keep pushing ahead as though it is business as usual, we need to respond to climate change as though our lives depend on it, because they do. Scrapping the proposed £10bn+ Lower Thames Crossing would be a good start.

We thank you for the opportunity to submit our response, and would be more than happy to discuss further should you wish. Thank you.