

Highways England consultation on proposed Lower Thames Crossing Response from Campaign for Better Transport

December 2018

Objection to proposed Lower Thames Crossing (new road crossing linking Kent and Essex)

Campaign for Better Transport is a leading charity and environmental campaign group that promotes sustainable transport policies. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment.

Summary

In March 2016, we formally objected to the proposed new Lower Thames road crossing, on the grounds that it will not deliver sufficient benefits to justify the environmental and financial costs. We argued that it would conflict with statutory requirements on environmental protection, modal shift, carbon reduction, air pollution and public health. We called instead for a strategic approach to freight movements, combined with better public transport alternatives.

We are restating our objections to these plans on the basis that the proposals would have an unacceptable environmental impact, combined with a failure to meet policy objectives and a failure to consider alternative approaches which could deliver greater benefits.

The changes made to the proposals have not addressed our earlier objections: in fact, the increased size of the road from four lanes to six lanes has increased the scheme's negative impact.

We believe that building this major new road through protected countryside is not the right way to address the long standing problems of traffic, much of it freight traffic, through Kent to Essex.

There is no clear evidence that additional road capacity will deliver the promised benefits. The evidence from previous major road schemes is that induced traffic will lead to more congestion and pollution, while permanently damaging the surrounding environment. The same investment in sustainable alternatives would deliver greater benefits at lower environmental cost.

The proposals fail to address legal requirements on greenhouse gas emissions and air quality and will worsen noise and light pollution along the route. They will cause extensive and permanent environmental damage including erosion of ancient woodland, and severance of habitats and communities along the route.

The consultation should be halted and replaced with a wider multi-modal strategy, to include options such as expanding port capacity north of the Thames, improving freight and passenger rail links, and considering measures such as distance-based HGV charging to better manage traffic on the existing road network.

Consultation response

1. Need for the Lower Thames Crossing

1.1. We strongly disagree that there is a need for the proposed Lower Thames Crossing.

1.2. We reject the argument that the new road is needed to relieve pressure on the existing road network. Any temporary congestion relief is likely to be eroded by induced traffic, as identified in the 1994 SACTRA report 'Trunk Roads and the Generation of Traffic'. More recent research confirms that the impact of induced traffic, with major road schemes showing traffic increases of up to 47 per cent over 20 years.¹ Building new capacity in response to demand is intrinsically unsustainable: the benefits of additional capacity are eroded as it is taken up. These additional journeys do not begin and end on the motorway: they result in increased traffic on the rest of the road network.

1.3. We reject the claim that the new crossing will provide relief for the Dartford Crossing. Past interventions at Dartford demonstrate that increasing the capacity of river crossings does not deliver long-term congestion relief. Highways England's pre-consultation reports on the Dartford Crossing confirmed that new road capacity cannot provide a sustainable long-term solution: *"Analysis of traffic data shows that traffic demand at Dartford has responded in step with capacity; such that whenever new capacity has been provided, it has filled up and created the need for more capacity. This has been a recurring pattern since the second tunnel was opened at Dartford in 1980 and then the QEII Bridge in 1991. Today there is insufficient capacity to cater for current and future traffic demand."*² The new proposals claim at best a 7 per cent reduction at traffic in Dartford.

1.4. We reject the claim that the proposed road will support sustainable local development. Sustainable development is delivered by locating homes and jobs close to existing transport hubs, prioritising use of existing brownfield sites. The revised National Planning Policy Framework (para 103) states that *"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."*³ The Lower Thames Crossing will introduce a new motorway-standard road that is not designed for local trips or multi-modal traffic. It will damage the environment for existing communities along its route and do nothing to deliver sustainable local development.

1.5. The argument that major roads will contribute to wider economic growth is also unproven. Research published since the previous consultation on the Lower Thames Crossing analysed 86 major road schemes from the past 20 years, using official data from the Post Opening Evaluation (POPE) reports. This confirmed that the promised economic benefits from new roads have not been delivered. Only a quarter of schemes in the study had evidence of economic uplift, and it was unclear whether this new economic activity would

¹ Sloman L, Hopkinson L and Taylor I: The Impact of Road Projects in England Report for CPRE (2017)

² Highways England Lower Thames Crossing Pre-Consultation Scheme Assessment Report (2016)

³ National Planning Policy Framework (July 2018)

have happened anyway and whether it was genuinely additional, or simply a displacement from elsewhere.⁴

- 1.6. Changes in travel demand have further undermined the case for the Lower Thames Crossing. The Commission for Travel Demand has reported on a consistent long-term decline in time spent and distance covered in travel: while there has been a growth in employment, there is a decline in commuting trips.⁵
- 1.7. These trends are stronger among young adults. There is a decline among young adults in take-up and use of driving licences. The number of young people with a driving licence peaked in 1992-94 at 48 per cent of 17 to 20-year-olds: by 2014 only 29 per cent of that age group had a licence. Among people aged 21 to 29, the number of licence holders dropped from 75 per cent to 63 per cent over the same period. There has also been a 10 per cent fall in the number of 17 to 29-year-olds driving a car in a typical week, from 46 per cent 1995-99 to 37 per cent 2010-2014.⁶
- 1.8. The most recent annual traffic statistics confirm that passenger traffic growth has stabilised, with car and taxi traffic was broadly stable at 252.5 billion vehicle miles (decreasing slightly, by 0.4 per cent) compared to the year ending September 2017, while car traffic rolling annual estimates were level with those for the year ending June 2018.⁷
- 1.9. The pressure caused by road-based freight on Kent's infrastructure is well-known, with Operation Stack having serious implications in terms of environmental impact and costs to the public purse and to business. For example, the Freight Trade Association has estimated that Operation Stack costs the UK freight industry about £750,000 a day,⁸ while the Port of Dover estimates the UK economy loses up to £250m per day when Stack is in force.⁹ To provide an additional road crossing to service traffic from Kent, risks embedding rather than resolving the problem of excessive road freight traffic through the county.
- 1.10. In addition, the current uncertainty about the final nature of the Brexit settlement and its impact on cross-Channel traffic makes any assumptions about the demand for and impact of this road scheme unreliable and premature.
- 1.11. There is real potential to expand use of ports north of the Thames instead of routing freight by road from Dover to north of the Thames. DP World London Gateway has ample capacity, served by a state of the art rail terminal, the largest in the country, with six 750 metre long rail sidings¹⁰ and improvements to the M25/A13 junctions to support HGV

⁴ Sloman L, Hopkinson L and Taylor I: The Impact of Road Projects in England Report for CPRE (2017)

⁵ Prof. Greg Marsden et al, University of Leeds "All Change? The future of travel demand and the implications for policy and planning" (May 2018)

⁶ Kiron Chatterjee et al, UWE/University of Oxford "Young People's Travel – What's Changed and Why? Review and Analysis" (Feb 2018)

⁷ DfT: Provisional road traffic estimates, Great Britain: October 2017 to September 2018 report (December 2018)

⁸ <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/transport-committee/operation-stack/oral/23089.html>

⁹ <http://www.bbc.co.uk/news/uk-england-kent-35866339>

¹⁰ <http://www.londongateway.com/the-port/#access>

movement.¹¹ Tilbury port, including the London Container Terminal (LCT), also has capacity to take extra freight without requiring additional road or rail infrastructure, while the Tilbury2 expansion proposals will see further capacity to handle large volumes of freight.

- 1.12. Heavy goods vehicles have high external costs, including infrastructure and pollution impacts, with only an estimated 30 per cent of these costs covered.¹² There is great potential benefit in shifting truck traffic to rail. There is potential to upgrade the gauge of the existing conventional rail network in Kent to accommodate more rail freight, and to expand the use of the HS1 line for freight shuttles between existing terminals at Barking and Calais.

2. Local environmental impacts

- 2.1. The proposals will cause extensive and permanent environmental damage and fail to address wider sustainability imperatives. This damage will be increased with the change in the road plans from a four-lane to a six-lane motorway standard route, with associated land take from construction works. The enlarged red line boundary for the proposed scheme has increased the land take from approximately 12 square km to over 21 square km. The irreversible impact on the natural environment makes the plans unacceptable.

- 2.2. In the 2016 consultation, Highways England stated *“We recognise that our proposed scheme would have an impact on local communities as well as cultural heritage and landscape. These include areas of greenbelt, the Kent Downs Area of Outstanding Natural Beauty and areas of ancient woodland...All route options would potentially affect areas of ancient woodland and protected species such as water voles, great crested newts and birds.”*¹³

- 2.3. The Woodland Trust and Kent Wildlife Trust have warned that the preferred route options threaten ancient woodland, with 54ha of ancient woodland falling within the development boundary or its 50 metre buffer zone, as confirmed by Highways England’s environmental report. Eight areas of ancient woodland, including three SSSIs, are threatened by direct loss or damage from the current road plans.

- 2.4. We note the changes made to the southern tunnel portal to address the impacts on the Ramsar sites. However, Essex Wildlife Trust advises that the northern tunnel alignment remains a threat to important coastal grazing marsh, and that it would damage the Goshems Farm wildlife reserve, which support a diverse range of Red Data Book invertebrates, and provide habitats for protected bird species and water voles. The new road will result in impacts on a further three local wildlife sites and four other nature areas that support UK Biodiversity Action Plan priority habitats within Essex.

- 2.5. The proposed road will have significant landscape impacts along its route, with the introduction of major highways infrastructure with elevated sections and overhead signage, to Green Belt land and conservation areas, and associated noise and light pollution.

¹¹ https://www.thurrock.gov.uk/sites/default/files/assets/documents/lct_letter_20160315.pdf

¹² CEDelft: External and infrastructure costs of HGVs in the EU28

¹³ https://highwaysengland.citizenspace.com/cip/lower-thames-crossing-consultation/user_uploads/lower-thames-crossing-consultation-factsheet---biodiversity--cultural-heritage-and-landscape.pdf

2.6. In Kent, the preferred route would damage the setting of Gravesham, with the loss of all the open land between Gravesham and Medway. The route cuts through the northern section of the Kent Downs AONB. The landscape impacts are widespread: the Shorne Woods Country Park will be adversely affected and the setting of many attractive villages will be permanently destroyed, with, for example Chalk village being cut off from its twelfth century church.

2.7. In Essex, it would have severe visual impact on the Mardyke Valley, threatening the setting of Horndon on the Hill, Orsett village and Orsett Heath. It will exacerbate community severance between East and West Tilbury and between North and South Ockendon and adversely affect Chadworth St Mary.

3. Wider environmental impacts

3.1. Even if the impact on specific sites could be mitigated, the proposals fail to address wider sustainability imperatives. There is an urgent need to meet CO₂ reduction targets in order to avoid catastrophic climate change impacts. The Climate Change Act (2008) established a target for the UK to reduce its emissions by at least 8 per cent from 1990 levels by 2050. The increase in traffic that the Lower Thames Crossing will generate is directly contrary to this imperative.

3.2. Transport is the largest emitting sector of the UK economy, accounting for 28% of UK greenhouse gas emissions in 2017. The UK Committee on Climate Change advises that policies to increase levels of walking, cycling and use of public transport need to be strengthened, to deliver reductions in vehicle mileage of at least 5 per cent below the baseline trajectory, and that opportunities to reduce demand for travel must be exploited. Demand reduction is generally highly cost-effective and has many co-benefits.¹⁴

3.3. Traffic reduction is also necessary to meet statutory air quality standards. Under the EU Ambient Air Quality Directive, all EU member states have been bound by limits on air pollution since 2010. The UK Government has failed to meet limits for nitrogen dioxide (NO₂) and is required by the High Court judgement of April 2015 to take steps to achieve compliance at the earliest opportunity. The major source of NO₂ pollution is diesel vehicles. The Lower Thames Crossing is planned to open in 2027, but the Government's Road to Zero plans will not deliver a zero emission fleet until at least 2040. In the interim, even a marginal increase in traffic volumes will have an adverse impact on air quality. This risks the Government being in further breach of its legal duty.

4. Consideration of alternatives

4.1. We are concerned that the consultation fails to offer any real options or consider any alternatives.

¹⁴ UK CCC: Reducing UK emissions 2018 Progress Report to Parliament (June 2018)

- 4.2. The project will cost up to £6.8 billion to deliver just 14.5 miles of motorway standard road. That same investment in maintaining the existing road network could make a significant contribution to addressing the estimated £9 billion road maintenance backlog, providing benefits over a much wider area, at much lower environmental cost.
- 4.3. Investment in rail alternatives could offer better value as well as greater environmental benefits. Rail freight investment could prove much more cost effective: for example the Bristol to Portishead rail link was refurbished for freight use at a cost of £21 million.¹⁵ The proposed western section of the East-West rail link (Oxford to Cambridge) has predicted benefits estimated at over £73 million to the economy, generating £4 million a year in revenue surplus and creating 12,000 jobs. This gave the project a Benefit Cost Ratio of between 6.3 and 11.2 and an investment payback period of 5.5 years.¹⁶ This compares to an estimated BCR for the preferred location C for the Lower Thames Crossing in the range 2.9 to 3.4.¹⁷
- 4.4. A multi-modal strategy could enable more reliable freight management and an overall reduction of HGV traffic, instead of this costly and damaging road scheme, including such positive alternatives as:
- smart queueing and other demand management approaches at Dartford
 - new cross-river rail and/or light rail links
 - investment in environmental and design improvements to existing roads to reduce air pollution and improve safety
 - improving provision of sustainable modes on the existing road network, encouraging modal shift and making better use of capacity
 - investment in ports north of the Thames to disperse the cross channel movement of freight
 - joining up with other initiatives to shift distance freight to rail and manage on-road delivery times
 - exploring a wider approach to demand management including road user charging / congestion charging not exclusively at new crossings.
- 4.5. We do not believe that the case for this road has been made. We believe that the consultation should be halted. Instead we are calling for a proper multi-modal strategy, giving full consideration of the alternatives for movement of goods and people from the Channel ports and through the region.

December 2018

Bridget Fox Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

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¹⁵ Campaign for Better Transport: Reopening railways (2012)

¹⁶ Campaign for Better Transport: Expanding the railways (2017)

¹⁷ Highways England: Lower Thames Crossing Summary Business Case (2016)