

Highways England consultation on proposed Lower Thames Crossing

Response from Campaign for Better Transport

March 2016

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.

We formally object 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. Instead it will undermine key policy goals on environmental protection, modal shift, carbon reduction, air pollution and public health. We are calling instead for a strategic approach to freight movements, combined with better public transport alternatives.

Road-based crossings represent a wasted opportunity to promote sustainable transport as part of a wider sustainable development approach and are therefore a waste of public money. A sustainable transport approach – as promoted at Ebbsfleet – would offer a more future-proofed investment for Kent and Essex. It would protect important environmental and heritage sites, while making the growing residential centres on either side of the river more attractive places, thereby strengthening the local economy.

In addition, other more sustainable and less damaging alternatives to a new road have not been properly considered, in particular a series of measures to manage demand for road-based transport on the existing network, moves to encourage more freight movement by rail or by water into Tilbury/London Gateway and alternative UK ports, and improvements in orbital passenger rail options.

In particular, investment in ports north of the Thames to disperse cross channel freight would be a much better long-term option to support resilience on the transport network, as opposed to further concentration of international freight traffic on corridors from Dover which are already under intense pressure.

An approach based on demand management and sustainable modes would sit far more comfortably with the NPPF which advocates that *“economic, social and environmental gains should be sought jointly and simultaneously through the planning system”*¹

The phenomenon of induced traffic is well-established. Indeed, Highways England’s latest reports on the Dartford Crossing demonstrate 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

¹ National Planning Policy Framework

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

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

https://highwaysengland.citizenspace.com/cip/lower-thames-crossing-consultation/supporting_documents/Scheme%20Assessment%20Report%20%20Volume%201%20%20Executive%20Summary.pdf

There is also a risk of displaced traffic on to local roads with adverse impacts on congestion, safety and environmental quality, particularly in the event of tailbacks or bridge/tunnel closures.

The higher traffic volumes and encouragement of car use arising from new road capacity would be at odds with other key public policy priorities.

- Carbon reduction. The UK has a binding target of an 80% CO₂ emissions reduction by 2050 and reducing transport emissions is key to achieving this and it is questionable whether these emissions can be reduced quickly enough through a move to low and zero emission vehicles alone.
- Air pollution. The UK Government has been found to be in unlawful breach of air quality standards, with London's air the dirtiest in Europe. The major source of NO_x and particulates is emissions from diesel engines.

Highways England's consultation documents acknowledge the environmental problems caused by the scheme: "*We recognise that there would be noise and air quality impacts generated in the vicinity of the proposed scheme*" but have no specific proposals to address these. In the light of continued failure by the UK Government to maintain legally required air quality standards, and evidence of widespread evasion of vehicle emission controls by motor manufacturers, it is insufficient to rely on bland assurances that impacts will be minimised. Without detailed proposals on how air and noise pollution can be addressed, it would be irresponsible to proceed with these plans.

The various route options all have adverse impacts on sensitive landscapes and protected wildlife sites, notably the RAMSAR Thames Estuary SSSI, but also the Kent Downs Area of Outstanding Natural Beauty, other SSSIs and ancient woodland. The proposals therefore appear to be in direct contradiction to the Road Investment Strategy which states that by 2020, Highways England must deliver no net loss of biodiversity, and that by 2040 it must deliver a net gain in biodiversity.³

We are not alone in expressing concern that the modelling is based on 2001 traffic figures which are out of date given subsequent developments such as the Olympic Games-related improvements to the A13.⁴ There are also concerns that the scheme does not deliver value for money. Option C with route 3 would, according to Highways England's own figures, deliver a reduced travel time between the M2 and M25 of 10 minutes, at a cost of £5.7bn – £570M a minute, and an overall (short-term) reduction of only 14% in traffic at Dartford.

The proposal to have tolls on the crossings – which we agree would be essential for demand management as well as funding – combined with expressways on either side, would increase the tendency for these to be primarily through routes for commercial traffic, with little or no local benefit to the surrounding communities.

A road-only crossing misses a vital opportunity to improve rail connections between Kent and Essex for both passengers and freight. Orbital rail links are a key area for improvement in transport connectivity across South East England given the historic focus on developing radial routes into central London.

Providing new orbital or light-rail connections across the river, with the option of parallel use for rail-based freight, would provide real regeneration benefits through direct connections from emerging neighbourhoods to employment centres across London and the South East that would be available to all.

Route options

The consultation considers two options, an additional crossing at Dartford (Option A) or the option presented as the Highways England preferred option for the Lower Thames Crossing from east of Gravesend to Tilbury (Option C) with local route variations.

Option A

We recognise that there are significant environmental problems, particularly noise and air pollution, at the existing Dartford crossings and that additional capacity at this location is likely to exacerbate these. Measures to avoid further degradation of the environment at Dartford are important. However, simply increasing the problem of noise and air pollution by spreading it to a new crossing is not a sustainable solution.

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/441300/N150146_-_Highways_England_Biodiversity_Plan3lo.pdf

⁴ https://www.thurrock.gov.uk/sites/default/files/assets/documents/lrc_letter_20160315.pdf

We welcome the measures recently announced to manage congestion at Dartford better ⁵ with improved signage, driver information and signal management and call on this approach to be expanded with consideration of:

- Variable charging to discourage use at peak times
- Use of new technology to facilitate dispersed 'smart queuing' for commercial / freight vehicles
- Variable charging to encourage use of low emission vehicles
- Priority for bus/coach use to enhance public transport connectivity.

These measures should be fully explored, implemented and assessed before any work on a new crossing is undertaken.

Option C

There are a number of serious environmental concerns about the Highways England preferred option for the Lower Thames Crossing from east of Gravesend to Tilbury (location C) and all its variant routes.

Highways England's consultation documents state "*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*". They go on to say "*All route options would potentially affect areas of ancient woodland and protected species such as water voles, great crested newts and birds.*"⁶ There are bland assurances on future mitigation but no specific proposals and therefore no ability to judge whether these would prove effective or make the scheme acceptable. Given the irreversible impact on the natural environment, these risks alone should make the plans unacceptable.

On the Kent side, Option C would irreparably 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 Eastern link would harm three ancient woodlands, including the Great Crabbles Wood SSSI, while the Western link would damage Claylane Wood and Shorne Wood. Up to thirteen ancient woodlands could be destroyed across the whole scheme as well as new woodlands provided to offset previous road schemes. 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 C12th church.

The route passes close to the South Thames Estuary & Marshes SSSI, a RAMSAR wetlands site, which supports outstanding numbers of waterfowl, including breeding birds, in internationally important numbers, as well as a number of rare invertebrates and nationally scarce plants.⁷ The plans appear to be in direct breach of Highways England's license requirement to minimise environmental impacts while protecting and enhancing the quality of the surrounding environment.

On the Essex side, we agree with Highways England that routes 2 and 4 have unacceptable environmental impacts. Highways England is recommending route 3 which it claims is least environmentally damaging: however this route still raises a number of serious concerns.

The proposed tunnel will encroach on the nationally protected floodplain at Tilbury marshes. It would introduce major highways infrastructure with elevated sections and overhead signage, to Green Belt land and conservation areas. In particular, it would threaten the setting of Horndon on the Hill and Orsett villages with negative impact on Orsett Heath and South Essex Wildlife Hospital. It will exacerbate community severance between East and West Tilbury and between North and South Ockendon.

These environmental impacts are significant and in our view combine to make the scheme unacceptable.

Freight traffic

The capacity challenges faced at the existing Dartford Crossing are in part a consequence of excessive road-based freight movements through Kent. Figures for 2014, the latest available, show that of the top ten UK ports, Dover had the largest percentage increase in tonnage ⁸ with 2.42 million freight vehicles handled in

⁵ <https://www.gov.uk/government/news/agreement-reached-on-dartford-traffic-improvements>

⁶ https://highwaysengland.citizenspace.com/cip/lower-thames-crossing-consultation/user_uploads/lower-thames-crossing-consultation-factsheet--biodiversity--cultural-heritage-and-landscape.pdf

⁷ <http://jncc.defra.gov.uk/pdf/RIS/UK11069.pdf>

⁸ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/465439/port-freight-statistics-2014.pdf

2014, growth 9.7% compared with the previous year and is 2.5% higher than the previous record of 2.36 million set in 2007.⁹

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,¹⁰ while the Port of Dover estimates the UK economy loses up to £250m per day when Stack is in force.¹¹ 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.

A more sustainable solution would see a strategic re-routing of freight to rail and to alternative ports including Thames Gateway and Tilbury (which have the capacity and would welcome the business) rather than reinforcing over reliance on Kent's roads, and further degradation of the county's environment, through provision of a road-based Lower Thames Crossing. In many cases these ports are nearer to the next destination of the goods in transit and so represent a smart operational choice as well as a more environmentally sustainable one.

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 sidings.¹² Since the 2001 traffic assessments which are the basis for the consultation, major works have been undertaken to the M25/A13 junctions to support HGV movement to DP World London Gateway.¹³ Tilbury port, including the London Container Terminal (LCT), also has capacity to take extra freight without requiring additional road or rail infrastructure.

Different options to reduce HGV traffic include:

- Upgrading existing conventional rail network in Kent. Both gauge and capacity upgrades needed.
- Potential to use Channel Tunnel rail link and HS1 for unaccompanied HGVs to go to Barking and avoid Kent. These type of services transporting the HGV trailer without driver and lorry cab already operate from Spain to Calais run by LOHR and from Germany to Italy run by Cargo Beamer. There could be huge congestion, environmental and social benefits of such a solution which now needs a scoping exercise to look at viability which Kent CC could lead on with other local authorities. There is already access from HS1 to Barking terminals and a terminal at Calais used by LOHR so there is potential to run long distance services from continental Europe to Barking. There is considerable local support for further investigation of this option both with CPRE, FTA and rail freight industry advisers
- Scoping exercise would need to examine the following, operational Barking and Channel Tunnel issues, physical access to HS1, timetabling and charging. However, given the high external costs HGVs impose on Kent's roads there would be huge merit in shifting truck traffic to rail.
- Another option could be extending the existing HGV shuttle services via the Tunnel to Barking.

⁹ <http://www.doverport.co.uk/about/news/port-of-dover-celebrates-record-breaking-freight-b/12937/>

¹⁰ <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/transport-committee/operation-stack/oral/23089.html>

¹¹ <http://www.bbc.co.uk/news/uk-england-kent-35866339>

¹² <http://www.londongateway.com/the-port/#access>

¹³ https://www.thurrock.gov.uk/sites/default/files/assets/documents/lct_letter_20160315.pdf

Conclusion

We therefore call on Highways England to abandon plans for a new road-led Lower Thames Crossing and to explore sustainable alternatives, which could include:

- 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.

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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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