

Louise Haigh MP
Secretary of State
Department for Transport
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By email
CC. Darren Jones MP, Chief Secretary to the Treasury
Lilian Greenwood MP, Future Roads Minister

18th September 2024

Dear Louise,

We warmly welcome your appointment and applaud your resolve to move fast and fix things. With communities up and down the country suffering for too long with inadequate transport infrastructure and services, your clear stated commitments to public transport, shared transport and active travel are not only refreshing but vital.

For three decades since the 1994 Standing Advisory Committee on Trunk Road Assessment report it has been clear that building new roads is not a solution to congestion, but creates new demand, exacerbating congestion and car dependency. As all departments have been asked by the Treasury to make savings, it was therefore encouraging to hear plans to cancel the A303 Stonehenge and the A27 Arundel schemes. Such out-of-date inherited road-building projects would never have been consistent with Government's modal shift and decarbonisation commitments, let alone your growth and productivity missions.

We are however still concerned that some other large and unnecessary road projects remain under consideration, particularly the £9bn Lower Thames Crossing and the £1.5bn A66 Northern Trans-Pennine. With adjusted benefit-cost ratios of 1.22 and 0.92 respectively (which already include wider economic benefits) these proposals make little economic sense. Instead, direct investment in rail freight and public transport connectivity would do a better job of growing the economy, while also bringing huge environmental benefits and freeing up existing road space for necessary road journeys.

The cases for the Lower Thames Crossing, the A66 and A5036 Port of Liverpool Access Road have been made largely on the basis of providing capacity for HGVs. Yet for a fraction of their cost, we know that vital rail freight upgrades could remove hundreds of thousands of HGV journeys from our roads. The following would be transformational and provide superb value, enabling you to reach and surpass the current 75% rail freight growth target:

- The Ely Area Capacity Enhancement project, which can transform rail freight connections and bring significant passenger benefits between the port of Felixstowe, the Midlands and the North (£500m)
- The Haughley rail junction upgrade in Suffolk, which could remove 150,000 freight lorry journeys a year from the A14 (£20m)

- Gauge upgrades from the Channel Tunnel to Wembley Yard and from Wembley to Dollands Moor to enable through rail freight passage from Europe to the Midlands and beyond (£42m)
- Six schemes to electrify 60 miles of short links in the rail network to enable electric trains to run to the ports of London Gateway, Felixstowe, and Liverpool's Seaforth as well as the Leeds and Birmingham Freightliner terminals, ultimately making possible the electrification of 95% of UK freight trains (£100m)

By contrast, many schemes in the roads programme would actively undermine modal shift to public transport, shared transport and active travel. Aside from creating extra traffic and congestion on the surrounding road networks for bus users to get caught up in, some like the Lower Thames Crossing have been designed in a way that precludes their use by local bus services. Scarce public funds would be better invested in the planned £800m cross-river tram from Kent to Essex – an example of the sustainable transport schemes which would deliver the growth opportunities this country needs, while protecting the environment.

We ask therefore that as part of the current Transport Infrastructure Review you:

- Do not grant a Development Consent Order (DCO) for the Lower Thames Crossing
- Revoke the DCOs for other unaffordable road schemes such as the A66
- Redirect funds saved towards essential rail freight and public transport infrastructure

Longer term, we urge you to:

- Refocus the third Roads Investment Strategy (RIS3) on maintaining and adapting existing roads infrastructure rather than increasing road capacity for private vehicles
- Instigate a more in-depth review of road schemes against net zero, like that conducted in Wales, setting clear criteria for any future road building
- Further update the National Networks National Policy Statement (NNNPS) to reflect the heavy environmental burden of road building and traffic growth
- Transform National Highways' remit to working with local authorities on finding and implementing sustainable infrastructure solutions to transport capacity issues, which include investment across modes rather than simply road building

We would be happy to meet with your team and Treasury colleagues to further discuss these options and look forward to hearing from you soon.

Yours sincerely,



Paul Tuohy – CEO, Campaign for Better Transport



Maggie Simpson OBE – Director General, Rail Freight Group



Chris Todd – Director, Transport Action Network