

Submitted to **Lower Thames Crossing Consultation**

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About you

1 Name

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4 Are you responding on your own behalf or on behalf of an organisation or group?

Providing a response on behalf of an organisation or group

Crossing location

5 On balance, do you agree or disagree with our proposal for the location of a crossing, at Location C?

Strongly disagree

Please provide the reasons for your response:

We do not wish our disagreement with the HE proposal for a crossing at Location C to be construed as any degree of support for the alternative, Location A.

CPRE Kent considers that additional capacity at either Location A or Location C is unacceptable in terms of longer-term induced traffic growth, congestion and reduction in air quality. HE's preferred locational option raises particular concerns of importance to CPRE and its membership, most particularly in the acknowledgement of the fact that because of the elevated risk of flooding in the area, adequate flood defences in alignment with the Environment Agency's TE2100 flood defence plans for the River Thames will be needed. This suggests that the flood defences for the tunnel will have significant landscape impacts, considerably greater than the benign 'artist's impressions' included in the consultation documents.

We also note with concern the requirement for dewatering – even if only temporary – and consider that the vague reassurances that "*Larger groundwater resources and public supplies ... are unlikely to be impacted*" (para 3.5.9 of the Environmental Appraisal) are not an adequate safeguard for those sites on the marshes with nationally and internationally important SSSI and Ramsar designations. We further observe that these proposals will have a particularly damaging impact on those important areas of countryside that are a vital 'green lung' to the urban population of the Medway towns, providing recreation and the opportunity for quiet enjoyment of the countryside which is so important for physical and psychological health. These areas include ancient woodland and Metropolitan Green Belt amongst other important designations. We contend that in this wider area, already identified as a focus for the considerable growth of the Thames Gateway, the loss of amenity in and around Shorne Country Park and the open landscapes to the north of the park is a disproportionate sacrifice to make. There are no proposals for SANGS (Suitable Alternative Natural Green Space) within this consultation because there are no areas with equivalent high value.

Any other comments

12 We would welcome any other comments you may have on our proposals

Text box for additional comments on proposals:

Q12 Other Comments on HE Proposal

Our recommendations to HE with regard to this consultation focus on three principal issues; firstly, the fundamentally unsustainable position of facilitating and encouraging the unconstrained growth of road-borne traffic, and secondly the legal requirement on government to address the existing breaches in air quality standards. Finally we query the piecemeal nature of these proposals, in that they pay scant regard to the longer term consequences on the wider roads network.

12.1 A Sustainable Transport Strategy

CPRE Kent considers that the 'business as usual' continuation of growth in the road-based traffic which travels through the county and on to other areas is fundamentally and inherently unsustainable. Without measures to address this, the provision of additional capacity at Location C or anywhere else is simply a short-term fix which will lead to a requirement for additional and even more environmentally-damaging built infrastructure in the future. Post Opening Performance Evaluation (POPE) studies for new roads schemes have repeatedly shown that new road routes do not just relieve congestion, but create and attract new traffic.

The channel corridor and the channel crossings are an inevitable logistics bottleneck in the transit of goods between the UK and the rest of mainland Europe. The over-reliance on the use of this route for a significant proportion of the goods traded into and out of mainland Britain should be an issue of national concern for the UK's resilience and security. This over-reliance has effects which are felt not only in the pinch-point of the Dartford crossings but also on the wider highways network and in the need to implement Operation Stack when the normal flow of traffic through the channel crossings is disrupted. Even in the case of normal operations at the Port of Dover, it is regularly necessary to implement the Dover 'Traffic Assessment Project' ('Dover TAP') which frequently holds back port-bound HGVs on the A20 to limit congestion and air pollution in Dover Town Centre; this of course simply displaces the same congestion and air quality concerns to other parts of the roads network.

Much of the freight traffic which transits the channel crossings has its UK origin or destination in places remote from Kent, such as the logistics hubs which are centred in the Midlands. The fact that some of this traffic travels between Mainland Europe and Scotland or even Ireland via Dover is an ample demonstration of the fundamental failure of the market to deliver sustainable transport solutions which respect environmental constraints. The time has come for policy intervention to stem the growth in this traffic.

Highways England as well as the DfT and the SE LEP have a role to play in ensuring that the UK's logistics network remains resilient. There should be an overall policy objective of reducing the proportion of goods with an origin or destination in the north using ports in southern England. It is clear that over-reliance on Kent's short, fast channel crossings has stifled investment in, and use of, other ports which in many cases are closer to the next destination of the goods in transit. Existing roll-on roll-off ports (such as Newhaven, Portsmouth, Purfleet etc.) should be incentivised to offer both driver-accompanied and unaccompanied trailer services. There should also be support for roll-on roll-off freight facilities at new ports such as London Gateway. Any or all of these would offer alternative capacity, and would have the significant benefit of reducing reliance on the Dartford crossings to access the British mainland's logistics centres.

We suggest that full consideration is given to dispersing this traffic to other modes and ports of access before further expense and blight is caused through the proposals for additional crossing capacity for the River Thames. It is simply unacceptable that this consultation has been embarked upon under the assumption that rail has been "...ruled out as a solution to the problems at Dartford" (Consultation Document, p10) and that no consideration has been given to the use of additional ports north of the Thames. Dover is the only major UK port with no rail connectivity, and the implications of the planned expansion of its western docks with a new cargo terminal, with no thought for rail connectivity, should be investigated as a matter of urgency. The Office of the Road and Rail regulator (ORR) should also be tasked with addressing this market irregularity, in which an entirely inadequate proportion of UK freight volume travels by rail.

12.2 Air Quality

In April 2014, the Court of Justice of the European Union ruled that the UK must act rapidly to clean up illegal levels of air pollution. Subsequent legal challenges have been raised over the government's response to this ruling, which has failed to act quickly to bring air quality to within safe limits within reasonable time frames.

The supporting documents to this consultation make it clear that while there will be a short-term improvement in air quality as congestion for north-bound traffic through the tunnels is eased, the overall effect will be a net reduction in air quality. We therefore query whether these proposals, which fails to consider any solutions other than the accommodation of ever-increasing road-based traffic, can possibly be pursued in the light of the CJEU ruling.

It is quite clear that a solution needs to be found to the current intolerable levels of air pollution at the existing Dartford Crossings. However it is by no means clear that the solutions proposed in this consultation will do anything more than, ultimately, make the existing problems significantly worse.

12.3 Failure of Strategic Roads Planning

These proposals appear to take no account of the consequences on the wider highways network of a twin bore tunnel east of Gravesend. We can see no evidence of modelling of the induced traffic generated by this additional capacity on (inter alia) the M2/A2 further afield, the A229 which links the M2 and M20 at Bluebell Hill within the Kent Downs Area of Outstanding Natural Beauty, or of the future implications of splitting road-based traffic travelling to and from the channel crossings made possible by upgrading the existing A2 between Faversham and Dover. Nor do these proposals contain any mention of what the elevated number of HGVs travelling through Kent will do when their drivers are forced to stop because of drivers' hours regulations. This is piecemeal highways planning that has failed to demonstrate integration with Kent's highways network, and which is neither strategic nor soundly planned.

Text box for further comments:

More about you

15 If you represent an organisation please complete all questions in this section.

Position in the organisation:

Director

Name of the organisation of group:

CPRE Kent (the Kent branch of the Campaign to Protect Rural England)

Please use the space below to provide further detail about your role or organisation:

CPRE Kent is the Kent Branch of the Campaign to Protect Rural England, part of the national CPRE network. Within Kent we represent nearly 3,000 individual members, 189 Parish Councils and 40 local amenity groups and civic societies. CPRE campaigns to promote a thriving and beautiful countryside. We work to protect, promote and enhance our towns and countryside to make them better places to live, work and enjoy, and to ensure the countryside is protected for now and future generations.

16 What category of organisation or group are you representing?

Environment, heritage, amenity or community group