

CPRE Kent response to HE Lower Thames Crossing Statutory Consultation

CPRE Kent is an independent charity that works alongside the 43 other independent county branches of CPRE as well as the national CPRE organisation. As a Kent-based organisation our comments focus on the southern portals of the crossing, the network connections south of the crossing and the impacts on the wider roads network to the south. However, our comments are in part informed by national CPRE's research and we support and endorse all the comments on this consultation made by our colleagues at CPRE Essex.

We have also seen, and fully endorse and support, the very comprehensive consultation response on detailed junction layouts for non-motorised road users (NMUs) submitted by the Dartford & Gravesham Cycling Forum.

Q1 Do you agree or disagree that the Lower Thames Crossing is needed?

Strongly disagree.

Q1b Please let us know the reasons for your response to Q1a and any other views you have on the case for the Lower Thames Crossing

We know that the congestion, delays and air pollution currently suffered at the existing Dartford crossings are intolerable and urgent action must be taken to address them. However, we emphatically do not agree that a new LTC east of Gravesend is the appropriate solution.

HE's own projections for traffic growth suggest that if the LTC is opened in 2026 as suggested, the amount of traffic using the existing Dartford crossings will be scarcely lower than the levels experienced today. Meanwhile, entirely new detrimental effects of traffic growth, built infrastructure, noise and air and light pollution will be suffered by communities, habitats, designated landscapes, SSSIs and ancient woodlands along and around the new route.

What *is* needed is a national transport strategy that does not foster and indeed encourage the ceaseless growth of road-based traffic but focuses on genuinely resilient and sustainable policies for the movement of people and goods.

These proposals for this project appear to represent the outcome of planning for a 'business as usual' scenario that flies in the face of government commitment to both climate change and air-quality obligations. They will also increase national reliance on the English Channel crossings, which are already under stress; the current level of contingency planning for a 'no-deal Brexit' and the potential delays caused by Customs checks demonstrate the fragility of the UK's over-reliance on these ports of entry and exit.

With regard to need, it is of particular concern to us that during the evolution of this project its objectives have shifted. The Lower Thames Crossing has evolved from the 2009 proposals featuring the alternative location Options A, A14, B and C – all of which were evaluated for their benefits in reducing congestion at the Dartford crossings – to the current proposals, which are focused on 'unlocking potential' and promoting growth.

The Kent branch of the Campaign to protect Rural England exists to protect the beauty, tranquillity and diversity of the Kent countryside

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We do, of course, understand that the national economy requires appropriate infrastructure, but the unprecedented social and environmental cost of these proposals in their current form is too high, particularly in a part of the UK that is already drastically over-stressed.

We are therefore deeply concerned that the only questions under consideration in this consultation, and in HE's previous consultations, on a new LTC have been '*where/how* should a new road crossing be built?' rather than '*whether*' a new road crossing ought to be built.

We consider it perverse that the only mode of transport considered for this crossing has been road-vehicle based¹; this is even more perverse in the light of the UN IPCC report ('Special Report 1.5°C')² and the recent COP24 negotiations, which highlighted the urgent and dramatic actions that will be needed internationally to prevent global temperatures – already 1°C above the pre-industrial range – from rising above 1.5°C, beyond which the level of climate-change impacts are forecast to be catastrophic.

In 2017, CPRE published a meta-analysis of Post-Opening Project Evaluation (POPE) studies from more than 80 official evaluations of road schemes carried out over the past two decades to establish whether they delivered the outcomes promised before their construction³. Specifically, the POPEs were analysed to examine if road-building:

- Delivered the promised congestion relief
- Damaged the landscape as much as feared
- Boosted local economies as hoped

With the benefit of hindsight stretching back over 20 years, this meta-analysis of road scheme POPEs overwhelmingly showed that new road schemes:

- Generated traffic far greater than that predicted for the scheme, and even substantially beyond traffic growth in comparable areas; long-term averages over six studies (8-20 years) showed a 47% increase above background levels of growth
- Led to permanent and significant environmental and landscape damage
- Demonstrated little specific evidence of economic benefit to local economies

Q2 Do you support or oppose our selection of the preferred route for the Lower Thames Crossing?

Strongly oppose: see our response to Q1. We do not consider that adequate evidence of full options appraisals – particularly with regard to the impacts of induced traffic on surrounding roads and junctions – has been demonstrated.

Q2b. Do you support or oppose the changes we have made to the route since our preferred route announcement in 2017?

N/A

¹ Other than brief consideration of the inclusion of some rail capacity, an option dismissed in 2009 and to our knowledge not revisited since ('Dartford River Crossing Study prepared by Parsons Brinckerhoff Ltd for DfT January 2009', accessed in December 2018 here: <https://webarchive.nationalarchives.gov.uk/+http://www.dft.gov.uk/about/strategy/capacityrequirements/dartfordrivercrossing/chap1execsummary.pdf>)

² <https://www.ipcc.ch/sr15/>

³ Available at this link on the CPRE website: [The end of the road: Challenging the Road Building Consensus](#)

Q3 Do you support or oppose the proposed route south of the river?

Strongly oppose

Q3b. Please give us your comments or any other views you have on the proposed route south of the river, including structures such as bridges, embankments and viaducts.

We remain strongly opposed to the proposed project: see our answer to Q1. However, if it were to go ahead, we note that the southern portal is now 600m farther south than in the 2017 proposals. This is a small improvement for the village of Chalk but not adequate to prevent significant harm to communities in Thong and Riverview Park, to Metropolitan Green Belt land and to ancient woodland and veteran trees between the A2/M2 junction and the proposed southern portal.

Q3d. Do you support or oppose the proposed route north of the crossing?

N/A

Q4a. Do you support or oppose the proposed junction between the Lower Thames Crossing and the M2/A2?

Strongly oppose

Q4b. Please let us know the reasons for your response to Q4a and any other views you have on the relationship between the Lower Thames Crossing and the existing road network south of the crossing, including new bridges, underpasses and diversions.

We strongly oppose the proposed project: see our answer to Q1. In the event that it does go ahead, we note and endorse the comments and suggestions made by the Dartford & Gravesham Cycling Forum (D&GCF) to improve safety of NMUs at the proposed junctions for the southern junctions. We also retain concerns that the M2/A2 proposals as outlined offer some highly exaggerated detours for traffic joining/exiting from and to the north and south and we echo the D&GCF fears that these will lead to the unintended consequence of rat-running in other areas as drivers seek to avoid these detours. Local commentators are better able to express this and we endorse the representations of Meopham Parish Council (and others) in this matter.

Q5a. Do you support or oppose our proposals in relation to public rights of way?

Strongly oppose.

Q5b. Please let us know the reasons for your response to Q5a and any other views you have on our plans in relation to public rights of way, including the new routes we have proposed.

As before: please see our response to Question 4. The plans at the current stage of consultation do not detail precisely how disruption to the PROWs used by walkers, cyclists and riders will be kept to a minimum and so more detailed comment is precluded. The proposals for 'green bridges' are noted but these must be meaningful wildlife corridors as well as routes for other users if they are to deserve the descriptor. We once again endorse the consultation response of the D&GCF highlighting the importance of adequate, dedicated and integrated NMU provision to support active travel.

Q6 Do you agree or disagree with the proposed measures to reduce the impacts of the project?

Strongly disagree

Q6b. Please let us know the reasons for your response to Q6a and any other views you have on the environmental impacts of the Lower Thames Crossing as set out in the Preliminary

Environmental Information Report, including our approach to assessing and reducing the impacts of the project.

Again, please refer to our comments in response to Q1. This project, as it stands, will be an expensive intervention that will do next to nothing to improve the air-quality problems caused by congestion at the existing Dartford/Thurrock crossings. Furthermore the proposals will have a particularly damaging impact on those important areas of countryside that are an important 'green lung' for the Medway Towns and Gravesend, providing recreation and the opportunity for quiet enjoyment of open spaces which is so important for physical and psychological health. We contend that in this wider area, already identified as the focus for the considerable growth of the Thames Gateway and now the Thames Estuary Growth Commission's proposals for further expansion, the loss of amenity in and around Shorne Woods Country Park and the open landscapes to the north of the Park is a disproportionate sacrifice.

Q7a. Do you support or oppose the proposed area of land we require to build the Lower Thames Crossing?

Strongly oppose

Q7b. Please let us know the reasons for your response to Q7a and any other views you have on the land we require to build the Lower Thames Crossing.

For the avoidance of duplication, our response to Q2 refers to this.

Q8a. Do you support or oppose our proposals for a rest and service area in this location?

No comments on the proposals for a RaSA in this particular area, but in the light of the experience of disruptions caused by Operation Stack in 2015 we recognise the importance of provision of dispersed HGV parking areas throughout the highways network.

Q9a. Do you agree or disagree with the view that the Lower Thames Crossing would improve traffic conditions on the surrounding road network?

Strongly disagree

Q9b. Please let us know the reasons for your response to Q9a and any other views you have on the Lower Thames Crossing's impact on traffic.

Please see our response to Q1: the very limited improvements to congestion at the existing Dartford crossings do not justify the evident harm that will be caused by the construction of a new Lower Thames Crossing.

Furthermore, we do not accept that the negative effects of 'rat-running' on the north-south routes has been adequately predicted or modelled – in particular on the A225, A227, A228, A229 and A249, which are already problematic and will in future be required to serve the extensive housing growth identified in existing and emerging local plans. Weight restrictions, pinch-points and heritage/listed buildings are common features of these routes.

It is already the case that disruption on any one of these north-south routes leads to knock-on congestion on the others. The step-change in traffic generation represented by the Lower Thames Crossing scheme will have wholly unacceptable consequences on these routes.

It is claimed that the Lower Thames Crossing will add resilience to the national roads network in the event of one or more of the existing Dartford crossings being unavailable at

any time. However, it is unclear to us how traffic expecting to divert between the Lower and existing Thames crossings, at least on the Kent side, will be able to achieve this in a timely manner given the existing weight of traffic using the A2 between the Gravesend and Dartford junctions.

Q10 views on charges

No comment

Q11 support/oppose plans for how to build

We note the approach to Tunnel Systems and Safety (approach to Design Construction and Operation section 21.3) but query whether, with a tunnel of this length, may be a case for a central escape tunnel (as provided in the channel tunnel) in the event of major incidents.

Q12 views on utilities and pylons

No comment

Q13 Other comments

We would welcome clarity over the source of funding, since statements made in the consultation guide about the split of public/private funding appear to be at odds with responses to queries at local consultation events that have been fed back to us. This is particularly relevant in the light of the recent announcement made in the 2018 Budget withdrawing Government support for PFI and PF2.