Options for a new Lower Thames crossing

Introduction

This consultation seeks views on the location of a new Lower Thames crossing.

The questions on which the Government is seeking views are set out on the pages that follow. In each case, the Government is interested in your views, as well as any additional evidence that you feel it should consider in reaching its final decisions.

About you

Please provide the following information about you. This information will help us analyse

responses.

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Are you responding on behalf of an organisation?

Yes ~~No~~ If yes, please state your organisation name: Protect Kent (the Kent branch of the CPRE)

What type of organisation is this?

~~Trade Association~~

Environmental organisation

~~Residents group~~

~~Business~~

~~Central Government~~

~~Local Government~~

~~Other (please specify)~~

Which of the following best describes how often you use the existing Dartford-Thurrock Crossing

~~Daily~~

~~Weekly~~

~~Occasionally~~

~~Never~~

Not applicable

Generally, how would you describe the purpose of these journeys?

~~Mostly commuting to and from work~~

~~Mostly business~~

~~Mostly leisure~~

Not applicable

Please provide your response to the consultation questions below.

Question 1. Do you agree that there is a strong case to increase road-based river crossing capacity in the Lower Thames area?

Disagree

Starting from the premise that the Government's actual objective is to relieve congestion at the Dartford Crossing, this consultation exercise is inadequate as it only provides for consideration of the three suggested locations. It does not seek to explore the many ways in which congestion could be alleviated without recourse to expensive additional bridges and tunnels.

We strongly believe that consideration of additional road-based river crossing capacity at this time is premature.

Several factors call into question the urgency of the need for additional capacity:

The impact of high-speed tolling

Vehicles which are forced to slow to a halt and physically pay the toll are a major contributor to the congestion experienced at the pinch points on the Kent side of the existing crossings. Even those vehicles equipped with pre-pay Dart-tags are obliged to come to a halt before the barriers allow them through. In contrast, the drivers of those vehicles paying the London congestion charge through ANPR are provided with a variety of options to pay which do not require them to pause their journey. It is our contention that free-flow tolling would provide a rapid opportunity to increase throughput and reduce delays while other factors are considered.

One option that is open to the DfT, and which would provide useful information on the benefits of free-flow tolling well in advance of its full implementation (assuming that the projected implementation date of autumn 2014 is met) would be to declare a temporary amnesty on the tolls in one or both directions. We recognise the utility of tolling as a demand management measure, but a temporary period of (say) two to four weeks should be long enough to gather useful observational data without encouraging a long-term change in travel habits.

London Gateway/Channel Crossings

The new London Gateway, described as "*the UK's first 21st Century major deep-sea container port and Europe's largest logistics park*", comes into operation later in 2013 and is likely to herald the beginning of major changes in the patterns of freight movement in the south east, which may ease congestion at Dartford but exacerbate it elsewhere on the network.

Demand management

The consultation appears built on the premise of 'business as usual' with regard to the movement of freight by road through the channel crossings, and assumes that growth will continue in line with any growth in the economy. We recognise that at present the movement of driver-accompanied HGVs across the channel is a cheap option for haulage operators, even if the road journey that is resumed is a lengthy one. However, this cheap option does not adequately reflect the external costs of the economic, environmental, structural and social damage caused by traffic which passes through Kent without making any significant contribution as it does so. Incentivising a modal shift away from road-based freight towards rail or water-based transport could be a far cheaper way to manage capacity in the road network than investing in major infrastructure.

We recognise the regeneration needs of the Thames Gateway but would question whether the projected population growth in the area will actually be sustainable, given the environmental constraints of a region already acknowledged to be severely water stressed. It is arguably beyond the remit of this consultation to look at rebalancing of the growth agenda to areas of the UK which are less constrained, and in greater need of economic regeneration, but consideration must be given to future policy changes which may address this.

Modelling

The forecasts of traffic growth upon which this consultation is based appear to be founded on the assumption that not only will population grow, but the number of miles travelled by road *per capita* will too. It assumes that as vehicles become more fuel efficient, the real mileage cost of road based traffic will drop, but does not provide for changes in demands as the result of fluctuating oil process or taxation changes to offset loss of revenue.

The modelling also appears to assume that past rates of growth in car ownership and use will continue; however, there is already evidence that in younger people the proportion of those holding driving licenses is falling.

Finally, we consider that the effect of technology changes on the rate of growth of road-based traffic has not been given adequate consideration. High-speed broadband and the growth of internet shopping will reduce the need to make journeys, and the use of new technologies such as 3-D printing may well transform the need to physically move many goods over long distances.

Junction management

Elsewhere on the M25 – for example near Heathrow Airport, at the junction of the M25 and the M4 – congestion is addressed partly through a degree of separation of through-traffic, which is simply following the M25, and traffic which is joining and leaving the M25. KCC's own research reports indicate that the concentration of junctions around the Kent approach to the Dartford tunnel are an additional source of congestion, as vehicles may need to make extravagant lane changes over a relatively short length of road to reach the correct lane for

their destination and choice of toll booth. We suggest that perhaps some consideration of simplifying the junctions here could be a far cheaper option to smooth the passage of through traffic and greatly reduce the stop-start congestion which is so detrimental to local air quality and public health.

Question 2. Which of the following location options for a new crossing do you prefer?

Not applicable – see above. However, we note that the disproportionate environmental and social costs of Option C and its variant, the widening of the A229 in an area highly constrained by landscape, heritage and biodiversity designations, in comparison with the other options available.

Question 3. Please indicate how important the following factors were in influencing your preference for the location of a new crossing, in answer to Q2. Please mark whether they were very important, important or not important.

Not applicable – see above

Question 4. Is your preference for the location of a new crossing, in answer to Q2, conditional on whether a bridge, bored tunnel or immersed tunnel is provided?

Not strictly relevant; see above. However we note the concerns that many have raised over the impacts of high winds on the existing QE2 bridge, which at times has to be closed for safety. Any bridge further east of the existing Dartford crossing would of necessity need to be longer, presumably higher, and therefore more vulnerable to adverse weather conditions, limiting its usefulness. We note further that the conflicting constraints of pressure for land use, protection of designated areas, food security and sea level rise may have a profound influence on which options remain feasible. The Environment Agency's indicative flood plain maps for the area suggest that as sea-level rise continues the challenges of maintaining the resilience of a bridge or a tunnel in the areas indicated will be severe.

Question 5. Do you wish to add any further comments?

We retain our concerns over the apparent failure to address the need for effective modal shift away from road-based freight which is such a major contributor to the existing crossings. The current consultation is based on the premise that the additional capacity released with the adoption of ANPR tolling will quickly be exhausted as traffic growth continues. However, it does not acknowledge that the additional capacity generated by a third crossing at any of the locations will also be exhausted unless policy measures are taken to appropriately manage demand.

Furthermore, we consider that the consultation does not give adequate consideration to the impacts on the wider road network of the traffic growth that will be induced by a third

crossing. There are occasions when the ferry crossings or the channel tunnel link or both are not operational, and on these occasions the process of Operation Stack is implemented, which brings the M20 to a halt while HGVs destined for the crossings are parked up and other vehicles are diverted off the motorway. The congestion and delays that this causes on the wider road network of the whole county can only be exacerbated by the provision of additional capacity to route road-based freight through Kent.

Furthermore, if the growth of freight traffic through Dover continues to be supported, there are potentially severe consequences for the resilience of the UK economy from concentrating a significant proportion of its goods and freight logistics through the narrow corridor which is afforded by the channel crossings, particularly when these are subject to disruption through factors such as weather which are beyond the operators' control.

The consultation also fails to consider the impacts of induced traffic on the wider road network in Kent and beyond on other modes of transport, such as cycling and public transport.

Finally, we register our regret at the failure to address the growth in road-based freight despite its adverse impacts on CO_2 emission control, its reliance on fossil fuel, its disproportionate damage to the wider road network, and the potential for future policy interventions to make road-based freight bear more of the financial consequences of its social and environmental costs.