

## **DEVELOPMENT CONSENT ORDER - LOWER THAMES CROSSING**

### **DEADLINE 1 - WRITTEN REPRESENTATION**

#### **CPRE ESSEX - IDENTIFICATION NUMBER 20035897**

#### **1. INTRODUCTION**

1.1 CPRE Essex is an independent charity that works closely alongside other branches of the Campaign to Protect Rural England, as well as the national CPRE organisation. We aim to protect the county from inappropriate development, creating a sustainable and attractive future for this very special county. As such, the geographic focus of our comments relate in the main to the northern element of the project.

1.2 CPRE Essex OBJECTS to the proposed Lower Thames Crossing on a number of environmental grounds, believes the project to be fundamentally flawed and questions whether it will deliver the cited benefits.

#### **2. GROUNDS FOR OBJECTION**

2.1 Our main reasons for objecting to the development are summarised under the following five themes:

##### **i) Congestion reduction**

2.2 The original justification for the delivery of the LTC was to relieve congestion and air pollution at the existing Dartford Crossing. However, Thurrock District Council's modelling has revealed that the reduction in traffic at the Dartford Crossing would be as low as 4% at peak times, thereby not satisfactorily addressing the existing problems of congestion, air pollution and delays. Additionally, the project's own model suggests that any advantages to the existing crossing will disappear within fifteen years, thereby raising significant concerns about its long-term viability and sustainability.

2.3 It is incredible that the Port of Dover is not connected by rail. 70% of goods in and out of the Port of Dover use the Dartford Crossing and around 42% of traffic using the Dartford Crossing is goods vehicles. We question, therefore, why the focus of the LTC is predominantly on road freight with no proper consideration given to modal shift and, in particular, rail alternatives.

2.4 Cheaper, better and more sustainable rail improvement alternatives would better serve the ports in the South East through to the Midlands and beyond as well as reducing congestion on the existing road network. There are practical solutions that could be made to get HGV traffic onto rail, which a concerted national transport policy approach could promote and which would actually improve environmental outcomes.

## ii) Induced traffic growth

2.5 It is well documented that new roads generate additional traffic, rather than alleviate congestion. It is concerning, therefore, that the scheme appraisal did not take account of the effect of the road in stimulating car-based development and the resulting likely congestion on the new road and feeder roads arising as a result of additional vehicle movements. We have major concerns that the LTC will encourage increased car dependency and generate induced traffic. At the same time it will cause serious environmental damage, adversely impacting on biodiversity and increasing CO2 emissions which contribute to climate breakdown.

2.6 This contradicts the Government's own target set in the Environment Act 2021 to halt the decline in species abundance by 2030, and the commitment to reach net zero by 2050, including a pathway that requires 78% reduction in emissions by 2035.

2.7 New roads should be considered only as a last resort and as part of a sustainable transport strategy, which should be strategically planned and fully integrated with conservation objectives and the land use planning process. This should prioritise environmentally sensitive maintenance and improvement of the current road network over new road schemes. Fundamentally, it should seek to reduce the need to travel and minimise dependency on private vehicle use in order to reduce traffic levels, fuel consumption and vehicle emissions.

## iii) Climate impacts

2.8 The construction and subsequent use of the scheme will have a significant carbon impact, increasing CO2 emissions, which contribute to climate breakdown. Air pollution levels at junction interchanges are likely to be particularly high in peak times resulting from congestion issues.

2.9 Last month's Climate Change Committee (CCC) report has called for an urgent and systematic review of all current and future road building in England in order for the government to meet its own carbon budget delivery plan. This highlighted the importance of coherence across Government decisions, that issues need dealing with now, and we cannot be locking in problems now that will make it harder to solve the issues in the long term. We agree and call for an urgent review into current and future road building and that all projects should, at the very least, be paused immediately until such a review has taken place. It is essential that this happens now and that no further road projects are progressed in the meantime.

2.10 Evidence shows that new road projects are not conducive to a sustainable future and we contend that it's now urgently important that transport policy must reflect the climate and ecological emergencies and incentivise lower carbon forms of transport. Hugely destructive and harmful projects - like the proposed LTC - are not sustainable. Rather, promoting a modal shift is critical for a sustainable future.

#### iv) Damage to habitats and wildlife

2.11 Overall, the new road will have a serious detrimental impact on the south Essex landscape. The project will cause considerable harm, impacting visually (eg the intrusion of major new infrastructure and road lighting) and physically (eg pollution and noise). Serious impact on biodiversity will result from the loss or damage to important habitats (which include designated Local Wildlife Sites) and fragmentation of the habitats that remain, with accompanying impacts on protected and priority species (including ancient woodlands).

2.12 We note that Natural England is progressing the case for a SSSI notification in the Tilbury area and that if the SSSI is notified, the Environmental Statement may need to be updated to reflect any additional impacts and mitigation measures required.

#### v) Impact on Green Belt and loss of BMV agricultural land

2.13 The whole route of the new road is located in the Metropolitan Green Belt. This is particularly disconcerting north of the Thames, given the high proportion of the proposed route that is situated in Essex and the subsequent development pressures that a new road of this type might encourage.

2.14 This project seriously undermines the concept and level of protection normally afforded by Green Belt designation. The NPPF establishes a general presumption against inappropriate development the Green Belt, unless there are very special circumstances. The applicant's case for the "special circumstances" is heavily based on the project's strategic objective of reducing congestion at the Dartford Crossing - however, the longer term likelihood of this is in doubt. It's clear to us, therefore, that far more attention to route selection decisions should have been given to avoiding inappropriate development in the Green Belt.

2.15 Associated to this, the loss of considerable swathes of Best and Most Versatile agricultural land is another key concern. In a time of high food price inflation, food shortages and a greater need for food security, the continuing and rapid loss of high grade farmland at a national and local level does not make any sense and requires more stringent control.

### 3. CONCLUSION

3.1 Based on our current understanding of the proposals, CPRE Essex objects to the scheme on a number of grounds and considers the range of negative impacts firmly outweigh its potential benefits.

3.2 CPRE Essex reserves the right to expand or amend its views in the light of additional information provided by the applicant or other Interested Parties.



The countryside charity  
Essex