

THAMES CROSSING ACTION GROUP

www.thamescrossingactiongroup.com

Mode shift grants review

Introduction

Thames Crossing Action Group (TCAG) represent thousands of people who are opposed to the hugely destructive and harmful, not fit for purpose £10bn+++ proposed Lower Thames Crossing (LTC). More info on us and our concerns and issues with the proposed LTC can be found on our website www.thamescrossingactiongroup.com.

This representation was prepared and submitted by Laura Blake, Chair of TCAG on behalf of the group in response to the call for evidence on the Mode Shift Grants Review¹. TCAG can be contacted via email – admin@thamescrossingactiongroup.com.

As a group we do not have any first-hand experience of using a Mode Shift Grant. However, due to our extensive research and work in regard to the proposed LTC we do feel we have valid evidence that is relevant to this call for evidence, which we hope you will find of interest and helpful.

Evidence

The supporting documentation for this call for evidence states that 89.5% of the award by flow type in 2022/23 was for Intermodal (such as containers to or from ports (onto rail)).

Our concern is that for grants for modal shift are important, if the infrastructure is not in place to support the modal shift how much value do the grants truly hold?

For example, 70% of goods in and out of the Port of Dover currently use the Dartford Crossing (road). National Highways have said that around 42% of vehicles using the Dartford Crossing are goods vehicles. Yet the Port of Dover is not connected by rail.

So for a company looking to make the modal shift from road to rail in the South East a grant is of little, if any, real value.

In 2019 21% of the total traffic using the Dartford Crossing during DartCharge chargeable hours were HGVs (Reference 4.2.62)² This was more than double what is typically seen on

¹ https://www.gov.uk/government/calls-for-evidence/mode-shift-grants-review?trk=public_post_comment-text

² <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001291-7.1%20Need%20for%20the%20Project.pdf>

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other routes in the SRN. Obviously, this doesn't include HGVs that travelled outside of the chargeable hours either.

National Highways predict that if the proposed LTC goes ahead 34% of HGVs using the Dartford Crossing would instead use the LTC. (Reference 5.2.25)³ This is stated for an opening year of 2030, which has since been delayed due to the 2 year delay rephasing announced by Government.

They also predict that approximately 13% of all vehicles using the LTC in an opening year of 2030, would be HGVs. (Reference 5.2.25)⁴ Again remembering that the opening year has since been delayed by 2 years. 13% is again more than the average 10% on the SRN.

The DfT were assessing a new river crossing to the east of London in 2009⁵. In a 2011 Government statement⁶, it was stated in regard to strategic rail freight interchanges that: "Rail can deliver goods quickly, efficiently and reliably and help reduce both congestion on our roads and levels of carbon emissions. To secure this longer-term growth and modal shift, rail needs to be able to compete effectively with the use of road by heavy goods vehicles, and it is significant that in recent years our major retailers have been keen to choose rail over road for the long distance carriage of goods to market. However, this expansion in rail freight will be very difficult to deliver unless the industry is able to develop modern distribution centres linked into both the rail and trunk road system - 'Strategic Rail Freight Interchanges' (SRFI) - in appropriate locations to serve our major conurbations. To date, this has proved extremely problematical, especially in the south east where growing demand and increasing congestion on the road network are creating serious logistical challenges."

Yet there hasn't been adequate consideration of rail alternatives to the proposed LTC road project, despite there being rail improvements between Ashford and Reading that would negate the need for the proposed LTC. So long as more roads are built, induced demand will see congestion continue to rise. We need to ensure that modal shift and alternatives are properly and fully considered.

We believe any consideration of rail alternatives have focused on cross river options, going through an already over capacity London rail network, rather than a London orbital as Ashford to Reading would be.

³ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001291-7.1%20Need%20for%20the%20Project.pdf>

⁴ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001291-7.1%20Need%20for%20the%20Project.pdf>

⁵ <https://webarchive.nationalarchives.gov.uk/ukgwa/20100513123749/http://www.dft.gov.uk/about/strategy/capacityrequirements/dartfordrivercrossing/>

⁶ <https://www.gov.uk/government/speeches/strategic-rail-freight-interchanges>

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Kent County Council have included such rail improvements in their rail strategy⁷, and is also supported by Transport for South East (TfSE). The strategy comments about Network Rail providing rail analysis to support the studies it was working on with TfSE.

Alistair Lenczner (who has been billed as one of the UK's most eminent civil and structural engineers) at first called for the LTC to incorporate rail⁸, and has since gone on to say the rail improvements outlined above would negate the need for the proposed LTC⁹. And he is not alone, Greengauge¹⁰ have also called for the proposed LTC to be scrapped in favour of rail improvements¹¹.

It is quite apparent that rail improvements would enable a modal shift from road freight to more sustainable rail freight. The cost of such rail improvements is estimated to be less than half of what the proposed LTC is predicted to cost, should it go ahead.

Additionally, the proposed LTC offers no provision for cross river active travel, and would not be viable for public transport due to the lack of adequate connections. So not only would this hugely destructive and harmful, not fit for purpose project, not offer modal shift for freight neither would it offer any modal shift options for other users.

⁷ https://www.kent.gov.uk/_data/assets/pdf_file/0014/13811/Kent-Rail-Strategy.pdf

⁸ <https://www.newcivilengineer.com/latest/lower-thames-crossing-should-be-multi-purpose-and-include-a-railway-14-12-2020/>

⁹

<https://www.railfuture.org.uk/Kent?highlight=lower+thames+crossing#:~:text=Ashford%20to%20Reading%20rail%20route%20can%20benefit%20Gatwick%20and%20avoid%20the%20need%20for%20a%20new%20Lower%20Thames%20Crossing>

¹⁰ <http://www.greengauge21.net/>

¹¹ <https://www.transportextra.com/publications/local-transport-today/news/65645/rethink-mids-and-north-rail-plans--greengauge>

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Conclusion

In the documentation for this review you state, *"By encouraging freight companies and customers to explore alternative transportation methods, the government aims to reduce road congestion, decrease carbon emissions and create a more sustainable and resilient freight network that benefits both the economy and the environment."*

Whilst we agree that modal shift is necessary and important, particularly for environmental and health reasons, we do not feel that Government are following through with actions to back up this ambition.

Around £20 million per year being spent on encouraging and support modal shift for freight is being greatly overshadowed by the billions of pounds being spent on more and more hugely destructive and harmful road projects, most (if not all) being unfit for purpose.

The DfT/Government should reduce the amount of investment into roads, and instead invest in better, more sustainable alternatives that support modal shift. For example, scrapping the proposed £10bn+ Lower Thames Crossing and investing in rail improvements between Ashford and Reading. Taking more freight off the roads and onto more sustainable rail.

It is counterintuitive to have grants to encourage and support modal shift if Government are focusing on road investment to the extent that other transport options are not properly and adequately being considered and invested in. After all, a grant to a company looking to move their freight from road to rail is worthless if there is not adequate rail connectivity to accommodate the rail freight.

We thank you for the opportunity to submit our evidence, and would be more than happy to discuss further should you wish. Thank you.