



Matter 8 – Transport and Infrastructure

Issue: Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to transport and infrastructure

- 1.1** We will consider **MIQ's 121 to 132** collectively in so much as they relate to **policy S2** and infrastructure planning for both the local and strategic highway network.
- 1.2** As set out within our detailed representations, we strongly object to the notion that opportunities to achieve highway and junction upgrades should be “maximised” as would be the outcome the current wording of Policy S2 paragraph c). We have referenced the CPRE report *The end of the road? Challenging the road building consensus*, which clearly evidences that building new roads simply lead to further environmental damage, which is then exacerbated by induced travel. It therefore remains our view that a policy which seeks to maximise further highway and junction upgrades, placing such on a parity with upgrades to more sustainable modes of travel such as rail and bus, is at odds with the NPPF Policies on promoting sustainable transport and therefore not sound.
- 1.3** It is also the case that, for the above reasons, CPRE Kent fundamentally disagree with the Lower Thames Crossing proposal and so are disappointed with the Council's continued support of this project. That is, we are of the view that providing additional capacity at either the currently proposed location or at the existing Dartford Crossing will have an unacceptable impact on the Borough in terms of longer-term induced traffic growth, congestion and reductions in air quality. We are seriously concerned the current wording of Policy S2 will be used as a policy hook to justify the default position of yet further road building within Dartford that will inevitably rise from the Lower Thames Crossing project ahead of, and instead of, consideration of alternative sustainable transport solutions.
- 1.4** We therefore suggested alternative wording should be used which recognises new road building will be regarded as the option of last resort and that all other possible alternatives, including non-road-building options and making more efficient use of existing infrastructure, should be considered first. That is, we would expect to see a hierarchical approach being taken which puts active travel first, then prioritises all means of public transport above any further encouragement of private car dependency.
- 1.5** Disappointedly, we have reviewed both the Council's consultation statement and proposed modifications though cannot see where or if this concern has been considered. Additionally, and for the avoidance of doubt, we do not consider the wording of Policy M16 (Travel Management) nor Policy M17 (Active Travel, Access and Parking) overcome this issue as it is the strategic policy SP2 which needs amending.

1.6 To assist the examination, alternative wording which may help alleviate our concern could be along the lines of:

Opportunities to achieve sustainable transport upgrades will be maximised. This includes promoting:

a) New and improved rail services and replacement or enhanced train stations.

b) New and improved Fastrack and other bus services/ routes, including addressing non-dedicated sections of Fastrack routes which are vulnerable to general traffic congestion and bus priority at junctions where possible.

~~**c) Further highway and junction upgrades. Additional investment will be supported, dependent on further assessment by Highways England, Kent County Council, Dartford Borough Council and partners.**~~

c) Use of rivers for the sustainable transport of goods and passengers as part of proposals for strategic scale development.

Further highway and junction upgrades will only be supported if its demonstrated no sustainable alternative is possible, including non-road-building options and making more efficient use of existing infrastructure.

1.7 In addition to the above and specific to MIQ 130 and 131, CPRE Kent remain unconvinced that the full impact of the proposed Lower Thames Crossing proposal on Dartford's local and strategic highway network, in combination with this plan's growth, has being fully accounted for.

1.8 Specifically, CPRE Kent raised the very serious issue with National Highways as to extent to which proposed allocations within Local Plans were being considered within the current traffic model. We were advised that the current model does not include the traffic movements generated from housing allocations of less than 200 units and that housing allocations within emerging local plans lacked the sufficient level of certainty to be included In the National Highway model at this time.

1.9 Whilst we will continue to challenge National Highways on this issue, the simple point is that if National Highways is not to be considering the full impact of this plan's growth at this time, it must then fall to Dartford to be fully considering the in-combination impacts of the Lower Thames crossing. Unfortunately, we cannot see that this has occurred and are therefore concerned necessary mitigation measures may be being missed. Accordingly, we welcome that this issue is to be explored further at the examination.