



Highways England
Lower Thames Crossing Consultation

By email to: ltcc@ipsos.com

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23 March 2016

Dear Sirs

Please find attached the Thames Gateway Kent Partnership's response to Highways England's consultation on the route of the Lower Thames Crossing.

The content of this attachment mirrors our online response also submitted today, but presented in a different format to highlight our key recommendations to Highways England, supported by commentary and other observations.

We are, as always, happy to discuss any aspect of our response where that would be helpful.

Kind regards

A handwritten signature in black ink, appearing to read 'Rob Bennett', with a long horizontal flourish at the end.

Rob Bennett
Chairman, Thames Gateway Kent Partnership

**HIGHWAYS ENGLAND CONSULTATION ON PROPOSALS FOR A LOWER THAMES CROSSING:
RESPONSE FROM THE THAMES GATEWAY KENT PARTNERSHIP**

1. Q1-4: About this organisation, and summary of our response

- 1.1 The Thames Gateway Kent Partnership (TGKP) is a strategic public-private partnership spanning the Kent portion of the Thames Gateway, and since 2001 has existed to promote the sustainable economic-led growth and regeneration of North Kent. Our Partnership Board comprises the Leaders or Portfolio-Holders from Dartford, Gravesham and Swale borough councils, Medway Council (unitary), Kent County Council and representatives from the Ebbsfleet Development Corporation, private sector business, further and higher education, the Environment Agency and Homes and Communities Agency, and a Member of Parliament (Rehman Chisti MP).
- 1.2 North Kent is home to an estimated 623,000 people including the largest conurbation (Medway) in the South East outside London. It straddles the A2/M2 corridor between London and Dover, and includes the entirety of the M2 motorway, the area served by Junctions 1 and 2 of the M25 as well as being the location of the existing A282 Thames crossing at Dartford.
- 1.3 North Kent, and the Thames Gateway more generally, is crucial to supporting London's role as a global city and continues to offer huge opportunity for growth in terms of homes, jobs and Gross Value Added (GVA) for the UK economy. In the period to 2031, North Kent is anticipating growth of 58,600 homes, 115,400 population and 59,100 jobs¹. The area includes the Government's flagship Ebbsfleet Garden City, and is the location for the proposed London Paramount Entertainment Resort at the Swanscombe Peninsula which could itself generate over 25,000 direct and indirect jobs.
- 1.4 The Lower Thames Crossing is therefore of critical importance to this Partnership, to the people and businesses of North Kent, and the prosperity of the Thames Gateway more generally. Highways England's consultation documents catalogue the problems of congestion caused by the existing overloaded Dartford Crossing. But these barely scratch the surface of the consequential damage that congestion at the Dartford Crossing causes to local as well as strategic road networks, to business efficiency across a wide area, to the health and safety of residents, especially in Dartford, and to the reputation of North Kent as a destination for investment. A solution to the problems associated with the existing Crossing is therefore vital if our Partnership's objectives for North Kent, and Government ambitions for the Thames Gateway, are to be achieved.
- 1.5 The Thames Crossing is not simply a local or regional matter, however. The A2/M2 corridor, together with the A20/M20/M26 corridor to the south, is the artery that connects most of the UK to the Channel Ports and continental Europe. The economies of the North, East and Midlands in particular depend heavily upon connectivity to the Channel Ports via the current Dartford Crossing. We entirely concur with Highways England that the existing Crossing is overloaded and lacks the resilience required on the strategic roads network. The Thames Crossing is therefore a matter of national importance, and investment in an effective solution needs to be a matter of national priority.
- 1.6 As our responses to the consultation questions explain in more detail, it is not enough to look at the Lower Thames Crossing in isolation. Holistic solutions are needed to ensure

¹ Source: Kent & Medway Growth and Infrastructure Framework, September 2015

that the entire strategic corridor from the Channel Ports to the M25 can perform at the level proposed for the new Crossing. Otherwise, the problems of congestion and lack of resilience will simply migrate to the next weakest point on the network. We would therefore argue strongly that investment in the Lower Thames Crossing should be complemented by a package of other investments on the A2/M2 and M20 corridors to be completed within the same timetable as delivery of the Crossing. These include upgrading Junction 7 of the M2, dualling the remaining single-carriageway sections of the A2 north of Dover, upgrading Junction 5 of the M2/A249 and upgrading the A229 that links the M20 and M2, including Junction 7 of the M20 and Junction 3 of the M2.

- 1.7 In summary, we welcome this consultation and absolutely concur about the need for a new Thames Crossing, as a national priority infrastructure investment, to alleviate the congestion at the existing Crossing, to improve the resilience of the strategic roads network, and to enhance the connectivity between the Channel Ports and the economies of London, Eastern England, the Midlands and the North. The majority view of our Partnership is strongly in support of a crossing at Location C; we acknowledge that our partner Gravesham Borough Council does not support this view. In delivering the new Crossing, it is essential that the environmental and social disbenefits of the scheme are minimised and mitigated as far as possible and that those areas that bear the residual social and environmental costs also enjoy the economic and growth-related benefits that the scheme could offer.**

Crossing location

- 2. Q5: On balance, do you agree or disagree with our proposal for the location of a crossing, at Location C?**
- 2.1 *The majority view of this Partnership is firmly in support of Highways England's proposal for a crossing at Location C, therefore we Strongly Agree.***
- 2.2 In an ideal world, a state-of-the-art bridge or tunnel already provided at the existing Crossing location – instead of the existing restricted tunnels – would obviate some but not all of the problems associated with the existing Crossing. But it would not ultimately provide sufficient capacity to accommodate and support growth, nor improve network resilience and connectivity to the Channel Ports. Equally, a new Crossing at Option A (Route 1) would still bear those deficiencies; the M25/A282 northbound approach roads would not have the capacity to utilise increased crossing capacity in full; the route would bring very limited regeneration benefits; it would offer no relief to the traffic pressures along the A2 between the M25 and the M2; and it would exacerbate further the local congestion and negative health impacts for residents and businesses in Dartford. ***As a Partnership we would not favour Option A.***
- 2.3 In stating our support for a crossing at location C, we acknowledge the minority view expressed by Gravesham Borough Council, which does not support the current proposals for location C. We share a number of Gravesham's concerns about the content and quality of evidence presented in support of the published analysis. We all recognise that the negative community and environmental impacts of the proposed crossing fall, south of the river, almost entirely upon Gravesham. ***As a Partnership we therefore strongly urge Highways England to explore, with local stakeholders, adjustments to the proposals that will further minimise and mitigate the adverse impacts of the crossing on communities, the environment and ecology of the affected area. At the same time, further examination is needed into ways to maximise the potential economic benefits to residents and businesses in Gravesham and North Kent more generally.***

Routes north of the river

3. Q6: There are three route options north of the river in Essex – Routes 2, 3 and 4. Where do you think the route should be located north of the river?

Don't Know

Q7: Thinking about the three route options north of the river, on balance do you agree or disagree with our proposal for each of these?

Routes 2 & 4 - Neither agree nor disagree;

Route 3 – Tend to agree

- 3.1 On the basis of the evidence presented we have no reason to disagree with Highways England's preference for Route 3 north of the river. However, as the route options north of the river are entirely outside the Partnership's geographic remit, ***we consider it appropriate to defer to the views expressed by our counterparts and stakeholders in Essex, Thurrock and the Growth Partnership for Thames Gateway South Essex. We would encourage Highways England to give weight to any views expressed by North Kent businesses in response to this question.***

Routes south of the river

4. Q8: There are two route options south of the river in Kent – the Western Southern Link and the Eastern Southern Link. Where do you think the route should be located south of the river?

Don't know

Q9: Thinking about the two route options south of the river, on balance do you agree or disagree with our proposal for each of these?

Both WSL and ESL: neither agree nor disagree

- 4.1 ***At this stage we do not consider that Highways England has provided sufficient information, nor carried out sufficient analysis, to enable a decision to be made between the Western Southern Link (WSL) or Eastern Southern Link (ESL). More work needs to be done and evidence presented, in consultation with local stakeholders, on the implications on strategic and local roads networks, including the A2, A289, A228 and A226, on the economic impacts of the different options and on further measures that might be taken through revised proposals to mitigate and minimise the adverse impacts on local communities, especially at Shorne, Thong and Higham, and environmental, ecological and heritage assets.***
- 4.2 Our vision, as Thames Gateway Kent Partnership, includes the aspiration that North Kent will be recognised as *"An area of exciting towns and cities complemented by an outstanding natural environment, providing an exemplar of urban regeneration"*². Modern infrastructure investments, particularly to support regeneration and growth, may inevitably carry some environmental disbenefits but also, in some cases, provide opportunities for environmental enhancement. The A3 Hindhead Tunnel is an example of the latter.
- 4.3 It is evident from the Appraisal Conclusions and Recommendations (Vol 7 and Section 12 Appendices) and the Environmental Appraisal (Vol 6) that across the majority of

² TGKP Plan for Growth 2014-20 – Summary Brochure, page 3.

environmental indicators – biodiversity, historic environment, landscape/townscape and the water environment – the present proposals would not deliver any element of environmental enhancement. On the contrary, the impacts for Route 3 range from moderate to very large adverse impact. The exceptions are for noise, where the scheme is expected to deliver relatively modest overall levels of relief from the annoyance of noise intrusion, with gains in Dartford partially offset by negative impacts in Gravesham, and air quality where welcome improvements in Dartford would be at least partially offset by deteriorating air quality in Gravesham, not only along the route but potentially across local feeder networks such as the A226 and A289.

- 4.4 The consultation documents acknowledge the environmental assets in North Kent potentially affected by the proposals, including the Kent Downs AONB, Claylane Wood ancient woodland, Shorne and Ashenbank Woods SSSI, Shorne Woods Country Park, Cobham Park Registered Park and Garden as well as a number of listed buildings. Both the proposed WSL and ESL would have adverse impacts, ranging from moderate to very large, on one or more of these assets. The new proposals are a considerable improvement upon the indicative route proposed in previous (2013) consultations, and effort has clearly been made to reduce the potential impacts upon environmental assets. ***Nonetheless, in refining their proposals we would be looking to Highways England to explore further means by which, through adjustments to the route configuration, adverse impacts on the environmental assets above could be avoided and opportunities for environmental enhancement introduced.***
- 4.5 The consultation documents appear to give relatively little weight to the fact that location C would, in its entirety north and south of the river, run through Green Belt. This is referenced in Vol 2 (Introduction and Existing Conditions – Planning Policy) in the context of *local* planning policy; but protection of Green Belts is clearly given significant weight in national planning policy. For there to be “very special circumstances” justifying inappropriate development a number of tests would need to be satisfied and it is not clear from the analysis presented that those tests and the implications of the Green Belt have been consistently and rigorously considered. ***We would expect Highways England to do further post-consultation analysis, engaging with local stakeholders, on the implications for the Green Belt and on measures to ensure that the objectives of maintaining openness and preventing urban sprawl can be delivered .***
- 4.6 Similarly, and perhaps more significantly, the area’s foremost ecological assets – the Thames Estuary and Marshes Ramsar and SPA sites – demand a very high level of protection as internationally important wildlife habitats. ***The proposal for a bored tunnel at Option C is welcomed and supported as the only viable solution to minimise adverse impacts on these sites.*** However, as with Green Belt, various tests must be satisfied before development potentially affecting Ramsar Sites and SPAs can be countenanced, as specified in the EC Habitats Directive (as referenced in Vol 2 – Introduction and Existing Conditions). The evidence presented in the consultation documents does not yet comprise the detailed assessment required to fulfil the regulatory requirements. ***We would expect Highways England to conduct the detailed assessment required to comply with The Conservation (Natural Habitats, &c.) Regulations 1994 and subsequent measures so to inform any scheme alterations that might be required.***
- 4.7 A critical issue relating to the choice of WSL or ESL is how it connects both to the strategic and local roads networks. There is insufficient evidence presented in the consultation documents as to the possible traffic and capacity implications for the A226, A228, A289 and A2 (eastwards from M2 Junction 1). For example, in Vol 5 (Traffic and

Economics Appraisal), paragraph 4.6.8 states “*We expect that the traffic flows as a result of the route options could be accommodated by the existing road infrastructure*”.

However, the traffic forecasts for selected roads including the A226 and A289 (Vol 5: tables 4.5 and 4.6) show significantly increased annual average daily traffic (AADT) without any exposition of analysis showing whether such increases can be accommodated without detriment to local networks. The ESL does not, for instance, enable Medway’s traffic to access the crossing from the A289 at M2 junction 1. This would have a major impact on connectivity to Medway and also pose an unacceptable risk of overloading the surrounding routes from the M2, M20, A226, A289, A228 and A249. This would also increase the risk of congestion to intolerable levels through Strood, Chatham and Rochester town centres, all of which are already close to capacity.

- 4.8 ***Further analysis and modelling should therefore be undertaken in consultation with local partners to clarify the differential impacts of WSL and ESL on local transport networks and any engineering or other improvements that might be required.*** (Further comments about the proposed A226 junction are given in response to Q11 below.)
- 4.9 On the evidence presented, the ESL appears to offer questionable operational advantages over the WSL but significantly worse environmental impacts. The economic arguments seem almost entirely based on estimated shorter journey times for predominantly west-bound traffic: these are not wholly convincing. For instance, Vol 5 paragraph 5.6.6 (examining wider economic impacts) argues that the ESL’s design “*improves connectivity with London compared to WSL*”, whereas we would suggest that connectivity with London would be essentially neutral between the ESL and WSL options.
- 4.10 Appendix 5.2 to Vol 5 (Traffic and Economics Appraisal) sets out the reasons why Highways England has not factored London Paramount Entertainment Resort into the V2 traffic model that has informed this consultation. We understand that closer dialogue has now been established between Highways England and London Resort Company Holdings, and it is clearly vital that modelling assumptions and information should be shared as a matter of urgency. ***We would suggest that if London Paramount goes ahead, of the southern Option C routes it would be better served by the WSL rather than the ESL.***
- 4.11 The consultation documents place considerable emphasis on the need for reduced speeds to negotiate sharper road curvatures at the WSL, whereas ESL could allow “*a motorway-to-motorway connection between the M2 and the M25 with a high quality 70mph road throughout its entire length*” (paragraph 2.10.3 of the Summary Business Case). However, paragraph 5.3.26 of Vol 3 (Identification and Description of Shortlisted Routes) states that only one of the ESL slip roads would have a design speed of 70mph with the others as low as 50mph, so the references to a 70mph road throughout are somewhat misleading. In relation to WSL, further adjustments to the alignment of the A2 and design modifications to avoid encroachment on environmental assets at WSL might permit a more generous geometry than the present illustrative design and thus the achievement of higher speeds than the 30-40mph restriction currently envisaged. This would alter the assessed differentials between ESL and WSL.
- 4.12 This touches on a wider issue of sensitivity testing what the effects on all aspects of the proposal might be were the maximum speed for the tunnel and its approach roads to be set below 70mph (e.g. 60mph or 50mph). A lower speed limit would help in the achievement of improved outcomes regarding noise, air quality, carbon emissions, maintenance costs and safety amongst other factors; it might also assist in the post-consultation consideration of the options for providing for non-motorised users. ***We***

suggest that additional sensitivity testing based on different road speed scenarios be carried out.

The proposed scheme

5. **Q10: Having evaluated the options, our proposed scheme is a new bored tunnel road crossing at Location C, following Route 3 north of the river and the Eastern Southern Link south of the river. On balance, do you agree or disagree with our proposed scheme?**

Tend to agree

- 5.1 As indicated above (Q6), we defer to our counterparts on the Essex side of the Thames regarding the relative merits of the three options. ***That said, the majority view of our Partnership is in support of Route 3 and with a bored tunnel for the estuarial crossing itself, subject to the observations in response to Q8 above.***
- 5.2 ***Our initial view is not to agree with Highways England's preference for the Eastern Southern Link.*** As indicated above, before a final decision can be taken between the Western or Eastern Southern Link, or an alternative option, we consider more information and analysis are needed on the implications of the options across strategic and local road networks, and on the differential economic, environmental, ecological, heritage and community impacts. In any event, whichever option is ultimately preferred, further modifications to the scheme design should be explored to minimise the adverse environmental, ecological, heritage and community impacts.
- 5.3 ***We support the proposal for a twin bore tunnel and link roads subject to confirmation that this design is sufficiently future-proofed to accommodate forecast traffic growth and takes proper account of planned growth in the Thames Gateway and in the South East more generally, including London Paramount.*** It is likely to be more cost-effective to build to a standard that exceeds current forecasts (i.e. a dual 3 lane crossing) than to provide additional capacity at a later date. We note from Vol 5 (Traffic and Economics Appraisal, paragraph 4.7.4 and table 4.9) that by 2041 both the existing crossing and the new crossing at location C would be carrying forecast traffic flows that appear to exceed their design capacity. We also note that paragraph A5.2.1.5 states, "*Based on the above qualitative assessment the inclusion of Paramount within V2 [modelling] might indicate that a dual-3 lane crossing is needed at Option A or Option C... and require a more detailed network-wide assessment of what supporting schemes are required to maintain network performance and the extent to which LPER [London Paramount Entertainment Resort] should provide developer contributions*". An investment such as the new Crossing is a once-in-several-generations scheme and it would clearly be a false economy to create an infrastructure asset that would not be fit for purpose within 15 or fewer years of opening. ***We would strongly urge Highways England to work closely with London Resort Company Holdings, Ebbsfleet Development Corporation and other stakeholders to ensure that a comprehensive understanding of the likely highways impacts of LPER and Ebbsfleet Garden City is factored into the final proposals for the Crossing and associated network improvements.***
- 5.4 To the extent that socio-economic trends within Kent and Medway itself affect the modelling, the evidence used in Highways England's analysis needs to be updated to include, amongst other documents, the Kent & Medway Growth and Infrastructure Framework which forecasts growth in population, homes and jobs and the associated infrastructure required to support that growth up to 2031. At present the socio-economic analysis appears not to look beyond 2020 (e.g. in Chapter 7 of Vol 2).
- 5.5 It is also crucial that the Lower Thames Crossing offers sufficient resilience, in the event of closures at the Dartford Crossing, to accommodate diverted traffic without crippling

the local roads network akin to the present experience around Dartford. The network of roads carrying traffic around North Kent and feeding traffic onto the existing crossing is complex and includes the M20, A227, A228, A229, B262, A206, B255, A226, A289, as well as the M25 and A2/M2. Several of these roads already operate at capacity, for instance the A228 and A229 and their associated junctions with the M20 and M2. ***The implications for this wider network need to be well understood, including in scenarios where the existing Dartford Crossing is closed or severely restricted, as part of the detailed modelling and assessment informing the final design proposals.***

Junctions

6. Q11: We would welcome any comments you may have on our proposals for junctions.

- 6.1 We offer further comments below (7.6) on the need to upgrade other junctions on the strategic roads network to ensure that the congestion the new Crossing is intended to relieve is not pushed elsewhere in Kent and Medway. ***There does not appear to be a strong case for any additional junctions south of the river beyond the A226 junction already under consideration.***
- 6.2 The proposed junction with the A226 just south of the tunnel entrance would potentially enable Gravesham and Medway to secure broad economic benefits from the new crossing. Realising such economic opportunities would depend upon a significant range of other, primarily local, decisions including Local Plan revisions to land-use allocations to the east of Gravesend. These have the potential to be locally contentious, including review of the Green Belt boundary. The WSL option offers the potential to create a new clear development boundary to the east of Gravesend that would limit urban expansion. This could provide for new land allocations for commercial, residential and mixed-use development creating homes, jobs and wealth-generating opportunities. Without such land releases, the potential economic benefits for Gravesham would be more limited.
- 6.3 For Medway, Option C provides potential for better connectivity to the strategic road network, particularly in the west of the local authority's area. However, that potential would be limited if the Eastern Southern Link were chosen because of the lack of direct connection to the A289. For both Gravesham and Medway, the socio-economic and transport implications of the proposed junction on the A226 need to be explored more fully, including the impact on the A226 itself both to the west and east of the junction and onto the A289, especially for the ESL option. More detailed evidence and work is needed to model the impacts and scope the engineering improvements that would be needed to both the A226 and A289 to enable the junctions to operate effectively – both in normal operation and emergency situations (e.g. tunnel closures) – without detriment to local road networks.
- 6.4 ***We should therefore like to see further engagement between Highways England and local stakeholders, notably Kent CC and Medway Council as highways authorities and with Gravesham BC and Medway as local planning authorities, to explore the socio-economic and traffic implications for both strategic and local networks, of a junction on the A226.***

Any other comments

7. Q12 We would welcome any other comments you may have on our proposals

The need for a new Crossing

- 7.1 The consultation document sets out clearly the reasons why a new crossing is needed, and we fully support the reasons put forward in the consultation document.
- 7.2 The socio-economic cost of congestion at the existing crossing has been immensely damaging to North Kent, and particularly to residents and businesses in Dartford. Vol 5 (paragraphs 4.9.6-7) give one example of how an incident at the tunnel approaches affected an area of 425 square kilometres and that 20,000 hours were lost in delay to drivers. However, that does not even begin to account for the delays to drivers on local road networks grid-locked by the incident at the crossing, and the consequential costs to businesses. Moreover, this is not an isolated example but, in varying degrees of severity, an almost daily occurrence. The impact on Dartford town centre is an impediment to productivity and regeneration, and the poor air quality resulting from congestion-related pollution has negative impacts on residents' health as well as the drivers caught up in it.
- 7.3 Relieving congestion at Dartford, enabling the M25-A282 to be genuinely free-flowing, will greatly benefit productivity and business growth that is currently constrained. The significant development underway at Ebbsfleet, coupled with the London Paramount proposals, will rely heavily on the A2 between Dartford and Gravesham. Re-routing traffic from the Channel Ports destined for the North, East and Midlands away from the A2, via Option C, will complement investments in improving the Bean and Ebbsfleet junctions and help ensure those investments provide sustainable solutions to the additional capacity required in that location.
- 7.4 We note that Highways England propose to refresh the traffic model post-consultation. It is crucial that revised modelling takes account of the most up to date information, bearing in mind that the present forecasts are based on 2001 data last refreshed at a time of recession in 2009. It is also important that revised forecasts and modelling take account of the expansion of the Port of Dover and planned-for growth in HGV traffic through the Channel Ports, as well as developments including the proposed London Paramount Entertainment Resort. ***It seems likely that revised forecasts will show higher traffic volumes in the period to 2021, reinforcing still further the need for an additional Thames Crossing on the strategic roads network.***
- 7.5 One issue that the proposals for Option C of themselves do not address is the incidence of delays at the Dartford Crossing caused by the operation of the Traffic Management Cell (TMC), for extracting over-height vehicles or escorting hazardous loads. The number of such interventions should reduce in relation to HGVs originating east of Gravesend, but over-height or hazardous load HGVs using the northbound M25 would continue to be subject to the TMC unless diverted at A2 junction 2 towards the new Crossing. Removing the need for TMC operations in all but the most exceptional circumstances would greatly improve traffic flow and capacity on the Dartford Crossing post the opening of the new Crossing. Whilst re-routing northbound over-height and hazardous load HGVs via the new Crossing would add mileage for those users, the effect on overall journey time might be neutral when account is taken of delays caused by the operation of the TMC both for these vehicles and all other northbound traffic on the M25-A282. ***We suggest that Highways England should look at the costs and benefits of routing north-bound over-height and hazardous load HGVs via the new Crossing, including the implications for the A2 junction 2 and enforcement and incentive mechanisms such as the toll structure for both new and existing crossings.***

Wider road network implications

- 7.6 The new Lower Thames Crossing cannot be considered in isolation. The entire Channel Ports to M25 corridor needs to be considered holistically so as to ensure that this critical stretch of the national strategic roads network can perform at the level proposed for the new Crossing. Otherwise, the problems of congestion and lack of resilience will simply migrate to the next weakest point on the network. ***We would therefore argue strongly that investment in the Lower Thames Crossing should be complemented by a package of other investments on the A2/M2 and M20 corridors to be completed within the same timetable as delivery of the Crossing.*** These include:
- Upgrading Junction 7 of the M2, to enable free-flow movement between the M2 and both the A2 and A299;
 - Dualling the remaining single-carriageway sections of the A2 north of Dover, near Lydden;
 - Upgrading Junction 5 of the M2/A249 (E14 New Commitment in the 2015-20 Road Investment Strategy);
 - Upgrading the A229 that links the M20 and M2, including Junction 7 of the M20 and Junction 3 of the M2 – see below.
- 7.7 The last of the improvements listed above was included as ‘C-Variant’ in the 2013 Lower Thames Crossing consultation but omitted from the present consultation. The forecasts presented in Vol 5 (Traffic and Economics Appraisal, section 4.6) illustrate changes in traffic flows (Annual Average Daily Traffic) on the M2 between the A228 and A289/A2 junctions, and on the M20 between the A228 and junction 3/M26. However, no modelling is presented to illustrate the impacts on the A229 which, as the shortest link, is the most obvious route for traffic moving between the M20 and M2. Without more information about the modelling of these impacts it is impossible to assess whether the M20-A229-M2 link, which already suffers heavy congestion at peak times, could accommodate the likely increased traffic flows. ***It is therefore vital that modelling information is shared with the statutory highways authorities and that the scope for improvements is fully explored as part of a complementary package of improvements to the A2/M2 and A20/M20 corridors.***

Regeneration impacts

- 7.8 Vol 5-paragraph 3.3.12 states, “A third economic impact, regeneration impacts, has not been estimated for the LTC options because complementary SCGE [Spatial Compatible General Equilibrium] economic modelling of the options has been undertaken. The results of this are reported separately in ‘Lower Thames Crossing: Complementary Wider Economic Impact Assessment’”. The document referred to does not appear to be in the public domain and it is not therefore possible to take a view on whether the assessed regeneration impacts of the Crossing proposals take full account of the regeneration potential in Thames Gateway Kent.
- 7.9 Figure 2.7 in the Summary Business Case shows the relative GDP impact from a new crossing at location C. This appears to show very high beneficial impact in parts of Essex and East London, relatively high impacts in Medway and Dartford but relatively modest impact in the rest of Kent with Gravesham enjoying no greater benefit than other districts despite the development opportunities that it is suggested the crossing might unlock. In relation to regeneration and economic impacts more generally, the consultation documents do not present data to support the assertion in paragraph 2.7.5 of the Summary Business Case that “Estimates of wider economic benefits indicate that a

crossing at Location C could increase GDP by over £7 billion and create over 5,000 new jobs.” We would ask Highways England to share and discuss their data and assumptions with stakeholders to understand more fully how the regeneration and economic benefits have been calculated and the scope to enhance the benefits accruing to North Kent in particular.

Funding options and timetable

- 7.10 The consultation booklet states that “*Subject to the necessary funding and planning approvals, we anticipate that the new crossing would be open in 2025, if publicly funded. If private funding is also used to meet the costs of the project we anticipate the crossing being open by 2027*”. It is not entirely clear why it should take two years longer to complete if private funding is used. Moreover, the problems at the existing Dartford Crossing are real and present now: it should be a matter of priority on the part of Government and Highways England to accelerate all aspects of the process, including decision-making, procurement and construction, to secure earlier delivery. We therefore ask Highways England, and Government, rigorously to review the timetable and to bring forward the completion date whatever funding route is adopted.
- 7.11 In relation to options for financing the crossing, we commend the observations offered by our partner Kent County Council in their response to this consultation.
- 7.12 ***In light of the need for a complementary package of road improvements in Kent and Medway alongside provision of the new crossing, we suggest that the funding options should include consideration as to how elements of future toll income might be hypothecated to fund those improvements.***

8. Q14 Do you have any feedback on this consultation – events, information provided, advertising, etc.?

- 8.1 Despite the apparently comprehensive nature of the information published to accompany this consultation, there are significant gaps in the documentation and in the engagement process. On documentation, there is very limited information or analysis to support the business case assertions about economic benefits, and a lack of published analysis about regeneration benefits. On the engagement process, TGKP has, along with other partners, been involved in the Stakeholder Panel convened by Highways England. This has been welcome, but on crucial issues such as the sharing and discussion of modelling information there has been limited engagement with key partners and the information provided is insufficient to enable properly-informed judgments to be made on some of the key questions posed in the consultation.

Thames Gateway Kent Partnership

23 March 2016