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Dear Mr Jones

LOWER THAMES CROSSING CONSULTATION

I am pleased to enclose the Thames Gateway Kent Partnership's response to the Lower Thames Crossing consultation, which has also been submitted via the online portal.

The Lower Thames Crossing (LTC) is of vital importance to Thames Gateway North Kent. For the reasons rehearsed in the consultation documents, a solution is needed to address the congestion, lack of resilience and adverse environmental and health impacts at the existing Dartford Crossing. These factors are constraining economic growth and business productivity and affecting the daily lives of residents in North Kent in particular and across Kent and Medway more generally.

We therefore welcome these proposals and the opportunity to respond to this consultation. But this is just another stage in the ongoing conversation we wish to have with Highways England about delivering the kind of strategic road network we need to support our ambitions for North Kent.

As our response makes clear, there are aspects of the proposed design that are disappointing and fall short of what is needed to maximise local economic benefit. These include the severing of local connections from east Gravesend, the removal of the Tilbury link road and the lack of all-direction connections between the LTC and the A13/A1089 in Essex. This is meant to be a once-in-a-generation investment; the opportunity should therefore be taken to deliver a comprehensive solution and not leave loose ends for future generations to tie up. We strongly urge Highways England to improve upon these proposals to enable the scheme objective of maximising economic growth to be achieved.

We recognise that Highways England has put a lot of effort into developing the Lower Thames Area Model (LTAM). However, some of the model's outputs lack credibility when the inputs knowingly disregard factors which, driven by Government policy and regulation, will shape future levels of housing and other development over the design lifetime of the LTC. Highways England's development assumptions understate Government's projections of local housing need in North Kent and neighbouring South East London by nearly 180,000

homes in the period to 2041. We therefore ask Highways England to work closely with our local authority partners in the period prior to submission of your DCO to gain the best possible understanding of future development ambitions, their likely effect on local and strategic road networks and any design modifications needed to accommodate these.

As we have emphasised in response to previous consultations, the proposed LTC is only one of several investments in the strategic roads network needed to keep Kent & Medway moving. You will be well aware of other investments which, disregarding the LTC, are needed to address existing challenges and to enable growth that is currently constrained by the highways network. These include junctions 5 and 7 of the M2, the M2 itself east of junction 4, the A2 between Lydden and the Port of Dover and the A229 linking the M20 and M2.

These upgrades are needed even without the LTC. But the risk is that, without them, the benefits of the LTC would be compromised. The problems of congestion and lack of resilience currently experienced at Dartford would simply migrate to the next weakest link in the network. We and our partners are therefore keen to work closely with Highways England to see how investment and funding from all possible sources can be secured and prioritised to deliver this wider programme of improvements over a realistic and achievable timescale. You will also be aware that our partner Swale Borough Council's support for the LTC is conditional upon full funding being committed for the improvements to M2 Junction 5.

We have enjoyed an open and productive relationship with Highways England over the many years' gestation of the LTC proposals, and on other schemes. We are keen for this to continue and to participate in or facilitate further engagement with yourselves and our partners over the months ahead. This might also be pursued through the new Thames Estuary Growth and Productivity Board to be established in early 2019 as part of our response, with partners in London and South Essex, to the report by the Thames Estuary 2050 Growth Commission.

I trust that our comments on this consultation will be found constructive and we look forward to working with you to bring a successful project to fruition.

Yours sincerely



Matthew Norwell
Chief Executive, Thames Gateway Kent Partnership

**THAMES GATEWAY KENT PARTNERSHIP: RESPONSE TO LOWER THAMES CROSSING
STATUTORY CONSULTATION QUESTIONNAIRE**

Q1a. Do you agree or disagree that the Lower Thames Crossing is needed?

Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
✓					

Q1b. Please let us know the reasons for your response to Q1a and any other views you have on the case for the Lower Thames Crossing.

TGKP's position on the Lower Thames Crossing is set out more fully in response to Q13 below. In summary, we strongly support the need for the new Crossing for the reasons that are set out in the consultation documents, notably to address the congestion, adverse air quality and lack of resilience experienced at the existing Dartford Crossing and the constraining effect this has on economic growth and regeneration. That support is qualified, however: Swale Borough Council, one of TGKP's partners, has formally withdrawn its support for the Project unless its concerns about separate investments needed on the existing network, in particular M2 Junctions 5 to 7, are satisfactorily addressed. We have a number of concerns, though, about the proposed design, set out in more detail in response to specific questions below.

In particular, there are aspects of the design around how the Crossing connects to other roads that seem to militate against delivering and maximising economic benefits in the areas most directly affected by the Project. For instance, the proposed junction with the A2 interferes with other traffic movements in ways that will be detrimental to residents and businesses in Gravesend; the removal of the Tilbury link road diminishes the scope to maximise the potential of the port; and the absence of west-facing slips on the A13 junction will inhibit growth in trade between Kent and Thurrock. In general terms, the very significant environmental disbenefits that the LTC will bring to Gravesham and Thurrock in particular do not seem to be outweighed by economic benefits to those areas. These local implications have to be seen in the wider context of the strategic benefits that the Crossing should deliver regionally and nationally. But at present the prospect for these areas seems to be to suffer all of the pain with little of the gain.

We are also concerned about some of the assumptions underpinning the traffic modelling used to support the Project, in particular about the levels of background growth in housing and other development. According to local partners' calculations, the assumptions of housing growth in North Kent¹ over the period to the Project's 'design year' (2041) may be understated by as much as 178,000 homes. Such a variance could have a significant bearing on the modelling of impacts on both the highways networks connecting with the Crossing and on usage of the Crossing itself.

In reviewing the design of the Project following this consultation, we would therefore strongly urge Highways England to re-examine ways that the Crossing and its link roads might truly enable better connectivity both strategically between the Channel Ports and

¹ The Kent districts/boroughs of Dartford, Gravesham, Maidstone, Sevenoaks, Tonbridge & Malling, Medway Council and the London Boroughs of Bexley and Bromley.

the Midlands and locally between businesses and residents on the Kent and Essex sides of the River.

The Lower Thames Crossing is vitally important for national, regional and local reasons; but it is just one, though clearly major, investment in the strategic roads infrastructure needed to support growth and network resilience in Kent and Medway. There are other improvements and upgrades required that stand on their own merits in business case terms, but which become all the more important to ensure that the benefits the Lower Thames Crossing should deliver are not undermined. As well as refining the proposals for this Project, therefore, we expect Highways England vigorously to continue making the case to Government, in prioritisation of other investment programmes such as RIS2 and RIS3, and pursuing with stakeholders any other potential sources of funding or support for improvements to the network – notably on the A2 and M2 – to ensure that it is fit for purpose.

2. Our preferred route for the Lower Thames Crossing

Q2a. Do you support or oppose our selection of the preferred route for the Lower Thames Crossing?

Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know
	✓				

Q2b. Do you support or oppose the changes we have made to the route since our preferred route announcement in 2017?

Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know
		✓			

Q2c. Please let us know the reasons for your response to Q2a-Q2b and any other views you have on our selection of a preferred route for the Lower Thames Crossing.

TGKP supports the proposed route including the selection of what was described as the Western Southern Link (now the junction with A2).

Though we are disappointed that a solution was not found that would have made a junction with the A226 workable, we understand the rationale for its removal and consequently welcome the extension of the tunnel taking its southern portal further south.

The emerging design for the junction with the A2 give us some causes for concern, set out in more detail at Q3 and Q4 below. The widening to Junction 1 of the M2 will undoubtedly impact adversely on the Kent Downs AONB and, coupled with the existing adjacent HS1 route, will create a concentration of 'hard' infrastructure that will intrude further upon the setting of the AONB and nearby ancient woodlands.

The land-take for the A2 junction and slip roads represents a significant incursion into the Green Belt. The loss of Green Belt land is not, however, offset by evident mitigation in the form of local community, economic or environmental benefits. Mitigation proposals should be further developed in consultation with local authorities and relevant agencies and interest groups.

3. Sections of the route

Q3a. Do you support or oppose the proposed route south of the river?

Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know
	✓				

Q3b. Please give us your comments or any other views you have on the proposed route south of the river, including structures such as bridges, embankments and viaducts.

There is insufficient detail about individual structures to offer any concrete opinion. But we have reservations about the complexity of the A2 junction explained further in response to Q4. In particular, once consequence of the proposed design is that eastbound traffic from Valley Drive – which is the main access route into and out of East Gravesend – will no longer be able to connect to the A2/M2 eastbound, but only to the northbound LTC. It would appear that only way of joining the 'old' A2 (to Strood and Rochester) from Valley Drive would be via six roundabouts and crossing the A2/M2 twice, then taking the slip road off Brewers Road. But there would still be no possible connection to the 'new' A2/M2. The only options available would either be via the A227 Wrotham Road, which would therefore increase traffic pressure on that route and on Gravesend Town Centre, or diversion via the A226 and A289. This is not an acceptable outcome and we would urge Highways England to reconsider the design, in consultation with the local district and highways authorities, to enable access between the A2/M2 and Valley Drive both westbound and eastbound to be maintained.

The crossing

Q3c. Please give us your comments on the tunnel, the north and the south tunnel entrances and any other feedback you have on this part of the proposed route.

From a future-proofing perspective we welcome the decision to provide two 3-lane tunnels and to move the southern portal further south.

Q3d. Do you support or oppose the proposed route north of the crossing?

Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know
		✓			

Q3e. Please give us your comments or any other views you have on the proposed route north of the river, including structures such as bridges, embankments and viaducts.

Other than as set out in response to questions 4 and 8 below, TGKP defers to the local stakeholders affected regarding the proposals north of the River.

4. Connections

Q4a. Do you support or oppose the proposed junction between the Lower Thames Crossing and the M2/A2?

Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know
	✓				

Q4b. Please let us know the reasons for your response to Q4a and any other views you have on the relationship between the Lower Thames Crossing and the existing road network south of the crossing, including new bridges, underpasses and diversions.

TGKP supports the broad proposals for the junction with the A2 but has a number of concerns which we would urge Highways England to consider in post-consultation amendments to the scheme developed in collaboration with local stakeholders and possibly re-consultation on these elements.

As referenced in response to Q2c, widening to Junction 1 of the M2 will undoubtedly impact adversely on the Kent Downs AONB and, coupled with the existing adjacent HS1 route, will create a concentration of 'hard' infrastructure that will intrude further upon the setting of the AONB and nearby ancient woodlands. The loss of vegetation in the central reservation and exposure of the enlarged road between M2 Junction 1 and the A2 LTC junction is likely to have a visual impact from some considerable distance as well as for road users themselves. We would urge Highways England to minimise the removal of vegetation and enhance planting wherever possible to reduce the visual impact of the enlarged A2/M2.

The proposals effectively extend the M2 beyond junction 1 as far as Thong Lane, but this has been underplayed in the description of the scheme. As explained in Q3b above, we are concerned about the loss of connectivity between East Gravesend and the A2/M2 Eastbound and urge Highways England to reconsider the design in consultation with district and highways authorities so as to enable all-direction connection from Valley Drive.

The land-take for the A2 junction and slip roads represents a significant incursion into the Green Belt. The loss of Green Belt land is not, however, offset by evident mitigation in the form of local community, economic or environmental benefits.

We appreciate that the red-line development boundary extends wider than the actual land-take that will ultimately be required for the crossing and its connections. The boundary earmarked for the A2 Junction slip roads currently represents around 200 acres

of mostly Green Belt land. Some of this will be untouched. However, whilst the images in the Guide to Consultation (p43) are merely indicative, these show land that is currently open planted as woodland, presumably as part of mitigation to create a buffer between the road and the existing residential area. There needs to be further consultation with local stakeholders on the implications for the Green Belt, including facilitating alternative uses for the land (such as commercial development), for example by improved access, if Green Belt purposes are no longer fulfilled.

The revised junction around Henhurst Road is extremely complicated and involves very tight curves that would necessitate significant speed reductions. We recognise that these would apply chiefly to the connections between LTC southbound/westbound and local networks, where speed reductions would be necessary in any event. But we urge Highways England to look again at whether a middle-ground solution is possible between the complexity of the statutory consultation design and the simpler PRA design, with a view to reducing land-take and junction complexity.

Q4c. Do you support or oppose the proposed Tilbury junction?

Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know
	✓				

Q4d. Do you support or oppose the proposed junction between the Lower Thames Crossing and the A13/A1089?

Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know
			✓		

Q4e. Do you support or oppose the proposed junction between the Lower Thames Crossing and the M25?

Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know
✓					

Q4f. Please let us know the reasons for your response to Q4c-Q4e, indicating which junction or junctions you are referring to, and any other comments you have on the proposed connections of the route north of the crossing.

4b TGKP's direct interest is primarily in those aspects of the LTC proposals south of the River Thames. Detailed responses on matters north of the River are primarily a matter for stakeholders with interests on the Essex side.

Subject to that proviso, TGKP supports the Tilbury junction as enabling and potentially future-proofing a possible link road to the Port of Tilbury – see comments at 4c below – which could deliver economic benefits to the area in the medium and longer terms.

TGKP supports in principle the proposed rest and service area. Given the distances between existing service stations on the M25, M2 and M20, the loss of A2 Cobham Services for west/northbound traffic and the fact that traffic using the LTC would not pass the existing M25 services at Thurrock, new provision makes sense. We suggest the precise location should be reviewed in the broader SRN context in the region to establish whether this is the best location. The lorry parking component of the proposed rest and service area seems too small and significantly greater HGV parking should be provided. This could also help address the need for such parking areas before HGVs enter Kent & Medway, particularly in situations where traffic through the Channel Ports faces disruption.

4c It is for others to make the case for the Tilbury link road that featured in the PRA; however, the reasoning offered in the Guide to Consultation for no longer including it is disingenuous. The relevant paragraph (p53) states “Our modelling highlighted a number of drawbacks to our potential design at Tilbury and the A13, including unnecessary delays to HGV journeys and significant impacts on the local roads”. But it then goes on to say “The inclusion of the Tilbury junction means that the opportunity remains to deliver a direct link to Tilbury in the future, *subject to necessary funding and consents* [our emphasis]”. In other words, the barrier to making that provision as part of the current scheme seems to be financial rather than practical. Some of the drawbacks identified by Highways England are, presumably, evidence of demand for such a route and it would make sense therefore to include it in the LTC Project. At the very least, as suggested in response to Q8c, it could make sense to provide a spur at the Tilbury junction as part of this scheme rather than the engineering of that junction having to be partially undone in the future to enable connection to a Tilbury link road.

4d TGKP supports the principle of junctions between the LTC and A13/A1089 but the proposed solution for this junction is not good enough. Recognising that one of the key objectives for the LTC is “*to support sustainable local development and regional economic growth in the medium to long term*”, one would expect the junction arrangements to facilitate access to markets – employment, supply chains and customers – particularly to benefit North Kent and South Essex as well as Kent and Essex more generally. The lack of west-facing slips is a serious shortcoming. The consultation indicates that traffic wishing to travel west-bound on the A13 – i.e. towards Tilbury and the economic heartland of Thurrock – would have to exit east-bound and travel three miles to U-turn at the Manorway Roundabout, then travel three miles back along the A13. In other words, traffic wishing to access Tilbury and Thurrock from the LTC in either north- or south-bound direction would have to undertake a six mile diversion and increase congestion on the section of the A13 between the junction with the A1089 and the Manorway Roundabout. Eastbound traffic on the A13 would also be prevented from joining the LTC either north or southbound. This is nonsensical, and inhibits rather than enables sensible and sustainable travel patterns and growth of economic opportunities.

This arrangement also impedes network resilience in circumstances where the Dartford Crossing is closed or seriously congested. Northbound traffic that might have used the

Dartford Crossing to access locations in Thurrock such as Lakeside and Tilbury would have to divert not only via the LTC but also this additional diversion. The same would apply to M25 south-bound traffic looking for alternatives if the M25 is blocked or congested between Junctions 29 and 31. We strongly urge Highways England to re-visit this proposal and devise a solution that enables all-direction access between the LTC, A13 and A1089 providing both connectivity to support regional economic growth and network resilience.

4e The improvements and simplification of the links with the M25, particularly removing the need for additional railway crossings and re-profiling to set the LTC lower in the landscape, are welcomed and strongly supported.

5. Walkers, cyclists and horse riders

Q5a. Do you support or oppose our proposals in relation to public rights of way?

Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know
		✓			

Q5b. Please let us know the reasons for your response to Q5a and any other views you have on our plans in relation to public rights of way, including the new routes we have proposed.

As a matter of broad principle, the LTC should be designed in such a ways as to enhance accessibility in the areas through which the road passes for walkers, cyclists and horse riders. This is important to encourage non-car modes, particularly for leisure purposes, wishing to travel along established corridors and public rights of way. We defer to the relevant interest groups and local authorities regarding the adequacy of the proposals. We welcome the proposal for 'Green Bridges' to replace and upgrade local road and PROW crossings affected by the LTC slip roads and urge Highways England to adopt this approach, particularly the 'heavy green structures', wherever possible both for the benefit of non-motorised road users and as wildlife corridors.

6. Environmental impacts and how we plan to reduce them

Q6a. Do you agree or disagree with the proposed measures to reduce the impacts of the project?

Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
		✓			

Q6b. Please let us know the reasons for your response to Q6a and any other views you have on the environmental impacts of the Lower Thames Crossing as set out in the

Preliminary Environmental Information Report, including our approach to assessing and reducing the impacts of the project.

It will clearly be important that the final Environmental Impact Assessment takes full account of any revisions to the design and comprehensive survey work to complement desk-based studies.

Linking to comments made in response to Q9, TGKP is concerned about whether the environmental assessment adequately takes into consideration the background growth forecast to take place in North Kent – in housing, jobs and traffic. The traffic modelling – and presumably therefore also the environmental assessment – does not take account of planned growth specified in emerging Local Plans. Moreover, MHCLG has made clear – whilst still subject to consultation – its policy intention to adhere to the forecasts of Local Housing Need (LHN) accompanying the standard methodology on which it consulted in September 2017 (<https://www.gov.uk/government/consultations/changes-to-planning-policy-and-guidance-including-the-standard-method-for-assessing-local-housing-need>). On the basis of the LHN figures for the most directly affected authorities south of the River, the shortfall between estimates reflected in Highways England’s modelling (LTC Schedule) and the Government’s methodology would be 39,390 dwellings in 2026 – the year of opening – and 177,904 dwellings by 2041 – the design year.

We have very real concern therefore about whether Highways England’s modelling adequately reflects background growth in housing and other development across the North Kent area (and similarly north of the River), and the likely transport impacts that this growth and associated economic activity is likely to have on both the local and strategic roads networks. We would therefore suggest that Highways England should review its modelling of future traffic flows in consultation with local authorities to take full account of both adopted and emerging housing numbers in local plans and to re-consult on any design modifications required to accommodate these.

7. Development boundary

Q7a. Do you support or oppose the proposed area of land we require to build the Lower Thames Crossing?

Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know
		✓			

Q7b. Please let us know the reasons for your response to Q7a and any other views you have on the land we require to build the Lower Thames Crossing.

As referred to in our responses at 2c and 4b above, we recognised that the red-line development boundary extends wider than the actual land-take that will ultimately be required for the crossing and its connections. The boundary earmarked for the A2 Junction slip roads (not including most of the cutting required for the southern tunnel approach) currently represents around 200 acres of mostly Green Belt land. Some of this will be untouched. However, whilst the images in the Guide to Consultation (p43) are

merely indicative, these show land that is currently open planted as woodland, presumably as part of mitigation to create a buffer between the road and the existing residential area. There should be further consultation with local stakeholders on the implications for the Green Belt, including facilitating alternative uses for the land (such as commercial development), for example by improved access, if Green Belt purposes are no longer fulfilled.

8. Proposed rest and service area, and maintenance depot

Q8a. Do you support or oppose our proposals for a rest and service area in this location?

Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know
		✓			

Q8b. Do you support or oppose our proposals for the maintenance depot in this location?

Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know
		✓			

Q8c. Please let us know the reasons for your responses to Q8a and Q8b, and any other views you have on our proposals for a rest and service area, and for the maintenance depot.

As noted in response to 4b, TGKP supports in principle the proposed rest and service area. Given the distances between existing service stations on the M25, M2 and M20, the loss of A2 Cobham Services for west/northbound traffic and the fact that traffic using the LTC would not pass the existing M25 services at Thurrock, new provision makes sense. We suggest the precise location should be reviewed in the broader SRN context in the region to establish whether this is the best location. The lorry parking component of the proposed rest and service area seems too small and significantly greater HGV parking should be provided. This could also help address the need for such parking areas before HGVs enter Kent & Medway, particularly in situations where traffic through the Channel Ports faces disruption.

The proposed design of the junction that would serve the rest and service area is, however, insufficiently future-proofed to allow or enable a possible future spur to Tilbury to be constructed. It would be more cost-effective and less disruptive to design in and construct a spur that would serve a future Tilbury link road as part of these engineering works than for this to be done in the future, which would involve undoing some of the engineering of the present design.

9. Traffic

Q9a. Do you agree or disagree with the view that the Lower Thames Crossing would improve traffic conditions on the surrounding road network?

Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
		✓			

Q9b. Please let us know the reasons for your response to Q9a and any other views you have on the Lower Thames Crossing's impact on traffic.

This question is posed in terms that are too simplistic given the range of issues involved.

Background growth

As noted in response to 6b, TGKP partners have concerns about the traffic modelling and whether it adequately takes into account background growth between now and the design date (2041) that is either emerging in local plan revisions or will be required to satisfy the Government's standardised methodology for assessing housing need. Local areas connecting to the strategic network and the LTC are likely to be subject to significant growth arising from development plans – for example on the Hoo Peninsula. Further assessment is needed on the combined effects that background growth and changed journey patterns resulting from the LTC will have across the surrounding road network. The consultation documents (e.g. Traffic Forecast Non-Technical Summary, part 3) acknowledge that Government projections of local housing need are not included in the model: but this is not a tenable position. At the very least, Highways England should collaborate with local planning authorities to identify the most likely growth locations and concentrations in light of the Government's projections of local housing need, as a sensitivity test of the model's outputs.

Credibility of model outputs

We are sceptical about some of the modelling results and suggest these data need to be revisited. For example, based on a Review of Model Output carried out on behalf of Kent County Council, Highways England's model suggests a modest increase in 2026 of 3.7% (two-way traffic flows of 240 additional vehicles per hour) at peak times on the A229 (Bluebell Hill), the most direct link between M20 Junction 7 and M2 Junction 3. The PEIR (6.6.12f) refers to up to 4,000 additional vehicles per day. Yet, the modelling also points to a significant reduction in traffic flows on the M20 between Junction 6 (A229) and Junction 1 (M25), averaging around -10.7% (873 vehicles per hour) across these sections. The PEIR refers to a reduction of between 5,000 and 12,000 vehicles per day (6.6.12b). If that reduction is attributable to the LTC, a key component must surely be that a significant proportion of traffic will leave the M20 at Junction 6 to use Bluebell Hill. These findings do not seem to marry up. Moreover, Bluebell Hill is already under strain and the Traffic Forecast shows peak flows exceeding 85% and in places over 95% of road capacity under both the "with and without" Crossing scenarios. We would ask Highways England to review the model outputs in consultation with local planning and highways authorities.

Wider network improvements

TGKP strongly supports the LTC itself as vitally important to relieve pressure on the existing Dartford crossing, to increase north-south connectivity and capacity, and to improve network resilience.

The provision of the LTC will need to be complemented by other network improvements, separate from this Project, delivered in a coherent, timely and joined up manner to ensure that its benefits can be fully realised and to prevent adverse consequences being felt elsewhere. There needs to be a phased programme of traffic management and physical highways infrastructure improvements prioritised in relevant investment programmes over the next 10-15 years and ideally completed by the time the LTC opens, notably on the A2/M2, to ensure that the network can operate effectively. These include, in likely order of priority:

- Improvements to **M2 Junction 5/A249** – a committed scheme in RIS1 but without full funding committed.
- The **A2 Bean and Ebbsfleet** Junctions;
- Improvements at **M2 Junction 7** (Brenley Corner) to enable free-flow movement between the M2/A2;
- Dual carriageway the full length of the **A2 between Lydden and the Port of Dover**;
- **Upgrading the M2 between Junctions 4 and 7**, possibly using **smart motorway** or other traffic management measures but preferably through widening particularly between junctions 4 and 5;
- Continued improvements to Junction 1 on the **A282/M25** at the existing Dartford Crossing.

Of these, only the first two are identified in the “Traffic Forecast non-technical summary” as schemes “likely to be built”.

Bluebell Hill

For traffic to and from the Port of Dover in particular, the improvements itemised above would enable traffic movements to/from north and east to be directed via the A2/M2 and traffic to/from the north and west and the Channel Tunnel to be directed via the M20 and M25. This would ease pressure on the Bluebell Hill section of the A229 and on Junctions 3 and 6 of the M2 and M20 respectively and also provide greater resilience for traffic movements through Kent and Medway.

However, Bluebell Hill is likely to be the route of choice for traffic to and from the Channel Tunnel and the LTC. Whilst much of the pressure on Bluebell Hill may not be specifically attributable to the LTC, it remains essential that upgraded links between the M2 and the M20 are developed and implemented ahead of or in parallel with the progression of the LTC to ensure the new crossing does not simply displace congestion to the next weakest point on the strategic roads network. We would therefore urge Highways England to work with local and strategic authorities and other stakeholders to devise a pragmatic scheme of improvement for Bluebell Hill and its connections with M20 Junction 6 and M2 Junction 3. ,

Other pinch-points

TGKP partners have expressed concern about a number of other network effects arising from the LTC, including:

- Loading on the M2 Junction 1, and ensuring the junction adequately caters for traffic flows involving the A289 to support expected increase in growth-related and HGV traffic to and from the Hoo Peninsula;
- Loading on the A228 and M2 Junction 2, and the impact of anticipated increased movements between the M20 and M2 along this corridor to access the LTC;
- Loading on the A249 (Detling Hill), where modelling suggests an increase in traffic overall though possibly a reduction in HGVs using this route (which would be welcome given the steep gradients involved).

These wider network effects emphasise the need for Highways England, working with strategic highways bodies as appropriate, to take a joined-up strategic approach to Kent & Medway highways network improvements on both the Strategic Roads Network and on other major roads, to enable the benefits of the LTC to be fully realised. Better communication and liaison between the teams leading on different projects will be essential.

10. Charges for using the crossing

Please give us your views on our proposed approach to charging users of the crossing.

We recognise that it is Government policy to toll estuarial crossings in England, without necessarily agreeing with that policy. Taking that as given, it is important that tolling arrangements for the LTC form part of a coherent and consistent approach that includes the Dartford Crossing and, if appropriate, other crossings within the M25 area.

A significant contributor to congestion and delays at the existing Dartford Crossing is 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. It may be that journey distance and time considerations overall would militate against re-routing northbound over-height and hazardous load HGVs via the new Crossing; these considerations would need to be weighed against the economic impact 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 in shaping proposals for the tolling regime for both new and existing crossings, and in providing flexibilities through the parameters covered within the DCO, Highways England should consider the costs and benefits of routing north-bound over-height and hazardous load HGVs via the new Crossing, any differential tolling arrangements that might incentivise this, the implications for the M25 junction 2 and enforcement mechanisms.

On a minor technical point, (paragraph 22.2.2 of the Approach to Design, Construction and Operations) the intention to adopt a charging regime with charges rising annually in line with the Retail Prices Index seems out of kilter with wider moves across Government to adopt the Consumer Prices Index or other mechanisms rather than RPI.

11. Building the Lower Thames Crossing

Q11a. Do you support or oppose our initial plans for how to build the Lower Thames Crossing?

Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know
	✓				

Q11b. Please let us know the reasons for your response to Q11a and any other views you have on our initial plans on how to build the Lower Thames Crossing.

We suggest that Highways England should develop and collaborate further with local stakeholders on proposals for transportation of spoil and construction materials by river rather than road, including maximising opportunities for beneficial re-use of excavated materials on appropriate schemes across the Thames Estuary area.

The indicative highways construction and tunnel portal compounds east of Gravesend will inevitably impact upon residential areas in the Riverview Park area and at Chalk, as well as bringing increased construction traffic movements on the A226 and other local roads in Gravesham. Whilst in principle temporary, on a construction project lasting several years it is likely that some arrangements will also endure for several years. Highways England should work closely with local stakeholders on proposals to manage and mitigate the likely highways impacts of construction traffic, including to avoid the kinds of tailbacks on the A226 that were part of the rationale for removing the junction proposed at PRA stage.

The period allowed for enabling works in the indicative timeline seems unrealistically short, particularly for environmental mitigation (e.g. relocating protected species) and archaeological investigations. By contrast, the period allowed for tunnel construction seems surprisingly long. The consultation states that the Tunnel Boring Machines will excavate at a rate of between 50 and 125 metres per week. Even at the lower end of this range, the boring process should not therefore take more than 80 weeks. There is clearly a lot to do to transform the bored tunnels into highways, but five and half years (286 weeks, including tunnel boring) seems slow compared with the programme for other highways and structures. All reasonable efforts should be made to accelerate the delivery programme.

Construction works will also impact for several years on the openness of the Green Belt and on existing uses of some of the land east of Gravesend. These are primarily matters on which local partners may wish to respond, but it should be a priority for Highways England to mitigate and, where appropriate, compensate for the disruption the construction works will bring to this area.

Construction of the LTC will clearly involve major contractors and procurement processes, but it is important that local companies in the Thames Estuary area have opportunity to participate in the supply chain. The procurement processes should be exemplary in helping to grow and develop construction workforce skills and apprenticeship opportunities, particularly within the Thames Estuary area.

Recognising that the proposal to build the tunnels from north to south makes sense, we would urge Highways England to ensure that suitable arrangements are put in place to enable residents and contractors based south of the river to access workforce opportunities for operations conducted from north of the river, including for example enhanced ferry services from Gravesend to Tilbury and complementary local transport arrangements.

Planning for the timing of works affecting the A2 should take account of other programmed works, such as at the Bean and Ebbsfleet junctions, and the cumulative effect on journey times if construction programmes overlap.

12. Utilities and pylons

Please let us know any views you have on the proposed changes to utilities infrastructure.

No comments.

13. Other comments

We would like to know what is important to you. Please let us know if you have any other comments about the Lower Thames Crossing.

The Thames Gateway Kent Partnership (TGKP) is a strategic public-private partnership spanning the Kent portion of the Thames Gateway (more commonly now referred to as the Thames Estuary), 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, Maidstone 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, Homes England and a Member of Parliament (Rehman Chisti MP).

TGKP's area is home to an estimated 802,300 people including, in Medway, the second largest conurbation after Brighton & Hove in the South East outside London. It straddles the A2/M2 corridor between London and Dover, and includes the entirety of the M2 motorway, a significant portion of the M20, 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.

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 78,600 homes, 186,800 population and around

77,600 new jobs². The area includes the Government's flagship Ebbsfleet Garden City, which could itself generate 15,000 homes and 30,000 jobs.

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 give only limited attention to 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 expectations for the Thames Estuary area, are to be achieved.

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 Lower Thames Crossing is therefore a matter of national importance, and investment in an effective solution needs to be treated by Government as a matter of national priority, a point reinforced by the National Infrastructure Commission.

As our responses to the consultation questions explain in more detail (in particular Q9), it is not enough to look at the Lower Thames Crossing in isolation.

Holistic solutions are needed to ensure 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 phased programme of other investments on the A2/M2 and M20 corridors. These include:

- upgrading Junction 5 of the M2/A249 and the Bean and Ebbsfleet Junctions of the A2,
- upgrading Junction 7 of the M2,
- dualling the remaining single-carriageway sections of the A2 north of Dover, and
- introducing smart motorway or other traffic management measures (and preferably widening) the M2 between junctions 4 and 7;
- continued improvements to A282/M25 Junction to reduce congestion around the existing Dartford Crossing; and
- a long-term solution for the A229 Bluebell Hill and its connections to M20 Junction 6 and M2 Junction 3.

² Source: Kent & Medway Growth and Infrastructure Framework, Revision 2017/18

The fact that LTC is part of a strategic corridor does expose the concern we have that the economic benefits that it should deliver may bypass those areas of North Kent and South Essex most affected by the Project. In preparing their DCO, and in addition to the points made above about connectivity, we urge Highways England to review the evidence for local economic benefits delivered by the scheme and amend the proposals where possible to enable greater local economic growth opportunities to be realised.

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 Kent & Medway, London, Eastern England, the Midlands and the North. In delivering the new Crossing, it is essential that the local and regional economic benefits of the scheme on both sides of the Thames are maximised and the environmental and community disbenefits are minimised and mitigated as far as possible.



The Thames Gateway Kent Partnership is a public-private partnership, established since 2001, promoting sustainable economic-led growth and regeneration in North Kent.

The top priorities in our *Plan for Growth 2014-20* are:

- Delivering growth in key locations
- Attracting and retaining investment
- Focusing on quality
- Supporting businesses – growth key industry sectors
- Supporting businesses – increasing innovation, enterprise and creativity
- Improving skills, qualifications and employability

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