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Dear Mr O’Sullivan

Supplementary Consultation on the Lower Thames Crossing: response from the Thames Gateway Kent Partnership

It was good to meet you on 20th February together with Kate Willard, the Thames Estuary Envoy, to discuss the Lower Thames Crossing and road planning across the Estuary area.

I welcome this opportunity to comment on this supplementary consultation on behalf of the Thames Gateway Kent Partnership (TGKP).

TGKP is a public-private partnership with local authority representation from Medway Council, Kent County Council and the Kent districts of Dartford, Gravesham, Maidstone and Swale, together with business leaders and various public agencies, Further and Higher Education sectors. TGKP’s mission is to promote sustainable economic-led growth and regeneration across North Kent.

As a Partnership, we seek to reflect the sometimes differing views of our partners.

Fundamentally, our support for the Lower Thames Crossing remains strong. However, the present proposals, and the wider roads network investment strategy, fall short of winning consensus support from all partners. Over successive consultations, we as a Partnership and individual Partners have repeatedly raised significant concerns about the project, in terms of detail on the route, design, construction and environmental impacts and the interaction with the wider road network. Our Partnership does not believe that these have been adequately addressed either in the consultation proposals for the Lower Thames Crossing itself or the positioning of the Lower Thames Crossing within the integrated approach to investment required across the Channel Ports to M25 highways network.

We have chosen not to address the specific questions in the consultation – where Partners’ views vary – but instead thought it more useful to write to outline the primary areas of concern. We ask Highways England to take account of this response both in refining its business case and design proposals for the LTC and we call on Government to commit to the supplementary investment needed to make the highways network fit for purpose, now and in the future.

As a Partnership, we agree on the following key points.

The importance of a new Thames crossing to the national economy

The Thames Estuary remains an area of national significance in terms of growth potential and prosperity. Despite engagement by successive governments over past decades, the area still faces a massive productivity challenge. Infrastructure investment and delivery continues to lag behind demand. North Kent's acknowledged growth potential is compromised by the limitations of the existing Dartford Crossing, which impacts negatively on local as well as strategic road networks, on business efficiency across a wide area, on the health and safety of residents, and on the reputation of North Kent as a destination for investment.

The report by the Thames Estuary 2050 Growth Commission in 2018 endorsed the LTC as a "must-do" infrastructure investment. We were pleased to see the government's commitment, in Budget 2020, to the initial funding in the period 2020-25 towards building the Lower Thames Crossing.

We wholeheartedly agree on the need to alleviate the excessive overloading and congestion at the existing Dartford 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. **The LTC is an intervention of national importance, and investment in an effective solution should be treated by Government as a national priority, backed by the full long-term funding commitment necessary to enable Highways England to progress the scheme.**

This is also a once in a generation investment. It is therefore crucial to get it right.

We want the LTC scheme to be the best that it can be. We recognise that cannot mean a blank cheque. Costs must be tightly controlled. But there are still aspects of the scheme that need to be improved and it is vital that long-term sustainability and future-proofing are not sacrificed in the interests of short-term value-engineering.

We are mindful that since the 2018 statutory consultation, the Government has confirmed its commitment to a target of net zero carbon by 2050, and the Climate Change Summit later this year may see more ambitious targets agreed. The recent Court of Appeal ruling on the 3rd runway at Heathrow, whilst still subject to potential appeal to the Supreme Court, is relevant in emphasising the need for infrastructure schemes to be compliant with carbon reduction targets. **We seek assurance that Highways England will take full account of those obligations in its approach to refining the design of the Lower Thames Crossing.**

The areas taking the pain should share in the gain

We strongly support the approach set out by *Transport for the South East* in their consultation draft Transport Strategy, of shifting from planning for vehicles to planning for people and places. The strategic case for the Lower Thames Crossing is undiminished: a well-designed and resilient national highways network has to be part of the framework around which changes in travel modes, patterns and behaviours are built. But the detail and the impact of the LTC on people and place must, however, be carefully considered against this backdrop.

We remain concerned that the areas most directly affected by the Crossing, on both sides of the river, but particularly Gravesham amongst our North Kent Partners, seem destined to

derive limited long-term economic and other benefits. The risks and actual harms to nationally- and internationally-designated habitats and environmental assets, and adversely affecting local communities, remain prominent among Partners' concerns. The supplementary consultation has been either lacking in detail or failed to address those concerns. These including impacts on local road networks in the vicinity of the Crossing, where we would ask Highways England to consider carefully the representations from Gravesham Borough Council in particular.

In designing and 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. Better solutions to safeguard the environment around the junction with the A2 and better connectivity via the A13/1089/LTC interchange should be priorities in further revising and refining the design proposals.

The M25-Channel Ports corridor supports the whole UK economy and deserves investment that reflects this.

We appreciate that this supplementary consultation is confined to the design changes since 2018. But we would reiterate comments in our previous consultation responses that **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. Investment in the Lower Thames Crossing should be complemented by a phased programme of other investments on the A2/M2 and M20 corridors, beyond those already in the pipeline such as M2 Junction 5/A249, including:

- upgrading Junction 7 of the M2 (Brenley Corner) to permit free-flow traffic on the M2-A2;
- upgrading the M2 between junctions 4 and 7, widening where possible;
- dualling or replacing the remaining single-carriageway sections of the A2 north of Dover;
- continued improvements to A282/M25 Junction to reduce congestion around the existing Dartford Crossing; and, of particular importance,
- working with strategic and local partners to implement a long-term solution for the A229 Bluebell Hill and its connections to M20 Junction 6 and M2 Junction 3.

A state-of-the-art Lower Thames Crossing should be matched by a fit-for-the-future highways network serving as the spine supporting trade and connectivity between continental Europe and the rest of the UK.

Conclusion

TGKP remains committed to working with Highways England and other stakeholders to refine the LTC proposals and to assist in any way we can to secure infrastructure solutions that will help unlock sustainable growth in North Kent. We would welcome continued engagement and stand ready, together with other partners in the Thames Estuary, to work constructively with Highways England to deliver a solution that works for everyone.

I am also writing on behalf of the Partnership to Rt Hon Grant Shapps, Secretary of State for Transport, and am copying this letter to Kate Willard, the recently appointed Thames Estuary Envoy.

Kind regards

A handwritten signature in black ink, appearing to read 'MN', written in a cursive style.

Matthew Norwell
Chief Executive, Thames Gateway Kent Partnership