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Lower Thames Crossing Consultation
Department for Transport
Zone 3/29, Great Minster House
33 Horseferry Road
London, SW1P 4DR

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Dear Sir/Madam

I am writing as Chairman of the Thames Gateway Kent Partnership (TGKP) to respond to your Department's consultation on options for a new Lower Thames Crossing. TGKP is the private and public sector partnership that works to champion sustainable economic growth across North Kent (Dartford, Gravesham, Medway and Swale).

The purpose of this response is not to express a preference for a particular location. Each of the options would have huge impacts on communities in North Kent. The distribution and severity of those impacts would vary depending on the location, and hence the implications for the local authority areas of members of the Partnership would also vary greatly depending on the option chosen.

The purpose of the response is to set out a number of important points, mainly in respect of **Option B**, which we believe are critical to the economic future of North Kent, and which the Partnership wishes the Government to take into account in reaching its decision.

The Partnership believes that any decision must take into account the impact of a new crossing on the future prosperity and quality of life of the communities and businesses directly affected. The Government must therefore take into account the impact on the prospects for sustainable economic growth and job creation in North Kent, and also the impact on the quality of the built and natural environment, and on the health and well being of people living nearby.

For these reasons the Partnership is strongly opposed to Option B. The route for this option would cut through the most important development sites in North Kent. It would put at risk the development of the whole of Ebbsfleet Valley ie the major housing site in Eastern Quarry and the proposed commercial development around the Ebbsfleet International station. Ebbsfleet Valley is the top investment priority for all partners in North Kent: it has the potential to create 20,000 jobs and 10,000 homes.

Nothing should be done by Government to undermine the successful delivery of this site.

Option B would also jeopardise major development opportunities at the Swanscombe Peninsula, notably the London Resort Company Holdings leisure resort project (Paramount Park). The promoters of Paramount Park have said that their proposals are not compatible with Option B. They argue that if Option B is chosen it will mean the project cannot proceed. Paramount Park is a nationally significant £2bn development, forecast to create 27,000 jobs that would transform the economy of North Kent and the Thames Gateway.

The promoters also state that the inclusion of Option B has made attracting sovereign wealth fund and other investment much more difficult, as foreign investors' perception is that the Government is at least considering the possibility of locating the crossing at Swanscombe, and so cannot be fully committed to the idea of the leisure resort.

For these reasons, an early Government decision to rule out Option B is essential. If for any reason there were to be a delay in reaching a decision on the preferred location, the Partnership argues that an announcement should be made in advance to at least make it clear that Option B will not be the location selected.

Even if the Paramount Park proposal were not to proceed, Swanscombe Peninsula is identified for significant development in the emerging plans for Dartford and Gravesham Borough Councils – all of which could be negated by the Option B proposal.

The Partnership wishes to make the following additional points. Where these are views shared by only some partnership members this is highlighted:

- **Need for additional river crossing capacity in the Lower Thames Area:** the Partnership believes that urgent action is needed to relieve the significant delays for traffic that occur at the existing crossing on a daily basis. We are concerned that, as completion of any new crossing is inevitably many years off, every effort should be made now to relieve congestion at the existing crossing. In particular, free-flow tolling should be introduced as quickly as possible; it is imperative that there is no further slippage in the implementation date of Autumn 2014. Furthermore, the majority of the Partnership believes the case for additional capacity is compelling. The existing crossing is already operating in excess of its design capacity. At the same time, additional traffic demands will be generated in future years through development of key sites in the Thames Gateway and through increasing road freight traffic from the channel ports. Gravesham and Dartford Borough Councils' view, however, is that it is premature to take a definitive view on the need for additional capacity at this time, as the impact of the introduction of free-flow tolling is not yet known.
- **Option A:** the Partnership notes the statement in paragraph 7.7 of the consultation document that Option A is predicted to perform better than the other options in terms of alleviating congestion on the existing crossing. However, the

majority of Partnership members believe this option is sub-optimal in several respects – they argue that it would do little to increase the resilience of the strategic road network, or to facilitate the growth and development of the North Kent economy and the wider Thames Gateway. However, Gravesham Borough Council argue that this is the only option that meets the requirement of increasing significantly capacity and reliability at the Dartford Crossing. It also, they argue, has the least implications for air quality and noise, but they recognise it does leave issues in the Dartford area.

- **Option C:** the majority of the Partnership believes that Option C would have the greatest positive economic impact, both for North Kent and nationally. The whole Partnership recognises, however, it would also have very significant negative impacts on environmentally sensitive areas, although it would also lead to a greater reduction in greenhouse gases. Gravesham Borough Council, through whose area the route would pass, oppose Option C on environmental and financial cost grounds. The Council argue it would have major environmental implications for the Ramsar, a number of SSSIs, Ancient Woodland, Shorne Country Park, Cobham Park (listed parkland), and the openness of the Green Belt. It would also have significant impacts on local residents.
- **Option C variant:** the Partnership recognises the value of improving links between the M2 and the M20, in terms of the benefits this would bring to steering the flow of traffic to and from the channel ports, and in avoiding further coast-bound traffic being forced onto the M2. It also recognises the environmental and engineering challenges of widening the A229 at Bluebell Hill. TGKP believes that the principle of the variant option should not just be associated with Option C; it should be applied to all or any option. This may not be the only possible 'variant' option; there may be alternative and more straightforward ways of strengthening the links between the M2 and M20, which should be investigated.

Lastly, we would add that whichever corridor option is chosen, there is likely to be significant impact on traffic flow further south along the A2/M2 into Kent. There are already significant bottleneck issues at a number of junctions and on the M2 itself where it narrows to two lanes in each direction. We would therefore anticipate that these consequent issues would be assessed and resolved as part of the wider project to install the new Lower Thames Crossing.

Yours faithfully



Rob Bennett
Chairman
Thames Gateway Kent Partnership