

## Appendix C - KCC's detailed proposed response to the consultation (draft).

*This is a draft of the proposed response set out to each of Highways England's (HE) consultation questions. Supplementary information is being prepared and the responses will have further detail added from KCC Officer comments and work being undertaken by colleagues at Medway Council and Gravesham Borough Council.*

*Information included in italics does not form part of the draft response but is to be updated or added to as the draft is progressed.*

### 1 **Q: On balance, do you agree or disagree with our proposal for the location of a crossing, at Location C?**

**Strongly agree.**

1.1 KCC strongly agrees with the proposal for a new Crossing at Location C, east of Gravesend and Tilbury. The reasons for this are set out below.

#### 1.2 **Economic benefits**

Fundamentally, the economic benefits of a new Crossing at Location C are significant in their own right. Further, they are substantially greater at Location C than at Location A. Work undertaken by the Department for Transport (DfT) as part of the 2013 consultation identified that Location C and the C Variant had the greatest potential for regeneration job creation.

1.3 KCC has also previously commissioned studies to further investigate the potential economic benefits of each proposed location. In 2010, KPMG produced a high level assessment of the economic benefits of a new crossing based on an opening year of 2021. This calculated that Location C has the potential to contribute £12.7 billion to the local economy, mainly through job creation. This is six times higher than at Location A. Subsequently, in 2012 URS carried out a more detailed assessment of the regeneration impacts. The findings supported the KPMG work and found Location C would generate the highest number of jobs and housing development. These studies are summarised in Table 1.

**Table 1: KPMG and URS studies job creation**

	Location A	Location C
KPMG (jobs)	1000	6000
URS (jobs)		
Local jobs	7,600	9,100
Local + hinterland (all of Kent and Essex counties)	23,000	32,300

1.4 A new Lower Thames Crossing (LTC) at Option C would also benefit the logistics sector (both in Kent and nationally) by enabling reliable and quicker journey times and thereby reducing operating costs. Access to potential

employees and to other businesses would be improved, including to the Midlands and North (and its aspirations to become the Northern Powerhouse), which will in turn, make Kent a more attractive place to do business.

1.5 The growth of Heavy Goods Vehicle (HGV) traffic crossing the Thames is severely constrained by the current congestion and capacity problems at Dartford. HGV activity is correlated with economic activity and the HE analysis has shown that generally the Location C routes increase HGV traffic over and above the Location A route, which is indicative of the increased potential for economic growth at Location C.

1.6 In addition, growth in the Dartford area (particularly that generating employment opportunities), is constrained by the congestion at Junctions 1a, 1b and on the A2. This prevents access to the Strategic Road Network (SRN) for businesses and causes the frequent severance of Dartford town centre from the rest of the Borough. Congestion at these junctions and on the A2 can result in the B255 St Clements Way and the A206 Crossways Boulevard being used as an alternative route with implications for Junction 1a and, importantly, the A2 Bean Junction and the A226 London Road/St Clements Way Junction. A new Crossing at Location A would not resolve these problems but would in fact worsen them, imposing constraint on the planned growth for the Ebbsfleet Garden City.

1.7 *KCC has written a summary narrative of the work undertaken to date on the economic benefits of a new LTC to the east of Gravesend, which will be appended to this response.*

1.8 It is also worth noting that it is for economic reasons that KCC opposed the now ruled out Location B. The principle reason for this is the detrimental impact it would have on plans for growth and regeneration in North Kent, which have now been given further impetus with the formation of the Ebbsfleet Development Corporation and the Government's plans to create a 21st Century Garden City at Ebbsfleet and the proposal for the London Paramount Entertainment Resort. Other issues with Location B include:

- The density of the existing community to the north of the Thames at Grays/Tilbury.
- The potential negative impact on Tilbury Docks.
- The ability of the A1089 corridor to deal with both strategic and local traffic.

1.9 **Network resilience**

Although the introduction of free-flow tolling (Dart Charge) has seen some improvements in journey time and congestion at the Dartford Crossing, it has done nothing for resilience when incidents occur that affect the flow of traffic at or around the Crossing. The provision of an independent crossing built to modern standards and suitable for all users will not only radically improve the resilience of crossing the Lower Thames but also the resilience of the strategic road network between Kent, the Midlands/North, and mainland Europe.

- 1.10 The new crossing will enable Kent's policy objective of bifurcation to be implemented, splitting traffic to and from the Eastern and Western Docks in Dover between the M20/A20 and M2/A2 corridors. With the addition of some improvements to the M2/A2, this will create a high quality strategic corridor that will cater for the significant likely growth of the Port and thereby release capacity on the M20.

*To be added – data on likely growth at the Port of Dover and growth in HGVs handled by the Port and Eurotunnel.*

- 1.11 Whilst Route 1 at Location A would provide extra capacity at the existing Dartford Crossing itself, it would not mitigate constraints on the road network on the approach to the Crossing. The same issues when either the tunnels or the QEII Bridge have to be closed would remain, with the resultant congestion affecting not only the strategic road network but the local road network in Dartford and south east London. The QEII closure on 8<sup>th</sup> February 2016 due to high winds resulted in 11 hours of delays, which not only demonstrates that Dartford is not a suitable location for providing extra capacity but also that any new crossing should not be a bridge if such disruptions are to be avoided. The HE consultation itself states that on average the Dartford Crossing is closed for 27 minutes per day and that must be avoided at the new Crossing.
- 1.12 Congestion and incidents on the approaches will to a large extent negate the benefits of additional crossing capacity. Constructing the Crossing at Route 1 would be a missed opportunity to boost British business and the national economy, and enhance transport connectivity between Kent and Essex, as well as nationally and internationally. Conversely, constructing a new crossing at Location C provides an alternative route in the event of an incident at the Dartford Crossing that can be accessed by remaining on the Strategic Road Network.
- 1.13 **Strategic transport benefits**  
Aside from the clear benefits to Kent and Essex from having two crossing points on the Lower Thames, there will also be impacts felt nationwide due to increased connectivity between the rest of the UK and Kent, which is the Gateway to mainland Europe.
- 1.14 Information released in the HE consultation documents and supported by a freight study commissioned by the South East Local Enterprise Partnership (Atkins, 2013) shows that when there is congestion at the Dartford Crossing traffic diverts to other crossings (notably the Blackwall Tunnel) or uses the long way around the M25. Therefore, by releasing capacity at Dartford and increasing resilience in the event of any incident by providing a crossing at Location C, capacity elsewhere on the wider transport network will also be released. Location C will also relieve sections of the A13 and A2 and journeys to the strategically important ports in East Anglia and Kent will be improved both in terms of journey time and reliability.
- 1.15 Further, the two possible locations for the Crossing will attract different users. If extra capacity is provided at Dartford then the same users as today will be

served in greater number (i.e. suppressed demand will be released). However, by locating the Crossing at Location C, the route will attract mainly traffic travelling between Kent/the Channel Ports and the M25/East Anglia. It will also attract a higher total volume of traffic crossing the Thames than expansion at Dartford would because of the higher capacity and improved connectivity. The provision of a faster, more reliable route to the Midlands and North from the Kent ports will be particularly attractive to long-distance freight traffic and will have the benefit of diverting many of these journeys away from Dartford.

- 1.16 It is clear that a new LTC must provide a strategic network solution rather than primarily catering for shorter journeys. Location C provides this connectivity both from Kent into neighbouring Essex and, most significantly, from Europe to the concentration of distribution centres in the Midlands and the North. As a result, increased capacity at Dartford (Route 1, Location A) will not provide nearly the same scale of benefits as LTC to the east of Gravesend (Location C).
- 1.17 *A summary narrative on the strategic transport benefits has also been produced, and will be appended to this response.*
- 1.18 *Further issues that are under consideration:*
- **Air quality** – with Route 1 (Location A), air quality will worsen at Dartford. With any Location C route air quality will improve at Dartford and no property on the new route will be at risk of exceeding air quality limits. The HE assessment did include sensitive receptors (residential properties) on the A226 both west and east of the proposed new junction with the LTC. KCC is liaising with Gravesham Borough Council in their assessment of air quality implications. However, the initial feeling is that there is insufficient information on forecast traffic flows to make a thorough assessment.
  - **Noise** – with Route 1 there would be a worsening of noise whereas with Location C overall there would be a net improvement in noise, although properties in the vicinity of the new route or on roads that would see an increase in traffic would see a corresponding increase in noise. As per air quality, KCC is liaising with GBC on noise impacts.

**2 Q: 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?**

**Route 2/3/4**

- 2.1 Essex County Council has proposed to support KCC's route choice south of the river and it is therefore proposed that KCC should reciprocate and support Essex's choice to the north of the Thames.
- 2.2 *Regardless of the specific route chosen north of the river, the need for connectivity between the ports and the Midlands/North is imperative. The HE traffic modelling has shown that forecast traffic volumes on Routes 2, 3 and 4*

*are broadly similar at around 77,000 on average each day. Therefore traffic volumes have not been a factor in determining the HE's preferred route.*

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

Route 2 -  
Route 3 -  
Route 4 -

3.1 As above, it is proposed to support Essex's choice for these route options and therefore KCC will replicate their response to this question.

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

4.1 KCC strongly supports the **Western Southern Link (WSL)**. This is also the proposed position of Medway Council and, as discussed above, Essex County Council will offer their support. The reasons for this route selection are:

**4.2 LTC junction with the A2/M2**

The Eastern Southern Link (ESL) would terminate with the M2 at Junction 1. This is already a complex junction and using this will require a fourth level of slip roads on viaducts with piers up to 23m in height. The number of slip roads could result in safety issues owing to its increased complexity. Further, as this would not be a dedicated junction an incident on one part of it could potentially affect the whole junction, with implications for traffic diverting on the local road network. It would not provide sufficient resilience to an incident of this nature.

4.3 Conversely, the WSL would create a new junction on the A2. However, this would require realignment of the A2 north of Junction 1 of the M2 so that the required slip roads can be accommodated between the A2 and HS1 rail line. This realignment work can largely be completed offline with minimal disruption to the running of the A2. However, owing to the proximity of the existing slip roads a new link road would have to be built south of the A2. The coast-bound on-slip at the Gravesend (E) junction would be closed so that traffic would have a minor diversion to cross the A2, use the new link road, and join at the Shorne on-slip.

**4.4 Relationship with Gravesend**

Currently, the largest proportion of Gravesham Borough Council's planned growth is to the west of the town centre, but it is under pressure to find sufficient land allocations to meet its housing and employment needs. The new link in the Strategic Road Network to the east of Gravesend may encourage developers to put forward proposals that would see the urban area expand eastwards, which would be hard to defend against. However, the

choice of the WSL would create a defined boundary to the east of the town that would limit urban expansion.

4.5 Further, there is potential for the embankments required for the WSL alignment to be dual purpose and enhance local flood defences. The Thames Estuary 2100 plan (TE2100) requires a secondary defence to Gravesend and the WSL could provide this.

#### 4.6 **Impacts on the built and natural environment**

The Crossing route should be selected to minimise negative environmental impacts as much as possible. The WSL would have less negative environmental impact compared to the ESL, which passes directly adjacent to Shorne village.

4.7 The WSL would mostly be located outside of the Kent Downs AONB, with only a slip road located within it. Although the new road would be visible from parts of the AONB, the alternative ESL has a greater footprint within the AONB. Both routes would result in the loss of ancient woodland but the ESL will result in a greater loss of ancient woodland in the Great Crabbles Wood Site of Special Scientific Interest (SSSI) which is also a designated Local Wildlife Site. Both possible alignments would have an impact on listed buildings, including Chalk Church.

4.8 There are major strategic issues for surface water in relation to the location of the route and potential impacts relating to construction. Both routes cross the Thames Estuary Marshes but the ESL for a greater length is underlain by SPZ 3 (Groundwater Source Protection Zone) and may have restrictions as a result of crossing SPZ 1 and 2. Whereas the WSL provides an opportunity to enhance flood defences for Gravesend, the ESL would require more detailed assessment so that a final design can be formed that does not compromise flood defence plans.

#### 4.9 **Traffic flows**

The choice of WSL or ESL does not have a significant impact on the total volume of traffic using the LTC, but it does affect the distribution of traffic on the local network and between the two river crossings.

4.10 Assuming Route 3 is chosen north of the river then by 2041, compared to the WSL, the ESL will have 600 fewer vehicles Annual Average Daily Traffic (AADT) on the LTC and an additional 1,000 vehicles using the Dartford Crossing. This trend is true for all Location C routes. Again, assuming Route 3 is chosen north of the river, if the WSL is chosen, then in 2025 (opening year) there will be on average 500 fewer HGVs a day crossing the Thames than if the ESL was chosen (i.e. the ESL tends to attract more HGVs). With the WSL more light vehicles (cars and vans) would use the LTC rather than Dartford.

4.11 The ESL provides greater relief to the A2 west of the LTC (M2 Junction 1) and to the M20 at Maidstone, but it puts significantly greater pressure on the M2 east of Junction 1 compared to the WSL (in the region of 10,000 additional vehicles a day on average). There is little difference on opening year between

the two southern links on how much extra traffic they attract to the A226, but by 2041 the WSL increases average traffic on the A226 significantly more so than the ESL. On opening year, AADT on the A226 to the east of Gravesend is forecast to more than double with both the WSL and ESL.

4.12 There is forecast to be relatively little difference between the WSL and the ESL in the traffic attracted to the LTC. Therefore, on balance and considering the range of other potential negative impacts that the HE's preferred ESL route option has, KCC supports the Western Southern Link. On balance, the WSL would have less negative environmental impacts and is the only option creating a new junction with the Strategic Road Network with opportunities to improve flood defences and define urban growth boundaries for Gravesend.

4.13 *Can the WSL be constructed without any impact on the AONB?*

*Mitigation for the impact on the historic environment.*

*More to be added from Officer comments on the heritage implications.*

*Irrespective of which Link in Kent is chosen there will be an improvement in air quality at Dartford and no sensitive receptors (residential properties) will be at risk of exceeding air quality limits. The HE assessment states that traffic pollutants decrease to background levels 200m away from the centre of the road, however, more detailed air quality modelling will be undertaken in the next phase of scheme development. KCC is liaising with GBC on the air quality and noise implications.*

*With both route options cycle routes, footpaths, bridleways and other public rights of way will be affected, resulting in diversions and possibly severance. There will also be some loss of amenity through impacting on local woodland. The WSL will directly affect the Southern Valley Golf Club. The extent of the impacts on community facilities will not be quantified until the next phase of the project but both alignments will have impacts.*

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

Eastern Southern Link – **Tend to Agree**

Western Southern Link – **Strongly Agree**

5.1 On balance KCC strongly agrees that Location C is the right corridor to locate the new Crossing within. The WSL is KCC's preferred route in Kent for the reasons set out above and for those reasons implores the DfT to disregard HE's preference for the ESL.

5.2 *More information to follow on whether KCC will support the ESL if it is a choice between that and no crossing.*

**6 Q: 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?**

- 6.1 KCC strongly agrees with the choice of the Location C corridor for the new Lower Thames Crossing.
- 6.2 KCC strongly supports the choice of a bored tunnel because this would minimise the impacts on residents and the environment in North Kent. It will also eradicate the risk of a closure due to high winds, which already affects the Dartford Crossing. Of the three crossing alternatives (bored tunnel, bridge or immersed tunnel), the bored tunnel provides the least damaging environmental impacts and the most resilient crossing. KCC therefore agrees with the HE contention that it is the **only viable option**.
- 6.3 *Route choice north of the River does not make a significant difference to traffic flows and so it is proposed to support Essex County Council's preferred route.*
- 6.4 However, KCC strongly disagrees with the choice of the Eastern Southern Link and urges HE/DfT to instead support the Western Southern Link. The reasons for this support are explained in the previous two questions but include the comparatively reduced environmental impact, the reduced impact on heritage sites, the dedicated new junction with the A2, the greater distance from residential properties (whereas the ESL would divide Shorne Parish), and the potential benefit to flood defences.

**7 Q: We are proposing to create junctions with existing roads including the M2/A2, A226, A13 and M25. We would like to hear your views on whether you believe additional junctions would be beneficial. We would welcome any comments you may have on our proposals for junctions.**

**7.1 A226**

The proposals include a junction with the A226, improving accessibility to Gravesend and diverting traffic from the A2 to join the LTC at the A226. Under this scenario, it is likely that traffic on the local road network leading into the A226 is also increased. Whilst development in the Ebbsfleet Valley should have improved access to the A2 at Ebbsfleet, planned development along the riverside could see the A226 as a better route to/from the LTC. However, it is more likely that the A226 could be the more attractive route to the LTC from the Medway towns rather than using the A2. This would see an increase in traffic through Higham and on the local road network in the Hoo Peninsula.

7.2 It is KCC's view that longer distance traffic using the new Crossing should remain on the Strategic Road Network (motorways and trunk roads) and not leak onto the Local Road Network which would cause traffic problems for KCC's roads. Therefore before KCC can come to a view on this proposed junction, detailed interrogation of the modelling needs to be undertaken and understood so that the following potential issues can be explored. KCC would need to see HE's modelling to ascertain:

- The likely impact of significant additional traffic accessing the new junction with the LTC. Scenario testing including a "no A226 junction" needs to be conducted to establish how the junction impacts on the existing/future trip

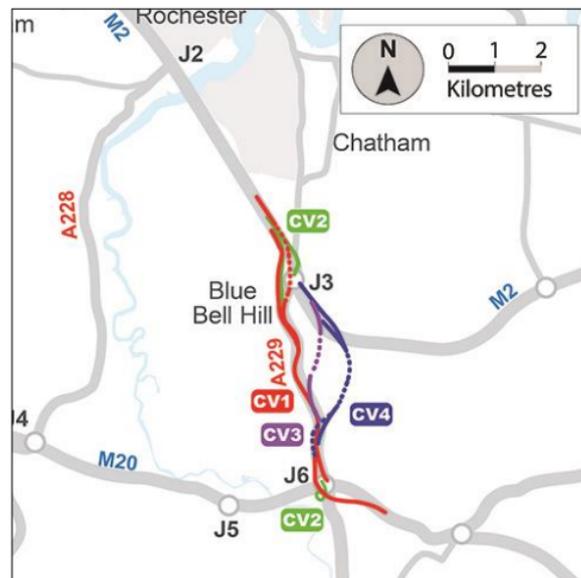
distribution on the local/North Kent road network. It also needs to determine how the “no A226 junction” scenario affects the economic impacts of the LTC.

- The likely impact of additional traffic on the A226 to east and west of the proposed junction with LTC route. For example, what would be the anticipated flow of traffic from Gravesend/Medway Towns which currently uses the A2/M2 to M25 Dartford Crossing alignment, which might be expected to transfer onto the A226 and access the proposed tunnel from the local road network.
- The likely impact of additional traffic on Gravesend East/Higham/Chalk from existing traffic changing routes from south and westerly movements, to an easterly movement.
- The likely (cumulative) impact of potential development pressures/consented development east of Gravesend.

### 7.3 C Variant

The C Variant was proposed in earlier consultations as a route upgrade associated with the construction of a LTC at Location C because it is a key link between the M20 and M2. Although in this consultation it is primarily referred to as widening of the A229 Bluebell Hill, the possible route options considered (diagram below) also include changes to the junctions at either end, such as free-flow slips.

#### ***C Variant – all route options considered by HE***



7.4 However, the C Variant has been ruled out of the proposals and it has been stated to have no influence over route choice between Dartford and the LTC. The modelling to support this contention is not provided in the consultation documents and has not been provided following requests from KCC to the HE to do so. KCC urges the HE and DfT to address the C Variant (upgrades to the A229 Bluebell Hill, including the possibility of free-flow slips at the M2 and M20 junctions) in wider road investment plans. Although KCC welcomes the

HE's commitment to consider the A229 in regional route planning, the A229 is the most direct link between the M20 and M2 and already suffers from significant congestion and stress at peak times. The link between the two motorway corridors needs to be considered as part of the Lower Thames Crossing project.

- 7.5 The limited traffic modelling data provided shows that on the M20 between the A228 (Junction 4) and the M26 (Junction 3) there is a forecast decrease in vehicles of 5,000 on average per day with the WSL and 6,400 with the ESL in 2025. Traffic flow data for the A229 is not provided but it can be inferred that these vehicles have diverted from the M20 to the M2, and it is likely that they will have used the A229 as the shortest and most direct link. Given that the A229 is at present a congested and stressed part of the road network in both the morning and evening peaks this clearly demonstrates that the C Variant is required to support the LTC.
- 7.6 Another consideration is the safety implications of increasing traffic on the A229. As the gyratory system at M2 Junction 3 is currently saturated at peak times, the extra traffic will increase blocking back on to the A229 from the off-slip road. The HE safety assessment shows a worsening of the accident rate on this road, but without access to the modelling report to assess how the queuing has been modelled, it is unclear if this is fully taken into account. With this in mind, the need for free-flow slips at M2 Junction 3 and M20 Junction 6 requires further detailed consideration.
- 7.7 Whilst KCC recognises and welcomes the HE's commitment to consider the A229 in ongoing regional route planning this is a foreseeable problem that can, and should, be resolved within the current planning and design work for the LTC.
- 7.8 **Wider network improvements**  
It is vital to the UK economy that the Channel Corridor operates efficiently at all times and is resilient to incidents on the network. Port traffic is currently routed along the M20/A20, which results in severance between Dover town centre and the harbour. With the construction of the new LTC, a second strategic route will be available between Dover and the Midlands and North – i.e. the potential bifurcation of the strategic route from the Southeast to the Midlands and North of the country. The project to revive the Dover Western Docks plus expansion of the existing Port would naturally split traffic so that for the Western Docks and Channel Tunnel would use the M20/A20, and traffic for the Eastern Docks would be encouraged to use the M2/A2. Bifurcation will also facilitate growth of Whitfield, Folkestone, Ashford and Maidstone by releasing capacity on the M20.
- 7.9 The LTC cannot be looked at in isolation. The network improvements that are essential to creating a high quality strategic corridor along the M2/A2 must be delivered in conjunction with the crossing to maximise the benefits it provides. To deliver bifurcation, upgrades are required along the M2/A2 at:

- M2 Junction 7 (Brenley Corner) improvements to increase capacity and provide free-flow between the M2 and A2.
- Dualling sections of single carriageway on the A2 north of Dover along Jubilee Way to Whitfield and near Lydden.
- M20 Junction 7 improvements to provide ease of access between the A249 and M20.
- M2 Junction 5 Stockbury improvements to provide free-flow between the M2 and A249, which will improve another strategic link between the M2 and M20.

7.10 These upgrades have been costed by KCC and could be delivered for (*high level cost estimates are currently being updated*) at 2016 prices.

7.11 In addition to these essential improvements, upgrades to the A249 to include widening and straightening, and the removal of at-grade junctions for local traffic would support bifurcation.

7.12 Finally, the likely impact of the proposal in terms of future traffic flows/travel patterns across the wider area need to be made. Particularly, the emerging Ebbsfleet Garden City and potential major developments, such as London Paramount Entertainment Resort, should be acknowledged. For example, would a new junction east of Chalk, accessing the A226, see a significant increase in traffic going through Gravesend, potentially worsening traffic conditions there (such as Lion Roundabout, A226, east of Gravesend which is already congested at peak times). This consultation, whilst it is focussed on route options, also needs to consider the impact on existing junctions on the local road network and identify where improvements would be required. Where these are as a result of the new LTC such improvements should be funded as part of the scheme to avoid them becoming issues for the Highway Authority at a later date.

## **8 Q: We would welcome any other comments you may have on our proposals.**

### **8.1 Financing the Crossing**

The anticipated opening year of 2025 is unacceptably far away when serious capacity and congestion problems at Dartford are an issue today. The consultation documents state that using private sector funding would lead to a 2 year delay in opening the crossing (in 2027) but it is not clear why this is the case. KCC research has shown significant interest from the private sector in financing a new Lower Thames Crossing and that there are infrastructure investors in Europe, North America and elsewhere that are ready to be involved in such a project today.

8.2 KCC has, in 2016, updated the previously commissioned work looking at the appetite for private finance for a new crossing, the conditions that would be needed to secure such investment and the level of investment that would be needed. Key findings from this work which surveyed the views international banks, construction parties, fund managers and pension investors include:

- Option C is prioritised over Option A as the only option, given its overwhelming benefits to the UK, London, Essex & Kent, as evidenced in a number of reports.
- Use of tolls will allow the project to be self-funding and therefore can be delivered without the need for public funds. Toll setting is not an issue if there is a controllable trade-off between toll level and concession term length, allowing Government to control the parameters of the tolling rate.
- A Design, Build, Finance and Maintain (DBFM) model is desirable with a 35+ year concession arrangement that includes toll revenue from the existing Dartford Crossing.
- The tolling model should incorporate the existing (Dartford) and new Crossing and tolling regulations should be transparent and certain over the life of the concession.
- Government should consider holding confidential market meetings with identified funders and investors to discuss how to bring forward the project.
- The new Crossing and the Dartford Crossing should be integrated for project financing and the tolls should be aligned to provide optimal efficiency and traffic management. Not linking the two crossings will create a traffic volume risk situation that will render a private financing option for the new Crossing untenable for many investors.
- Traffic risk and Government willingness to see tolls increased are key to revenue forecasting and must form part of an acceptable model for Government and investors.

8.3 Although the details of the future charging regime are not part of this consultation, it is nevertheless stated that it is Government policy to toll estuarial crossings. Whether privately or publically operated, the tolls need to be operated in conjunction with the existing crossing so that they can be set to encourage bifurcation between the M2/A2 and M20/A20 corridors to/from the Port of Dover.

#### 8.4 **Minerals**

There are known mineral deposits (Sub-Alluvial River Terrace Deposits and River Terrace Deposits) that are threatened with sterilisation by the potential development at Location C. Therefore, the proposed development should identify the minerals that are threatened with sterilisation and in accordance with the National Planning Policy Framework's drive for sustainable minerals use in Section 142, seek to ensure that prior extraction is fully investigated for the chosen route.

#### 8.5 **Surface water**

The Assessment identifies major strategic issues for surface water in relation to location of the route and potential impacts in relation to construction. The Assessment, however, does not clearly state the impacts in relation to increased surface water flow from construction of the project itself, whether in relation to water quantity or quality. It would be expected that impacts relating to construction and operation will be mitigated through compliance with regulation for surface water management.

## 8.6 Compensation

It is essential that property owners, who have already been blighted by the two proposed routes, are fully compensated for the loss of property value and inability to now sell if they need or want to move. This consultation has caused considerable distress in the local community and a swift decision on the preferred route option must be taken by Government following the consultation so as to minimise the uncertainty around the two potential routes through the community.

## 9 Q: Do you have any feedback on this consultation – events, information provided, advertising, etc.?

- 9.1 The consultation was launched on 26<sup>th</sup> January 2016 without prior stakeholder notification and in a considerably rushed and unexpected way. Hard copies of the Scheme Assessment Report were sent to KCC a week after launch, and hard copies of the appendices (including the detailed plans) were received a week after that. The duration of the consultation, being only 8 weeks long, is a short period of time.
- 9.2 Information that is particularly pertinent to members of the public on the proposed routes, such as that relating to property blight, only became available online two weeks after the consultation had commenced. This is unacceptable and presumably unhelpful to the consultation because members of the public would have been able to submit a response before they had the full information available.
- 9.3 Of substantial concern to KCC is that a range of technical information that would have been helpful in assessing the impacts of the proposed scheme and route options is not available; and on requesting this information from HE it has still not been forthcoming. For example, the Appraisal Specification Report for the traffic modelling is referred to in the consultation documents but not published. Traffic volumes on key local links have also not been published despite these being of known importance to KCC and other stakeholders. For example, it is stated that the C Variant (upgrades to the A229) has been rejected from further investigation because it has been shown not to affect route choice between the Dartford Crossing and the LTC but the parameters used in the modelling are not known, including how the junctions and congestion at either end have been modelled. Similarly, the forecast traffic increases on the A229 Bluebell Hill have not been made explicit; rather the traffic volume data for both the M2 and M20 has been shown as links starting at the junctions with the A228. Therefore, increases in traffic on the A229 can only be inferred from this information.