

Response to the Lower Thames Crossing Route Consultation 2016



Introduction

The Highways England proposed scheme for the Lower Thames Crossing is strongly supported by businesses in the South East. Their primary concern is that a decision to proceed is taken as quickly as possible, that the necessary processes are undertaken speedily and that the new crossing opens by 2025 or earlier.

The primary objective of this response from the South East Local Enterprise Partnership (SELEP) is to provide a coherent business response to the consultation, reflecting the economic importance of the crossing nationally, regionally and locally. The UK currently faces a productivity challenge, one aspect of which relates to connectivity and infrastructure. It is also important that the UK exports more. The proposed Lower Thames Crossing has an important contribution to make to both challenges by opening new routes.

SELEP comprises public and private sector representatives from East Sussex, Essex, Kent, Medway, Southend and Thurrock. Its aim is to drive economic growth across this strategically important area. The area itself is home to nine ports, the Channel Tunnel, two regional airports, eight universities, high speed rail links and is a significant economic gateway enabling access routes to the North, South, London and European markets. Its business base covers some of the most important companies for UK plc in logistics, transportation and freight, goods and passengers. The proximity to London and geographical relationship to major overseas markets means that it is impacted by multiple route ways and therefore requires significant investment in the area.

Current investment in the area as facilitated by SELEP amounts to some half a billion pounds and will see the delivery of significant growth in homes of 18,000 units and employment generating 35,000 jobs by 2021.

SELEP has been involved in the consultation process on behalf of its stakeholders since its formation in 2011. It responded to the 2013 consultation and has continued to engage with businesses and local councils on this issue of national importance.

In the discussions and events facilitated by SELEP, of which there were approximately 200 businesses and business associations engaged, group and one to one interviews were held in a number of locations including events in Thurrock, Kent and Essex.

This consultation response brings together the varied views of these stakeholders and answers the key questions posed in the core of the consultation document outlined by Highways England on 26 January 2016. This submission also draws on the responses to the consultation from the local authorities in the area, including the two county and three unitary councils, and the partnerships spanning the Thames Gateway area.

The councils, economic partnerships, business organisations and many individual businesses in the SELEP area have also submitted their own responses to the consultation. This response does not attempt to bring together all their comments, rather it is intended to provide a high level response from a SELEP perspective, reflecting its focus on economic growth and the vitality of the business community.

This response sets out:

- SELEP's response to the core proposal;
- The benefits to business of the proposed crossing;
- Issues which SELEP considers require attention, including:
 - A small number of enhancements to the proposal;
 - A number of areas which require further work;
 - Wider network issues.
- A number of issues relating to the wider national and regional context; and
- SELEP's response to the environmental and community concerns.

The overall proposition

There is overwhelming support from businesses in the SELEP area for Highways England's (HE) proposed scheme: that is for the construction of a bored tunnel at Location C adopting Route 3.

Location A is not supported at any level. Their primary concern is that a decision to proceed should be taken as soon as possible and that following a decision steps should be taken to proceed to the construction stage as quickly as possible.

The strength of the business view reflects the urgent need to:

- Provide additional capacity to cross the Thames East of London and improve the resilience of that capacity;
- Avoid six additional years of congestion during the build phase which would be a significant risk under Location A;
- Reduce the severe congestion in South Essex and North Kent and increase the capacity and resilience of the strategic highways network in those areas;
- Improve the reliability of journey times which is critically important to businesses which rely on 'just in time' processes;
- Accommodate planned growth and enable further economic growth in the South East;
- Reduce the environmental impact generated by the current inadequate capacity; and
- Make the areas more attractive to investors and businesses.

The Lower Thames Crossing would have a significant contribution to make to two of the UK's most significant economic challenges: the need to increase productivity and level of exporting. This stance is strongly supported by most of the local authorities in the area reflecting their roles in enabling economic growth and as highways and planning authorities.

Thurrock Council and Gravesham Council are opposed to the proposed scheme and SELEP is keen to ensure that action is taken to address local concerns about the impact of the new crossing on local communities as well as ensuring on-going engagement to ensure all stakeholders can be well informed of the opportunities ahead.

If the new crossing is to have maximum impact on the economy of the area SELEP considers that there is a very strong case for enhancing HE's proposed scheme in two respects:

- First, by including a new junction east of Tilbury with a direct link to the Port of Tilbury. This will allow a significant improvement in the connectivity into and out of the port as well as to surrounding areas to future proof significant expansion plans; and
- Second, by constructing three lanes each way (plus an emergency lane), routes from the outset instead of the proposed two lane solution in order to ensure a greater degree of future proofing and considering the depth of the bored tunnel to allow accommodation of larger vessels in the future.

There are also a number of aspects of Highways England's proposal which require attention, most notably:

- The need to address the so-called "C Variant" – upgrades to the A229 Bluebell Hill, including the possibility of free-flow slip roads at the M2 and M20 junctions; and
- The proposals for new junctions with the A13 and M25, capacity for which must be fit for purpose.

Business and councils in the SELEP area believe that further investment is required in order to improve the strategic highway network in the area to enable further economic growth, address potential local consequences of the new crossing and enhance the resilience of the network. This includes, for example:

- Improvements to the A12/A130 junctions at Fairglen and Howe Green and M25 junction 28 in Essex; and
- A package of route upgrades in Kent, including M2 junctions 7 and 5 and M20 junction 7.

We are seeking a commitment from Highways England to actively pursue these schemes in parallel with the development and promotion of this proposal.

The proposed scheme: why it matters to business

SELEP and its stakeholders are clear on its position. It is indisputable that the Dartford Crossing has reached its capacity and a Lower Thames Crossing is required to support future growth and improve resilience.

The current crossing is considered to be one of least resilient areas of UK network. Connectivity of this area is critically important to the national, regional and local economy. Its growth is however hindered by a lack of investment in the national road network and the consequences of traffic levels carried by the Dartford Tunnel and QEII Bridge. The unpredictable nature of the current crossing is cited as a key factor for business dissatisfaction. It reduces business resilience and increases the level of risk which businesses must manage from a variety of perspectives.

The level of congestion reported on a daily basis and lack of resilience on the network as a result is seen as a business critical issue as it affects distribution of perishable and time sensitive goods. This can be costly for business, forces them to invest more heavily and can be easily remedied with a network that supports large-scale logistics.

Loss of productivity is cited as a major issue as businesses are forced to build significant contingency in their daily operations. It is also suppressing growth aspirations and opportunities for existing business expansion as well as dampening the level of inward investment and job creation.

The view of businesses is that there will be wider opportunities for their growth potential with an opening of this additional route. It will connect the south to the north and vice versa while opening up access to wider European networks. In a recent Kent business survey, the majority of respondents said that they would grow and employ more staff if they could rely on the existing crossing. At present businesses do not look for staff north or south of the river depending on their location as it is considered too high risk for business continuity. From an economic perspective, this limits business potential and overall skills development.

Businesses are confident that a decision to proceed with the new crossing would give existing businesses the confidence to invest in growth. It would also enable specific regeneration sites to be brought forward for development. Businesses also point to significant developments in the area which will have significant impact on traffic in the area and whose growth and success could be enabled by the proposed crossing. They include:

- The growth of the Port of Tilbury;
- Development at Ebbsfleet; and
- The London Paramount Park Proposals.

Most of the small and medium sized businesses reported that they have yet to consider and plan for the potential business benefits of the crossing. There was however an overwhelming sense that such investment, improved connectivity and resilience would open up new markets into the rest of county and internationally from a business to business perspective. They also envisage significant benefits in terms of travel to work continuity for their workforce.

The major ports in the area – Tilbury, DP World, Dover and Folkestone – and Eurotunnel – are particularly strong supporters of the proposed crossing. They are all planning for increased throughput which will have a significant impact on the highways network. Their plans and the existence of transport links to enable them is critically important to the economy of the South East and the UK as a whole.

A key factor in Kent County Council's support for the proposed new crossing is that it will enable its policy objective of "bifurcation" to be implemented, splitting traffic to and from Dover between the M2/A2 and M20/A20 corridors. Their aim is to create a high quality strategic corridor that will cater for the significant growth of the port and release capacity on the M20.

Similarly, logistics and freight companies strongly support the proposed crossing. They stress its national importance, particularly in the light of the time-sensitive nature of much freight traffic. A number of these companies have expressed their view that the access routes outlined need to also consider their positioning with the M11 which provides essential routes to the north and a route which many of the businesses in the SELEP consider vital for their daily operations and logistical planning.

Equally businesses in East Sussex highlight that gateways and connecting infrastructure into the region need to be unlocked to deliver the potential for the region. It is also considered key to helping to regenerate the area in terms of new industry and communities.

Finally, many of the councils in the SELEP area have highlighted the importance of the proposal to their ability to deliver their economic vision for their areas. Essex County Council, for example, says that the crossing is essential to the delivery of its Economic Growth Strategy: 'the crossing enables the efficient transport of people and goods, supports our locations for growth, and is essential for the development of the ports and logistics business sector.'

Issues which respondents consider require attention

Many of the responses to the consultation – from councils, businesses and business organisations – support the core proposal and go on to make the case for additional and often consequential investment. It is important to note, however, that the single most important issue for business in the SELEP area is for a speedy decision to be taken to proceed with the new crossing. This objective could be prejudiced if too many elements are added to Highways England’s core proposal. It is possible to categorise these issues into three headings:

- Enhancements which SELEP considers should be made to the core proposal;
- Issues which SELEP considers require further work; and
- Issues which SELEP considers could be pursued through parallel projects for which SELEP is seeking Highways England’s support.

This section deals with each category in turn.

Enhancements to the proposed scheme

SELEP supports a further enhancement to the proposed scheme which is the inclusion of a new junction at Tilbury.

The Port of Tilbury has made a strong case for the inclusion in the proposal of an all moves junction east of Tilbury with a direct link to the Port of Tilbury (including its three expansion sites). The benefits of this additional junction are that it would:

- Enable further growth at the port, supporting local, national and international trade;
- Provide further congestion relief to the Dartford Crossings and approach roads and improve the reliance of the local strategic road network;
- Provide environmental benefits to Tilbury residents and those along the A1089 corridor; and
- Improve connections to north Kent to provide better access to significant and growing employment opportunities.

Both Kent County Council and Medway Councils support the Western Southern Link which they have concluded is less environmentally damaging and safer than the Eastern Southern Link. Similarly, the Thames Gateway Kent Partnership has challenged Highways England’s preference for the Eastern Southern Link and has concluded that the case for the Western link would be even stronger if London Paramount goes ahead. This preference is also shared by Kent and Medway Economic Partnership.

Independent businesses however have an overall mixed view of whether a Western Southern Link or an Eastern Southern link would be more economically beneficial but are unanimous in their view that the delivery of a new crossing at Option C is needed and at the soonest opportunity. To this end, on-going engagement with SELEP and the partners it represents is vital from now on to ensure consensus can be reached and that the views of local businesses and stakeholders are fully taken into account.

Issues which require further work

SELEP urges Highways England to review its position on the “C Variant” – the upgrades to the A229 Bluebell Hill, including the possibility of free-flow slip roads on the M2 and M20 junctions. The A229 is the most direct link between the M20 and M2 and already suffers from significant congestion and stress at peak times. There is a strong case for considering the link between the two motorway corridors as part of the Lower Thames Crossing project.

Similarly, there are concerns in Essex that action should be taken to ensure that traffic using the new crossing should remain on the strategic road network and not leak onto the local network. More evidence is required before the councils and businesses in the area can make a judgement on proposals for new junctions with the A13 and M25, capacity for which needs to be fit for purpose.

Businesses are also keen to ensure that the new crossing has the capacity to accommodate continued traffic growth in the South East, including the increased throughput already being planned for by the ports and Eurotunnel. They question whether the current proposals for two lanes in each direction can meet that likely demand. This should be considered in the context of a refreshed focus on the potential for further economic growth in the Thames Gateway, including the government’s decision to establish the Thames Estuary 2050 Growth Commission.

The wider network and parallel programmes

Businesses in the South East question whether Highways England is thinking about the new crossing in the context of a more strategic view of the highways network in the region and nationally. Logistics and freight businesses in particular have called for a national freight strategy which would consider multi-modal freight routes.

SELEP is keen to avoid any changes which would delay a decision on Highways England’s core proposal, but it is keen to ensure that these wider strategic issues are being addressed. In addition, there are a number of programmes which it considers should be pursued in parallel and which have been included in a number of other responses to the consultation including those from Kent County Council, Essex County Council and other organisations which support SELEP.

In Kent this parallel programme would include:

- Improving M2 junction 7 to increase capacity between the M2 and A2;
- Dualling sections of the A2 specifically at Whitfield and Lydden;
- Improving M20 junction 7 to provide an improved link between the A249 and M20; and
- Improving M2 junction 5 to provide improved flow between the M2 and A249 and improve another strategic link between the M2 and M20.

In Essex it would include:

- Improving M25 junction 28 to ease important anti-clockwise movements;
- Improving the A12/A130 junction at Howe Green and A127/A130 at Fairglens which is already a bottleneck and would see increased traffic flow as a result of the new crossing; and
- Improving the A12/A130 junction which is currently a major bottleneck on the A12 and is also forecast to see increased traffic flow as a result of the new crossing.

Environmental and community concerns

Business in the SELEP area respects the decisions of Thurrock and Gravesham Councils to oppose the Highways England proposal because of its impact on local communities and environment. It is essential that the environmental and social dis-benefits of the scheme are minimised and mitigated as far as possible and that action is taken to ensure that those areas that bear the social and environmental costs of the scheme benefit from the opportunities for economic growth and regeneration.

In particular, it is important that:

- A speedy decision is taken to reduce the uncertainty faced by local communities and property owners;
- Property owners are fully compensated for the loss of property value and their inability to sell; and
- There is an integrated approach to local planning in Thurrock and Gravesham and the detailed planning of the new crossing.

Conclusion

The inadequacy of the current Dartford Crossing is a major weakness in the national and regional highways network and the congestion that frequently results undermines the economic strength and potential and the Thames Gateway and the wider SELEP area. This has serious consequences for individual businesses, increasing costs and constraining their appetite for growth. It also contributes to the national productivity challenge.

Business in the SELEP area strongly supports Highway England's proposal for a bored tunnel at Location C adopting Route 3. Their priority is to ensure that a decision to proceed is taken as soon as possible.