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Chief Executive, Highways England  
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Guildford  
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HW/AD/144638

5 December 2018

Dear Mr O'Sullivan

### **Lower Thames Crossing Statutory Consultation Response**

We welcome the economic benefits the Lower Thames Crossing will bring the County by improving links between Kent and Essex.

However the crossing must not be looked at in isolation. Changes to traffic flows mean that roads downstream of the crossing must also be improved to avoid gridlock. It is important that upgrades are made to connecting roads in time for the opening of the crossing in 2027.

It is vital to the UK economy that the Channel Corridor runs efficiently. However Highways England's modelling shows significant growth in traffic, even without the Lower Thames Crossing. With the new crossing, and with many thousands more houses planned for Kent and Medway, the resilience of our roads will be severely tested.

The crossing is an opportunity to improve Kent's road infrastructure by bifurcating traffic to the port between the M20/A20 and M2/A2 corridors, relieving pressure on local roads. But this is not possible without improvements to the wider road network – particularly connecting routes between the M20 and M2 which are not currently part of the strategic network.

The following specific improvements are needed to support the crossing and make sure its benefits are fully realised. These must be completed before 2027.

## **The A229 Bluebell Hill**

The modelling shows traffic volumes on the A229 will increase by 10% even without the new crossing. With the new crossing the A229 – as the most direct link between the M20 and the A2 – will essentially become a trunk road. The junctions at either end of this road are already congested at peak times and this can only get worse. We recommend that this is considered a strategic road and upgraded accordingly.

Without upgrades to the A229 there is a risk that strategic traffic coming from the south and west will use, or be diverted, onto the A226, A227 and A228, which are not suitable. Therefore we think that improvements to the A229 should be considered part of the Lower Thames Crossing project.

## **A228**

Almost 30,000 new homes are planned for Medway by 2035, many of which will be off the A228 – increasing pressure on Junctions 1 and 2. The Lower Thames Crossing upgrade proposals only extend as far as Junction 1. Improvements are needed to divert strategic traffic away from this road and make sure it can cope with increased pressure from population growth.

## **M2 Junction 5**

Similarly, the modelling shows an increase in traffic at this junction, regardless of the Lower Thames Crossing. It is vital the current funding gap for improvement works to the Stockbury junction is filled to ensure this project remains in RIS1 and is delivered on time to avoid gridlock at this key strategic interchange.

## **A249 Detling Hill and M20 Junction 7**

The heavy congestion on Detling Hill and at Junction 7 is also modelled to get worse due to natural growth and housing development, and this will be exacerbated by the new crossing. Traffic coming from Eurotunnel will use this route to the M2 as will traffic travelling to the tunnel. Again, it is vital that improvements to both the A249 and, particularly, M20 Junction 7 are completed before the new crossing opens.

## **M20 Junction 4**

This junction remains over capacity despite an extra lane being added two years ago to the eastern bridge over the motorway. There will be an extra 2,500 homes in Tonbridge and Malling borough alone using this junction before the crossing is built. Southbound traffic must be directed away from the A228 once it leaves the tunnel to avoid even greater pressure on this highly congested junction.

## **M2 Junction 7 (Brenley Corner)**

This junction is now at capacity and has been identified as one of the country's top 50 accident hot spots. It must be re-built to allow free-flow between the M2 and A2, particularly for freight. Kent County Council has submitted for DfT funding for this junction but the projected timeline should it be successful – with design work and business case prepared in RIS2 and works delivered in RIS3 – is too slow. This work must be completed before the Lower Thames Crossing opens, otherwise the M2 will often be at a standstill along with the A2 each side of the junction.

## **A2 Dualling**

The Dualling of the single carriageway sections of the A2 from Lydden to Dover is essential to complete the strategic route along the M2/A2 to the Port of Dover. This is required not only for the resilience of the current network and to cope with increased traffic resulting from the Lower Thames Crossing. This must be completed before the Lower Thames Crossing.

## M2

Increased capacity is needed on the M2 to make it suitable for strategic traffic – for instance making it a smart motorway to create 3 lanes on the M2. This should be done before the Crossing opens.

## M25

Investment is needed in M25 Junctions 2 and 3 before the Crossing becomes fully operational to avoid congestion.

### **Secure overnight lorry parking**

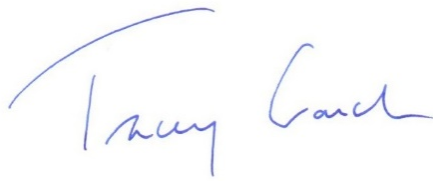
Section 107 of the National Planning Policy Framework published in July said that “Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance.”

Kent has a severe shortage of lorry parking spaces. The current consultation document states that 80 HGV spaces will be provided as part of a motorway service area. These spaces are suitable for drivers wishing to take a short break but they are not secure enough for overnight breaks. If drivers have high value goods they will not feel safe or comfortable parking in a publicly accessible area. We urge Highways England to include secure overnight lorry parking facilities in the Lower Thames Crossing in accordance with planning policy.

Our constituents will not accept undue pressure on local roads caused by strategic infrastructure. A free-flowing corridor to the ports is essential for the whole UK economy – so making the necessary upgrades to our roads to support the Crossing should be a national priority.



**Helen Whately MP**  
Member of Parliament for  
Faversham and Mid Kent



**Tracey Crouch MP**  
Member of Parliament for Chatham  
and Aylesford



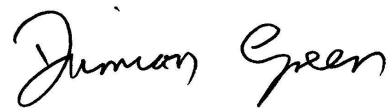
**Gordon Henderson MP**  
Member of Parliament for  
Sittingbourne and Sheppey



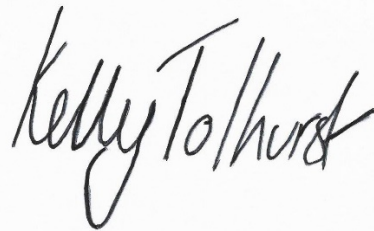
**Tom Tugendhat MP**  
Member of Parliament for Tonbridge  
and Malling



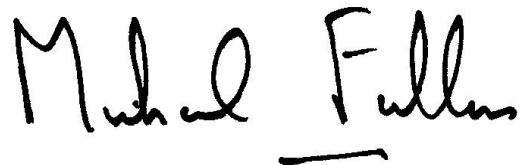
**Adam Holloway MP**  
Member of Parliament for  
Gravesham



**Damian Green MP**  
Member of Parliament for Ashford



**Kelly Tolhurst MP**  
Member of Parliament for Rochester



**Michael Fallon MP**  
Member of Parliament for Sevenoaks



**Helen Grant MP**  
Member of Parliament for  
Maidstone and the Weald



**Charlie Elphicke MP**  
Member of Parliament for Dover  
and Deal