

**Lower Thames Crossing formal consultation response to
Highways England**

Final Decision-Maker	Strategic Planning, Sustainability & Transportation Committee
Lead Head of Service/Lead Director	Rob Jarman, Head of Planning & Development
Lead Officer and Report Author	Helen Smith, Principal Planning Officer, Strategic Planning
Classification	Public
Wards affected	All

Executive Summary

On 10th October 2018, Highways England launched a 'pre-application' public consultation on the proposed Lower Thames Crossing. The consultation closes on 20th December 2018. This report considers the consultation and recommends that the proposed response as set out in paragraphs 1.28 to 1.33 of this report is submitted to Highways England as the Council's formal response.

This report makes the following recommendations to this Committee:

1. That the responses set out in paragraphs 1.28 to 1.33 be agreed as the Council's response to the Highways England 'pre application' consultation on the Lower Thames Crossing.

Timetable

Meeting	Date
Strategic Planning, Sustainability & Transportation	04/12/2018

Lower Thames Crossing formal consultation response to Highways England

1. INTRODUCTION AND BACKGROUND

- 1.1 Currently the Dartford Crossing is the only crossing of the River Thames east of London. The first two-lane Dartford tunnel was opened in 1963 with a second two-lane tunnel added in 1980. Subsequently, the four-lane Queen Elizabeth II Bridge was opened in 1991. Free flowing tolls via the Dart Charge was introduced in 2014.
- 1.2 There are 50 million crossings made each year on the Dartford Crossing and although it was designed for 135,000 vehicles a day, it carried more than 180,000 on some days in 2017. The Crossing has one of the highest incident rates on the strategic road network and it can take anywhere between 3 to 5 hours for the roads to clear following a closure.
- 1.3 Alternatives to the Dartford Crossing are the Woolwich Ferry (operational 14 hours/day), the Blackwall Tunnel, or the Silvertown Tunnel (expected to open in 2023). Alternatively, traffic could make a 100-mile diversion around the M25.
- 1.4 The proposed Lower Thames Crossing is expected to improve journey times, cut congestion on approach roads to the Dartford Crossing, increase capacity across the Thames from four to seven lanes in each direction, and allow nearly double the amount of traffic to cross the Thames. In its first year, more than 27 million drivers are forecast by Highways England (HE) to use the Lower Thames Crossing (around 75,000 vehicles per day).
- 1.5 In reaching this current pre-application consultation stage, Highways England have already refined their three initially identified broad locations ('A' at Dartford, 'B' at the Swanscombe Peninsular and 'C' to the East of Gravesend), to option 'C' being their preferred location.
- 1.6 In 2016, Highways England undertook a formal public consultation on their preferred location 'C' to the east of Gravesend and sought feedback on a number of route variants within that location corridor both north and south of the river. Maidstone Borough Council made a formal response to the consultation in support of the preferred route 'C' corridor and expressed a preference for the Eastern Southern Link route south of the river, as opposed to the Western Southern Link. The reason submitted for this preference was that "this route provides a better connection to the A2/M2 corridor and has the potential to remove traffic and thus increase capacity/resilience earlier on the A2 than the Western Southern Link" [see Section 9, Background Papers for the web link to the 2016 SPST report].
- 1.7 The Kent and Medway Economic Partnership (KMEP) also submitted a response to the 2016 Highways England consultation that was supported by MBC. In summary, the KMEP strongly agreed with the preferred location

('C'), citing improved connectivity to the Channel Ports, increased economic benefits and reduced journey times/greater road capacity. The KMEP response also sought to lobby for an accompanying package of funded improvements to the wider Kent motorway and road network (including the A229 and A249), of which it was stated that the proposals should be worked up concurrently to the Crossing proposals. For clarification, this requested package of additional works was not proposed by Highways England as part of their consultation, but was suggested by KMEP.

- 1.8 In April 2017, Highways England announced their preferred route, which included the Western Southern Link rather than the Eastern Southern Link. Again, no additional package of works to roads in Maidstone borough or in its immediate surrounds were proposed specifically in relation to the Lower Thames Crossing proposals.

Changes since the 2017 preferred route

- 1.9 In the time between the 2017 preferred route announcement and this 2018 pre-application consultation, a number of changes have been made to the scheme including: an increase in tunnel width from two to three lanes in each direction, and widening of the M2/A2 through junction 1 of the M2 to provide four lanes rather than three. The full list of changes, including maps and images can be viewed on the Highways England website: <https://highwaysengland.co.uk/lower-thames-crossing-home/>

2018 Development Consent order 'pre-application' stage

- 1.10 As part of the government's Nationally Significant Infrastructure Projects (NSIP) process, Highways England are now undertaking a formal pre-application public consultation exercise that seeks representations on the proposed Lower Thames Crossing and the evidence supporting the proposed scheme. The consultation commenced on 10th October 2018 and runs until the 20th December 2018. In undertaking this consultation, Highways England are going beyond their duty (as set out under section 47 of the Planning Act 2008) to consult with local authorities in the vicinity of the land to which the application relates, and are actively engaging with local authorities beyond that, including Maidstone Borough Council and other local authorities across Kent and Essex.
- 1.11 At Members' request, representatives from Highways England provided a briefing on 6th November 2018, outlining the case for the crossing and the current scheme proposals. Members had the opportunity to ask questions about the scheme and raised concerns predominantly around the issue of increased traffic flows and reduced road capacity in and around Maidstone – most notably the A229, Bluebell Hill and the M2 Junction 3.
- 1.12 The following sections of this report highlight the key elements of the current pre-application consultation that are considered of most relevance to Maidstone borough.

Traffic modelling

- 1.13 The Traffic Forecasting Report released as part of the supporting documentation to the consultation (for link to the non-technical summary see Section 9, Background Papers), uses the Lower Thames Area Model (LTAM) to forecast the impact of providing a new road crossing of the River Thames on the performance of the highway network. The LTAM is used to assess the changes in traffic flows, travel times, speeds and levels of congestion on the road network. The modelled hours are AM peak (0700-0800), Average inter peak hour (0900-1500), and PM peak (1700-1800). The years modelled are 2026 (assumed opening year at time of modelling), 2031, 2041 and 2051. The two scenarios modelled are 'Do minimum', where the crossing is not provided but all other planned highways projects (not related to the Lower Thames Crossing) are undertaken; and 'Do something', where the crossing is provided in addition to all other planned highways projects (not related to the Lower Thames Crossing).
- 1.14 The core modelling includes all changes to the network that have funding or are more than likely to be built. It also includes planned land use developments that are classified by Highways England as "near certain" and "more than likely" to happen. For Maidstone borough, this includes projects such as: M2 J5 improvements; M20 J3-5 smart motorway project; and Maidstone Bridge Improvement Scheme. Developments modelled include: Land east and west of Hermitage Lane; North and south of Sutton Road, Langley; North of Bicknor Wood, Gore Court Road; Bicknor Farm, Sutton Road; Springfield, Royal Engineers Road and Mill Lane; Newnham Park, Bearsted Road; and Eclipse Park, Sittingbourne Road.
- 1.15 Understandably, the housing and employment developments input into the traffic modelling only provide a snapshot in time. MBC is in the early stages of a Local Plan Review, as part of which we will revisit our overall spatial strategy, housing numbers and employment land requirements. Anticipated adoption of the updated Local Plan is 2022. Based on the current thinking and indications from central government, it is highly likely that Maidstone, like many other Kent authorities, will be experiencing a significant uplift in their housing figures. This potential level of development goes well beyond that which has currently been modelled and is likely to have an even greater impact on both the local and Strategic Road Network in terms of both flow and capacity. As part of the ongoing Local Plan Review, MBC officers will ensure that Highways England remain aware of our potential levels of growth.
- 1.16 The traffic modelling for Maidstone shows that the A229 and M2 both have increases in traffic flows at the AM, PM and inter peak hours with the opening of the new crossing. Flow increases are, perhaps unexpectedly, greatest along the M2 west of the A229. Positively, there are reduced vehicle flows along the M20 west of the A229 at all times of the day as a result of road users altering their route north towards the M2 and the new river crossing rather than towards the M25 and the Dartford crossing.
- 1.17 The A229, Bluebell Hill is forecast to see an increase in traffic flows under the 'do something' scenario, equating to approximately 4,000 vehicles per day (rounded to the nearest 1,000) (see Section 9, Background Papers, Preliminary Environmental Information Report, para. 6.6.34). Highways England does not consider that this increase in vehicle flows justifies

mitigation measures specifically as part of the Lower Thames Crossing project of works.

- 1.18 However, whilst the increase in traffic flows are relatively modest relative to the project as a whole, it is important to understand the effect of the flows on the existing road capacity. For example, in 2026, during the morning peak hour, without the Lower Thames Crossing (the 'do minimum' scenario), a number of sections of the local road network including sections of the A229 and A249 reach 95% or more volume over capacity. Under the equivalent conditions in the 'do something' scenario, there is an increase in the number of road sections at 85%- 94.9%, including the M20, and 95% or more volume over capacity, as shown in the Traffic Forecasting Report Non-technical Summary (see Section 9, Background Papers). Anything above 85% capacity is likely to result in slower traffic speeds and more unreliable journey times.
- 1.19 Therefore, when put into perspective, whilst the capacity of a number of Maidstone's roads, or sections thereof, are forecast to worsen in the future; this is likely to occur with or without the construction of the Lower Thames Crossing. Whilst the crossing is forecast to increase the number of vehicles using the roads, particularly the A229; the issue of road capacity is far greater than just the effect of the proposed river crossing. Highways England is clear that when considered in isolation, the Lower Thames Crossing's effects on Maidstone's roads do not justify road improvements as part of the project.
- 1.20 However, this is not to say that funding for improvement works cannot or should not be sought outside of the Lower Thames Crossing project. From officer discussions with Highways England, it is evident that a preferred approach would be to explore other opportunities for securing funding of key road improvement schemes, such as the inclusion of projects on the upcoming Road Investment Strategy (RIS) 2 or RIS 3; or through the preparation of business cases to bid for funding from Highways England's designated funds or the government's Housing Infrastructure Fund (HIF).
- 1.21 Accessing these sources of funding has the potential to enable road improvement works ahead of, or in conjunction with, the construction of the Lower Thames Crossing. Indeed, the LTAM work may help to demonstrate the clear need for improvements to roads and junctions within Maidstone, irrespective of the Lower Thames Crossing proposals.

Air Quality

- 1.22 According to the Preliminary Environmental Information Report (PEIR) that accompanies the pre-application proposals, construction of the tunnel would result in an increase in traffic of up to 4,000 vehicles per day on the A229, which leads to an increase in NO₂ at receptor PEIR0358 of 1.7 µg.m⁻³ (annual mean), compared to not constructing the crossing. This increase remains below the annual mean Air Quality Strategy objective figure. There are no receptors which exceed the annual mean PM₁₀ AQS objective and there are expected to be no exceedances of the 24-hour mean objective for PM₁₀.

- 1.23 A full compliance risk assessment will be undertaken for the Environmental Statement, assessing compliance with the EU Directive on Ambient Air Quality. Based on current information, Highways England consider the project to have a low risk of leading to non-compliance with the aforementioned EU Directive.
- 1.24 Given that an Air Quality Management Area (AQMA) is designated specifically around the M20 (east of junction 5 to east of junction 7); the A229 from the town centre to just north of the junction with the M20 (junction 6); the A249 from the town centre to just north of the junction with the M20 (junction 7); and Maidstone town centre gyratory, it is important that Highways England undertake full air quality assessment as part of their Environmental Statement and if significant negative effects are predicted, it is imperative that Highways England work closely with MBC and KCC to agree appropriate mitigation measures to manage the effects of traffic in the affected area(s).

2018 pre-application: Consultation questionnaire

- 1.25 The 'pre-application' consultation questionnaire seeks views on the following main topic areas:

1. The need for the Lower Thames Crossing
2. The preferred route for the Lower Thames Crossing
3. Sections of the route (south of the river in Kent; the crossing; and north of the river in Thurrock, Essex and Havering)
4. Connections (south of the crossing and north of the crossing)
5. Walkers, cyclists and horse riders
6. Environmental impacts and how we [Highways England] plan to reduce them
7. Development boundary
8. Proposed rest and service area, and maintenance depot
9. Traffic
10. Charges for using the crossing
11. Building the Lower Thames Crossing
12. Utilities and pylons
13. Other comments
14. The consultation

- 1.26 It is proposed that the Council responds only to those questions of most relevance to Maidstone Borough in order that the response remains focused on the issues most likely to impact the borough and its residents. Highways England have asked officers, where possible, to suggest mitigation or improvements rather than simply highlighting road capacity issues. However, this would require specialist technical transport input.

- 1.27 The suggested responses to the relevant questions are as follows:

- 1.28 Question 1a: Do you agree that the Lower Thames Crossing is needed?
(*Strongly agree; Agree; Neutral; Disagree; Strongly disagree; Don't know*)

A: Strongly agree

Question 1b: Please let us know the reasons for your response to question 1a and any other views you have on the case for the Lower Thames Crossing.

A: Maidstone Borough Council (MBC) strongly agrees that the Lower Thames Crossing (LTC) is needed in order to provide greater long-term capacity and resilience on the Strategic Road Network and also to alleviate capacity issues in the area surrounding the Dartford Crossing. MBC recognises that without the LTC, the current issues surrounding the Dartford Crossing will only be set to worsen; negatively impacting upon those residents and businesses of Maidstone borough whom currently rely upon the Dartford Crossing to cross the River Thames.

1.29 Question 2a: Do you support or oppose our selection of the preferred route for the Lower Thames Crossing? (Strongly support; Support; Neutral; Oppose; Strongly oppose; Don't know)

A: Support

Question 2b: Do you support or oppose the changes we have made to the route since our preferred route announcement in 2017? (Strongly support; Support; Neutral; Oppose; Strongly oppose; Don't know)

A: Support

Question 2c: Please let us know the reasons for your response to Q2a-Q2b and any other views you have on our selection of a preferred route for the Lower Thames Crossing.

A: Maidstone Borough Council supports in principle the changes Highways England have made to the route since the preferred route announcement was made in 2017, particularly the widening of the M2 and A2 to junction 1 and the redesign of the M2/A2 junction in order to cut journey times and improve junction safety.

Whilst MBC generally supports the selection of the preferred route corridor 'C', the Council previously expressed a preference in favour of the Eastern Southern Link as opposed to the chosen Western Southern Link during the 2016 consultation. MBC considered the Eastern Southern Link to provide a better connection to the A2/M2 corridor and had the potential to remove traffic and thereby increase capacity/resilience earlier along the A2 than the alternative Western Southern Link.

Subsequently and in favour of this preference, Table 9.13: Summary assessment of the Eastern Southern Link, published in Highways England's LTC Approach to Design, Construction and Operation document, states that the Eastern Southern Link would provide higher benefits in terms of supporting sustainable local development and regional economic growth in the medium to long term and would provide better value for money than the alternative Western Southern Link.

Notwithstanding the Council's previously expressed preference, MBC recognises that the Eastern Southern Link would have had greater

environmental impacts including more significant intrusion into the AONB, and is satisfied with the additional appraisal work undertaken by Highways England concluding that the Western Southern Link is, on balance, more appropriate.

The Council's in principle support is, however, subject to caveat over concerns related to the impact of the proposed crossing on the local road network. Road capacity is forecast to reduce on sections of the A229, A249, and M20 east of the A229 due to increased levels of traffic. Whilst reduced road capacity is forecast with or without the construction of the Lower Thames Crossing, the impact is greater with the construction of the crossing. MBC strongly advocates the concurrent provision of road and junction improvements to ensure the benefits of the speedier, more reliable river crossing are not stymied by insufficient road infrastructure further along the road network, and to ensure that local traffic is not unduly impacted as a result of the crossing.

- 1.30 Question 3a: Do you support or oppose the proposed route south of the river? (This refers to the section of the proposed route starting at the M2/A2 and ending to the south of the southern tunnel entrance). (Strongly support; Support; Neutral; Oppose; Strongly oppose; Don't know)

A: Support

Question 3b: Please give us your comments or any other views you have on the proposed route south of the river, including structures such as bridges, embankments and viaducts.

A: Maidstone Borough Council supports the widening of the M2 and A2 to Junction 1 and the redesign of the M2/A2 junction in order to cut journey times and improve junction safety.

Question 3c: Please give us your comments on the tunnel, the north and the south tunnel entrances and any other feedback you have on this part of the proposed route. (This refers to two bored tunnels beneath the Thames, the southern tunnel entrance and the northern tunnel entrance).

A: The Council supports the proposal for both the north and south tunnels to have three lanes in each direction in order to maximise road capacity and to meet future need.

- 1.31 Question 6a: Do you agree or disagree with the proposed measures to reduce the impacts of the project? (This refers specifically to the potential environmental impacts of the Lower Thames Crossing). (Strongly agree; Agree; Neutral; Disagree; Strongly disagree; Don't know)

A: Neutral

Question 6b: Please let us know the reasons for your response to Q6a and any other views you have on the environmental impacts of the Lower Thames Crossing as set out in the Preliminary Environmental Report, including our approach to assessing and reducing the impacts of the project.

A: For Maidstone borough, the primary environmental concern relates to air quality around the main routes in the borough: the A229 and M20. Whilst the traffic modelling shows reduced traffic flows along the M20 under the 'do something' scenario, the A229 is expected to see in the region of an additional 4,000 vehicles, including HGVs, per day (rounded to the nearest 1,000). According to the Preliminary Environmental Information Report (PEIR), this would lead to an increase in NO₂ of 1.7 µg.m⁻³ (annual mean). As this is below the annual mean Air Quality Strategy objective figure, no form of air quality mitigation measures are currently being proposed.

The Council notes that this is a preliminary air quality assessment that will be updated at the Environmental Statement stage of the project, and that the need for mitigation or monitoring during the operational phase of the project will be identified at that point. If significant negative effects are predicted, it is imperative that Highways England work closely with MBC and KCC to agree appropriate mitigation measures to manage the effects of traffic in the affected area(s).

- 1.32 Question 9a: Do you agree or disagree with the view that the Lower Thames Crossing would improve traffic conditions on the surrounding road network? (Strongly agree; Agree; Neutral; Disagree; Strongly disagree; Don't know)

A: Disagree

Question 9b: Please let us know the reasons for your response to Q9a and any other views you have on the Lower Thames Crossing's impact on traffic.

A: Having viewed the Traffic Forecasting Report and Appendices, and non-technical summary, Maidstone Borough Council is in agreement that the Lower Thames Crossing would improve traffic conditions on the roads in the immediate vicinity of the Dartford Crossing, as well as the M20 and the A2 (west of the LTC junction), by reducing the flow of vehicles on these routes.

However, traffic flows along Maidstone's key routes, specifically the A229, A249, and M2 are generally forecast to increase as a result of the proposed Lower Thames Crossing. The A229 is expected to see an increase in the region of 4,000 vehicles, including HGVs, per day (rounded to the nearest 1,000). This increase in traffic flowing through and around Maidstone is of grave concern given that a number of key roads are shown to be at 95% or above capacity even under the 'do minimum' scenario (Figures 4.4, 4.6 and 4.8 in the Traffic forecast non-technical summary).

Of most notable concern is the M2 Junction 3 at the interchange with the A229/Bluebell Hill. This is an area already known locally to be under strain, particularly during the morning and afternoon peak times, with users regularly experiencing delays.

MBC therefore strongly recommends that the Lower Thames Crossing is accompanied by funded improvements to the road network. As the shortest route between the two motorways and already suffering from significant congestion at peak times, improvement work to the A229, specifically its interchange with the M2 at Junction 3, is of the utmost importance in order

to accommodate the forecast increase in vehicle numbers (particularly commercial vehicles).

Whilst it is understood from discussions with Highways England that the impacts arising from the proposed Lower Thames Crossing do not meet the threshold requirements for mitigation works as part of this specific project; it remains essential that upgraded links between the M2 and the M20 are developed and implemented ahead of or concurrently to the progression of the Lower Thames Crossing, to ensure the new crossing truly relieves congestion across the entirety of the network and does not simply displace it to the next weakest point.

The effects and consequences of the Lower Thames Crossing, beyond the immediate confines of the proposal area must be fully addressed in a coherent, timely and joined up manner. The benefits of improving journey times and reliability across the river can only be fully realised if improvements are made along the entirety of the strategic route network. Otherwise the initial benefits are simply stymied by queues and reduced traffic speeds further along the network; Junction 3 of the M2 being one such key junction.

1.33 Question 13: Other comments

A: Maidstone Borough Council remains supportive of the proposal for a Lower Thames Crossing and is satisfied that the Western Southern Link has been appraised to be the most appropriate route option above the alternative Eastern Southern Link. However, this support is caveated with a significant degree of concern for the worsening of existing problematic traffic pinch points with no proposals for mitigation measures or improvements to the wider road network.

For MBC, the primary concern with the current proposals is the increase in the volume of traffic on Maidstone's roads, especially along the A229; and the resultant inadequacy of the current M2 Junction 3 to be able to accommodate the increased traffic flows. Highways England's traffic modelling clearly demonstrates that a number of Maidstone's roads (or sections thereof) are forecast to be at 95% or more capacity even under a scenario where the LTC is not built. Therefore, whilst the forecast increase in traffic flows resulting from the construction of the crossing may be perceived by Highways England as relatively modest when considered against the LTC project as a whole; it becomes a different matter when they are added to the already at or near capacity roads and key junctions in the area.

Added to this concern is that the assumptions of "near certain" or "more than likely" housing and employment developments input into the traffic modelling are, understandably, only a snapshot in time. MBC is in the early stages of a Local Plan Review, as part of which we will revisit our overall spatial strategy, housing numbers and employment land requirements. Anticipated adoption of the updated Local Plan is 2022. Based on the current thinking and indications from central government, it is highly likely that Maidstone, like many other Kent authorities, will be experiencing a

significant uplift in their housing figures. This potential level of development goes well beyond that which has currently been modelled and is likely to have an even greater impact on both the local and Strategic Road Network in terms of both flow and capacity.

Whilst the Lower Thames Crossing is not responsible for this overall proposed increase in development and cannot be expected to account for all such uncertainties at this point in time, it is something that simply cannot be ignored as, without sufficient mitigation or road improvements, the impact of the Lower Thames Crossing may in fact suppress the wider housing and growth agenda. Any residual route capacity will be consumed, congestion will appreciate and capabilities for development generated improvements will be lost. An even greater scale of improvements will be required to enable development, likely with increased complexities and associated costs.

At a local level, improvements to the A229, particularly the interchange with the M2 (Junction 3) are imperative. Providing dedicated, free-flow slip lanes onto the M2 from the A229 would be one possible solution that would have a lesser impact on the AONB compared to the alternative of, for example, widening of the A229 carriageway. However, a clear overriding economic development case would need to be made to justify the need over any potential harm to the environment, landscape and ecology. Or indeed, exploring the option of a completely new tunnelled road, dedicated to carrying strategic traffic between the M2 and M20, thus freeing up capacity along the A229 for local traffic.

MBC is keen to work collaboratively with Kent County Council and Highways England to ensure that required improvements to the road network within and surrounding the borough are promoted as a priority through appropriate channels such as the government's Road Investment Strategy (RIS) 2 or 3, and that any potential sources of funding or support are pursued.

2. NEXT STEPS: COMMUNICATION AND IMPLEMENTATION OF THE DECISION

- 2.1 The public consultation closes on 20th December 2018. If agreed, the proposed response set out in this report will be submitted to Highways England to meet that deadline.
- 2.2 Highways England will then consider all consultation responses received and use them to further develop and refine their proposals where they consider it necessary. They will produce a consultation report explaining if, and how, their proposals have changed in response to the consultation feedback, and this will be submitted as part of the Development Consent Order application in 2019. This part of the process provides a short window of time to register to participate in the examination process, and to prepare Local Impact Reports, written representations and Statements of Common Ground where appropriate.

- 2.3 The DCO examination and a decision recommendation are both expected in 2020, with a final decision made by the Secretary of State in 2021 and commencement of the project soon after. It is expected that the Lower Thames Crossing will then be open to traffic in 2027.
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3. AVAILABLE OPTIONS

- 3.1 There are two options available to Members. Firstly, a formal response from the Council can be sent to Highways England; secondly Members could choose not to make a formal representation to the public consultation.
- 3.2 Choosing to make representations by way of a formal response to the public consultation will enable the Council's views to be taken into account as further consideration and possible refinement of the project by Highways England takes place prior to any subsequent application for a Development Consent Order (DCO) is made.
- 3.3 Members could choose not submit any formal response to Highways England on the public consultation. This would result in a missed opportunity to set out the Council's position and to ensure that the Council's comments are taken account of by Highways England prior to any submission of a DCO application.
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4. PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS

- 4.1 The preferred option is for the Council to make formal representations to the current public consultation within the timescales set out by Highways England as this is the only way to ensure the Council's views are formally recorded and can be taken account of in any project refinement prior to the submission of a DCO application by Highways England in 2019.
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5. RISK

- 5.1 The risks associated with this proposal, including the risks if the Council does not act as recommended, have been considered in line with the Council's Risk Management Framework. We are satisfied that the risks associated are within the Council's risk appetite and will be managed as per the Policy.
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6. CONSULTATION RESULTS AND PREVIOUS COMMITTEE FEEDBACK

- 6.1 Following a series of early studies and a public consultation in 2013, the government commissioned Highways England to carry out a more detailed assessment of two location options for the construction of a Lower Thames

Crossing: Location 'A' close to the existing Dartford Crossing, and Location 'C' east of Gravesend.

- 6.2 In March 2016, Maidstone Borough Council submitted a formal response to Highways England's consultation on the preferred crossing location 'C' and the various route options within that location, both north and south of the river. In summary, the submitted response expressed MBC's strong agreement with the preferred choice of Location C and the Eastern Southern Link route as opposed to the Western Southern Link route south of the river. Full details of the Council's response are given in the 2016 SPST report [see link in Background Papers].
- 6.3 As detailed in Section 1, the Council also supported the response submitted by the Kent and Medway Economic Partnership.

7. CROSS-CUTTING ISSUES AND IMPLICATIONS

Issue	Implications	Sign-off
Impact on Corporate Priorities	The scheme, if constructed, is likely to assist the connectivity of the Borough with the National Strategic Road Network and could potentially boost economic activity within the Borough. However, the potential increase in traffic flows could have an environmental impact on the Borough, particularly in terms of air quality. The environmental impacts will need to be balanced against the wider economic benefits that could accrue from the scheme.	Rob Jarman, Head of Planning
Risk Management	Risks are set out in Section 5 of this report.	Rob Jarman, Head of Planning
Financial	The work on this consultation is within already approved budgetary headings so there is no financial implications with the production of this report.	Paul Holland, Senior Finance Manager
Staffing	The recommendations can be delivered within current staffing levels.	Rob Jarman, Head of Planning

Legal	No implications arising directly out of this report	Estelle Culligan, Principal Solicitor
Privacy and Data Protection	No implications directly arising from this report.	Helen Smith, Principal Planning Officer
Equalities	No implications directly arising from this report.	Helen Smith, Principal Planning Officer
Crime and Disorder	No implications directly arising from this report.	Rob Jarman, Head of Planning
Procurement	No implications directly arising from this report.	Rob Jarman, Head of Planning

8. REPORT APPENDICES

There are no appendices as part of this report.

9. BACKGROUND PAPERS

The SPST committee report outlining the Council's formal response to Highways England 2016 consultation on the Lower Thames Crossing route consultation can be viewed here:

<https://meetings.maidstone.gov.uk/documents/s47535/Response%20to%20Consultation%20by%20Highways%20England%20on%20proposed%20Lower%20Thames%20Crossing.pdf>

LTC Traffic Forecasting Report Non-technical Summary can be viewed here:

https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/LTC%20a%20Traffic%20forecast%20nontechnical%20summary.pdf-1

LTC Preliminary Environmental Information Report (PEIR) can be viewed here:

https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/LTC%20Preliminary%20Environmental%20Information%20Report%20PEIR%20Non%20Technical%20Summary.pdf-1

LTC Design, Construction and Operations can be viewed here:

https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/LTC%203_4%20Design%20Consultation%20and%20Operations.pdf