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Your Reference:

TR010032

Date: 10th March 2023

Dear Rynd,

RE: Application by National Highways for an Order Granting Development Consent for the Lower Thames Crossing (LTC) – Principal Areas of Disagreement Summary (PADS) Tracker

Following the Examining Authority's request for a Principal Areas of Disagreement Summary (PADS) Tracker, as outlined within the Procedural Decisions and other information following issue of Acceptance decision letter (dated 19th December 2022), please find enclosed the first iteration of Kent County Council's (KCC) PADS Tracker. This document will be updated and resubmitted throughout the Examination when requested by the Examining Authority.

It is imperative that the detailed comments that follow in this PADS Tracker are read in the context of our overall support for this strategically significant project. KCC has supported proposals for a new estuarial crossing for many years and we have expressed our strong support through many consultations led by the Applicant, National Highways, and the Department for Transport (DfT). KCC's support for the project is stated in its statutory Local Transport Plan 4 (LTP4), where the LTC is identified as a key strategic priority, and also part of the long-term transport policy aim of bifurcation.

It is clear that LTC is of strategic importance to the long-term economic prosperity of this country going forwards, but it will (together with the Dartford Crossing) serve an equally important local function. With increased crossing capacity and greater journey time reliability, residents in Kent will have a much greater range of opportunities for work, education and leisure. Currently this market is suppressed by the unreliability of the Dartford Crossing, which constrains productivity in the Lower Thames area. To not proceed with the project would lead to a worsening of the existing unacceptable conditions at Dartford as well as restrict economic growth and miss out on productivity benefits nationally, regionally and locally.



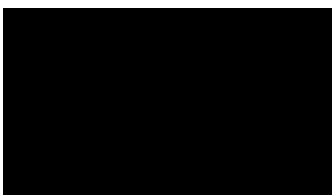
KCC has been heavily involved in negotiations with the Applicant regarding a Statement of Common Ground (SoCG) (APP-126). The SoCG submitted as part of the application is a National Highways document that reflects the Applicant's position at the time of submission, setting out matters agreed, not agreed and under discussion. This PADS Tracker provides a summary of KCC's view of the principal areas of disagreement currently within the Statement of Common Ground. We strongly feel these are issues that can be resolved throughout the Examination through timely cooperation of relevant parties and the intervention of the Examining Authority. Whilst KCC is keen for these issues to be resolved, it is vital any Requirements placed upon the Applicant do not result in significant delay to the delivery of the LTC.

The matters outlined below will be expanded upon within our Local Impact Report and Written Representation but in summary, our current principal areas of disagreement relate to:

- Wider Network Impacts
- Public Transport and Active Travel
- Sustainable Transport and HGV Parking
- Inappropriate HGV Parking
- Traffic Modelling
- Construction Impacts
- Road Asset Maintenance
- Public Rights of Way (PRoW)
- Tilbury Link Road/Junction
- Skills and Employment
- Open Space and Ancient Woodland
- Socio-Economic Evidence – Impact on Community Assets
- Climate and Carbon
- Air Quality – A229 Blue Bell Hill
- Heritage and Archaeology
- Biodiversity
- Environmental Mitigation
- Waste Management
- Health Equalities Impact Assessment (HEqIA)
- Additional Issues Associated with the draft DCO and highways related documents

Should you require any further information or clarification, please do not hesitate to contact me.

Yours sincerely,



Simon Jones
Corporate Director – Growth, Environment and Transport

TR010032: Kent County Council Principal Areas of Disagreement Summary (PADS) Tracker
10th March 2023



Number	Principal Issue in Question	Statement of Common Ground Ref:	The brief concern held by Kent County Council which will be reported on in full in the Written Representation/Local Impact Report	What needs to; change, or be included, or amended as to overcome the disagreement	Likelihood of the concern being addressed during Examination
1	Wider Network Impacts - Strategic Road Network Improvements	SoCG Item Number: 2.1.25 2.1.26 [KENT-#0001 KENT-#0020 KENT-#0023 KENT-#0024 KENT-#0025]	LTC is only the first section of a new strategic route from Dover to the Midlands and the North which is desperately needed, given the anticipated growth in cross-channel traffic forecast at the Channel ports and the significant level of planned housing and economic growth in Kent over the coming years. KCC calls for further improvements to the Strategic Road Network providing a list of upgrades to the wider road network we consider are required to successfully realise the scheme's benefits, including improvements to the A229 and A249 and associated motorway junctions Improvements should be made to: - Links between the M2/A2 and M20/A20 via A229, A249 and along the M2/A2 corridor - Dualling of the A2 from Lyddon to Dover - Improvements to M2 J7 (Brenley Corner) - M2 Junctions 1, 2 and 3.	The Applicant, National Highways (NH), must urgently consider, as part of its DCO submission, the need for necessary wider network improvements to be incorporated within the next Road Investment Strategy (RIS) and assist in making the case to Government for funding for local road improvements through the Major Road Network. Whilst KCC welcomes the Department for Transport (DfT) announcement that in Road Investment Strategy 2 (RIS2) (2020-25) schemes will be developed for a RIS3 (2025-30) pipeline for some improvements to the M2/A2 corridor – namely A2 Brenley Corner and A2 Access to Dover. This has not been adequately considered by NH within its DCO documents. The corridor as a whole must be considered in response to the changing traffic flows resulting from the LTC. The omission of any improvements in RIS2 or RIS3 pipeline to M2 junctions 1, 2 and 3, which have been identified by the traffic model as being significantly affected by the LTC, is wholly unacceptable and must be revisited.	These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure a financial contribution to KCC towards improvements to the A229, or other action as appropriate to the concern under discussion. Likelihood: A229 - should be a key issue discussed at the Examination. M2 J1, 2, 3 - directly impacted by LTC and should be discussed at the Examination. A2 Dover Access and M2 J7 (Brenley Corner) are both RIS3 pipeline projects and therefore within the remit of the DfT to assess and ultimately approve.
2	Wider Network Impacts - Impacts on the Local and Strategic Road Network as a result of LTC that require mitigation	SoCG Item Number: 2.1.25 2.1.26 [KENT-#0006 KENT-#0156 KENT-#0547 KENT-#0063 KENT-#0256 KENT-#0263 KENT-#0264 KENT-#0269 KENT-#0314 KENT-#0340 KENT-#0341 KENT-#0342 KENT-#0356 KENT-#0379 KENT-#0569 KENT-#0576 KENT-#0574 KENT-#0613 KENT-#0619 KENT-New 1 KENT-New 14 KENT-New 17 KENT-New 18]	Wider Network Impacts (other than A229 Blue Bell Hill Scheme) The outputs of the modelling for the LTC DCO and the additional modelling and assessment undertaken by KCC shows that mitigation is required on the Local Road Network and also the Strategic Road Network that requires mitigation and commitment to address it. Without action to address the impacts on the wider road network, KCC is concerned that the scheme does not meet the relevant policy requirements. The Wider Network Impacts Management and Monitoring Plan (WNIMMP) (APP-545) states that its outputs should be used to seek funding from other sources. This is not acceptable. The following locations should be added to the WNIMMP scope: - The A206 Thames Way and its junctions, - The A226 to the east of Gravesend, - The A227 and its junction with Green Lane, - The A228 and junctions with Cuxton Road, Bush Road, Station Road, Pilgrims Road, Germander Avenue, Merralls Shaw Interchange as per KCC's WNI study, - Unsuitable rural routes between the A227, A228 and A229 (such as through Sole Street, Cobham and other villages), - The A229 should be monitored on the mainline as well as the motorway junctions either end, including Chatham Road between Old Chatham Road and the A229 as per the KCC WNI study, - M25 J1b and J2, - A2 Pepper Hill junction including Hall Road/Station Road/New Barn Road. WNIMMP (APP-545) baseline monitoring should be undertaken ahead of the construction of the scheme to avoid a distorted picture of traffic patterns rather than as currently proposed at 1 year before scheme opening. The land around the A206 is safeguarded for widening and the issues on this route have led to the establishment of a joint working group with Bexley and Dartford. The Applicant should join this group and assist in seeking future funding. Tables 7.17 and 7.18 of the Combined Modelling and Appraisal Report (APP-518) shows Valley Drive, Wrotham Road and Forstal Road are predicted to receive 'slightly adverse – large adverse' impacts, yet no mitigation is proposed in these locations. At Valley Drive and Wrotham Road increases in severance should be mitigated through the s.106 agreement, through measures including formalised pedestrian crossing points to be determined by KCC as the highway authority.	KCC requires that the scope of the WNIMMP (APP-545) is expanded to include all areas of concern that KCC has identified, including those identified in KCC's Wider Network Impacts study that is currently being undertaken in collaboration with the Applicant. Monitoring of the rural routes should be included in the WNIMMP (APP-545) through use of continuous ANPR to assess the impact of rat running on the Local Road Network. Ideally mitigation should be delivered by the Applicant ahead of the LTC opening to prevent congestion materialising. If not possible, a Requirement must be included as part of the DCO to ensure the WNIMMP (APP-545) includes provision for a funding package (including contingency and index linking) from which the Applicant can implement junction and link mitigations where required as per the monitoring data. Alternatively, then the funding package should be secured as S106 for KCC to draw down on for Local Road Network mitigation. Attendance of National Highways at A206 working group. Formalised pedestrian crossing points funded through a Section 106 contribution to deal with severance.	These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure S106 funding for mitigation, to expand the scope of their monitoring and management plans, or other action as appropriate to the concern under discussion. Likelihood: Impacts on the wider Local Road Network and Strategic Road Network should be a key issue discussed at the Examination.

TR010032: Kent County Council Principal Areas of Disagreement Summary (PADS) Tracker
10th March 2023



3	Wider Network Impacts - A229 Blue Bell Hill, M2 J3 and M20 J6	SoCG Item Number: 2.1.25 2.1.26 [KENT-#0021 KENT-#0156 KENT-#0157 KENT-#0548 KENT-#0738 KENT-#0739 KENT-#0742 KENT-#0743 KENT-#0745 KENT-#0746]	<p>Wider Network Impacts (A229 Blue Bell Hill)</p> <p>The modelling undertaken for LTC and additionally by KCC shows that LTC has an adverse impact on M2 J3, M20 J6 and A229 (Blue Bell Hill) so that this route requires upgrading. An upgrade must be made within the timescales of the delivery of the LTC to maximise the benefits of the LTC but also to prevent use of less suitable routes for traffic transferring between the M2/A2 and M20/A20 corridors. This is further emphasised by the allocation of compensatory land due to nitrogen deposition on the A229 and the impact of increasing traffic on the Maidstone Air Quality Management Area.</p> <p>This essential wider network improvement was originally identified as the "Option C Variant" in earlier iterations of the LTC plans. The DCO documents state that an improvement scheme on the A229 would "ready the network" for the LTC. Currently there is no commitment or funding confirmation for a scheme on this corridor. The increase in traffic on the A229 Blue Bell Hill as a result of LTC is unacceptable without mitigation from the project.</p>	<p>KCC has developed a Strategic Outline Business Case for some local road improvements to the A229 to be delivered through the Major Road Network (MRN) and Large Local Major (LLM) scheme programme. An option has been submitted by NH that addresses the traffic impacts of the LTC but KCC does not have sufficient match funding to secure this to delivery.</p> <p>It is therefore essential that the Applicant provides a contribution of £35m as the match funding element of the A229 Blue Bell Hill Improvement scheme LLM bid to DfT.</p> <p>Furthermore, KCC requests further data behind the maps and tables presented within the DCO application.</p>	<p>These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure a financial contribution to KCC towards improvements to the A229, or other action as appropriate to the concern under discussion.</p> <p>Likelihood: The impact of the scheme on the A229, M2 J3 and M20 J6 should be a key issue discussed at Examination.</p>
4	Public Transport and Active Travel	SoCG Item Number: 2.1.57 2.1.58 [KENT-#0008 KENT-#0073 KENT-#0076 KENT-#0764]	<p>There is no infrastructure proposed on the LTC to support and encourage increased sustainable travel mode share such as public transport., walking and cycling.</p> <p>Cross-river cyclist and bus demand does not appear to have been assessed. This is very disappointing given one of the reasons for the crossing is to open up new business opportunities, labour supply and market competition. This demand should have been considered in the business case and design.</p> <p>Journey time reliability is considered to be one of the most important factors that attracts or discourages people from using bus services. Whilst it is welcomed that buses would be able to use the crossing, if they get caught up in congestion it would affect reliability and discourage passengers.</p> <p>It is unlikely that any local bus operator will be able to deliver commercially viable services linking local employment, leisure, and residential zones across the Thames, including Demand Responsive Travel and Bus Rapid Transit because "the most suitable collection and drop-off points would be at the proposed M2/A2 junction and as far north as the proposed A13/A1089 junction" (stated by the Applicant). This will result in prohibitive public transport journey time for targeted local trips across the Thames. Nevertheless, this will not stop the currently suppressed demand for local crossings, which will engender private vehicles trip across LTC.</p> <p>KCC questions the compliance of the scheme with Circular 01-2022, 'Strategic road network and the delivery of sustainable development' which addresses sustainable development on the SRN and the requirement for schemes to take all reasonable opportunities to deliver modal shift, promote walking, wheeling and cycling, public transport and shared travel to assist in reducing car dependency. Likewise, the NPSNN requires consideration of alternative modes and KCC policy requires consideration of public transport.</p>	<p>The Applicant must reconsider providing priority infrastructure for public transport that would allow reliable operation, improve bus service attractiveness for user and operator, significantly increase sustainable local and regional accessibility between both sides of the crossing and ultimately lead to a reduction in traffic using the crossing. A solution could consider combining elements of the following:</p> <ol style="list-style-type: none"> 1. Provision of priority access to and from LTC for buses, mini-bus and coach of any form (bus lanes, signal, Intelligent Transport Systems, bus gate to/from the tunnel) 2. Dedicated Lane for buses, mini-bus and coach across the crossing (or high occupancy vehicle at the minimum) 3. Incident management: Technological solutions should be considered where bus/mini-bus/coaches are given priority over general traffic in the event of an incident. <p>As the use of Emergency access being ruled out by the Applicant for a number of reasons, KCC would like the Applicant to consider alternative priority accesses across the Thames for public transport as part of developing a future ready new highway infrastructure.</p> <p>A requirement to invite KCC Public Transport Team to the Sustainable Transport Working Group.</p>	<p>These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion.</p> <p>Likelihood: The scheme's support for sustainable transport options should be discussed at the Examination to test the compliance with national policies on this matter.</p>
5	Sustainable Transport and HGV Parking	SoCG Item Number: 2.1.57 2.1.58 [KENT-#0159 KENT-#0380 KENT-#0765 KENT-#0767 KENT-#0161 KENT-#0615 KENT-#0539 KENT-#0008 KENT-#0073 KENT-#0076 KENT-#0764]	<p>KCC fully encourages Highways England to maximise the opportunities from this scheme, not only to reduce congestion but to also encourage the transition to ultra-low emission vehicles. Essential to this is to have infrastructure that is fit for the future in terms of electric vehicle charging and suitable walking, cycling and public transport provision as part of the scheme.</p> <p>The lack of service area does not comply with Circular 01/2022 'Strategic road network and the delivery of sustainable development' with regards to maximum distances between facilities. This may also deter drivers of electric vehicles who may need to use rapid chargers en-route. Further, enhanced lorry parking in an area that suffers with a lack of facilities for hauliers would have been an ideal legacy benefit of the project.</p>	<p>KCC requests a copy of the assessment that considered walking and cycling provision across the LTC, that ultimately rejected this option.</p> <p>Provision for Non-Motorised Users (NMUs) crossing the Thames should be reconsidered as the detour to either the Dartford Crossing or the ferry would be significantly longer.</p> <p>Bus provision should be reconsidered as per PADSS ref. 4.</p> <p>Design of the emergency access at the northern tunnel portal must not preclude the potential for the future provision of a junction to provide which would allow motorists the opportunity to turn around and/or a motorway service area with lorry parking facilities.</p>	<p>These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion.</p> <p>Likelihood: Compliance with relevant policies on sustainable mode choice and provision for Zero Emission Vehicles should be considered at the Examination.</p>

TR010032: Kent County Council Principal Areas of Disagreement Summary (PADS) Tracker
10th March 2023



6	Inappropriate HGV Parking	SoCG Item Number: 2.1.15 2.1.16 2.1.17 [KENT-#0162 KENT-#0186 KENT-#0539 KENT-#0615]	KCC has concerns over HGV parking on the widened Thong Lane and Henhurst Road areas as well as others in the vicinity. There needs to be a clear strategy for dealing with unwanted HGV parking including both legislation and physical restrictions or there will be a legacy of anti-social behaviour and parking. A Roadside Service Area could potentially also provide electric charging stations and help contribute to achieving net-zero carbon.	KCC insists that government provides National Highways and KCC with the necessary enforcement powers to tackle cases of inappropriate lorry parking that will increase as a result of the new crossing.	Likelihood: Enforcement powers are within the remit of the DfT. Provision of RSAs is likely within the remit of the Applicant as a wider organisation and the private sector providers.
7	Traffic Modelling	SoCG Item Number: 2.1.23 [KENT-#0340]	The Base Year modelled traffic on the A226 appears low to the east of Gravesend, compared with DfT counts, so LTAM may not highlight some impacts of the LTC in this area. The A226 is of particular concern to KCC officers, in terms of road maintenance and construction traffic. Tables 5.9 – 5.15 of the Combined Modelling and Appraisal Report (APP-518) show the match at individual count sites in the model calibration for vehicles in each of the peaks. Only three of the 24 comparisons achieved the “required” 95% match. It is understood that not reaching 95% overall pass does not necessarily mean the model is unsuitable, but no explanation has been provided as to why it is acceptable. It is encouraging that the inner modelled area has a pass rate of between 91% - 96%. With regard to traffic flows at validation sites, paragraph 5.10.7 of the Combined Modelling and Appraisal Report states “Over 84% of the validation sites met the TAG criteria in the Inner Modelled Area in the morning peak hour, 86% in the inter-peak hour and 72% in the evening peak hour for all vehicles. This is considered a good match for a model that covers such a large area as the LTAM”. The 72% achieved in the inner modelled area is 23% lower than the ideal 95%. Some of the sites are shown as achieving a significantly low match with at least 2 in the low 40%. This is concerning and further explanation is required.	The Applicant to expand the scope of WNIMMP to include the A226 (as per request in PADSS ref. 2). Explanation of the model calibration process suitability is required, along with consideration given to whether it is anticipated that additional monitoring/mitigation (and how this would be secured) is needed to address any identified impacts.	These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion. Likelihood: All concerns around the transport modelling should be discussed and concluded at the Examination.
9	Construction Impacts - Measures to be conditioned on the Applicant	SoCG Item Number: 2.1.13 [KENT-#0535 KENT-New 8 KENT-New 9 KENT-New 11 KENT-New 12 KENT-New 13 KENT-New 15 KENT-New 16]	The DCO documents propose a number of measures during the construction phase. KCC has reviewed these and also requests that a number of additional measures are also conditioned, such as provision for electric vehicle charging at compounds, shuttle buses for workers, and additional restrictions on routing and timing for construction vehicles and construction workers. Related, NH proposes KCC attends the Travel Plan Liaison Group to support sustainable travel during the project. This is a significant amount of work and KCC requires funding to ensure our attendance can be provided.	The measures KCC has proposed should be a Requirement for any Development Consent Order made. A contribution of £2880 per year to adequately resource KCC to attend the Travel Plan Liaison Group is required. Secured through a Requirement of the DCO or the S106 Agreement.	These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion. Likelihood: This matter could be resolved at Examination.
10	Construction Impacts - Funding and monitoring	SoCG Item Number: 2.1.10 [KENT-#0465 KENT-#0520 KENT-#0521 KENT-NEW 10]	KCC is concerned about the impacts of construction on the wider highway network. For example, increased demand on the A20/M20 and the Local Road Network (including unsuitable rural routes) by drivers diverting to avoid roadworks. These diversions may not necessarily be official diversion routes, but still have the potential to cause gridlock on the wider Kent network. The use of inappropriate routes by HGV traffic is also a concern during the construction period, particularly on the A226 and A227	A requirement should be made to ensure the Applicant has a funding package for remedial actions should issues be identified, e.g. Travel Plan targets being breached, the potential need for highway schemes to deter general traffic from rat running through unsuitable rural areas. Continuous monitoring of construction traffic is required in order to ensure drivers are adhering to permitted routes only. GPS in vehicle tracking or ANPR. The results should be presented to the Travel Plan Liaison group along with any remedial measures proposed. Further route restriction to construction vehicles as KCC will set out in more detail, to be conditioned (as per PADSS ref. 9).	These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion. Likelihood: Measures to avoid unacceptable construction traffic impacts should be discussed and agreed at Examination.

TR010032: Kent County Council Principal Areas of Disagreement Summary (PADS) Tracker
10th March 2023



11	Road Asset Maintenance - Proactive strengthening of the existing network	SoCG Item Number: 2.1.8 [KENT-#0346 KENT-#0438 KENT-#0439 KENT-#0440 KENT-#0522 KENT-#0523 KENT-#0340 KENT-#0264 KENT-#0342 KENT-#0465]	A condition survey to be undertaken before and after LTC construction is insufficient to address concerns about the impact of the increased loading due to construction traffic on the Local Road Network, even with funding to return the network to its previous condition following the construction period. The assets should be pre-emptively strengthened by the Applicant prior to the start of the construction period to prevent asset failure.	Funding of £2.55m is needed to proactively strengthen the highway network (supported by £1.15m from KCC) as per the programme provided to the Applicant. Secured through a Requirement of the DCO or the S106 Agreement.	These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion. Likelihood: Measures to avoid unacceptable construction impacts should be discussed and agreed at Examination.
12	Construction Impacts - Public transport	SoCG Item Number: 2.1.18 [KENT-#0536]	All delays to buses should be minimised and avoided where at all possible. Achieving modal switch from private car to public transport is key to reducing congestion on a network, especially where physical mitigation opportunities are limited. Times of congestion on the network (caused by such things as long-term development construction) is a good opportunity to achieve this shift. Research shows the attractiveness of public transport services is mainly based on reliability and journey times and even the slightest increase in journey time can dissuade users. Under the construction phases presented, both the road network and the public transport network are disadvantaged (although it is noted that this mainly affects services on the A226). Incentives should therefore be provided to users to increase the attractiveness of public transport for both employees and existing local residents to reduce the overall number of vehicles on the network during construction. Every opportunity should be explored in prioritising public transport during this time through such things as dedicated bus routes on key networks affected by construction etc.	KCC require a financial contribution to provide additional buses during construction, to counter the delays that are predicted to occur. This will help to reduce delays and retain passengers during this time. KCC is reviewing the impacted bus routes and putting together a proposed mitigation package for the Applicant to implement.	These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion. Likelihood: Measures to avoid unacceptable construction impacts should be discussed and agreed at Examination.
13	Public Rights of Way (PROW)	[KENT-#0727 KENT-New 2 KENT-New 3 KENT-New 4 KENT-New 5 KENT-New 6 KENT-New 7]	KCC has a number of requirements around the amendments and upgrades to the Public Rights of Way (PROW) network, as set out in our Relevant Representation and forthcoming Local Impact Report and Written Representations. These include matters such as agreeing transfer of assets, commuted sums for maintenance, clarity on plans and legal status of routes being provided, and ongoing consultation with the KCC PROW and Access Service through the detailed design and creation of Traffic Management Plans. For example, KCC remains concerned that what is to be a key link in the Non-Motorised User (NMU) network and integral to long term East West connectivity south of the M2 corridor, is to be delivered by means of a permissive agreement. The route is also to accommodate NCN177 on a temporary basis through the construction phase through. There is no clarification as to the nature of the permissive agreement, the terms of the agreement or the parties to the agreement. There can therefore be no certainty moving forward that permission will not be rescinded -removing the link for NMUs and specifically equestrians and cyclists. Currently the provision south of the M2 corridor through Jeskyns Community Woodland cannot be considered adequate. Should the permission be revoked at some future point the only viable alternative for recreational users would be the replacement NCN177 route; this route is conceived as meeting the needs of commuting cyclists. It will inevitably, given its location, be of considerably lower amenity and unlikely to be used by equestrians given the proximity to traffic. Permissive access cannot and should not be viewed as a suitable alternative/ compensatory provision for NMUs. PROW routes need to have highways status.	Requirements to be imposed on the Applicant as follows include: <ul style="list-style-type: none">• Provision of an adequate commuted sum or ongoing maintenance arrangements for the upkeep of new routes.• Permissive access, particularly for equestrian and cycle use, is not to be viewed as a suitable alternative/compensatory provision for Non-Motorised Users (NMUs). PROW routes need to have highways status.• Installation of active travel counters 12 months prior to the start of construction; with the counters maintained for a period of three years post road opening.	These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion. Likelihood: This matter could be resolved at Examination.
14	Tilbury Link Road/Junction	SoCG Item Number: 2.1.29 [KENT-#0171 KENT-#0172 KENT-#0173 KENT-#0174]	The removal of the Tilbury junction means that there are no turnaround facilities for drivers who have crossed the river by mistake from Kent into Thurrock. Leaving the LTC at the A13 junction requires a long diversion to get back onto the LTC southbound and return to Kent if the LTC was taken by mistake from the A2. Design of the emergency access at the northern tunnel portal must not preclude the potential for the future provision of a junction to provide a link road to the port of Tilbury and/or a service area with lorry parking facilities.	Design of the emergency access at the northern tunnel portal must not preclude the potential for the future provision of a junction to provide either/or a link road to the port of Tilbury which would allow motorists the opportunity to turn around and/or a motorway service area with lorry parking facilities.	These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion. Likelihood: This matter could be resolved at examination if the design of the emergency access at the northern tunnel portal allows the potential to deliver a service area and/or Tilbury link road in the future.

TR010032: Kent County Council Principal Areas of Disagreement Summary (PADS) Tracker
10th March 2023



15	Skills and Employment	SoCG Item Number: 2.1.30 2.1.31 [KENT-#0012]	Local employment and procurement is a priority and KCC is keen for the scheme to use the local workforce, with apprenticeships and training provided. Whilst KCC welcomes the 'overarching objectives' listed in the Skills, Education and Employment (SEE) Strategy (APP-505) and broadly agrees with the associated 12 'key targets', for such a large project the numbers could be more ambitious. For example, 437 Apprentices in an expected total workforce of more than 20,000 is less than KCC's ambition for 2.5% of the workforce. There is also concern that the large demand for people with construction (and engineering) skills from the Lower Thames Crossing will draw on a labour supply which is already facing shortages in many skills areas.	Capital funding, secured through the S106 Agreement, towards the construction of a skills hub to provide training, re-training and up-skilling for roles in the Lower Thames Crossing, its supply chain and other local building projects.	These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion. Likelihood: This matter could be resolved at Examination.
16	Open Space and Ancient Woodland	SoCG Item Number: 2.1.46 [KENT-#0016 KENT-#0050 KENT-#0039 KENT-#0148 KENT-#0315 KENT-#0700 KENT-#0614 KENT-#0328]	Widening of the A2 must not impact on Shorne Woods Country Park or result in the loss of woodland in the SSSI. Expansion must remain within the existing boundary. Further revisions to the requirements of construction and utility diversions have reduced the requirements for loss of ancient woodland, but new road crossings over the modified A2 will impact on the woodland within the SSSI. It is noted that the SSSI boundary extends to include Park Pale and an existing access road. There would also be impacts on woodland adjacent to Thong Lane.	Both KCC and Natural England have indicated that the loss of SSSI woodland along Thong Lane could be avoided if the footpath was to be relocated to the opposite side of the road. This amendment to the design should be considered to protect the SSSI woodland.	These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion. Likelihood: This matter could be resolved at Examination.
17	Socio-Economic Evidence - Impact on Community Assets	SoCG Item Number: 2.1.32 2.1.33 2.1.34 [KENT-#0149]	Land around Thong, and also the Riverview Park area of Gravesend, to be used for environmental mitigation is welcomed provided that it is appropriate to the character of the landscape. With this permanent acquisition of land for environmental mitigation, also comes with loss of the Southern Valley Golf club, and while this is unavoidable for the route and environmental mitigation around the new road is welcomed, the loss of leisure amenities should also be compensated with new facilities provided nearby. Furthermore, where community assets/facilities are affected then suitable compensation should be arranged to offset the impact. For example, Shorne Woods Country Park is the county's most popular country park and a large proportion of its financial sustainability comes from car park income, particularly in school holidays and weekends, and other revenue streams such as education visits, shop, café, events, venue hire, log sales. The impact of lengthy diversions and congestion will impact on whether people visit or book Shorne Woods. In addition, the closure of Brewers Road bridge for any period would be significant for the park and have a large impact on visitor numbers as well as increasing traffic along local country lanes and through Shorne village. Where community assets/facilities are affected throughout the six year construction period then suitable compensation should be arranged to offset the impact. KCC wishes to see the Applicant work with local asset managers and owners, including Shorne Woods Country Park, to agree a sufficient monitoring strategy and mechanism of claiming compensation when there is evidence to prove construction of the Project has had a clear adverse impact on revenue generated.	A sufficient monitoring strategy and mechanism of claiming compensation when there is evidence to prove construction of the LTC has had a clear adverse impact on revenue generated by community assets, such as Shorne Woods Country Park. Secured through the S106 Agreement.	These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion. Likelihood: This matter could be resolved at Examination.
18	Climate and Carbon	SoCG Item Number: 2.1.37 2.1.91 [KENT-#0158 KENT-#0008 KENT-#0732 KENT-#0744]	The LTC should not disbenefit the efforts of local authorities and central government to improve air quality and achieve net-zero carbon. KCC have a target for the entire county of Kent to be Net Zero by 2050. Whilst the position taken within the Environmental Statement is that the project is 'not significant' at a national level, the scale of emissions anticipated from LTC (both construction and operational) are highly significant at a Kent level and will inevitably disbenefit our net zero goals and any intention to play our part locally in meeting the legally binding goals of the Paris Agreement. As it stands the proposals are inconsistent with DfT's Transport Decarbonisation Plan (2021) which expressly includes both modal shift and the infrastructure to support a transition to zero emission vehicles. LTC seeks to rely on the ambitions of the Transport Decarbonisation Plan for reducing exhaust emissions, but does not support the plan through the design principles. Electric vehicle charging infrastructure and prioritisation for buses would go some way to addressing this. Whilst KCC notes the inclusion of figures relating to the policy ambitions of the DfT's Transport Decarbonisation Plan, these figures remain ambitious and cannot form the basis of robust planning given the scale of policy implementation required to achieve them. The figures based on the TAG GHG emissions workbook and Emission Factor Toolkit version 11 (EFT v.11) should be the basis of expected carbon emissions from the project. Chapter 15 of the Environmental Statement (APP-153) is largely silent on compensation/mitigation relating to emissions, other than limited references to floodplain storage losses and nitrogen deposition compensation.	The Applicant should consider further their opportunities to mitigate this significant carbon impact through improving provision for EV charging along the route, prioritising public transport and fully investigating cross river proposals for cycling. Simply relying on ambitious proposals nationally to phase out petrol and diesel vehicles is insufficient. KCC would expect for this to be secured through a Requirement of the DCO. Consideration should also be given to ways of encouraging electric vehicles to use those parts of the affected road network routes that are most likely to be significantly affected by nitrogen dioxide emissions.	These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion. Likelihood: This matter could be resolved at Examination.

TR010032: Kent County Council Principal Areas of Disagreement Summary (PADS) Tracker
10th March 2023



19	Air Quality - A229 Blue Bell Hill	SoCG Item Number: 2.1.88 2.1.90 [KENT-#0738 KENT-#0739 KENT-#0742 KENT-#0743 KENT-#0746 KENT-#0745]	Further detail is required on the level increase in traffic around the A229 Blue Bell Hill and other local roads in order to understand what the impacts are for other pollutants/particulates. Furthermore, there is a lack of clarity regarding the impact of the increasing traffic on the M20/Maidstone Air Quality Management Area (AQMA) or how the declared pollutant (which is Nitrogen Dioxide https://uk-air.defra.gov.uk/aqma/details?aqma_ref=1744#1373) levels will be impacted despite the affected network falling within the AQMA. Impact on the AQMA is not acceptable to KCC and further indicates a need to mitigate the traffic impact of LTC. KCC has submitted a bid for improvements to the A229 to be delivered through the Large Local Major (LLM) scheme programme with an objective to improve air quality, particularly in the Air Quality Management Area. However, the funding available will not be sufficient to mitigate the impact of increased strategic road network transferring between the M2 and M20 as a result of the LTC, therefore these impacts must be mitigated by National Highways.	Contribution of £35million as the match funding element of the A229 Blue Bell Hill Improvement Scheme LLM bid to DfT. Secured through a Requirement of the DCO or the S106 Agreement.	These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion. Likelihood: The impact of the scheme on the A229, M2 J3 and M20 J6 should be a key issue discussed at Examination.
20	Heritage and Archaeology - Assessment	SoCG Item Number: 2.1.40 2.1.41 2.1.43 2.1.51 2.1.87 [KENT-#0307 KENT-#0735 KENT-#0750 KENT-#0757 KENT-#0759 KENT-#0331 KENT-New 19 KENT-New 20 KENT-New 23]	KCC supports the work done to date to seek to identify heritage assets and set out alternatives for further evaluation and mitigation of impacts. However, KCC is concerned that certain areas of the scheme have not been subject to archaeological field evaluation (APP-194) and there is a risk of unexpected archaeological discoveries, which may be of national importance. This is a particular concern in respect of the tunnel boring and development in the wetland areas of the scheme. Clarification is needed on how this issue is to be satisfactorily addressed. There remains a lack of detail on the assessment of undesignated heritage assets and particularly those with archaeological interest which require evaluation before a consideration of significance and impacts can be made. This remains a significant concern. Further clarification is also required on the proposals for landscape and planting mitigation areas, including Chalk Park, and the impact of these on the historic landscape of the area and the setting of, and ability to appreciate relevant heritage. It is unclear how the assessment (APP-150) has concluded vibration impacts during construction will have no significant impact on built heritage. Furthermore, clarification is also needed on whether a realistic approach was taken to assessing the impact on designated and non-designated built heritage assets and historic landscapes (e.g. the Darnley Estate), before it is possible to determine if the proposed mitigation is appropriate and sufficient.	The Applicant to provide specific additional detail in the Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMS-OWSI) (APP-367) and Code of Construction Practice (APP-336) and update any relevant supporting documents where necessary, including consideration to whether additional monitoring/mitigation is required. Types of detail will include: - Detailed plans of investigation and mitigation areas and methodologies, - Detailed consideration of the archaeological and historic landscapes, in which individual heritage assets have, and will be, defined by archaeological investigation -Detailed consideration of the archaeological and historic landscapes, which provide the setting for, and therefore contribute to the significance of, defined heritage assets (designated and non-designated). KCC will also seek internal specialist comment on the issue of vibration – this issue can be resolved with dialogue between relevant experts, which in this case may include Historic England.	These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion. Likelihood: Confident this matter could be resolved by ensuring additional detail is provided during the Examination process and that future necessary work is secured by processes set out in DCO documentation.
21	Heritage and Archaeology - Mitigation	SoCG Item Number: 2.1.42 [KENT-#0524]	It is unclear whether there will be sufficient flexibility in the process of design and build, as well as the resources, to provide for combinations of meaningful preservation in situ (as required by the REAC CH006, 007 and 008 and in the Design Principles) and/or recording in advance of loss to mitigate impacts on archaeology. KCC also has concerns about the lack of detailed recognition and explanation of the impact of the LTC on the historic landscape and the wider setting of heritage assets such as Cobham Hall and Thong village Conservation Area. It is perhaps also worth noting, that with regards to below-ground archaeological remains and historic landscape features, some of the proposed mitigation, such as landscaping, creation of ponds and woodlands etc. will have archaeological impacts.	The Applicant to provide specific additional detail in the Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMS-OWSI) (APP-367) and Code of Construction Practice (APP-336) and any other relevant documents (such as site-specific Written Schemes of Investigation) where the construction process and associated mitigation works are defined. Types of detail will include detailed plans of investigation areas and methodologies for investigative methods such as geophysical survey and trial trenching to define approaches to mitigation of impacts.	These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion. Likelihood: Confident this matter could be resolved by ensuring additional detail is provided during the examination process and that future necessary work is secured by processes set out in DCO documentation.

TR010032: Kent County Council Principal Areas of Disagreement Summary (PADS) Tracker
10th March 2023



22	Biodiversity Surveys	SoCG Item Number: 2.1.36 2.1.92 2.1.93 [KENT-#0316 KENT-#0512 KENT-#0731 KENT-#0756 KENT-New 29]	<p>The species surveys have not covered all habitats or species to fully assess the impact of the proposed development (for example moth surveys have not been conducted, all required bat emergence surveys not completed, bat activity surveys did not follow best practice guidelines and reptiles surveys do not appear to have been carried in all suitable habitat).</p> <p>The increase in emissions will potentially have an impact on vulnerable species of fungi, lichens and bryophytes as areas of the park that were buffered from the road will now potentially be exposed to higher levels of air pollution. More detailed surveys on lichens and bryophytes and invertebrates associated with the veteran trees should be carried out to better understand what the impact of the new development will be.</p>	<p>KCC are currently in discussions with the Applicant regarding the undertaking of additional surveys. This request has been noted by the Applicant and the County Council is currently awaiting confirmation of when these surveys will be undertaken. Where it is agreed by KCC that specific surveys are not required to be undertaken during the examination then the DCO should include a Requirement for the Applicant to undertake these surveys prior to start of construction.</p> <p>Mitigation strategies must be continuously updated following new survey results. In addition, a long term monitoring programme is needed to understand the impact of increased emissions on Shorne Wood Country Park and vulnerable species. This is to be secured through a Requirement of the DCO or the S106 Agreement.</p> <p>The Southern Valley Golf Course site must be managed and maintained by the Applicant during the timeframe of the DCO to ensure habitats do not improve as a result of fairways not being regularly cut.</p>	<p>These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion.</p> <p>Likelihood: This matter could be resolved at Examination.</p>
23	Biodiversity Net Gain (BNG)	[KENT-New 24]	<p>KCC is concerned that the BNG calculations for the Project is anticipated to be lower than 3% for Kent. Trading rules have not been satisfied and thus the positive net gain scores south of the Thames will be invalid.</p> <p>Furthermore, there are concerns that condition assessment information may be inaccurate – a limitation the ecologists acknowledge. BNG has been discussed since the original DCO submission in 2020 so the applicant has had sufficient time to collect this information to support the BNG assessment.</p> <p>There is also no mention in document 6.3 appendix 8.21 – Biodiversity Metric Calculations (APP-417) about how additionality has been dealt with, with regards to protected species. For example, receptor sites for Great Crested Newts/reptiles should only be allowed within the calculations up to no net loss and it is not clear within the submission if this point has been addressed.</p>	<p>The BNG calculations must be regularly reviewed and updated following new surveys results. The DCO should include a Requirement for the Applicant to undertake further work to ensure a minimum of 3% BNG can be achieved, but ultimately the Applicant should be aiming for 10%.</p>	<p>These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion.</p> <p>Likelihood: This matter could be resolved at Examination.</p>
24	Environmental Mitigation - Maintenance	[KENT-New 27 KENT-New 28 KENT-#0532 KENT-#0727]	<p>There is a need to ensure that proposed mitigation areas and habitat creation works will be managed in the short and long term. There is also a need to highlight that the habitats have to be retained long term and not lost as part of future developments (e.g. habitat creation as part of the mitigation for the High Speed 1 rail line is being lost as a result of this scheme).</p> <p>No information has been provided on who will be responsible for implementing the management (short or long term) or how associated funding will be secured. The open habitats, such as the meadows and chalk grassland will require minimal but very specific management on an annual basis.</p> <p>Woodlands are proposed to be created to mitigate the impacts of nitrogen deposition and there is a need to ensure they can be established, retained and managed in the long term. A number of the woodlands surveyed as part of this works were flagged up as not having any management and therefore as part of this process there is a need to question if further mitigation can be carried out through enabling management of some/all of those woodlands.</p>	<p>Management and monitoring plans need to form a Requirement of the DCO, with long term management plans reflecting the time it takes for a site to become established. Management plans should also be revised when necessary throughout their timeframe.</p>	<p>These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion.</p> <p>Likelihood: This matter could be resolved at Examination.</p>
25	Waste Management - Chalk Park	[KENT-New 31]	<p>Paragraph 2.3.77 of Chapter 2 of the Environmental Statement (APP-140) introduces the “creation of Chalk Park following construction”. National Highways is proposing the creation of Chalk Park as mitigation for the loss of open space as a result of the project (APP-126 item 2.1.33).</p> <p>It is not clear, however, whether Chalk Park is required to ensure the project is a sustainable pattern of development or if it is in fact required in order to effectively dispose or reuse of otherwise waste materials.</p> <p>It is not clear whether this is a disposal led activity at the bottom of the defined waste hierarchy, and as the least sustainable waste management outcome, this would not be in accordance with the Kent Minerals and Waste Local Plan 2013-30 (early Partial Review 2020).</p>	<p>Clarification is needed as to whether the creation of Chalk Park is sustainable and in accordance with the Kent Minerals and Waste Local Plan 2013-30.</p>	<p>These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion.</p> <p>Likelihood: This matter could be resolved at Examination.</p>

**TR010032: Kent County Council Principal Areas of Disagreement Summary (PADS) Tracker
10th March 2023**



26	HEqIA	<p>SoCG Item Number: 2.1.60 2.1.61</p> <p>[KENT-#0687 KENT-#0690 KENT-#0691]</p>	<p>The LTC project could increase health inequalities particularly around physical activity, access to open space and air quality without further mitigations being in place. Reducing health inequalities does not appear to be a consideration for the LTC despite the project objective being to minimise impacts on health and the governments levelling up agenda.</p> <p>Current mitigation appears to focus on Riverview and Shorne areas which have low levels of deprivation and generally perform above Kent and England averages on a number of PHOF indicators, however we would like to see a proportional universalism approach with mitigation being greater in particular in areas of deprivation and with higher levels of health inequality.</p> <p>Whilst it is positive that air quality is likely to improve in Kent as a result of the scheme, particularly in and around Dartford, not mitigating against increases in worsening air quality in certain areas will likely increase health inequalities. To not monitor air quality, particularly in areas which are expected to experience increases in air pollution and have a greater number of vulnerable residents who are more susceptible to health problems caused by air pollution, is disappointing.</p> <p>Areas of concern where there are predicted increases in air pollution due to LTC include:</p> <ul style="list-style-type: none"> •Higham ward •Shorne, Cobham and Luddesdown •Singlewell •Riverview •Westcourt •Chalk •Aylesford North and Walderslade •Snodland East and Ham Hill <p>All these areas have higher than average numbers of people who are more susceptible to health problems caused by air pollution yet despite an increase in air pollution predicted to be caused by the LTC no mitigations or monitoring have been suggested.</p>	<p>Interventions are required to mitigate loss of PROWs and access to open space during in particular the construction phase for residents of Westcourt and Riverside wards. These interventions are to be secured either through a Requirement of the DCO or the S106 Agreement.</p> <p>Additionally as a minimum provide monitoring equipment for areas in which air pollution is due to increase due to the impact of the LTC.</p>	<p>These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion.</p> <p>Likelihood: This matter could be resolved at Examination.</p>
27	Additional Issues Associated with the draft DCO and Highways Related Documents	[KENT-New 32]	<p>The issues raised regarding omissions within the draft DCO and highways related and other documents prevent KCC from being able to agree/disagree certain matters with the Applicant, as KCC requires adequate information in order to form a proper view. This is clearly unfortunate and KCC has tried to engage positively with the Applicant in resolving these issues.</p> <p>In addition to the issues above, greater clarity will be required from the Applicant on a range of important issues, including, for example:</p> <ul style="list-style-type: none"> • KCC needs to understand precisely which parts of the authorised development will be transferred to it as highway authority (e.g. roads, bridges, LEMP works etc). KCC needs to see a table/matrix of Schedule 3 Part 5 (list of road closures, classification of roads) and Schedule 1 (relevant part of the authorised development) to assist with understanding which parts of authorised development are to be transferred to KCC in order to inform any discussions and agreements. • KCC needs to understand clearly which roads in the Classification of Roads Plan (APP-041) relate to what Authorised Works and what works and new assets KCC will ultimately be responsible for. • The Applicant states that the Control Plan (referenced in APP-003), which is effectively the mitigation 'route map', is a non-statutory framework of documents, some of which are in the application and others which will be completed as secured by DCO requirements following consent. However, there is a clear gap in the DCO in terms of implementation of mitigation and the relationship of the documents identified within the Control Plan is not clear. • The discharge of requirements under the DCO will also place a very considerable resource burden on KCC as a relevant highway authority. KCC seeks a mechanism that ensures the Applicant will reimburse KCC with the costs of resourcing this additional work. This is not currently clear within the draft DCO and other documents. <p>KCC has also noticed DCO drafting issues in the draft DCO, such as the failure to include a 'time limit' within which development must 'commence'. As currently drafted, the DCO will allow unlimited time for the discharge of pre-commencement requirements. The above examples illustrate where the application documents are currently inadequate, but the issues are not limited to the above examples. Furthermore, once further information / clarification is provided, as requested above, additional issues may arise on the draft DCO and other documents which will require input from KCC so it can be satisfied its concerns have been adequately addressed.</p>	<p>Further information and clarification on a number of the DCO documents need to be provided before it can be satisfied that KCC's concerns have been adequately addressed. On the information currently available, however, it appears that these concerns are not adequately addressed in the draft DCO and the certified documents and/or an agreement with / assurances from the Applicant will be required.</p>	<p>These issues need to be addressed and resolved during the Examination stage with the timely cooperation of relevant parties and the intervention of the Examining Authority to impose planning obligations on the Applicant, to secure additional funding, to expand the scope of their scheme, or other action as appropriate to the concern under discussion.</p> <p>Likelihood: This matter could be resolved at Examination.</p>