

TR010032 Lower Thames Crossing

Procedural Deadline C (13 June 2023) written submission

Gravesham Borough Council (IP ref 20035747)

Introduction

1. This submission provides input to the Examination on the matters raised in item 5 of Annex D of the Rule 6 letter for submission at Procedural Deadline C.

Any written submissions on oral comments on the Preliminary Meeting Part 1

2. The Council provided written submissions at Procedural Deadline B [[PDB-005](#)] on the matters it wished to raise orally at the Preliminary Meeting (part 1) and sees no need to provide a post-event written submission of those oral comments, which would be repetitive of PDB-005. At Preliminary Meeting (part 1) the Council did make some additional oral comments seeking clarification of certain aspects, and those comments are included in the recordings of the event and in the associated transcript. In the circumstances, given that the Council was content with the clarifications that were provided by the Examining Authority (ExA) and by the Applicant, the Council sees no need to rehearse those matters fully here.
3. Consequently, the Council has limited additional comments to make over and above those previously made. The clarifications on various matters by the Examining Authority were very helpful, in particular about the purpose and content of the Issue Specific Hearings 1 & 2 (further enhanced by the draft agendas published on 12 June 2023). Also, the further information on the expectations in relation to Open Floor Hearings and the ability of the local authorities to comment on their own Local Impact Reports by way of a supplementary annex if issues emerged at the Open Floor Hearings that it was not practical to address in the LIRs.
4. On the principal issues, comments have already been made by the Council (see paragraph 14 of its Procedural Deadline B submission [[PDB-005](#)]) and a number of useful additional points came up from other parties, for example the importance of monitoring, as highlighted in our draft s.106 asks [[AS-070](#)].
5. The Council has been in discussions with the Case officer and National Highways about timing and venue for holding an Open Floor Hearing in Gravesend in the autumn. The Council notes that the ExA did indicate that it would be appreciated if firm proposals in terms of specific venues that may be available were put forward by the Council at Procedural Deadline C. The current position in that regard is that a date of 8 September is currently being discussed.
6. The Council mentioned the issue of the planning performance agreement (PPA) in paragraph 3 of its Procedural Deadline B submission [[PDB-005](#)]. In particular it mentioned that the Applicant had agreed to fund Thurrock Council for the preparation of its Local Impact Report and said that a similar offer should be made to the Council so that it can cope with the burden on its limited resources, especially in assisting the ExA with its Deadline 1 documents. The Council has written to the Applicant requesting that the existing PPA be extended to cover the preparation of the Local Impact Report. At the time of writing no response has been received to that request. Whilst the Council recognises the limited role of the ExA on the question of PPAs, the Council does ask the ExA to note that the lack of either a response or substantive assistance from the Applicant is creating difficulties for the Council and that may have implications for the content of the LIR and therefore its ability to provide comprehensive information to the ExA on all relevant impacts affecting the Council's

area and the communities and businesses within it. The Council considers that it would be unfortunate if there was an imbalance in the level and quality of information provided to the ExA north and south of the River about local impacts simply as a consequence of different levels of funding being provided by the Applicant.

Further written submissions

7. The Council has no further submissions to make on the matters raised orally at the Preliminary Meeting.

Requests to be heard orally at Preliminary Meeting Part 2

8. The Council would like to be heard orally at the Preliminary Meeting Part 2 should that meeting be held but the Council can advise that this would be in order to respond to any matters raised or any changes of circumstance and not because the Council has any new issues it wishes to raise at the present time. This is not therefore a request that the meeting be held.

Requests to be heard orally at Meetings listed in Annex E

9. Open floor hearings 1-3 - the Council does not expect to speak at these meetings and will therefore not complete an event participation form. The Council does intend to attend the hearings (south of the River) as an observer.
10. Issue Specific Hearings 1 and 2 – the Council and its legal advisers will complete event participation forms so that they can appear to respond to any questions from the ExA and pose any clarification questions if necessary.

The applicant's proposed Accompanied Site Inspection (ASI) Itinerary

11. In making these comments on the Applicant's draft ASI submitted at Procedural Deadline B [\[PDB-001\]](#), the Council has taken account of the Unaccompanied Site Inspections (USIs) that the Examining Authority has undertaken. The draft ASI does not include driving along the A289 and A226 through Higham and Lower Shorne and back into Gravesend, however USI3 did cover this, and in the circumstances the Council sees no need for this route to be added to the ASI. Two further additional items which the Council proposes the ExA should visit would be:
 - a. The local road loop through Cobham (Henhurst Road, Jeskyns Road, The Street, Halfpence Lane – in either direction) to appreciate the local road network south of A2
 - b. A visit to Cobham South Services to see how they perform a useful function for HGV drivers, other travellers on the A2 and local residents.
12. Both a. and b. could also be accomplished in a further USI. Additional locations may emerge during the course of the Examination, especially in the light of matters that may be raised at the Open Floor Hearings.

13 June 2023