

Planning Inspectorate Scheme Reference: TR010032
Unique Interested Party Reference: LTC-SP097
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By project webpage submission only

Dear Mr Smith

Summary of Written Representation - Deadline 1

Please accept this letter as a summary of the Written Representation on behalf of Medway Council.

The Written Representation sets out Medway Council's support for the Lower Thames Crossing (LTC), subject to actions and commitments concerning local impacts.

Relevant planned development

- Medway Council is concerned that the core scenario does not reflect the spatial distribution of relevant planned development and Medway's development needs.
- Following Medway Council's review, the core scenario was found to be based on a surplus of 1,400 homes and a deficit of 400,000 sqm non-residential floorspace in Medway's development pipeline. Almost all of the missing non-residential floorspace is associated with planning applications for development located at Kingsnorth and Grain. Sites at Kingsnorth and Grain are allocated for development in the Medway Local Plan 2003; they are among the largest sites for economic growth in the Thames Estuary and the wider region.
- The Uncertainty Log includes five highway schemes that have been included in the core scenario, however these schemes are uncertain. Therefore, local traffic impacts have been understated, particularly on the A289 – Four Elms Roundabout to M2 junction 1 route. This has been compounded by the Secretary of State's (Department for Levelling Up, Housing and Communities) decision to withdraw upfront funding for road improvements.
- Medway Council's oral comments during the early-stage Issue Specific Hearing 1 highlighted the existing M2 junction 1 as a development constraint. This issue emerged in the Transport Assessment to support a proposed development on the former Kingsnorth Power Station site. The LTC application would have ideally addressed M2 junction 1 if it had included planned developments at Kingsnorth and Grain in the core scenario.
- Medway Council did not have an opportunity to review the Uncertainty Log during the period October 2021 to early 2022. This is when updates to the future scenarios would have been made before the second application was submitted. Given the status, scale

and proximity of planned development at Kingsnorth and Grain in relation to the LTC, this matter is 'not agreed' in the Statement of Common Ground.

Medway's emerging Local Plan

- The Planning Inspectorate's Scoping Opinion, dated December 2017, required the Environmental Statement to consider Medway Council's emerging Local Plan.
- Although Medway Council is at an early stage of local plan-making, local housing need has been established since December 2020. Recent interventions since December 2022 have introduced uncertainty in local plan-making, however the standard method remains the starting point for determining local housing need. Medway Council has also published iterative versions of an Employment Land Needs Assessment since 2015.
- In August 2021, Medway Council received a letter from the applicant which confirmed the approach to housing growth assumptions. Further analysis has found that the core scenario assumes 4,600 fewer homes in Medway by 2040 (i.e. the end of the new Local Plan period) compared to the standard method. This presents challenges for local plan-making.
- It is unclear how the requirement in the Planning Inspectorate's Scoping Opinion, along with the scheme objective to support sustainable local development and regional economic growth in the medium to long term, has been met. However, Medway Council supports the LTC, subject to actions and commitments concerning local impacts.

Actions and commitments

- A contractor's report on behalf of Medway Council has recommended a review of the LTC in conjunction with an assessment to inform local plan-making.
- The Local Impact Report (LIR) presents an evidence base for Medway Council to require paragraph 5.3.4 and Plate 5.1 of the Wider Network Impacts Management and Monitoring Plan (APP-545) to add the Four Elms Roundabout (A289 / A228) as a location to be included in the monitoring scheme.
- Following the Written Ministerial Statement on 9 March 2023, which announced a two year rephasing to the construction funding for capital works, the monitoring scheme is unlikely to provide certainty in local plan-making, specifically funding sources in an accompanying Infrastructure Delivery Plan (IDP).
- Medway Council has commissioned a new traffic model and an assessment to inform local plan-making, including a 'with LTC scenario'. The assessment will include analysis to determine proportionate developer contributions from sites to be allocated for development, which is likely to include contributions due as a result of traffic flows generated by the LTC; the IDP will need to specify National Highways as a funding source. A commitment from National Highways would provide more certainty to support local plan-making.
- The LIR has set out the need for other actions and commitments:
 - An updated assessment of traffic-related severance on pedestrians (APP-525 and APP-529).
 - An appropriate noise insulation assessment for Cuxton and Halling ward must be carried out as soon as possible before construction starts.
 - The Project Air Quality Action Plan must consider off-site mitigation to deliver air quality improvements within Medway's air quality management areas, along with a financial payment to support air quality monitoring, modelling and associated plans (APP-350).

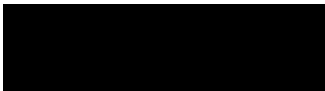
- Paragraph 3.4.9 of the Outline Materials Handling Plan (APP-338), along with the Register of Environmental Actions and Commitments (MW002) (APP-336), should refer to sourcing aggregates from proximate wharves, e.g. North Sea Terminal at Cliffe.
- There is a need for a feasibility assessment of off-site recycling, as well as recovery and disposal capacity. The Register of Environmental Actions and Commitments (MW012) (APP-336) should be updated accordingly.

Road user charging

- On 28 July 2020, during a briefing from the applicant, Medway Council members called for a discount scheme to be extended to Medway.
- Paragraph 2.1.4 of the Road User Charging Statement explains how the approach to charging (equal to the Dartford Crossing) emerged following the 2018 Statutory Consultation. The approach to charging has been assumed in the LTC's appraisal. A discount scheme for residents who pay their council tax to Gravesham Borough Council or Thurrock Council has also been assumed in the LTC's appraisal.
- There appears to be very little scope for a Department for Transport consultation on road user charging. It is unfortunate that opportunities to maximise the benefits of the LTC for residents and businesses in Medway, and to promote public transport use for longer journeys, appear to have been missed.

Medway Council will continue to engage with the applicant and in Examination hearings in September, October and November.

Yours sincerely



Andrew Bull MRTPI
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