



Executive Summary - A122 Lower Thames Crossing – Written Representation

**Produced by Kent County Council
(Interested Party Reference Number: 20035779)**

18th July 2023

This is a summary of the Written Representation produced by Kent County Council (KCC) as a statutory consultee and host authority.

KCC's Written Representation outlines the principal representations which KCC intends to make in relation to National Highway's Lower Thames Crossing (LTC) Development Consent Order (DCO) application.

Kent County Council's Overall Position

KCC has long supported proposals for a new crossing of the River Thames. It is clear the need for a new Lower Thames Crossing (LTC) is now urgent: demand to cross the Thames at Dartford exceeds the available capacity and having a single point of failure on the network leads to journey time delays, increased costs for businesses and individuals, and ultimately restricts economic growth both regionally and nationally. It is time for a significant change to our Strategic Road Network (SRN) to make it fit for purpose now and into the future. KCC therefore continues to support the proposed LTC and the investment in additional road capacity that will unlock new opportunities for Kent, the South East and the wider UK.

KCC's support for the project is stated in its statutory Local Transport Plan 4 (LTP4), where the new Crossing is also part of the long-term transport policy aim of bifurcation. This splitting of traffic to/from the Channel portals along the M20/A20 and M2/A2 corridors will help to release capacity and therefore relieve pressure on the M20, especially in times of disruption to cross-Channel services. To fully achieve this aim, improvements to the A2/M2 are needed as well as enhanced links between the corridors, such as the A229 (for which KCC needs a financial contribution from National Highways to deliver a Large Local Major scheme that will ensure this essential link is able to support LTC traffic when the project opens). The LTC must be delivered and seen as only the first stage in improving the A2/M2 corridor (Road Investment Strategy pipeline projects of A2 Brenley Corner and A2 Dover Access must also be delivered by National Highways in advance of the LTC opening for public use) to provide an enhanced strategic route from the Port of Dover to the Midlands and the North, essential to UK prosperity.

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. The detailed comments in KCC's submissions must be read in the context of our overall support for this strategically important project.

KCC's Written Representation

A scheme of this size and scale will inevitably result in a range of impacts to the local area. KCC's Local Impact Report (LIR) identifies the positive, negative, and neutral impacts of the LTC proposals on Kent, based on our local knowledge. Our Written Representation then elaborates on the impacts identified and proposes mitigation for the negative impacts of the LTC.

It is clear that with the correct monitoring and mitigation measures in place, the adverse impacts on the local area could be reduced. Only with these mitigation measures will the LTC be able to fully achieve its objectives.

KCC's requested mitigation for the identified impacts, outlined within our Written Representation, are summarised below.

Strategic Impacts

Strategic Impact A – Improved Network Resilience – Positive Impact

- No mitigation required.

Strategic Impact B – Reduced Journey Time Delays – Positive Impact

- No mitigation required.

Strategic Impact C – Increased Journey Time Reliability – Positive Impact

- No mitigation required.

Strategic Impact D – Supports Bifurcation between A2/M2 and M20/A20 corridors – Positive Impact

- No mitigation required.

Strategic Impact E – Generation of Economic Benefits – Positive Impact

- No mitigation required.

Transport Impacts

Transport Impact A – Impacts of the LTC on the Strategic Road Network (SRN) – Negative Impact

- A Requirement that National Highways should undertake mitigation works for any LTC impacts on the Strategic Road Network (SRN).

- The Applicant's monitoring strategy should be amended to include an assessment of increased use of unsuitable rural routes to avoid congestion on the SRN in the vicinity of the LTC.
- A Requirement that National Highways should make provision for Electric Vehicle (EV) charging points and HGV parking along the LTC route.
- A Requirement that National highways should make provision for cross-Thames active travel.
- Commitment from the Applicant to actively support the inclusion of the A2 Brenley Corner and A2 Access to Dover schemes in the next Road Investment Strategy.
- The M25 Junction 2 (M25/A2/A282) should be added to the list of SRN junctions to be monitored within the Applicant's Wider Network Impacts Monitoring and Management Plan (WNIMMP).

Transport Impact B – Wider Network Impacts (WNI) – Negative Impact

- The scope of the Applicant's Wider Network Impacts Monitoring and Management Plan WNIMMP (APP-545) should be further expanded to include the locations identified in the Wider Network Impacts (WNI) Study and to cover baseline surveys before construction starts.
- A Requirement that National Highways should deliver mitigation on the Local Road Network (LRN) as identified through the WNI study (details of mitigation schemes including costs to be provided later in the Examination on completion on the study – expected October 2023). In the alternative, a Requirement that National Highways should fund KCC to carry out the identified WNI study mitigation works.

Transport Impact C – Impacts of the LTC on the A229 Blue Bell Hill – Negative Impact

- KCC has developed an improvement scheme for the A229 Blue Bell Hill to mitigate the existing situation as exacerbated by the effects of the LTC. A Requirement that National Highways should carry out those works at its own expense should be added to the DCO. In the alternative, National Highways should fund KCC to carry out such works. If the Government does provide the Large Local Major (LLM) funding for the mitigation works, then National Highways should provide the 15% match funding (anticipated to be approximately £35 million) towards those works.

Transport Impact D – Road Safety Impacts of the LTC – Positive Impact for the Strategic Road Network (SRN) but Negative for the Local Road Network (LRN)

- A Requirement that National Highways must carry out an International Road Assessment Programme (iRAP) scenario assessment of the Project itself, together with local routes demonstrating a casualty cost as a result of the Project (A226, A227, A228 and A229), and undertake works required to mitigate the adverse safety impacts of such assessment.

Transport Impact E – Public Transport and Active Travel Impacts of the LTC – Negative Impact

- A Requirement that National Highways must submit a scheme to the Secretary of State for approval, following consultation with KCC, to identify and fully fund mitigation to local bus services which are disrupted as a result of temporary works during construction.
- A Requirement that temporary works are identified in writing to the KCC Public Transport team at least four weeks in advance of them happening and required compensation discussed at the same time based on £200 per additional operational hour.

Transport Impact F – Severance Issues for Walkers, Cyclists and Horse Riders (WCH) – Positive to the Cobham Area but Negative to Valley Drive and Wrotham Road

- No mitigation required for Cobham area.
- A Requirement that National Highways must submit a scheme to the Secretary of State for approval, following consultation with KCC, to identify the impacts on Valley Drive and Wrotham Road and fully fund mitigation appropriate mitigation measures. In the alternative, KCC would accept a Section 106 Agreement for these mitigation measures to be secured.

Transport Impact G – Dangerous Goods Vehicles (DGVs) and Oversized Vehicles – Negative impact but with potential to be positive

- A Requirement that National Highways submits to the Secretary of State for approval, following consultation with KCC, a scheme that requires Dangerous Good Vehicles (DGVs) and oversized vehicles to use the Project in order to phase out the use of the Dartford Traffic Management Cell and remove the associated delays and incidents, rather than just reducing them.

Transport Impact H – Construction Shifts and Deliveries – Negative Impact

- A Requirement that restricts:
 - (a) construction deliveries and construction vehicles movements; and
 - (b) construction worker shift changes occurring, during the LRN peak hours (0800-0900 and 1700-1800).
- A Requirement that National Highways should fund proposed remedial measures, along with providing a six-monthly monitoring report to KCC to determine whether Travel Plan targets are being met and whether the construction traffic generation is at or lower than predicted. In the alternative, KCC would accept a Section 106 Agreement for these mitigation measures to be secured.

Transport Impact I – Construction Traffic Routing – Negative Impact

- A Requirement that construction vehicle routing plans should be agreed with KCC, along with a left turn ban for construction related HGVs when joining the A226.
- A Requirement for a scheme for the monitoring of construction vehicle movements to ensure compliance with agreed haulage routes, and associated rat running on the local road network.
- A Requirement that the Applicant must permit:
 - (a) all construction-related traffic, including workers to use Haul Road H18, to access the southern portal compound from Phase 2 until it is no longer operational, and
 - (b) construction workers in cars to use both the A226 and Lower Higham Road access points to access the A226 Gravesend Road compound.

Transport Impact J – Construction Impacts on the Condition of the Existing Local Road Network (LRN) – Negative Impact

- A Requirement for the Applicant to carry out a programme of pre-emptive works to prevent or minimise damage to the Local Road Network during the LTC construction phase. In the alternative, funding for KCC to undertake such works at National Highway's expense.

Transport Impact K – Highways Asset generation and impact of transference from National Highways to Kent County Council – Negative Impact

- A Requirement that, before the commencement of construction, National Highways provide KCC with further information regarding the full structural and local details of the structures and special geotechnical measures that will become the responsibility of KCC.
- A Requirement that National Highways should cover the costs of KCC Officers undertaking the technical approval process for any new structures or special geotechnical measures.
- A Requirement for that National Highways pay KCC, as Local Highway Authority, an appropriate commuted sum for the long-term maintenance of each structure KCC is expected to accept ownership of.

Wider Network Impact Monitoring and Management Plan (WNIMMP) –

- Requirements should be imposed to secure that:
 - Baseline surveys are undertaken at least one year before commencement of construction and supplemented with additional surveys annually until five years post-opening.
 - Certain key roads on KCC's local and major road network (such as the A229, A249, A227, A228 and A226) that will be impacted by the LTC, are incorporated into National Highways' permanent monitoring programme.
 - At least four (4) cameras are used to monitor each road; with a total of 20 cameras needed for the whole programme of additional permanent monitoring on the KCC local and major road network.
- DCO Schedule 2 Requirement 14 should be amended to include the following sites within the WNIMMP:
 - M2 Junction 1 to Junction 4 journey time monitoring
 - M25 Junction 2

- A2 Pepper Hill Junction
- A227/Green Lane Junction
- A228 Junctions between the M2 and M20
- DCO Schedule 2 Requirement 14 should also be amended to include active travel monitoring within the WNIMMP, including key routes for walkers, cyclists and horse riders affected by the LTC.
- A Requirement for National Highways to provide a funding package for KCC to implement mitigation measures on the LRN, which are required to address a direct impact of the LTC.

Public Rights of Way (PRoW) Impacts

PRoW Impact A – Enhancements to the Public Rights of Way Network – Positive Impact

- A Requirement or agreement that National Highways should pay KCC a commuted sum to cover the additional maintenance costs of any new and improved Public Rights of Way which are to be transferred to KCC.

PRoW Impact B – Omission of improvements to bring Hares Bridge up to cycling/equestrian standard – Negative Impact

- A Requirement to secure improvements to Hares Bridge to accommodate pedestrians, cyclists and equestrians.

PRoW Impact C – Omission of improvements to bring key structures up to cycling/equestrian standard – Negative Impact

- A Requirement to secure the provision for future improvements to bring structures up to walking, cycling and horse riding (WCH) standards.

PRoW Impact D – Designation of temporary National Cycle Route (NCR) 177 – Negative Impact

- An amendment to the designation of temporary National Cycle Route (NCR) 177, from permissive route to Public Bridleway.

PRoW Impact E – Absence of construction detail – Negative Impact

- The Applicant should be required to provide one clear plan which indicates the PRoW network to be created and includes the legal status of the routes to be provided and links to the wider PRoW network.
- A General Arrangement Plan should also be provided showing the WCH widths achievable to ensure they adhere to relevant standards.

PRoW Impact F – Existing leisure/recreation PRoW use – Negative Impact

- A Requirement to secure liaison with KCC's Public Rights of Way and Access Service on the closure of PRoWs during construction and restoration of routes, to minimise disruption to WCH users.
- A Requirement to secure the installation of active travel counters for 12 months prior to construction and three years post road opening.

Minerals and Waste Impacts

Minerals and Waste Impact A – Mineral Safeguarding – Neutral Impact

- No mitigation required.

Minerals and Waste Impact B – Waste Generation – Positive Impact

- No mitigation required.

Sustainable Urban Drainage System (SUDS)

SUDS Impact A – Departure on Peak Rainfall – Negative Impact

- A Requirement for the Applicant to demonstrate the future climate change for the 3.3% AEP rainfall event has been considered.
- Or for evidence of it being acceptable to the Environment Agency.

SUDS Impact B – Drainage design of realigned or widened highway – Positive Impact

- No mitigation required.

SUDS Impact C – Watercourse channels – Neutral/Positive Impact

- KCC would actively encourage the improvement of existing watercourses and a package of methods to achieve this to be provided by the Applicant.

SUDS Impact D – Discharge rates – Positive Impact

- No mitigation required.

SUDS Impact E – Surface flooding 1 – Negative Impact

- The Applicant should provide information clearly demonstrating that as a result of the proposed works areas, there is no detrimental impact on the local area.

SUDS Impact F – Surface flooding 2 – Neutral/Positive Impact

- No mitigation required.

SUDS Impact G – Flood issue – Positive Impact

- No mitigation required.

SUDS Impact H – Surface water flow path – Negative Impact

- The Applicant should be required to provide further information to clearly demonstrate that the construction of the project does not interfere with the watercourse.

SUDS Impact I – Groundwater flooding – Negative/Neutral Impact

- A Requirement for the Applicant to demonstrate the future climate change for the 3.3% AEP rainfall event has been considered.
- Or for evidence of it being acceptable to the Environment Agency.

SUDS Impact J – Flooding from sewers and water mains – Negative Impact

- Any works involved with the diversion of a sewer or water main should be approved and overseen by the appropriate asset owner.

SUDS Impact K – Surface water run off – Negative Impact

- Detailed design should clearly demonstrate that suitable pollution control mechanisms are to be installed and that these are sufficient to mitigate issues of contamination and pollution to receiving groundwaters.

SUDS Impact L – Discharged water run off – Neutral Impact

- No mitigation required.

SUDS Impact M – Contamination – Neutral Impact

- No mitigation required.

SUDS Impact N – Permanent Drainage System – Negative Impact

- Information should be provided of any proposed connections to the permanent drainage system and for this to demonstrate appropriate management of surface water.

SUDS Impact O – Box Culvert Installation – Negative Impact

- It should be clearly demonstrated that the overarching approval body (EA, IDB, LLFA) for the receiving network which the water passing through the type of culvert, approves this method of waterproofing and does not consider it a risk to pollution.

SUDS Impact P – Management of Surface Water – Neutral Impact

- No mitigation required.

SUDS Impact Q – Sustainable Drainage Systems – Neutral Impact

- No mitigation required.

SUDS Impact R – Ponds – Positive/Neutral Impact but with the potential to be negative

- The programming of the construction of these new ponds needs to be carefully considered such that they are established sufficiently so to be a 'like for like' replacement of any drainage feature that is to be removed or diverted.

SUDS Impact S – Infiltration basins – Negative Impact

- Definitive clarification should be provided that no surface water drainage is to be conveyed to the infiltration basin south of the Thames.

SUDS Impact T – Rainfall runoff – Negative Impact

- Full consideration should be given to all and any methods that could be utilised to ensure that the quality of surface water discharged from the temporary works is such as it is not detrimental to the wider receiving water network.

Health Impacts

Health Impact A – Air quality during construction and operation – Neutral Impact (however further information is required)

- Further assessments should be provided by the Applicant on the changes in air quality as a result of construction and operation and assess the impact this has on human health.

Health Impact B – Active Travel Impacts by Ward – Positive Impact

- Wards identified as having a high sensitivity should be targeted for improvements in active travel to reduce health inequalities between communities.

Biodiversity Impacts

Biodiversity Impact A – Foraging/Commuting Bats and associated habitat – Negative/Neutral Impact

- The Applicant should be required to undertake updated surveys.
- Early provision of new planting should be provided to mitigate the extensive loss of hedgerows.

Biodiversity Impact B – Roosting Bats – Neutral Impact

- Additional information such as details around the survey approach and timetabling should be included within the DCO documents.
- Detailed design for the proposed hibernation bunker should consider successful designs by the Sussex and Kent Bat Group.
- A detailed mitigation strategy and plan is required.

Biodiversity Impact C – Dormouse – Negative/Neutral Impact

- The Applicant should be required to undertake updated surveys.
- Early provision of new planting should be provided to mitigate the extension loss of hedgerows.
- Ongoing monitoring and long-term management.

Biodiversity Impact D – Badgers – Negative/Neutral Impact

- The Applicant should be required to undertake updated surveys.
- A detailed Impact Assessment and mitigation strategy is required, providing details of proposed habitat creation and proposals for long term management and monitoring.

Biodiversity Impact E – Water Voles – Neutral Impact

- Habitat creation and a clear long term management plan will result in a neutral impact to Water Voles.
- Displacement should be undertaken between 15th February and 31st March.
- Funding/better management of the existing low suitability ditches.

Biodiversity Impact F – Otter – Neutral Impact

- The Applicant should be required to undertake updated surveys.

Biodiversity Impact G – Invertebrate – Negative Impact

- The Applicant should be required to undertake updated surveys.
- The Landscape Ecology Management Plan (LEMP) should provide details of species planting.
- A thorough management plan is required to manage the loss of veteran trees.

Biodiversity Impact H – Loss of Ancient Woodland – Negative Impact

- A detailed plan should be provided outlining where ancient woodland soil will be moved to.
- Clarification is required regarding the term 'contamination'.
- A detailed mitigation strategy and ongoing management/habitat creation/monitoring plan should be produced by the Applicant.

Biodiversity Impact I – Bird – Negative/Neutral Impact

- Updated surveys should consider the increase in suitability of agricultural land and golf courses (area which were previously maintained).
- The key habitats being lost should be replaced with established planting and monitored/managed in the long term.

Biodiversity Impact J – Outline Landscape and Ecology Management Plan (OLEMP) - Negative Impact

- The Applicant needs to include clear details on how replacement habitats will be created and managed, including who will be responsible for management and any associated funding within the LEMP.
- A joint up approach to LEMPs to ensure continuity between landscaping and mitigation management across the Project.

Biodiversity Impact K – Lighting – Negative Impact

- Lighting spill should be reduced to as low as possible within the adjacent habitat.

Biodiversity Impact L – Biodiversity Net Gain – Negative Impact

- The Applicant should be required to correctly run the Biodiversity Net Gain (BNG) metric with clear detail of limitations and reference to the wider habitat creation/benefits to biodiversity.

Biodiversity Impact M – Green Bridges – Negative/Neutral Impact

- The Applicant needs to ensure the design of green bridges provide opportunities for connectivity to other suitable habitats.

Biodiversity Impact N – Nitrogen Deposition – Neutral Impact

- A clear management plan is required to ensure new habitats can be established, retained and managed in the long term.

Biodiversity Impact O – Reptiles and Great Crested Newts (GCNs) – Positive Impact

- The Applicant should be required to produce a clear Reptile Mitigation Strategy Plan, showing distribution of different species of reptiles, proposed displacement areas, proposed translocation and receptor areas for each species.

Climate Change

Climate Change Impact A – Construction and Operation Emissions – Negative Impact

- The Applicant should be required to provide Electric Vehicle (EV) charging points along the route and prioritise the use of public transport.

Heritage Conservation Impacts

Heritage Conservation Impact A – Conservation Areas – Negative/Neutral Impact

- The Applicant should be required to screen using earthworks and woodland planting, and the final design of mitigation earthworks and planting should take full account of the local historic environment character and any constraints due to buried archaeological remains.

Heritage Conservation Impact B – Designated built heritage (listed buildings) – Negative Impact

- The Applicant should be required to screen using earthworks and woodland planting, and the final design of mitigation earthworks and planting should take full account of the local historic environment character and any constraints due to buried archaeological remains.

Heritage Conservation Impact C – Non-designated built heritage – Negative Impact

- If it is not possible to avoid physical impacts then the Applicant should be required to commit to historic building recording, to a minimum of Historic England Level 3.
- The Applicant should also be required to screen using earthworks and woodland planting, and the final design of mitigation earthworks and planting should take full account of the local historic environment character and any constraints due to buried archaeological remains.

Heritage Conservation Impact D – Archaeology – Scheduled Monuments – Negative/Neutral Impact

- The wording of the Historic Environment section of the draft DCO should be revised to include *“acceptance of the project archives with a suitable box fee will be agreed with the relevant Local Planning Authorities”*.
- The Applicant should be required to screen using earthworks and woodland planting, and the final design of mitigation earthworks and planting should take full account of the presence of scheduled monuments, the local historic environment character and below ground archaeological remains.

Heritage Conservation Impact E – Archaeology – Geology and Palaeolithic/Early Holocene archaeology – Negative Impact

- The Applicant should be required to commit to the staged investigations and mitigation as set out in the ES (AS-044), dAMS-OWSI (APP-367), PDQM (APP-358), SPAA-&-RF, Annex F (APP-359) and relevant supporting project delivery documents and that updated versions of these documents are submitted for consideration during the examination process.
- Mitigation of impacts to geoarchaeology and Palaeolithic/Early Holocene archaeology will comprise a combination of preservation in situ (where possible) and where not then detailed archaeological excavation, recording, analysis and reporting, as secured by the DCO Requirements (AS-038, Section 9).

Heritage Conservation Impact F – Archaeology – Non-designated archaeology – Negative Impact

- The Applicant should be required to commit to the staged investigations and mitigation as set out in the ES (AS-044), dAMS-OWSI (APP-367), PDQM (APP-358), SPAA-&-RF, Annex F (APP-359) and relevant supporting project delivery documents.
- The Applicant should be required to undertake archaeological investigations as early as possible to ensure there is sufficient time before the start of construction.
- Mitigation should take the form of a combination of preservation in situ (where possible) and where not, then detailed archaeological excavation, recording, analysis and reporting, as secured by the DCO Requirements (AS-038 Section 9).
- The Applicant may be required to fully excavate the total defined site to the west of Thong village as it may not be possible to guarantee long term preservation of part of the asset and it may be necessary to excavate the whole asset to understand the part directly impacted.
- The Applicant should provide scope in the dAMS-OWSI for final decisions on the extent of excavation of sites to be agreed with the local planning authority archaeologist.
- The Applicant should commit to finding options for preservation in situ where other high value heritage assets are identified.
- National Highways should commit to securing the temporary and long-term management of heritage assets that would be preserved in situ.
- A monitoring regime should be agreed between the Applicant, KCC and Historic England for non-designated archaeological remains associated with organic deposits in the wetland areas.
- The Applicant should commit to appropriate archaeological investigations and mitigation in areas of Soil Scrape where there are negative impacts for below-ground archaeology.
- Confirmation that preliminary works do not include the building of compounds or utility works where there could be major environmental impacts and that details of agreed approaches to mitigation, including plans, are included and agreed with KCC during the examination process.

Heritage Conservation Impact G – Registered Parks and Gardens – Negative Impact

- The Applicant should be required to screen using earthworks and woodland planting, and the final design of mitigation earthworks and planting should take full account of the presence of scheduled monuments, the local historic environment character and below ground archaeological remains.

Heritage Conservation Impact H – Historic Landscapes – Negative Impact

- The Applicant should be required to ensure that the proposed mitigation earthworks and woodland planting will preserve aspects of the open agricultural historic landscape character around Thong village which contributes to the setting and significance of Thong Conservation Area.
- Detailed documentary research of the historic landscape should be undertaken and combined with archaeological evidence.
- Final, detailed design for mitigation areas of landscape creation and planting, including Chalk Park, should take account of the results of archaeological investigations and a detailed understanding of setting of heritage assets.
- Precise details of the mitigation that will be put in place, for example, in respect of Shorne Woods Country Park, which will be impacted by utilities works along its southern border should be provided.
- The Applicant should be required to commit to an iterative, research focused approach to mitigation which will be developed as the scheme progresses.
- The Applicant should be required to ensure they have sufficient resources (funding and staff) to undertake the necessary archaeological mitigation.

Other Matters

Workforce Impact A – Increase in employment in Kent – Positive Impact

- The Applicant should have a dedicated team of staff to ensure the measures set out within the SEES are delivered.
- A Requirement should be made that any training offered should directly link to available jobs and in respect of those jobs and associated apprenticeships, there should also be a clear progression route for new apprentices and existing staff to progress and further their careers within the scheme.
- The Applicant should be required to support a centralised apprenticeship scheme, such as a flexi-jobs apprenticeship scheme or the lead contractor employing all apprentices, to ensure that the volume of apprenticeships required can be offered.
- The Applicant and their delivery partners should be required to provide staff to act as tutors in shortage areas or provide funding to enable the education providers to offer financial incentives to support recruitment.
- The Skills, Education and Employment Strategy (SEES) should be revised to increase the volume of apprentices to match either the previous statutory (although no longer) of 2.3% of the workforce as an example of best practice, or aim for funding of at least one apprentice per £1m of spend on labour on the scheme.
- The training target within the SEES should be revised from 350 to a more appropriate 500 spaces given the size of the scheme.

Community Assets Impact A – Loss of revenue at Shorne Woods Country Park – Negative Impact

- A commitment from the Applicant to reimburse KCC for its demonstratable loss of income before, during and after construction of the LTC. To protect cash flow and to mitigate against compounded losses, this should be assessed and paid on an annual basis ensuring the SWCP is left in no worse of position than it would have otherwise been before the scheme.
- A commitment from the Applicant to fund a community engagement programme and to collaborate with KCC to produce a campaign to help highlight what Shorne Woods Country Park (SWCP) has to offer. The aim of this will be to inform and promote the SWCP from an educational and environmental standpoint. We consider this will go some of the way to help mitigate some of the negative impacts that will be caused by the LTC.

Community Assets Impact B – Tree removal and replanting at Shorne Woods Country Park – Negative Impact

- A Requirement on the Applicant to provide mitigation planting and maintenance of the new woodland that needs to be led by members of the Council's Country Parks team, as experts in their field. KCC estimates that two members of staff will need to be dedicated full time to deliver this mitigation and seeks a commitment that associated costs would be covered by the Applicant.

Community Assets Impact C – Proposed Car Park at Thong Lane – Negative Impact but with potential to be positive

- A Requirement on the Applicant to provide a sustainable business case (which is approved by KCC) in advance of any agreement to transfer/manage the facility and a commitment that associated costs would be covered by the Applicant.

Community Assets Impact D – Blighted Property – Woodlands Cottage, Thong Lane – Negative Impact

- A commitment from the applicant to work in collaboration with KCC to minimise the impacts to Woodlands Cottage. If suitable solutions cannot be agreed upon for any reason, then a blight notice may need to be served.

Conclusion

This Written Representation from Kent County Council (KCC) has set out the authority's position on the Lower Thames Crossing (LTC) scheme which is one of overall support. However, further mitigation is required, and this been set out in this Representation, to enable the Project to achieve its full benefits at a local, regional and national level in Kent, the wider South East and the UK as a whole.