



Rynd Smith  
Lead Member of the Examining Authority  
National Infrastructure Planning  
The Planning Inspectorate  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

**BY EMAIL ONLY**

**Growth, Environment & Transport**

Sessions House  
Maidstone  
Kent  
ME14 1XQ

Ask for: Nola Cooper  
Email:

[\[REDACTED\]@kent.gov.uk](mailto:[REDACTED]@kent.gov.uk)

Your Reference:  
TR010032

KCC Interested Party  
Reference Number:  
20035779

Date: 3<sup>rd</sup> August 2023

Dear Rynd,

**RE: Application by National Highways for an Order Granting Development Consent for the Lower Thames Crossing - Kent County Council's Submission to Deadline 2**

As outlined within the Examination Timetable (Annex A of the Rule 8 letter (PD-020), this letter is Kent County Council's Deadline 2 submission which provides the following:

- Comments by Interested Parties on the Applicant's amended proposed Accompanied Site Inspection (ASI) itinerary
- Comments on the Applicant's amended draft Development Consent Order (dDCO)
- Updated Principal Areas of Disagreement Summary (PADSs)
- Comments on the Applicant's submissions at Deadline 1

**Comments by Interested Parties on the Applicant's amended proposed Accompanied Site Inspection (ASI) itinerary**

Kent County Council (KCC) provided comments on the Applicant's proposed ASI itinerary at Procedural Deadline C (PDC-005). KCC has since reviewed the Applicant's amended proposed ASI itinerary (REP1-178), along with the Examining Authority's Guidance on the Draft Site Itinerary (PD-019), and has no further comments to make.

**Comments on the Applicant's amended draft Development Consent Order (dDCO)**

KCC has reviewed the Applicant's amended dDCO (REP1-043), which was submitted at Deadline 1. It is noted many of the amendments address previous drafting errors. Whilst we appreciate it has not yet been possible for the Applicant to consider the requests raised within our Written Representation (REP1-243), it is disappointing the amended dDCO does



not address any of the concerns raised by KCC within our Relevant Representation (RR-0557).

### **Updated Principal Areas of Disagreement Summary (PADSs)**

Following submission of KCC's Local Impact Report and Written Representation at Deadline 1, KCC's PADS has now been updated to reflect our latest position. The second iteration of KCC's PADS will be submitted at Deadline 2 as a separate document.

### **Comments on the Applicant's submissions at Deadline 1**

#### 9.15 Localised Traffic Modelling (REP1-187)

KCC has reviewed DCO Document 9.15 Localised Traffic Modelling (REP1-187) and notes under **Action Point 8** that National Highways has shared a model cordon with KCC related to our area of highway authority in the vicinity of the A2 junction with the Lower Thames Crossing. Some additional model outputs have been shared by the Applicant in relation to KCC's A229 Blue Bell Hill Improvements Scheme. However, KCC did request but was refused a model cordon of the Medway area, which would have been useful for reviewing the impacts of the Lower Thames Crossing on the A228, a road which is shared between the two highway authorities; Kent County Council and Medway Council.

Under **Action Point 9**, Table 3.2, KCC has recently learnt that National Highways has undertaken design development microsimulation modelling for the A2/M2 corridor; Gravesend East interchange and junctions on Henhurst Road, Thong Lane and Brewers Road. KCC disagrees with the statement in paragraph 3.4.4 that "no requests were made for this information and so it has not been shared to date". KCC has made requests for microsimulation modelling in our responses to previous consultations undertaken by the Applicant in 2018, 2020 and 2021. Furthermore, KCC is working together with National Highways on the Wider Network Impacts (WNI) Study, for which this information would have provided a useful input / reference; providing a higher level of detail than the strategic models used.

Under Action Point 10, KCC notes the criteria the Applicant will use to determine how to respond to requests for local / micro modelling of intersections, and observes that a KCC request would meet all three criteria: in being from a highway authority (Criterion a); in providing supplementary information where existing analysis is insufficient (Criterion b); in providing information complementary to an engagement that the requestor is having with DfT (Criterion c). In this respect KCC requests microsimulation modelling assistance from National Highways on the impacts of the Lower Thames Crossing on the A229 Blue Bell Hill. This work would provide more understanding of the impacts to the interpeak period, which is significantly busier for freight traffic along this corridor, according to the Applicant's Lower Thames Area Model.

Yours sincerely,

**Simon Jones**

Corporate Director – Growth, Environment and Transport