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BY ONLINE SUBMISSION ONLY

**Growth, Environment &
Transport**

Sessions House
Maidstone
Kent
ME14 1XQ

Your Reference:
TR010032

KCC Interested Party
Reference Number:
20035779

Date: 14th November 2023

Dear Rynd,

RE: Application by National Highways for an Order Granting Development Consent for the Lower Thames Crossing (LTC) - Kent County Council's Submission to Deadline 6A

As outlined within the Examining Authority's Rule 8(3) and 9 letter giving details of changes to the Examination Timetable (PD-044), this letter is Kent County Council's (KCC) Deadline 6A (D6A) submission which provides the following:

- Submission of comments by Local Highways Authorities, Ports and other IPs engaged in traffic and transportation topics relating to traffic modelling and intended to be heard at ISH13 on 27th November 2023.

KCC comments on topics relating to traffic modelling and intended to be heard at ISH13 on 27th November 2023

KCC has made various submissions relating to traffic modelling and highway related impacts throughout previous deadlines and Issue Specific Hearings (ISH). As we approach the end of the Examination, there are three key areas that remain outstanding and should be resolved during the Examination period. These are as follows:

1. KCC's Wider Network Impacts Study

As it stands, the outputs of KCC's Wider Network Impact Study have not been heard in detail at a Traffic and Transportation ISH. KCC will be submitting the final outputs from the Wider Network Impact (WNI) study at Deadline 7 for consideration in advance of the upcoming November hearings. It remains KCC's view that mitigation for these impacts should be secured through an obligation in the S106 Agreement. As it stands, the draft S106 Agreement provides no provision for these mitigation measures to be delivered. Where the traffic modelling demonstrates an adverse effect on the highway network as a result of the LTC, it is imperative these impacts are mitigated by the Project.



2. Robust Monitoring and Management Plan (Silver Town Tunnel Mitigation)

It is clearly understood that traffic modelling carries a level of uncertainty and impacts can materialise on the network that were not identified through traffic modelling undertaken at the planning stage. Therefore, it is crucial that a robust monitoring and mitigation plan is secured through the DCO which would allow for these impacts, on both the LTC scheme itself and the wider highway network, to be identified and mitigated in a timely manner. It is KCC's view that the Applicant's Wider Network Impacts Management and Monitoring Plan (WNIMMP) [APP-545] remains entirely unsatisfactory. This document has not been updated by the Applicant since it was submitted as part of the DCO application, and still does not provide local authorities with the assurance needed that currently unknown adverse impacts will be mitigated by the Project. It is entirely inappropriate for Local Highway Authorities to be expected to bid against each other for funding from entirely separate national funding pots to deliver measures that are necessary to mitigate the impacts of the LTC. Therefore, a clear approach needs to be arrived at as to how a robust Monitoring and Mitigation Plan can be secured through the DCO, similar to the approach taken for the Silver Town Tunnel.

3. Blue Bell Hill Requirement

KCC has repeatedly raised concerns regarding the impact of the LTC on the A229 Blue Bell Hill. It is entirely unsatisfactory for the Applicant to state that the overall economic benefit of the LTC outweighs the need for mitigation to address the direct impacts of the scheme on Blue Bell Hill. Whilst KCC clearly recognises the importance of the LTC and the overall objectives it sets out to achieve, it is KCC's view that the strategic benefits of the LTC cannot be fully achieved without improvements to the connection between the A2/M2 and M20 via the A229 Blue Bell Hill, due to the increased traffic on that link caused by the LTC. KCC is in the process of drafting appropriate wording for a Requirement to be added to the DCO which would provide reassurance that the impact of the LTC on the A229 Blue Bell Hill will be addressed by the Applicant. This is necessary because of the uncertainties around approval for the delivery of the Blue Bell Hill scheme through Large Local Majors (LLM) funding, as it is only at Outline Business Case stage. The Applicant should not rely on a scheme being delivered by a third party (the Local Highway Authority) with uncommitted funds from a separate government funding source (LLM) to mitigate the impacts of the Applicant's LTC scheme.

As a result, KCC would request for the above items to be added to the agenda of ISH13 on 27th November 2023.

Yours sincerely,

Simon Jones

Corporate Director – Growth, Environment & Transport