

Rynd Smith  
National Infrastructure Planning  
Temple Quay House  
2 The Square Bristol  
BS1 6PN



18<sup>th</sup> July 2023

Dear Rynd Smith

**RE: Lower Thames Crossing Nationally Significant Infrastructure Project (NSIP) Application –  
Written Representations (Deadline 1) Summary – Kent Wildlife Trust**

This summary is written in response to the Lower Thames Crossing Written Representations which are due on the 18<sup>th</sup> of July 2023. Kent Wildlife Trust's Written Representations expand on the comments made during the Relevant Representations, which were submitted on 24<sup>th</sup> February 2023. Kent Wildlife Trust's remit includes impacts to biodiversity within Kent. We have reviewed relevant documents submitted within the DCO against national and local legislation and policy. A summary of our main concerns is described below, with more detailed comments in a separate document which must be read in conjunction with this letter.

**SUMMARY**

Kent Wildlife Trust (KWT) has the following concerns on the basis of the information submitted in the Lower Thames Crossing DCO submission:

- The Project should be part of a sustainable transport strategy that aligns with the UK's climate and environmental policies.
- The mitigation hierarchy has not been applied when proposing mitigation throughout the DCO.
- There are discrepancies within the DCO about how much ancient woodland is being lost.
- Due to the loss of ancient woodland, we would expect to see new woodland creation at a minimum of 30ha created for every one hectare of ancient woodland lost (30:1).
- The construction of the tunnels risk temporally and/or permanently impacting South Thames Estuary and Marshes SSSI. No mitigation measures have been put in place to reduce these threats.
- Mitigation measures for the loss of functionally linked land (FLL) are not adequate for the amount of FLL that will be lost.
- The Project overall would have a 7% net gain in habitat units, -11% in hedgerow units and -7% in river units and therefore not meet the minimum 10% biodiversity net gain targets. The metric does not account for the loss of irreplaceable habitats, such as ancient woodland and ancient and veteran trees, which are being directly lost to the Project, therefore would prevent any overall claim of BNG.
- The proposed green bridges are for the functionality and permeability of the Project's infrastructure, as opposed to being primarily to promote habitat connectivity, and therefore not suitable for the level of mitigation that is required for this project.
- The Project will have a total net greenhouse gas emissions of approximately 6.596 million tonnes of carbon dioxide equivalent (tCO<sub>2</sub>e). This is an unacceptable increase in greenhouse gas emissions and does not align with the Government's net zero targets.

- The Project will breach the UK's legally binding air quality targets for 2040, where 100% of monitoring sites are already exceeding the legal air quality limit.
- 32% of monitoring sites across Kent surpass the UK's legal nitrogen dioxide limit, with 50% of monitoring sites within the 200m construction and operational buffer exceeding the legal limit.
- Nitrogen deposition enriches the soil and leads to biodiversity changes through various processes such as acidification, eutrophication, increased risk of secondary stressors and direct damage to plants and habitats through toxicity. Once nitrogen deposition impacts have occurred, there are few ways to restore and reinstate habitats to their previous botanical conditions.
- Significant effects as a result of nitrogen deposition have been identified across 36 sites. Mitigation and compensation measures have been proposed, however our main concerns regarding nitrogen deposition are how it will affect the Project's proposed mitigation and compensation schemes for ancient woodland, protected species, loss of FLL etc., and the potential degradation and/or prevention of successful habitat creation.

We hope that our comments are useful. If you require any further information regarding our comments, please not hesitate to contact me.

Kind regards,

Emma Waller  
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Kent Wildlife Trust  
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