

Gravesham Borough Council (IP Ref: 20035747)

Response to 7th consultation letter dated 12 November 2024 requesting update and further information from the applicant on carbon emissions, public transport and active travel opportunities etc.

Gravesham Borough Council (the 'Council') notes the content of the [letter](#) issued by the Transport Infrastructure Planning Unit dated 12 November 2024 on the Lower Thames Crossing Development Consent Order (DCO) application requesting further information from the applicant on carbon emissions, public transport and active travel opportunities. Whilst Gravesham has not been asked to comment, the Council wishes to take this opportunity to raise points in respect of the above given there is no guarantee that it will be consulted on the applicant's response.

The Council welcomes further attention being given to public transport and active travel given this signals a more holistic approach toward transport needs within the Thames Estuary.

As the Secretary of State (SoS) will be aware, the Council has raised the issue of whether Lower Thames Crossing (LTC) could assist in improvements to the Gravesend-Tilbury ferry link and other modes as sustainable alternatives to road-based trips on numerous occasions (see [REP1-228](#) at [REP4-287](#) at Q3.2.1; [REP4-292](#) at GL3.10; [REP9A-106](#) at GBC010, GBC089, and REP9A-050 at pages 154 – 155 for the applicant's final position).

The Council submitted further [comments](#) to the SoS 5th post examination consultation letter dated 9 July 2024 detailing the then current position regarding the ferry following the cessation of the service on the 1 April 2024. This was following a public consultation on the future of the service, the details and responses being available [here](#).

Whilst it is understood that the Local Transport Authorities (Kent County Council and Thurrock Council) are looking at options for reinstating the link, this would be contingent on the availability of funding, which is obviously constrained.

In the interim, the service remains suspended much to the detriment of people living on both sides of the river, the local economy and those with protected characteristics under the Equalities Act 2010 who are unable to use road transport or find the tortuous hourly public transport alternative via Bluewater to Lakeside ([X80 service](#)) inconvenient.

The loss of the ferry service (which is historic) is causing problems in several areas and will impact on the effectiveness of other strategic investments being made to the north and south of the river. Put simply the loss of the ferry:

- Has resulted in severance between Gravesham and Thurrock making it far more difficult for those wishing to work, shop, visit or use facilities on either side of the river (including schools). This also impacts on the economy of Gravesend as an historic riverside town.
- Has resulted in the loss of an important connection between the King Charles III England Coastal Path to the north and south of the river and other active travel

routes that also contribute to the recreational and tourism offer of the area - linked to defence heritage associated with Tilbury Fort and New Tavern Fort, Gravesend.

- Will adversely impact accessibility to the proposed £4.5 million [Tilbury Riverside Station](#) heritage/community hub from Gravesend and the further development of cultural synergies between the two areas.
- Will make it difficult for people living south of the river to access employment and other opportunities associated with the [Thames Freeport](#) other than by private car.

The Council wishes to highlight ways in which LTC *might* assist in resolving the above situation and provide a permanent legacy in this part of the Thames Estuary that would contribute to the delivery of sustainable transport options whilst reducing the carbon impact of the project.

One purpose of this response is therefore to raise the issue of the ferry, explore the range of possible solutions having regard to policy and to ensure that it is taken into consideration in the determination of the DCO application. The Council also intends to use this opportunity to identify some terrestrial active travel schemes in Gravesham that could be supported by LTC alongside other issues.

Consultation letter dated 12 November 2024

Your letter dated 12 November 2024 refers to the applicant's [latest assessment of the impact on carbon](#). This deals primarily with reducing embodied carbon and emissions due to construction and subsequently those arising due to maintenance over the period 2030 – 40, with this assumed to be zero beyond that date in accordance with National Highway's net zero plan. The applicant intends to set a limit of 1.763 million tCO₂e for the construction phase, which they hope to better, and assume 0.31 million tCO₂e for the maintenance period.

In terms of emissions from user traffic, the applicant argues that it can influence these but not control.

The Council contends that this is not necessarily true because LTC itself induces additional trips and choices made between alternatives in terms of location and design are likely to result in different outcomes. Any additionality in terms of emissions is therefore to an extent by design. In addition, pricing of the toll road will impact usage and levels of operational emissions.

Ensuring that public transport alternatives are available and active travel is promoted would also impact on the overall level of transport emissions. Even if this might not significantly reduce longer-distance trips on the Strategic Road Network (SRN), the impact of these might still be mitigated or off-set by reducing emissions associated with more local trips.

Even if LTC is unlikely on its own to have a material impact on the ability of the Government to meet its carbon reduction targets in accordance with Paris Agreement commitments, this does not mean that more cannot be achieved during the operational phase through supporting alternative modes that both reduce those impacts whilst meeting other objectives – including reducing severance.

National Planning Policy Statement for National Networks (May 2024)

The Council has considered the above in the context of the new National Policy Statement for National Networks ([NPSNN 24 May 2024](#)). Whilst the current DCO application stands to be determined in accordance with the [NPSNN 2015](#), this is dated and does not reflect changes in policy that have taken place in the interim.

On transitional provisions, NPSNN 2024 is clear at 1.16 – 1.17 that the new NPSNN is capable of being a material consideration in the determination of the LTC DCO, with the weight accorded it being a matter of planning judgement for the SoS. The Council considers that this approach is consistent with the statutory scheme set out in sections 104 (2)(d) and (3) of the Planning Act 2008.

1.16 The Secretary of State has decided that for any application accepted for examination before designation of this revised NPS, the 2015 NPS should have effect in accordance with the terms of that NPS. The revised NPS will therefore have effect only in relation to those applications for development consent accepted for examination after the designation of the revised NPS.

1.17 However, any emerging draft NPSs (or those designated but not having effect) are potentially capable of being important and relevant considerations in the decision-making process. The extent to which they are relevant is a matter for the relevant Secretary of State to consider within the framework of the Planning Act 2008 and with regard to the specific circumstances of each Development Consent Order application.

As stated in previous submissions, the Council maintains its objection in principle to LTC on the grounds that the applicant has not demonstrated that the project is the most appropriate way in which the issue of cross-river capacity at Dartford can be addressed whilst minimizing environmental impacts.

The NPSNN (in both its 2015 and 2024 iterations) provides support for improvements in the SRN to support growth in the context of seeking to achieve other policy objectives in parallel. The Council considers the following paragraphs of NPSNN 2024 to be relevant to the determination of the application:

Government's policy for addressing need of the national road network

3.42 Recognises the interdependencies between the efficient operation of the SRN and the local road network and vice versa and that effective operation and optimization of both are essential to achieve outcomes set by the Transport Decarbonisation Plan. Suggests that there are a range of measures that can be deployed to make the best use of all road capacity (not just the SRN) which may impact upon demand for the SRN: including (amongst other things) -

- Promoting journey choice by enabling more active travel and public transport in urban areas whilst not restricting other transport options.
- Providing genuine choice in transport mode by increasing accessibility to public transport, connecting places and by improving the environment for journeys by active travel, in both urban and rural areas.

3.43 States that the Government recognises the need to base local transport planning on setting the outcome communities want to achieve based (amongst other things) on vision-led approaches.

3.44 Recognises that whilst most journeys on the SRN will continue to be made by private motor vehicle and over long distances, there may be opportunities to consider how the SRN can assist in delivering sustainable transport interventions or outcomes connecting communities and enabling active travel. Notes also that transport corridors created by the SRN can also be used to support public transport by

facilitating coach journeys and park-and ride schemes, providing vital connections to jobs, international gateways and between our towns and cities. In addition, notes that safe links and movements across the SRN can be incredibly valuable to support better accessibility and connectivity and enhance the local active travel and public transport offer, including in rural areas.

3.45 Notes that the interventions set out in this section of the NPSNN 2024 all have an important role to play in making effective use of the SRN and the government fully intends to make use of them. However, it is considered that they may not in themselves be sufficient to address all the challenges of the SRN and that other interventions may need to be brought forward under the NSIP regime in some locations to address those challenges.

3.47 Recognises that in some cases it will not be sufficient to simply expand capacity on the existing network. In those circumstances new road alignments and corresponding links, including alignments which cross a river or estuary, may be needed to support increased capacity and connectivity.

4.78 States that applicants are required to demonstrate the following where relevant:

- That all reasonable opportunities to deliver improvements in accessibility on and to the existing national road network have been taken, including improvements for non-motorized users.
- Recognises that severance can be a problem in some locations and that where appropriate, applicants should seek to deliver improvements that reduce community severance and improve accessibility.
- Notes that national network infrastructure should incorporate good design which includes delivering accessible infrastructure for users.

Road tolling

4.79 States that the government will continue to consider tolling as a means of funding new river and estuarial crossings, especially in locations where a similar route is already tolled.

Whilst the NPSNN 2024 represents a significant update in policy there are clearly elements of continuity with NPSNN 2015. For example:

Table 1 at page 14 on options for addressing need considers modal shift. This recognises that the nature of some journeys on the SRN means that there will be less scope for the use of alternative transport modes and that it is not realistic for public transport, walking and cycling to be a realistic viable alternative to the private car for all journeys. However, the promotion of significant improvements in public transport, rail capacity and quality walking and cycling is encouraged.

3.16 Sets out the Government's commitment to sustainable travel in terms of developing a high-quality cycling and walking environment across the country.

3.17 Notes that there is a direct role for the national road network to play in helping pedestrians and cyclists and that applicants will be expected to use reasonable endeavours to address their needs in the design of new schemes. Applicants are

expected are expected to invest in infrastructure in locations where the national road network severs communities and acts as a barrier to cycling and walking.

3.22 Notes that severance can be a problem in some locations and that applicants should seek to deliver improvements that reduce community severance and improve accessibility.

3.24 – 3.25 States that the Government anticipates that river and estuarial crossings will normally be funded by tolls or road user charges and that it will consider tolling as a means of funding new road capacity on the SRN. New road capacity in this context was seen as including entirely new roads and existing roads where they are transformed by an improvement scheme.

5.205 States that applicants should consider reasonable opportunities to support other transport modes in developing infrastructure. As part of this, the applicant should provide evidence (consistent with paragraphs 3.19 – 3.22) that as part of the project they have used reasonable endeavours to address any existing severance issues that act as a barrier to non-motorised users and have regard to Equalities Act 2010 considerations (as per paragraph 3.21).

In this context, the Council wishes to highlight an apparent change in policy between NPSNN 2015 and NPSNN 2024. Paragraphs 3.24 – 3.25 of NPSNN 2015 only refers to road tolls or road user charges being a means of funding new road capacity on the SRN. In contrast paragraph 4.79 of NPSNN 2024 refers to road tolling of new river and estuarial crossings *in general*, not restricted to roads or even the actual road to be tolled.

This is *capable* of being interpreted as providing a policy basis for road tolls arising from a crossing to be applied to another form of crossing in a separate location that improves accessibility and deals with issues of severance for non-motorised users. Neither is it stated that expenditure met from road toll income is restricted to capital spending rather than revenue spending – allowing for potential cross-subsidy?

Exploring ways in which LTC could make an improved contribution toward public transport and active travel whilst reducing carbon emissions.

The Council accepts that some of the points made below may not be directly relevant to the LTC DCO application.

However, it is considered beneficial to look at transport issues in this area in a holistic way rather than placing LTC/the SRN in a silo. NPSNN 2024 at paragraph 3.42 is correct in saying that there are interactions between the SRN and local road network. In this area, many local trips are made using sections of the SRN because of the lack of alternatives. Conversely, when there are issues on the SRN, this impacts on the local road network.

The Government's growth agenda for this part of the Thames Estuary is likely to be challenging in terms of accommodating development levels and managing transport impacts in such a way that it does not have an adverse impact on the SRN and its associated junctions with the local road network.

Achieving a meaningful degree of modal shift away from the private car to increased public transport usage and active travel is likely to be required for this and other environmental reasons and to reduce future pressures on the SRN. Public transport in this context should also be seen as including the potential to improve non-road based cross-river connectivity to reduce severance and provide a sustainable alternative to the SRN. The re-introduction and

improvement of ferry services between Gravesend and Tilbury would be a good start in this respect.

What LTC effectively does is to create a new transport corridor crossing the river to the east of Gravesend but with no dedicated public transport or active travel connections. Whilst it would be possible for a bus service to use the LTC, the route between central Gravesend and Tilbury would be tortuous and unattractive. Further, it would rely on a private sector operator and there is no guarantee that it would either come to fruition or survive on a commercial basis.

In determining the LTC DCO application, the Council asks that the following points are considered should the SoS be minded to approve:

1. Given active travel and effective public transport severance across the river caused by the cessation of the Gravesend – Tilbury ferry that LTC does not resolve, could a mechanism be put in place that requires the applicant to submit a scheme for the approval of the SoS for the reinstatement of the service – the development of such a scheme to include engagement and consultation with the relevant local transport authorities (KCC and Thurrock) and Gravesham Borough Council?
2. Given the wording of NPSNN 2024 paragraph 4.79 appears to allow for funds raised from a tolled river crossing such as LTC to contribute towards expenditure on other non-road river crossings, could consideration be given to financial support for the Gravesend-Tilbury ferry taken from LTC revenues? As forecast Average Daily Flows at LTC are stated to be around 87,000 vehicles/105,000 PCUs in 2030 (See [APP-528: National Highways -7.8 Traffic Forecasts Non-Technical Summary](#) at Table 5.2) any uplift in toll to secure on-going funding for the ferry as a sustainable and accessible public-transport alternative is likely to be negligible and could address Equalities Act 2010 considerations where those with protected characteristics do not have access to a car.
3. On the ability to do the above, the Council has taken into consideration the applicant's Funding Statement ([APP-063](#)) submitted as part of the application. This states that whilst Government will fund the project, the charge revenue and related charge collection cost from the Lower Thames Crossing would accrue to the Government and not the Applicant. However, how such arrangements are structured between Government and National Highways (a company wholly owned by the SoS under [s.1 of the Infrastructure Act 2015](#)) are entirely in the gift of Government. The proposed arrangements therefore are no impediment to LTC subsidizing the ferry as an active travel link because Government could facilitate it. Even if all revenues passed to Government, as suggested, there would also be nothing stopping the SoS from entering into a separate legal agreement regarding funding for the ferry from LTC income.
4. In terms of active travel interventions, some work has been undertaken using National Highways Designated Funds to look at a possible walking and cycling route from the Cascades Leisure Centre, Thong Lane to Gravesend Town Centre that would link Chalk Park and the surrounding area to the Gravesend – Tilbury ferry at Town Pier. This would be an important active travel route associated with LTC if the ferry is reinstated as a public transport link. Including a mechanism by way of a DCO requirement to provide the resources to at least fully develop a 'spade ready' scheme

eligible for funding would be a useful benefit or, better still, full delivery of this active travel link.

The Council does not wish to make any comments at this stage on measures to minimize disruption during the construction phase as we have yet to see the applicant's response and are still in active discussions on the various control documents etc. to be approved under any DCO requirements.

Yours Sincerely,



Senior Planner (Planning Policy)