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By email only:
LowerThamesCrossing@planninginspectorate.gov.uk

Your Reference:
TR010032

Interested Party
Reference Number:
20035779

Date: 10th December
2024

Dear Sir/Madam,

Planning Act 2008 and the Infrastructure Planning (Examination Procedure) Rules 2010

Application by National Highways (“the Applicant”) Seeking Development Consent for the Proposed Lower Thames Crossing Scheme

Request for comments from All Interested Parties on the Applicant’s Response

This letter is Kent County Council’s (KCC) response to the Secretary of State’s eighth [consultation letter](#) (issued on 28th November 2024) and provides comments on National Highways’ [responses](#) (dated 26th November 2024) to the Secretary of State’s previous [consultation letter](#) (dated 12th November 2024).

KCC has long been supportive of the Lower Thames Crossing (LTC) proposals. It is clear that the need for a new crossing of the river Thames is now urgent. Demand to cross 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 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.

However, KCC fully understands that a scheme of this size and scale could result in various adverse impacts on both the environment and local communities. Therefore, it is imperative that for the LTC to be a success, robust measures are put in place to

both mitigate adverse impacts but also maximise on the opportunities a scheme of this nature presents.

Our comments within this letter specifically relate to National Highways' response to:

- Measures to further reduce the carbon emissions that will result from the scheme;
- Measures to further enhance and improve public transport and active travel opportunities;
- Measures to further minimise disruption to local people during the construction phase.

Our comments end with a brief comment on Gravesham Borough Council's response to the Secretary of State's previous consultation letter of 12th November 2024.

Measures to further reduce carbon emissions

As stated in National Highways' responses (dated 26th November 2024):

The Applicant has designated the Project as a 'pathfinder' for low carbon construction and set the following ambitions:

- a. To construct it for the lowest practicable carbon emissions;*
- b. To test low carbon innovation and approaches;*
- c. To leave a legacy that enables future projects to achieve carbon neutral construction.*

From this premise, the project could be set up to directly influence carbon reduction figures for the future Kent supply chain of goods and services for all related construction and works.

Practically this would involve a direct commitment by National Highways to share learning and results with KCC Highways procurement and commissioning staff as well as similar in Kent Districts and Boroughs, facilitating communication with qualifying suppliers and construction companies, detailing scalable innovative materials and measures. This might include low or zero emission specialist construction vehicles that could be adapted for minor road works, street cleaning or refuse collection, the adoption of diesel free work sites, the pilot use of lower carbon materials or construction methods that have not had future maintenance regimes adopted yet.

There is also an opportunity for the LTC to help create a tipping point where supplier attitudes and behaviour pivot in favour of sustainability across the south-east. The project has had significant supplier engagement within the scope of the project, but in terms of 'wider value' and co-benefits (also in line with the new Procurement Act due February 2025) it is reasonable to expect sustainable construction and procurement benefits beyond the direct scope of the project.



Additionally, the points made below on encouraging people to switch from their carbon generating car to a more sustainable mode of transport – in response to the following question on public transport & active travel – would also help to influence a lower carbon footprint for the Project. The transition to low emission vehicles could also be further supported by National Highways by incorporating electric charging infrastructure as part of the scheme.

Measures to further enhance and improve public transport and active travel opportunities

There is growing policy & planning support for public transport & active travel provision in development planning either side of the Thames from Government, KCC, Local Authorities and developers. However, we have been less successful in influencing public transport & active travel provision in cross-Thames movements.

KCC believes an attractive cross-river public transport link would complement National Highways' objectives, by encouraging a mode switch away from private cars. Increased public transport patronage and active travel could help to extend the time in which it takes both the existing Dartford Crossing and the LTC to reach capacity.

The current LTC design represents a missed opportunity to embed sustainable public transport access from the outset. It is unlikely that any local bus operator will be able to deliver commercially viable services linking local employment, leisure, and residential zones across the Thames, including demand responsive transport (DRT) and bus rapid transit (BRT). This is because the most suitable collection and drop-off points would be at the proposed M2/A2 junction and as far north as the proposed A13/A1089 junction. This will result in unreasonable public transport journey times for targeted local trips across the Thames.

Bus priority on the LTC could be a segregated access at locations much closer to the tunnel portals to create attractive and competitive public transport journey times. As the use of the emergency access has been ruled out by National Highways, KCC had previously requested consideration of alternative priority accesses for public transport as part of developing future-ready new highway infrastructure. Such a link would also support the movements of construction workers associated with the LTC project, and National Highways' associated Skills, Education and Employment Strategy.

KCC welcomes the Applicant's proposed "*active travel fund, valued at £1 million, to fund active travel studies and interventions*"; and suggests this could be used to fund further studies into providing infrastructure and initiatives that would support both public transport and active travel movements through the LTC.

KCC's position on public rights of way (PRoW) remains as stated in our associated Definitive Statement of 31st October 2023, provided as Appendix C in our Deadline 6



Submission - Post-event submission and comments on Applicant's submissions at Deadline 5 [[REP6-138](#)].

However, we would like to state, in addition to the Applicant's points in paragraph 2.17 a to g of their [response](#) of 26th November 2024, that KCC is currently engaged in some Public Rights of Way (PRoW) projects which are being supported by National Highways' Designated Funds initiative related to the Lower Thames Crossing. These projects could be considered to "*enhance and improve . . . active travel opportunities*" as part of the LTC scheme, as per the intent of Question 2 in the Secretary of State's [consultation letter](#) of the 12th November 2024.

These Designated Funds projects are designed to provide alternatives for local recreation and active travel outside of the LTC footprint during the construction phase and post construction to provide wider links into the PRoW network. The projects are essentially aimed at complementing / enhancing the objectives of the LTC PRoW initiatives.

We welcome the Applicant's proposed active travel fund; and the proposal to fund studies into providing an improved solution to the proposed A226 cycleway. Ultimately, a switch to sustainable modes should increase as a result of a holistic approach to an area, rather than one single measure that encourages lots of people to change modes. It could be a combination of things, including support for public transport and active travel provision discussed above; as well as parking restrictions, demand responsive transport, car clubs, mobility as a service, etc., all being located appropriately for integrated use.

Measures to further minimise disruption during construction

Throughout the development of the LTC proposals, KCC has closely engaged with National Highways regarding the impacts of constructing the LTC on local communities. If the project is consented, KCC will continue to work with National Highways to ensure mitigation measures are robust and monitored throughout the construction period.

This includes consideration of the LTC's impact on local bus services (both peak and off peak) with respect to its construction phase. The Applicant should consider the impact on the local road network and consequently the impact on bus journey times and the ability to operate full-service routes for all phases of construction. Should there be a need to add additional resource (e.g. through adding an additional vehicle to a service or to introduce dedicated shuttle buses to maintain key links) then the Applicant would be expected to meet the cost of providing these.

KCC's position on public transport remains as stated in our Written Representation [[REP1-243](#)], with reference to Transport Impact E – Public Transport and Active Travel Impacts of the LTC and the associated requests:



- 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.

Additionally, there are opportunities to protect certain roads surrounding the construction footprint on which buses operate. For instance, Chalk Road could be made “Access Only” to minimise likely rat running along Gravesend Road which would disrupt buses running between Medway and Gravesend.

Comments on Gravesham Borough Council’s submission

KCC would like to confirm that we also support Gravesham Borough Council’s [view](#) that the Gravesend-Tilbury ferry supports “*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*”. We believe the ferry link would also support the movement of construction workers associated with the LTC project, and National Highways’ associated Skills, Education and Employment Strategy.

Summary

In summary, whilst KCC has long supported the need for a new Lower Thames Crossing and we hope development consent is granted, we have always been clear that the impacts of the proposals need to be appropriately mitigated for the scheme to be a success. Therefore, we would be grateful if the concerns raised in this letter could be considered as part of a decision being made on the outcome of National Highways’ Development Consent Order application.

Yours faithfully,

Simon Jones

Corporate Director – Growth, Environment and Transport