



Interested party reference: 20035666

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Dear Mr Bartkowiak,

AI22 Lower Thames Crossing DCO 28 November 2024 Secretary of State consultation

This letter provides Transport for London's (TfL's) response to the Secretary of State's consultation letter of 28 November 2024. Our response provides comments on the Applicant's submission of 26 November 2024 addressing requests made in the Secretary of State's letter of 12 November 2024.

The Mayor of London is committed to decarbonisation across every sector in order to achieve London's and the UK's targets for net zero carbon emissions. We welcome further scrutiny by the Secretary of State of the Lower Thames Crossing scheme to ensure all necessary steps are being taken to reduce carbon emissions, including encouraging trips by sustainable modes. A more robust approach to mitigation of carbon impacts would better address local policy including The London Plan and the Mayor's Transport Strategy, which are important and relevant matters for the purposes of section 104 of the Planning Act 2008.

TfL is fully supportive of the steps taken by the Applicant, in consultation with Active Travel England, to enhance opportunities for walking and cycling. In particular, the £1 million active travel fund (referred to in Paragraph 2.21b of the Applicant's response) demonstrates a useful commitment to developing further improvements with the aim of encouraging active travel.

It is, however, disappointing that the Applicant has not demonstrated a similarly proactive approach to encouraging public transport trips. In submissions during the examination, TfL requested that the Applicant consider targeted interventions to improve bus performance and reliability as part of the Project. At the conclusion of the Examination, and following a review of the Applicant's response, this remains an area of concern for TfL, as set out in Section 2.1.22 of the Statement of Common Ground between the Applicant and TfL (examination reference REP9A-042). The Applicant points to

improvements that will benefit private cars and buses on the Dartford Crossing alike (Paragraph 2.24 of its submission) and the impacts, both positive and negative, on existing bus services (Paragraph 2.25). The Applicant indicates that it is starting to offer modelling data which it has previously withheld, in order to support bus provision (Paragraph 2.26), but explicitly rules out supporting new or existing bus services (Paragraph 2.27). In relation to this latter point, TfL notes that Active Travel England, in its letter to the Applicant (Annex A Paragraph 3.5.2), asked it to consider pump-priming a cross-river express bus service, citing reduced carbon emissions and increased social and economic benefits. If the Applicant is serious about supporting public transport trips, then it must do more to secure these, with funding if necessary; simply hoping that others might step in is not sufficient.

More generally, notwithstanding the clear request from the Secretary of State, the Applicant appears to seek to absolve itself of responsibility for the carbon emissions associated with the scheme once operational (Paragraph 2.15). This issue remained not agreed between TfL and the Applicant throughout the examination (see Section 2.1.30 of the Statement of Common Ground between the Applicant and TfL for a summary). Bringing forward such an uplift in highway network capacity, it is incumbent on the Applicant to put in place credible, effective measures to reduce carbon emissions, including, but not limited to, strong commitments to encourage both public transport and active travel. The Carbon and Energy Management Plan could be further aligned with net zero targets by investigating mitigation and reduction of user carbon emissions from the opening year, rather than simply stating that the Applicant cannot control user carbon and scoping out any efforts to mitigate the impacts.

We note the Applicant's response to the Secretary of State with regard to her request for further measures to minimise disruption. Given the scale of the scheme, we would urge that mechanisms are put in place to ensure ongoing engagement with and opportunities for feedback from the local communities affected. Moreover, it is essential that any contractors acting on behalf of the Applicant are fully aware of the commitments it has made with regard to the construction impacts and their responsibility to minimise those impacts.

Yours sincerely,



Shamal Ratnayaka
Strategic Analysis Manager – Aviation, GIS, Third Party DCOs

