

# Lower Thames Crossing

## 7.6 Road User Charging Statement

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# Lower Thames Crossing

## 7.6 Road User Charging Statement

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# 1 Introduction

## 1.1 Purpose of the Road User Charging Statement

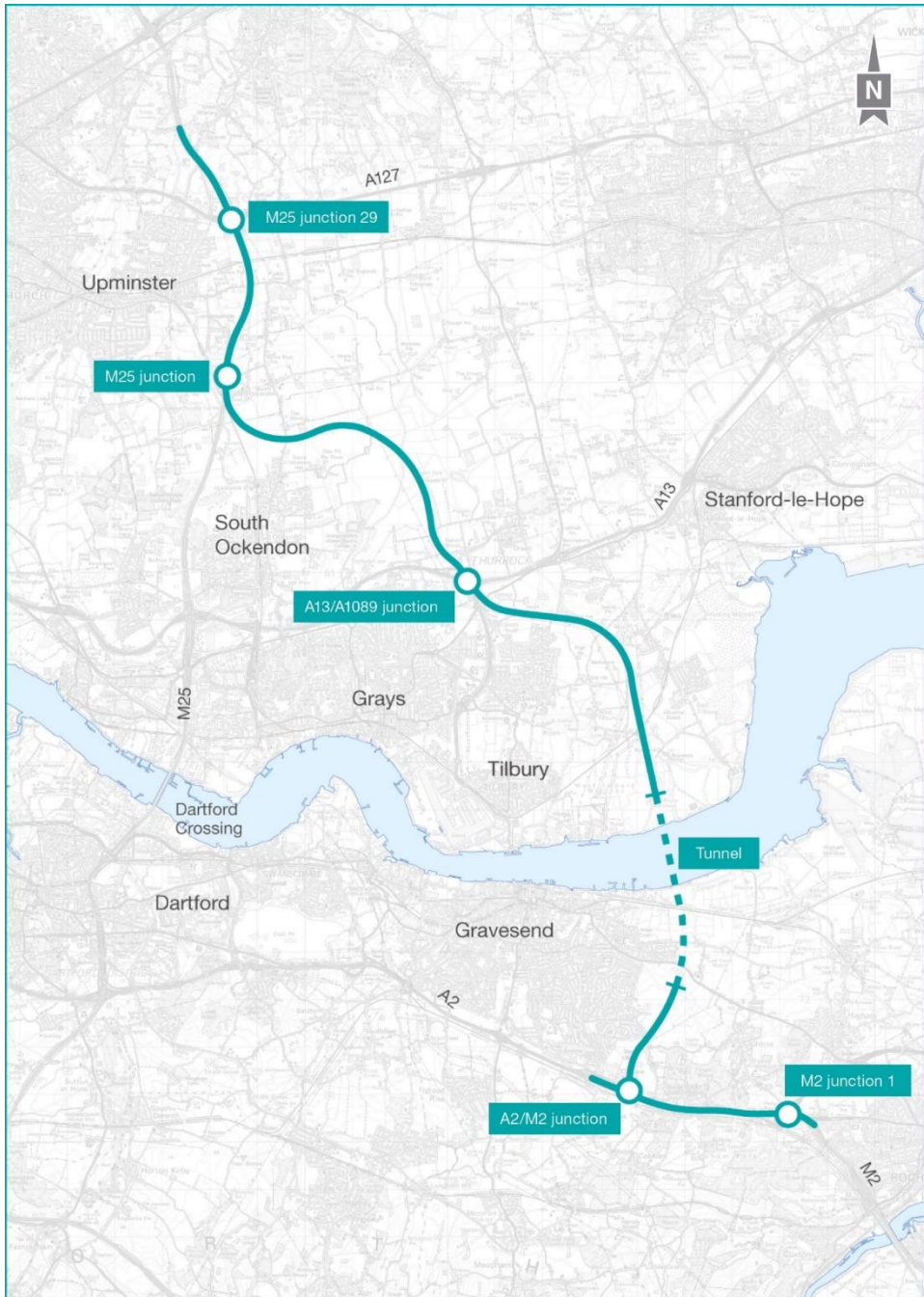
- 1.1.1 This Road User Charging Statement (Charging Statement) explains the powers that are being sought in the draft Development Consent Order (DCO) (**Application Document 3.1**) ~~[Revision 20.0]~~ which would permit the Secretary of State<sup>1</sup> to introduce and enforce road user charges at the Tunnel Area of the A122 Lower Thames Crossing (the Project). The Tunnel Area is shown on the Tunnel Area Plan ~~(Application Document 2.12)~~. ~~[REP9-080]~~.
- 1.1.2 This Charging Statement is part of a suite of documents which accompanies the application for development consent. A full description of all the Application Documents is provided in the Introduction to the Application ~~(Application Document 1.3)~~. ~~[REP4-002]~~.

## 1.2 The need for the Project

- 1.2.1 The need for the Project is set out in detail in ~~Application Document 7.1~~. ~~the Need for the Project [APP-494]~~. The high level of traffic wanting to use the Dartford Crossing exceeds the design capacity of the road. This results in frequent traffic congestion and poor journey time reliability, making the Dartford Crossing one of the least reliable sections of the strategic road network (SRN). While incremental improvements to the Dartford Crossing have helped ease these issues, these have not been sufficient to address the lack of road capacity east of London.
- 1.2.2 Congestion, delays and poor journey time reliability at the Dartford Crossing and on surrounding roads is a major impediment to economic growth in the South East of England. The River Thames acts as a barrier between Kent, Thurrock and Essex and affects the ability to build strong connections between these communities.
- 1.2.3 As a result of these ongoing issues, slow-moving and queuing traffic on both the local highway network and SRN approaches to the Dartford Crossing also impact the environment and surrounding communities through high levels of noise and air pollution.
- 1.2.4 The Project would provide a connection between the A2 and M2 in Kent and the M25 south of junction 29, crossing under the River Thames through a tunnel. The Project route in relation to the existing Dartford Crossing is presented in Plate 1.1.

<sup>1</sup> In the context of private financing options for the Lower Thames Crossing, it should be noted that powers and functions under the DCO are capable of being transferred. See further section 2.1 of this document.

**Plate 1.1 Project route in relation to Dartford Crossing**



### 1.3 Background

- 1.3.1 In 2009, the Department for Transport (DfT) published the Dartford River Crossing study into Capacity Requirements (DfT, 2009), which looked at the proposals for the Lower Thames Crossing. That review was based on the crossing being subject to a road user charge.
- 1.3.2 The 2013 review of crossing options undertaken for the DfT noted that assumptions agreed with DfT included that users would be charged to use a new crossing facility (DfT, 2013). This DfT stipulation for a road user charge was retained when responsibility for the Project was transferred to National Highways (then, the Highways Agency) in 2014.

- 1.3.3 On 29 January 2025, the Chancellor published a statement (HM Treasury, 2025) in which she stated that “the government is also assessing options for privately financing the Lower Thames Crossing, which will improve connectivity across vital ports and alleviate congestion as goods to be exported come from across the country to markets overseas.” National Highways has identified two funding options involving private finance which could viably deliver the Lower Thames Crossing, and this iteration of the Road User Charging Statement has been updated to reflect those options.
- 1.3.4 Further information is provided in the updated Funding Statement, submitted alongside this document, but in summary the updated Funding Statement presents three funding options:
- (a) public funding under the Road Investment Strategy process (**Full Public Delivery model**);
  - (b) full public funding for the tunnels, with the connecting roads being delivered and funded by the private sector under Design, Build, Finance, Operate and Maintain (DBFOM) contracts (**Public Tunnel and DBFOM Roads model**); and
  - (c) a regulated private entity model, under which a private sector body finances, builds and operates the Project in its entirety in perpetuity, subject to the oversight of an independent regulator (**Regulated Private Entity model**).
- 1.3.5 No decision has been taken on the delivery model to be pursued, and that investment decision would be a matter for government to determine separately from the development consent decision. The investment decision would be made in accordance with the Green Book (HM Treasury 2022).

## 1.4 Rationale for charging

- 1.4.1 The Lower Thames Crossing would be close to the Dartford Crossing, which already has a road user charging scheme in place for demand management purposes. The Lower Thames Crossing would join the Dartford Crossing in a very heavily utilised part of the SRN. Section 4.2 of National Highway’s licence (DfT, 2015a) requires it to ensure the effective operation of the network.
- 1.4.2 A charge at the Lower Thames Crossing, in conjunction with the existing charging regime at the Dartford Crossing, would enable the effective operation of both crossings and the wider SRN and local road network. If there was no charge for using Lower Thames Crossing, this would lead to higher overall demand and traffic taking longer routes than would otherwise be necessary.
- 1.4.3 Under the Full Public Delivery option, although charging revenue would not directly fund the Project, it would go to the government and hence distribute the cost of the Project between the taxpayer and users. ~~This is~~The same would be the case under the Public Tunnel and DBFOM Roads option, since the Secretary of State would remain the charging authority for the Project tunnels. Under the Regulated Private Entity option, the regulated private sector body would levy, collect and retain the road user charges at both the Lower Thames Crossing and at the Dartford Crossing.
- 1.4.31.4.4 Accordingly, all of the options are aligned with paragraph 3.25 of the National Policy Statement for National Networks (DfT, 2014)-) as the revenues would directly or indirectly contribute to the funding of a river crossing in all cases.

- 1.4.41.4.5 Setting the Lower Thames Crossing road user charge to be equal to the one used for the Dartford Crossing would encourage customers to take the most appropriate route based on journey factors rather than being distorted by the level of charge. This would discourage unnecessary vehicle mileage from those seeking to save money from a cheaper crossing, and therefore would reduce the impacts of longer journeys, such as the consequential effect of additional emissions and noise.
- 1.4.51.4.6 To most efficiently use of the SRN and local roads, both in normal operations and incident scenarios, the two crossings would need to operate in an integrated manner. In each of the three funding options set out in the Funding Statement, an equal charge would therefore apply at both crossings. Equal charging would support this integrated operation by simplifying decision making for the customer, allowing them when necessary to switch between crossings without the concern of different charging regimes.
- 1.4.61.4.7 Without prejudice to any decision by the Secretary of State on the grant of development consent, the DfT has reviewed details of the proposed road user charging regime for the Project and has confirmed that they are in line with government policy. That confirmation was provided by the DfT, in its capacity as the proposed charging authority, and submitted into the examination (Annex B of 9.11 Post-event submissions, including written submission of oral comments, for ISH2 [REP1-184]).

## 2 Proposed road user charging regime

### 2.1 Proposed road user charging regime

- 2.1.1 The DCO would permit the Secretary of State<sup>2</sup> to impose road user charges at the Tunnel Area that are equal to the charges that apply at the Dartford Crossing from the date at which the Project opens for traffic.
- 2.1.2 The draft DCO (**Application Document 3.1**), **[Revision 20.0]** defines the Tunnel Area of the Project as the tunnels and the tunnel approaches as shown on the Tunnel Area Plan (~~Application Document 2.12~~), **[REP9-080]**.
- 2.1.3 The Project's 2018 Statutory Consultation (Highways England, 2018) and subsequent Supplementary Consultation and Design Refinement Consultation in 2020 (Highways England, 2020) provided opportunities for the public and stakeholders to comment on the proposals for the Project, including the proposals for introducing road user charging at the Tunnel Area. These comments have been considered and responses are provided in the Consultation Report (Application Document 5.1).
- 2.1.4 Among those who supported road user charging or agreed that it was necessary for the Project to meet its objectives, there was general consensus that a consistent charging approach across the existing Dartford Crossing and the Tunnel Area would be preferable. These views have contributed to a change in approach since the 2018 Statutory Consultation, from one where the Applicant was intending to seek flexible charging powers to an approach that aligns the road user charging regime at the Tunnel Area with the Dartford Crossing road user charging scheme (the Dart Charge).
- 2.1.5 Accordingly, the charging regime contained in the DCO would align the road user charging regime at the Tunnel Area with the Dart Charge at the Project's opening, and on an ongoing basis. This includes details such as the hours during which the charges apply, the vehicles charged, the approach to concessions and discounts for account holders, and any exemptions granted. However, eligibility for the Local Residents' Discount Scheme (LRDS) is specific to each crossing.
- 2.1.6 Under the Full Public Delivery option and the Public Tunnel and DBFOM Roads option, the Secretary of State is the charging authority for Lower Thames Crossing and remains the charging authority for the Dartford Crossing, and. The DCO does not include any powers to change the Dartford Crossing charges. Dartford Crossing charging legislation remains wholly unchanged by the draft DCO (**Application Document 3.1**), **[Revision 20.0]**.
- 2.1.7 In order to implement a Regulated Private Entity option, whereby a private sector body receives the charging revenue for both the Lower Thames Crossing and the Dartford Crossing, it is considered that primary legislation would be required which would provide the statutory basis for that regime.
- 2.1.8 Accordingly, there are two routes by which the Regulated Private Entity option could make provision for user charging at the Lower Thames Crossing:

<sup>2</sup> In the context of private financing options for the Lower Thames Crossing, it should be noted that powers and functions under the DCO are capable of being transferred, as outlined below in this section 2.1.



(a) the private sector charging regime could be implemented at the Dartford Crossing which would automatically apply at the Lower Thames Crossing, and the powers under the DCO to charge for the Lower Thames Crossing could be transferred (under article 8) to the private sector body – by virtue of Schedule 12 to the DCO, the charging regime at the Lower Thames Crossing would replicate that at the Dartford Crossing; or

(b) the draft DCO contains a permissive power for the Secretary of State to charge for use of the Lower Thames Crossing tunnels. As that power is permissive, road user charges are capable of being imposed at the Lower Thames Crossing (and the Dartford Crossing) under a separate new charging powers established by primary legislation, instead of imposing charges at the Lower Thames Crossing under the DCO charging regime.

2.1.9 The appraisal of the impacts of the Project, as detailed in the Combined Modelling and Appraisal Report (~~Application Document 7.7~~), [APP-518], is based on the assumption that the same charges apply at both crossings and that cost of these charges to road users stay constant in real terms over the Project's appraisal period- (starting from a 2014 base date). These assumptions have been agreed with the DfT.

2.1.10 With both the Full Public Delivery model and the Public Tunnel and DBFOM Roads model there is no link between the road user charge and the funding for the Project. In both models, the revenue from the road user charge goes to the government, and there would be no change to the road user charging assumptions as set out in paragraph 2.1.9.

2.1.11 Under the Regulated Private Entity model the same charges would apply at both the A122 Lower Thames Crossing and the Dartford Crossing, per the assumption at paragraph 2.1.9 above. The assumption that the cost of these charges to road users stay constant in real terms at paragraph 2.1.9 above would also apply. VAT has been assumed to be applicable to user charges under this model. The Applicant has accounted VAT in the forecast charge for this model (i.e. there is no material change in the total forecast cost to the end user as compared with Combined Modelling and Appraisal Report). On that basis there would be no change to the forecast road user charge applicable to cars. VAT applicable to HGVs and LGVs would be added to the user charge, however VAT-registered users would be able to recover the VAT and so the cost to these users would remain unchanged.

2.1.12 Two groups of users are treated differently by the VAT regime:

- a. A small number of HGVs and LGVs are owned by users who are not VAT-registered and therefore are unable to recover VAT; and
- b. Employers business trips made by car would be able to recover VAT.

2.1.13 HGVs and LGVs owned by users who are not VAT-registered are a minor component of these vehicle users. The travel decision making by these users is highly inelastic (i.e. the travel decisions do not change significantly in response to price changes), as evidenced in Table 10.29 of the Combined Modelling Appraisal Report - Appendix B - Transport Model Package [APP-520]. Accordingly, this would have a negligible impact on traffic flows.

2.1.14 Employee trips made by car on behalf of a business that is VAT-registered could reclaim the VAT reducing the cost of the trip to the business. The

employers business journey purpose has an inelastic price elasticity. As shown in Table 10.29 of the Combined Modelling Appraisal Report - Appendix B - Transport Model Package [APP-520], it has the most inelastic of car journey purposes. This is because the choice of destination for business trips is less discretionary than for commuting and other trips. In addition, the charge is a minor aspect of the decision to travel across the River Thames, and the charge is a minor component of the effective cost of the journey to the employer. The value of time for car employers business trips is the highest value of time used in the variable demand modelling, which uses the value of time by vehicle type and journey purpose set out in the DfT TAG databook. This makes the charge at the Dartford Crossing / the A112 Lower Thames Crossing a minor proportion of the total time/cost of a journey, which further reduces the impact of a minor change in the charge on the total time/cost of the journey.

2.1.62.1.15 Taken together, the impact of the proposed changes to VAT on the forecast traffic flows on the network would be negligible and, in line with the principles of proportionate appraisal, would not merit the re-running of the Applicant's traffic model and the assessments that use the traffic flows forecast by the traffic model.

## 2.2 Exemptions and discounts

- 2.2.1 Certain vehicles are exempt from the existing road user charges at the Dartford Crossing, including emergency and military vehicles, local bus services, motorcycles and vehicles that are tax exempt because they are registered for the use of a disabled person. The DCO would apply the same exemptions at the Tunnel Area. Exemptions based on vehicle tax class ensure that eligibility is well understood and easy to apply on a free-flow charging scheme.
- 2.2.2 The DCO would allow for discounted road user charges to be payable by users with accounts, in line with the Dart Charge account discounts. Account-based road user charging systems are more cost effective to operate and increase compliance, so account take-up is incentivised through the offering of discounts. As well as providing savings on the road user charge for each crossing made, registering for an account brings the road user an additional benefit of removing the risk of incurring a penalty charge as a consequence of failing to pay the road user charge.
- 2.2.3 The DCO would require that any account discounts that are applied to the road user charging regime at the Tunnel Area be offered on the same terms as the account discounts that apply to the Dart Charge. As detailed in the Combined Modelling and Appraisal Report (~~Application Document 7.7~~), [APP-518], the Project's appraisal assumes that such discounts apply.
- 2.2.4 The charges used for the Project's appraisal also assume that an LRDS would be offered. The LRDS is a discounted charge offered to households who pay council tax to Dartford Borough Council or Thurrock Council. The LRDS applies for vehicle classes B (cars, motorhomes and minibuses with nine or less seats) and C (vehicles with two axles). Class B company or hire vehicles are not eligible for LRDS.
- 2.2.5 The DCO would allow the Secretary of State to enter into the same discount arrangement, at the same rates as offered to Dartford and Thurrock residents on the Dart Charge, with residents who pay their council tax to Gravesham

Borough Council or Thurrock Council. This aligns with the Dartford Crossing LRDS by limiting eligibility to residents of local authorities in which the tunnel portals would be situated.

- 2.2.6 Gravesham residents would be eligible for discounts for the use of the Lower Thames Crossing, Dartford residents would continue to be eligible for discounts for Dartford Crossing, and Thurrock residents would be eligible for discounts for both crossings. Thurrock residents would only need to apply once and pay one account fee in order to benefit from discounts at both crossings.

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2.2.7 If, under the Regulated Private Entity option, charging is imposed under a separate legal regime rather than that contained in the DCO, the assumption is that the same exemptions and discounts would apply on that basis that Government has confirmed these align with Government policy (see Annex B of 9.11 Post-event submissions, including written submission of oral comments, for ISH2 [REP1-184]), and it would be expected that any primary legislation would align with Government policy.

## 3 Establishing the charges

### 3.1 Establishing the road user charge

- 3.1.1 The DCO links the Project's road user charging regime with the Dart Charge. This is implemented by article 45 of the draft DCO (**Application Document 3.1**) **[Revision 20.0]** which allows for the imposition of road user charges in accordance with Schedule 12 of the draft DCO. The legal basis for the inclusion of road user charges is set out in the Explanatory Memorandum (~~Application Document 3.2~~). **[REP9-109]**.
- 3.1.2 Schedule 12 contains the terms on which charges are to be imposed under the DCO. In general terms, this Schedule is set out in a similar way to a road user charging scheme order under the Transport Act 2000, and incorporates related procedures and processes so that the charges for the Tunnel Area will operate in the same way as road user charges under the Transport Act 2000. More specifically, Schedule 12 is modelled on the existing Dartford Crossing charging order (i.e., the A282 Trunk Road (Dartford-Thurrock Crossing Charging Scheme) Order 2013).
- 3.1.3 The legislative process for either varying or revoking and replacing the Dart Charge, or details thereof, is set out in The Trunk Road Charging Schemes (Bridges and Tunnels) (England) Procedure Regulations 2001.
- 3.1.4 As outlined in section 2.1, this approach to charging would apply to both the Full Public Delivery option for the Project, and the Public Tunnel and DBFOM Roads option, whereby the Secretary of State would remain the charging authority for both the Lower Thames Crossing and the Dartford Crossing.
- 3.1.5 In order to implement Regulated Private Entity option, whereby a private sector body receives the charging revenue for both the Lower Thames Crossing and Dartford Crossing, it is considered that primary legislation would be required which would provide the statutory basis for that regime. Under that option, as set out in paragraph 2.1.8 above, charges could either be imposed at the Lower Thames Crossing under the DCO (by virtue of transferred of powers, which would replicate the new private sector charging regime in place at the Dartford Crossing), or under the separate new charging powers established by primary legislation.

### 3.2 Powers to waive or suspend the road user charges

- 3.2.1 The charging powers being sought under article 46 of the draft DCO (**Application Document 3.1**) **[Revision 20.0]** include provision for the Secretary of State to waive and suspend the road user charges at the Tunnel Area in emergencies or exceptional circumstances, which might include failure of, or interruption to, the road user charging systems, and management of incidents or road closures. Under the Regulated Private Entity option, if charging at the Lower Thames Crossing was imposed via a new legal regime rather than the DCO, an equivalent power would need to be provided for by any primary legislation enabling that regime.

### 3.3 Application of the Eurovignette Directive

- 3.3.1 The Eurovignette Directive (Directive 1999/62/EC) made provision relating to road charges and tolls primarily across the Trans-European Road Network. The Directive is incorporated into UK law by the Heavy Goods Vehicles (Charging for the Use of Certain Infrastructure on the Trans-European Road Network) Regulations 2009 (the 2009 Regulations). The 2009 Regulations do not apply to the charges proposed over the Tunnel Area on the basis that the Tunnel Area does not form part of the Trans-European Road Network, nor is it proposed to be designated as a motorway. Even if the 2009 Regulations applied to the Tunnel Area, there would be an exemption available under regulation 3(2) of the 2009 Regulations (as is the case for the Dartford Crossing).

## 4 Road user charging operation and enforcement

### 4.1 How the road user charges would be operated

- 4.1.1 National Highways currently manages the operation of the Dart Charge and enforcement on behalf of the Secretary of State under a protocol arrangement (DfT, 2015b). Under the Full Public Delivery option and the Public Tunnel and DBFOM Roads option, the same arrangement is proposed to manage the charges at the Tunnel Area, albeit that the protocol arrangement for the Tunnel Area is not a matter for the DCO itself, in the same way that the protocol arrangement for the Dartford Crossing is not set out in the road user charging scheme order which applies to that crossing. Under the Regulated Private Entity option, a private sector body would receive the charges.
- 4.1.2 In all of the funding options for the Project, the road user charging regime at the Tunnel Area would be a free-flow charging regime, with appropriate technology to detect and identify vehicles and to charge remotely. It is proposed that the operation and enforcement of the new charging regime and the Dart Charge would be combined. These services include payment channels, payment processing, account registration and management back office and customer contact centre. By directly linking charges to those at the Dartford Crossing, ~~the DCO would require~~ users of the Tunnel Area ~~to would~~ pay charges in the same way as they do for the existing Dart Charge (for example, in advance of, or within a certain period after crossing, and through the same payment channels).

### 4.2 Non-compliance and enforcement

- 4.2.1 In order to deal with users not complying with the requirement to pay a road user charge, the draft DCO (**Application Document 3.1**) [Revision 20.0] includes powers to enforce the road user charges at the Tunnel Area as if they were charges imposed by a road user charging scheme under the Transport Act 2000. This would allow the Secretary of State to draw on existing legislation, The Road User Charging Schemes (Penalty Charges, Adjudication and Enforcement) (England) Regulations 2013 (the Enforcement Regulations), in order to enforce the road user charges at the Tunnel Area in the same way as the Dartford Crossing road user charges. This is through issuing penalty charge notices, charge certificates and, in cases of continued non-compliance, through the appointment of enforcement agents and use of a European debt recovery agency to facilitate enforcement against both UK and non-UK registered vehicles.
- 4.2.2 By drawing on the existing Enforcement Regulations, the DCO would align both the enforcement process and the penalty charge levels across the two crossings, allowing the Project to draw on the same enforcement services used to support the Dart Charge. Should the Government elect to adopt the Regulated Private Entity option, where a private entity would operate the road, primary legislation would set out equivalent enforcement powers.

## Glossary

Term	Abbreviation	Explanation
<b>A122 Lower Thames Crossing</b>	<b>Project</b>	A proposed new crossing of the Thames Estuary linking the county of Kent with the county of Essex, at or east of the existing Dartford Crossing.
<b>Application Document</b>		In the context of the Project, a document submitted to the Planning Inspectorate as part of the application for development consent.
<b>Dart Charge</b>		The Dartford Crossing free-flow electronic number plate recognition charging system (operates between 06:00 and 22:00).
<b>Dartford Crossing</b>		Road crossing of the River Thames in England, carrying the A282 road between Dartford in Kent to the south with Thurrock in Essex to the north. It consists of two bored tunnels and the cable-stayed Queen Elizabeth II Bridge.
<b>Department for Transport</b>	<b>DfT</b>	The government department responsible for the English transport network and a limited number of transport matters in Scotland, Wales and Northern Ireland that have not been devolved.
<b>Development Consent Order</b>	<b>DCO</b>	Means of obtaining permission for developments categorised as Nationally Significant Infrastructure Projects (NSIP) under the Planning Act 2008.
<b>Development Consent Order application</b>	<b>DCO application</b>	The Project Application Documents, collectively known as the 'DCO application'.
<b>Free-flow charging</b>		Barrier-free, remote road user charging.
<b>Highways England</b>		Former name of National Highways.
<b>Local Residents' Discount Scheme</b>	<b>LRDS</b>	Accounts that offer discounts on road user charges but are subject to location-based eligibility criteria.
<b>National Highways</b>		A UK government-owned company with responsibility for managing the motorways and major roads in England. Formerly known as Highways England.
<b>National Policy Statement</b>	<b>NPS</b>	Set out UK government policy on different types of national infrastructure development, including energy, transport, water and waste. There are 12 NPS, providing the framework within which Examining Authorities make their recommendations to the Secretary of State.
<b>National Policy Statement for National Networks</b>	<b>NPSNN</b>	Sets out the need for, and government's policies to deliver, development of Nationally Significant Infrastructure Projects (NSIPs) on the national road and rail networks in England. It provides planning guidance for promoters of NSIPs on the road and rail networks, and the basis for the examination by the Examining Authority and decisions by the Secretary of State.
<b>Order Limits</b>		The outermost extent of the Project, indicated on the Plans by a red line. This is the Limit of Land to be Acquired or Used (LLAU) by the Project. This is the area in which the DCO would apply.
<b>Planning Act 2008</b>		The primary legislation that establishes the legal framework for applying for, examining and determining Development Consent Order applications for Nationally Significant Infrastructure Projects.



Term	Abbreviation	Explanation
<b>Real terms</b>		Price that has been adjusted for inflation
<b>Scheme Objectives</b>		<ul style="list-style-type: none"> <li>• To support sustainable local development and regional economic growth in the medium to long term</li> <li>• To be affordable to government and users</li> <li>• To achieve value for money</li> <li>• To minimise adverse impacts on health and the environment</li> <li>• To relieve the congested Dartford Crossing and approach roads and improve their performance by providing free-flowing north-south capacity</li> <li>• To improve the resilience of the Thames crossings and the major road network</li> <li>• To improve safety</li> </ul>
<b>South Portal</b>		The South Portal of the Project (southern tunnel entrance) would be located to the south-east of the village of Chalk. Emergency access and vehicle turn-around facilities would be provided at the tunnel portal. The tunnel portal structures would accommodate service buildings for control operations, mechanical and electrical equipment, drainage and maintenance operations.
<b>Strategic road network</b>	<b>SRN</b>	The core road network in England managed by National Highways.
<b>The tunnel</b>		Proposed 4.25km (2.5 miles) road tunnel beneath the River Thames, comprising two bores, one for northbound traffic and one for southbound traffic. Cross-passages connecting each bore would be provided for emergency incident response and tunnel user evacuation. Tunnel portal structures would accommodate service buildings for control operations, mechanical and electrical equipment, drainage and maintenance operations. Emergency access and vehicle turn-around facilities would also be provided at the tunnel portals.
<b>Tunnel Area</b>		The tunnels and tunnel approaches as shown in the Tunnel Area Plan (Application Document 2.12).

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