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**The Planning Inspectorate**

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**By E-mail**

Dear Sirs and Madam,

**National Highways' (Lower Thames Crossing Project) Deadline 2 response in respect of the Norwich to Tilbury Project**

This letter constitutes a Deadline 2 submission on behalf of the National Highways Lower Thames Crossing (“NH LTC”) team. At Deadline 1, the Applicant submitted a number of documents that the NH LTC team wishes to comment on – these comments are set out below.

**1. Cover letter [REP1-141]**

The Applicant confirms in its cover letter that it will be making consequential changes and updates to a number of application documents as a result of the decision to proceed with Scenario B in relation to the Project’s interface with the Lower Thames Crossing, and that it intends to submit these updated documents at Deadline 5 on 10 June 2026. NH LTC welcome confirmation that application documents will be updated but is concerned about the length of time it will take until these are introduced into the examination. Current plans showing both Option A and Option B make it difficult to assess the impact of the Project on the Lower Thames Crossing including, but not limited to, the potential overlap and conflict of land powers. By Deadline 5, four months would have passed since the Applicant confirmed to the Examining Authority that it

would not be pursuing Option A. NH LTC fails to understand why an update to documents necessitates such a long delivery time.

## **2. Applicant's Comments on Relevant Representations [REP1-132]**

On page R3, the Applicant confirms that it is willing to explore the possibility of NH LTC undertaking Work No.23b as part of its own construction activities. Whilst NH LTC understands that discussions remain ongoing as to the feasibility of this (partly due to the exploration of construction programmes of both projects), NH LTC confirms that should this be agreed, it would wish to see an express transfer of the benefit of the order in relation to Work No.23b in Article 6 (Benefit of Order) of the draft DCO, rather than a transfer needing to be granted and consented to at a later date under Article 7 (Consent to transfer benefit of Order). Similarly, NH LTC advocates the benefit of works to provide the replacement compensatory woodland, being expressed granted in NH LTC's favour in the draft DCO.

On page R5, the Applicant sets out its position on the site selection process for the Tilbury North Substation. The Applicant states that the selection of the site has been, "appropriately evidenced and justified in Section 11.4 of the Design Development Report" [APP-122]. The NH LTC team disagrees with this statement, but note that recent interactions between the parties has elicited further information. In particular, the NH LTC team is considering a document setting out further detail on the site selection process for the replacement of NH LTC's compensatory habitat sites received from the Applicant on 3 March 2026 and expects to be able to provide a response on this issue to the Examining Authority at Deadline 3.

## **3. Applicant's written summary of oral submission and response to action points for Issue Specific Hearing 1 [REP1-139]**

In table 3.1, section 5, pages 33 and 34, the Applicant again addresses the site selection process for the North Tilbury Substation. Reference is made to LTC's "locational flexibility". NH LTC would like to clarify that this flexibility relates to a required degree of flexibility at the LTC's detailed design stage. It is based on established principles, formed through interaction with key stakeholders and is measured and proportionate in the context of a DCO of LTC's scale. It was not intended as flexibility in the manner in which the Applicant refers to it in this document.

#### **4. Report on Interrelationship with other infrastructure projects [REP1-134]**

NH LTC welcomes the Applicant's submission of the Interrelationship document but has concerns as to the substance of the content within it. As previously set out in NH LTC's written post hearing summaries [REP1-249], NH LTC considers that this document should contain information on:

1. Land interfaces between the Applicant's project and the LTC DCO
2. Consideration of temporal impacts of the Applicant's project on the LTC DCO, i.e. construction effects
3. Inter-Project Cumulative Effects
4. Construction phase control documents - Code of Construction Practice - Outline Traffic Management Plan for Construction
5. Consultation and engagement with key stakeholders

In particular, the interface between the Applicant's Project and the LTC is not solely spatial but also temporal and, as such, this document should include details of construction activities of both projects including details of site occupation and accesses. It should also cover the outages issue, referenced in 3.2.1 of the Statement of Common Ground between the parties [REP1-075], which is a main factor of concern for NH LTC.

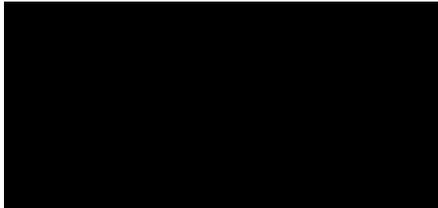
The Interrelationship document fails to address these issues, and those listed above, and does not contain any information about how the interrelationship between the projects is to be managed. As discussions between the parties progress, NH LTC would expect to see this document updated to reflect any discussions that take place.

#### **5. Statement of Common Ground with Natural England [REP1-034]**

NH LTC notes the content of the Applicant's Statement of Common Ground with Natural England. Following a meeting held between the Applicant, Natural England and NH LTC on 6 March 2026, NH LTC awaits Natural England's confirmation that the alternative sites proposed for LTC in the NTT DCO for nitrogen deposition and environmental mitigation are appropriate in terms of connectivity, size and suitability, in comparison to those secured through the LTC DCO. Confirmation is also awaited from Natural England that a circa 10 year delay of planting at these sites, as a result of the NTT DCO is acceptable.

NH LTC remains committed to working with the Applicant to ensure its concerns are addressed.

Yours sincerely,



**David Davey**

**Lower Thames Crossing Roads North Project Director (Delivery)**