

**Lower Thames Crossing**

National Highways  
Woodlands  
Manton Lane  
Bedford  
MK41 7LW

**The Planning Inspectorate**

c/o QUADIENT  
60 Buckingham Drive  
Slough  
SL1 4PN

**By E-mail**

Dear Sir / Madam

**National Highways (Lower Thames Crossing Project) deadline 3 response in respect of the Norwich to Tilbury Project**

This letter constitutes a Deadline 3 submission on behalf of the National Highways Lower Thames Crossing (“NH LTC”) team. NH LTC’s submission includes:

- Responses to the Examining Authority’s First Written Questions;
- A request to attend hearings during the week commencing 27 April 2026; and
- An update on the Lower Thames Crossing project.

**1. Examining Authority’s First Written Questions**

<u>Question Number</u>	<u>Question</u>	<u>Response</u>
GEN 1.9	<p>Report on interrelationship with other infrastructure projects</p> <p>A report on interrelationship with other infrastructure projects was submitted by the applicant at deadline 1 [REP1-134].</p> <p>The applicants/ developers of the projects listed in table 2.1 of the report (those which are IPs in this examination) are asked to provide comments on the content of the report, cross referencing to any relevant statements of common ground (SoCG) where necessary.</p>	<p>NH LTC has previously commented on the Applicant’s Interrelationship document [REP1-134] and refers the ExA to those comments in section 4 of NH LTC’s response to Deadline 2 [REP2-052]. Whilst NH LTC recognises that there has been progress in discussions with the Applicant, it is of the view that further substantive engagement is still necessary in order to ensure that NH LTC can appropriately assess the impact. Its position therefore remains as per its Statement of Common Ground with the Applicant.</p>

<u>Question Number</u>	<u>Question</u>	<u>Response</u>
ALT 1.1	<p>Reasonable alternatives: policy and legislation</p> <p>The local authorities are invited to comment on their understanding of 'reasonable alternatives' in the context of NPS EN-1 paragraphs 4.3.22 to 4.3.19, and Regulation 14(2)(d) and paragraph 2 of schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations). The local authorities are also requested to comment on paragraph 3.2.32 of ES chapter 3: 'Where options assessed do not meet the definition of 'reasonable alternatives' (such as certain offshore cable options that conflict with NPS policy preferences), these are included to address specific scoping requirements under Regulation 14(3) rather than as reasonable alternatives under Regulation 14(2)(d)'.</p> <p>The local authorities are asked, where they have suggested alternatives, if they would meet the definition of reasonable alternatives in the context of the policy and the EIA Regulations.</p> <p>Other IPs are also invited to comment on their understanding of reasonable alternatives, if they wish to do so.</p>	<p>NH LTC's comments in relation to reasonable alternatives centre around the Applicant's siting process for the Tilbury North substation, and the proposed location for displaced Lower Thames Crossing mitigation / compensatory habitats.</p> <p>NH LTC does not consider it helpful to duplicate its concerns, which remain unchanged, and so for full details of its concerns refers the ExA to the SoCG between the Applicant and NH LTC [REP1-075], particularly matters 3.2.12, 3.2.20, 3.2.23, 3.2.26 and 3.2.39.</p>

Question Number	Question	Response
DCO 1.A42	<p>Article 58 (Application, disapplication and modification of legislative provisions)</p> <p>The ExA would ask for comments in regard to the disapplication and modification of certain public general legislation (See provisions set out in article 58(1) and the public general legislation listed at schedule 17 of the draft DCO), especially in regard to the Highways Act 1980 and the Land Drainage Act 1991.</p>	<p>NH LTC has discussed the suitability of the disapplication of the Highways Act 1980 provisions with the National Highways spatial planning team and agrees with its objection to their disapplication. NH must have control over the operations being carried out on its network, including the LTC. This is critical from a safety perspective and to maintain the integrity of the asset.</p>

## **2. Notification of a wish to attend hearings on the week commencing 27 April 2026**

In accordance with the Examining Authority's Rule 8 letter [PD-011], NH LTC requests to attend and, if appropriate, be heard at Issue Specific Hearing 2 and Compulsory Acquisition Hearing 2 in the week commencing 27 April 2026.

## **3. Update on the Lower Thames Crossing project**

As part of the normal course of the detailed design development of the LTC scheme, a change to the alignment of Brentwood Road is being proposed. This change, as shown on the drawing appended to this submission (reference HE540039-BAL-LDC-RN\_SNZ\_ZZ-DR-ZL-900124), would reduce the amount of land available to the Applicant for its proposed replacement mitigation / compensatory habitat in the area around the proposed Tilbury substation.

The area marked "Planned NTT Environmental mitigation area" on the drawing has been obtained from the Applicant's document "*NTT 6.8.A1 Environmental Statement Appendix 8.1 - Habitat Report - Ecology and Biodiversity Habitats of Principal Importance (HPI) Section H Page 62a of 63*". From our calculations, the effect of the LTC project's realignment of Brentwood Road is estimated to reduce the availability of the proposed mitigation / compensation area from 88,500m<sup>2</sup> to 73,700m<sup>2</sup>, a reduction of 14,800m<sup>2</sup>.

Pursuant to paragraph 3 of Schedule 2 of the LTC DCO, an application to authorise the Brentwood Road realignment will be made by the Secretary of State following consultation with the relevant planning authority, which in this case is Thurrock Council. The application process has not yet formally begun and is unlikely to be

completed by the end of the Norwich to Tilbury examination. However, NH LTC wishes to ensure that all relevant information is introduced into the examination as early as possible to ensure that it can be properly taken into consideration and accounted for in the examination of the Norwich to Tilbury proposal, and ultimately in the decision. The Applicant and Thurrock Council have both been made aware of NH LTC's proposal.

NH LTC is aware of the Examining Authority's written question DES 1.13 which asks Thurrock Council to provide a view on the effectiveness of mitigation in relation to the Tilbury substation, which is evidently affected by the realignment of Brentwood Road. NH LTC proposes to comment further on this matter at Deadline 4, following further engagement with the Applicant and Natural England, and having reviewed Thurrock's response to question DES 1.1.3.



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

Yours faithfully



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



-  Proposed change to DCO footprint - Land needed temporarily
-  Proposed change to DCO footprint: Land needed permanently

Planned NTT  
environmental  
mitigation area

24981m<sup>2</sup>

4155m<sup>2</sup>

153m<sup>2</sup>

12236m<sup>2</sup>

4251m<sup>2</sup>

Orsett Golf Course

Health Place

Track

Pond

Gas Distribution Station

Signal

**Lower Thames Crossing - Proposed Brentwood Road Realignment**  
Drawing Number -HE540039-BAL-LDC-RN\_SNZ\_ZZ-DR-ZL-900124  
Date 10/04/2026