

Lower Thames Crossing
**Material Change
Consultation**

Summer 2026



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Foreword

Almost three years have passed since our last consultation, and in that time, we've made significant progress on the A122 Lower Thames Crossing (the Project).

This included our DCO examination in 2023, consent being granted by the Secretary of State in March 2025, further commitment from Government through additional public funding, the start of works across the route, and the announcement earlier this year of the Highways (Financing) Bill in the King's Speech. This legislation paves the way for us to bring private sector investment into the Lower Thames Crossing through a new Regulated Asset Base funding model.

These are just some of the milestones we've delivered. Alongside this progress, I am proud that we have continued working to make this the greenest road ever built in the UK, and the first major British infrastructure project to be carbon neutral in construction.

This includes being the first project to use a hydrogen-powered digger outside of a test environment, as well as a deal with GeoPura to supply 2,500 tonnes of hydrogen, which will replace over 12 million litres of diesel and save an estimated 30,000 tonnes of CO2 emissions. I am keen to see further developments in this vital area as main construction works commence, and to help leave a legacy for the British construction industry.

This consultation is required as we are considering making a change to part of our DCO, which would require a material change application. Before we decide whether to submit an application, we would like to consider your views, to help refine our proposals.

Whilst traffic levels are predicted to decrease at the Dartford Crossing and some busy sections of the A2 and A13, traffic is forecast to increase on parts of the M25. This would increase emissions and potentially affect land within the Epping Forest Special Area of Conservation (SAC). Therefore, one of the environmental management measures included in our consent is a reduced speed limit on the M25 between junctions 26 and 27, aimed at reducing the impact of increased vehicle emissions on Epping Forest SAC.

We are now considering an application to remove the requirement for a reduced speed limit on this part of the M25 and instead create new enhanced ecological habitats nearby, which would provide compensation to address the predicted effects on Epping Forest SAC.

Thank you to everyone who has engaged with us to date. Your input continues to play an important role in shaping the delivery of the Project, and I am looking forward to delivering this vital infrastructure for communities in the south east and across the UK.



A handwritten signature in black ink that reads "Matt Palmer". The signature is fluid and cursive.

Matt Palmer

Lower Thames Crossing
Chief Executive Officer

About this guide

This guide explains the changes that National Highways is considering making to the Development Consent Order (DCO) for the A122 Lower Thames Crossing.

These changes would be limited in nature but because they involve potentially new environmental effects, we're seeking feedback from individuals and stakeholders likely to have an interest in them.

We are considering making an application to remove an existing DCO commitment for a speed limit reduction on the M25 between junctions 26 and 27 when the A122 Lower Thames Crossing opens for traffic. Instead, as we do not consider there are any other feasible alternative solutions to avoid an adverse effect on integrity on the Epping Forest SAC, we are considering the provision of compensation through the creation of enhanced ecological habitats on agricultural land near junctions 26 and 27 of the M25.

The proposed changes relate to a specific requirement within the DCO and would not affect the design or construction of the road or tunnel. We are consulting on these proposals because we are considering the submission of a 'material change' application to the Planning Inspectorate. Your feedback will help us understand your views on our proposals and inform our next steps.



Material change to a Development Consent Order

In March 2025, the Secretary of State for Transport granted National Highways development consent for the A122 Lower Thames Crossing. The proposals presented in this guide relate to a material change to part of the Development Consent Order (DCO) that is under consideration by National Highways.

Changes to made DCOs are governed by the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011. The change application process was amended in the Planning and Infrastructure Act 2025, but the necessary secondary legislation to enable this has not yet come forward.

This change would only relate to a specific requirement within the made DCO, and not any other aspect of the Lower Thames Crossing proposals as secured by the DCO. The changes, if taken forward, are considered 'material' because they would remove a mitigation measure that was included in the DCO to reduce impacts on the Epping Forest Special Area of Conservation (SAC), and instead provide compensation.

Before submitting a material change application to the Planning Inspectorate, there is a requirement to carry out a public consultation on the proposals and consider the feedback received.

National Highways and A122 Lower Thames Crossing

National Highways is the Government-owned company which plans, designs, builds, operates and maintains England's motorways and major A-roads, known as the strategic road network (SRN).

Working together with the Department for Transport, we are responsible for delivering over £27 billion of investment as set out in the Government's Road Investment Strategy 3, while continuing to set highway standards across the UK.

We manage and improve the SRN to support safer, smoother and more reliable journeys, while prioritising safety, customers and delivery.



The A122 Lower Thames Crossing is a new road crossing beneath the River Thames, which will connect the A2 and M2 in Kent with the M25 south of junction 29 in Essex.

The new route will be around 23km long, including a 4.25km tunnel beneath the Thames.

On completion, it will almost double road capacity across the Thames east of London, easing congestion on the Dartford Crossing, improving journeys across the south east, and creating a reliable new route across the river.

The DCO for the A122 Lower Thames Crossing, giving us permission to build and operate the road, was granted by the Secretary of State for Transport on 25 March 2025. Early work to prepare for construction of the Lower Thames Crossing is now underway.

What we're consulting on

We're inviting feedback on:

- The proposed acquisition of an interest in agricultural land by the Project and the creation of enhanced ecological habitats
- Removal of the requirement for a reduced speed limit on the M25 between junctions 26 and 27
- Removal of the requirement to monitor nitrogen and other air pollutants in this area
- Local environmental and community effects from the creation of enhanced ecological habitats

We're not consulting on:

- Other aspects of the Lower Thames Crossing
- Other National Highways projects or roads

What are we proposing?

The changes that we are considering would not alter the route of the A122 Lower Thames Crossing, or affect its main elements including the road, junctions, tunnel or other significant infrastructure.

The proposed change under consideration would remove the requirement to reduce the speed limit on the M25 between junctions 26 and 27. Instead, National Highways would seek to acquire an interest in an area of existing agricultural land, north-west of Epping Forest SAC and south of the M25, to enable enhanced ecological habitats to be delivered.

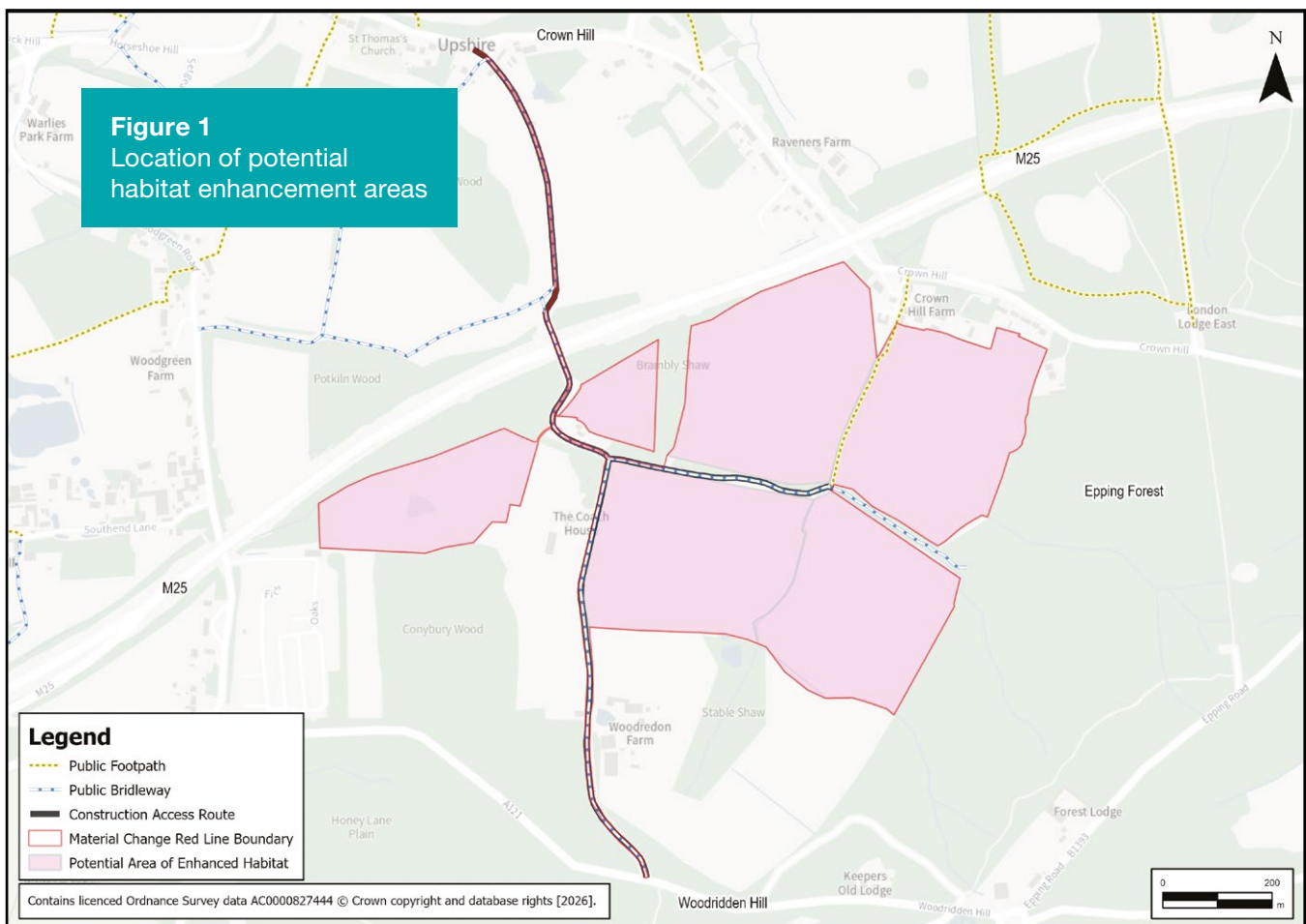
Why was a reduced speed limit proposed?

As part of the decision to grant permission to build and operate the Lower Thames Crossing, the Secretary of

State for Transport and Natural England agreed that predicted traffic increases on the M25, resulting from the opening of the new road, would have a negative impact on Epping Forest SAC. Vehicle emissions contain nitrogen, and increased levels of this in the atmosphere would adversely affect habitat quality, leading to a reduction in biodiversity.

To reduce the impacts on Epping Forest SAC from nitrogen, the DCO included the following requirements:

- A temporary reduction in the speed limit from 70mph to 60mph on the westbound carriageway of the M25 between junctions 26 and 27, with the intention to reduce emissions from vehicles. The reduced speed limit would have been removed when emissions had reduced sufficiently.
- Monitoring of nitrogen and other air pollutants in this area to identify any negative impacts from increased vehicle emissions.



Enhanced ecological habitat

Recent research conducted by National Highways elsewhere on the existing SRN¹ concluded there was no clear and discernible evidence to demonstrate a link between a reduced speed limit from the national speed limit to 60mph and improved roadside air quality. National Highways is therefore considering whether there is a case for providing compensatory habitats instead of introducing the speed limit reduction.

We are considering applying for a change to the DCO that would:

- remove the requirement to implement a speed limit reduction on the M25 between junctions 26 and 27
- remove the requirement to monitor nitrogen and other air pollutants in this area
- replace these measures with new compensatory habitats near the M25 and Epping Forest
- update the Project's Environmental Statement and Report to Inform an Appropriate Assessment on the grounds that a reduced speed limit on the M25 (between junctions 26 and 27) is not certain to be effective.

To deliver this change, we would acquire an interest in approximately 50 hectares of agricultural land between the M25 and Epping Forest SAC, as shown in Figure 1, and enhance the habitat on that land. The establishment of new trees and shrubs would compensate for the negative impacts from vehicle emissions identified in the DCO application in relation to Epping Forest SAC.

The area shown in Figure 1 comprises the maximum area of compensation under consideration. We are currently in discussions with stakeholders on the need for measures to address air quality impacts in Epping Forest against the backdrop of rapidly improving air quality over the last few years. These discussions will help us decide the best way forward. For example, this may include a reduction in the area if appropriate.

The land would be enhanced through changes to long-term land management, primarily through supporting natural regeneration and introducing low-level grazing. The land, which is currently low-biodiversity agricultural land would gradually evolve into high-biodiversity wood pasture.

The land under consideration is currently owned by the City of London Corporation and is let under the Agricultural Holdings Act 1986. We are discussing the proposals with the relevant parties to seek to agree a suitable mechanism to secure the land rights necessary to deliver the proposed new habitats. As well as acquiring an interest in the land for the newly proposed habitats, we may also need additional land and rights to allow temporary access to the area as we prepare the site, and for occasional access to the new habitat to manage and maintain it in the future.

¹ More information can be found on the National Highways website at: <https://nationalhighways.co.uk/our-work/environment/communities/air-quality/air-quality-library/#research>

Preparation of the site

Creating enhanced ecological habitats on land that is currently in agricultural use would require the installation of fencing to protect new planting areas and developing habitats. Following the installation of fencing, selected areas would be planted with new trees, while other areas would be allowed to develop through natural regeneration.

Enclosure of the habitat areas would be completed prior to planting, which – to support tree establishment – would primarily take place seasonally between November and February. These works would be undertaken in advance of the opening of the A122 Lower Thames Crossing, which is expected in the early to mid-2030s.

Ongoing works to manage vegetation and facilitate grazing would take place throughout the year and would continue into the future as part of the long-term management of the land.

The land would be accessed by light goods vehicles to transport young trees and other materials, such as fencing, to and from the site, as well as to remove waste. Mechanical tools would be used for habitat creation activities, including fencing, planting, and the management of grazing animals.

As shown in Figure 1, Green Lane and Woodredon Farm Lane would be used to access the land. During the works, small areas of hardstanding may be required to facilitate construction access or the storage of materials. Mobile welfare facilities would be provided, and any waste would be removed by vehicle. All temporary facilities would also be removed once works to prepare the site are complete.

Effects on the environment and local communities

Acquiring an interest in the land and enhancing it would have potential local effects, including:

- A permanent change in land use from agricultural land to grazed nature conservation habitat, through the creation of enhanced ecological habitats
- Minor changes to the landscape character, through the establishment of new trees and shrubs and open areas.
- Temporary effects on nearby footpaths and bridleways during construction, which may require very short-term diversions or closures
- Temporary construction effects such as traffic and visual impacts.

We have carried out a preliminary environmental appraisal to understand the likely effects of the proposals under consideration. If, following consultation, we decide to progress with the change, we would submit an addendum to the Project's Environmental Statement as part of our material change application to the Planning Inspectorate.

This addendum would provide a full assessment of the likely predicted effects of the proposals.

The Environmental Statement submitted with the DCO assessed the following aspects for both construction and operational effects:

- Air quality
- Cultural heritage
- Landscape and visual
- Terrestrial biodiversity
- Marine biodiversity
- Geology and soils
- Material assets and waste
- Noise and vibration
- Population and human health
- Road drainage and the water environment
- Climate
- Cumulative effects

Our preliminary appraisal of the changes we are consulting on has established that there would be no construction or operational effects for the following aspects:

- Marine biodiversity
- Geology
- Material assets and waste
- Noise and vibration
- Road drainage and the water environment
- Climate

For this reason, these aspects have been excluded from the preliminary appraisal and would not feature in the assessment presented in the addendum to the Environmental Statement.

Table 1: Preliminary environmental appraisal for the material change

Aspect	Construction effects	Operational effects
Air quality	The proposed works would be expected to introduce temporary increases in emissions associated with construction vehicle movements. Neither these emissions nor any other construction activities would have a significant impact on air quality during construction.	No effects on air quality would be anticipated following implementation of the proposals.

Aspect	Construction effects	Operational effects
Landscape and visual	<p>Works to implement new habitat areas would be expected to have limited effects on landscape character and views, resulting from the presence of light construction vehicles and workers undertaking planting operations.</p> <p>Effects on landscape character and views during construction would not be anticipated to be significant.</p>	<p>Initially, the establishment of young plants would alter the currently open character of the fields adjacent to Epping Forest. Once the proposed woodland is established, the open character of the landscape would be further reduced and views may be shortened in some locations.</p> <p>The provision of glades or vistas, along with setting planting back from the edges of properties and Public Rights of Way, would help to limit these changes. However, the creation of enhanced ecological habitat would be likely to result in adverse effects on landscape character and views, including some localised significant visual effects where views are shortened from adjacent Public Rights of Way.</p>
Terrestrial biodiversity	<p>No effects on terrestrial biodiversity are anticipated during construction.</p>	<p>An increase in vehicle emissions resulting from predicted traffic increases on this part of the M25 during the operation of the A122 Lower Thames Crossing would have a negative impact. Vehicle emissions contain nitrogen, and increased levels of this in the atmosphere would impact the quality of the habitat, reducing biodiversity.</p> <p>Removing the reduced speed limit would remove the mitigation of this impact, potentially leading to an Adverse Effect on Integrity (AEoI) on Epping Forest SAC; a significant effect on terrestrial biodiversity.</p> <p>Providing compensation through establishment of improved terrestrial habitats with new trees and shrubs would provide enhanced ecological habitats with positive effects on biodiversity that would fully offset the adverse effects.</p>

Aspect	Construction effects	Operational effects
Cultural heritage	<p>The modest scale of construction is expected to have a limited impact on any buried archaeological remains.</p> <p>However, the proposed habitat creation may result in effects on boundary and landscape features, including potential direct physical impacts and changes to their setting during construction.</p> <p>If any significant boundaries or landscape features associated with the pre-enclosure landscape are identified during further assessment, these would be recorded before any works commence.</p>	<p>The proposed land for biodiversity enhancement sits within the Copped Hall Ridge and the Cobbin's Brook Historic Landscape Character Area.</p> <p>Given the nature of the proposed habitat creation, no impacts on buried archaeological deposits are predicted.</p> <p>Any significant views identified through assessment would be retained through the careful design of areas of vegetation regeneration. Historic landscape features, such as boundaries that may be altered by the proposal, would be recorded prior to any works commencing.</p>
Soils	<p>Based on the recently published Predictive Agricultural Land Classification map of England, this area is likely to comprise Grade 3b land, which does not form best and most versatile (BMV) land. Based on our appraisal, the land is used for a mix of arable and grazing. The proposal would result in a loss of this land from agricultural production, and while there would not be a loss or change in soil conditions, the effect on agricultural land would be assessed. As the land is unlikely to comprise BMV land, it is not considered the proposals would result in a significant effect. With the implementation of good practice soil handling and management, there are not expected to be significant effects in terms of soil function.</p>	<p>As land would be taken out of agricultural production during the construction phase, no further effects on agricultural land would be anticipated during the operational phase. Activities during the operational phase could affect the soil resources (for example, rutting and mixing of topsoil and subsoil) but with standard good practice approaches to sustainable soil management, it is not envisaged that these would result in significant effects.</p>

Aspect	Construction effects	Operational effects
Population and human health	Initial appraisal of the impacts of proposed changes to land use found no new significant adverse environmental effects on population and human health during construction.	Initial appraisal of the impacts of proposed changes to land use found no new significant adverse environmental effects on population and human health once the proposals have been implemented.
Cumulative effects	Construction or operation of the material change would not be expected to cause significant cumulative effects. If the change application is taken forward, the Environmental Statement Addendum would include an assessment of cumulative effects, including the combined impacts of the proposed development and its interaction with other nearby developments.	

Habitats Regulations Assessment

If we decide to progress with a change application, we would need to include an updated Report to Inform an Appropriate Assessment under the Habitats Regulations. As part of the DCO decision, a commitment was included to implement a reduced speed limit on the M25 between junctions 26 and 27. This was informed by the traffic and environmental assessments submitted as part of the DCO application.

Based on those assessments, if we were to seek approval to remove the speed limit mitigation measure, it would be necessary to demonstrate through an updated Habitats Regulations Assessment that:

- there are no feasible alternative solutions that would avoid the adverse effect in integrity
- there are Imperative Reasons of Overriding Public Interest (IROPI) for the Project
- suitable measures to compensate for the impact on the SAC have been secured.

If the speed limit commitment is withdrawn, we do not consider there to be any feasible alternative solutions² (including no other feasible types of mitigation) that would avoid an adverse effect on integrity on the site and meet the project objectives.

Our IROPI case would be based on the case for the Project, which was the basis on which the DCO was granted approval³. The proposed compensatory measures have been set out above and form part of this consultation.

² Alternative solutions are considered in section 2.2 of annex c.7 of the Statement of Common Ground between National Highways and Natural England (electronic page 187)

[nsip-documents.planninginspectorate.gov.uk/published-documents/TR010032-006161-National%20Highways%20-%20Other-%205.4.1.6%20SoCG%20between%20\(1\)%20National%20Highways%20and%20\(2\)%20Natural%20England_v6.0_clean.pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/TR010032-006161-National%20Highways%20-%20Other-%205.4.1.6%20SoCG%20between%20(1)%20National%20Highways%20and%20(2)%20Natural%20England_v6.0_clean.pdf)

³ For more information about the case for the Project, and the Project objectives, please see the Need for the Project document submitted with the DCO application.

nsip-documents.planninginspectorate.gov.uk/published-documents/TR010032-001291-7.1%20Need%20for%20the%20Project.pdf

Have your say

Consultation feedback can be submitted by:

Completing the online response form at:
nationalhighways.citizenspace.com/ltc/material-change-consultation

Emailing comments to:
consultationresponses@lowerthamescrossing.co.uk

Posting printed response forms or letters to:

Material Change Consultation,
Lower Thames Crossing, Pilgrims Lane,
Chafford Hundred, RM16 5UZ.

The consultation opens on **Tuesday 30 June 2026**
and closes on **Tuesday 28 July 2026**.

The deadline for submitting your feedback is
11.59pm on **Tuesday 28 July 2026**.

We cannot guarantee that consultation feedback submitted by any other method, or received after this deadline, will be considered.

Find out more

You can contact us to find out more about the proposals or to request a printed consultation brochure, response form or materials in an alternative format, free of charge (one per household).

Email: info@lowerthamescrossing.co.uk

Phone: 0300 123 5000

Next steps

After the consultation closes, we will review all feedback received and consider whether to proceed with an application for a material change to the Planning Inspectorate

The application will include a summary of feedback received during the consultation.

If we decide to submit an application, we currently expect that this would be submitted in late 2026 or early 2027. The Secretary of State for Transport would then decide how the application should be considered, which may include holding an examination, before making a final decision on the material change application.

The timeline below sets out the potential next steps and anticipated timescales, should an application be submitted.



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