



FREEPOST LTC CONSULTATION

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**Sessions House
County Hall
Maidstone
ME14 1XQ**

12th August 2020

Dear Sir/Madam,

Lower Thames Crossing Design Refinement Consultation 2020

Response from Kent County Council

This is Kent County Council's (KCC) officer response to the design refinement consultation by Highways England on the latest proposals for a new Lower Thames Crossing.

Our response to the 2018 statutory consultation and 2020 supplementary consultation outline in detail our overall support for the scheme, but also our concerns regarding the impact on the environment and existing highway network. In respect to the proposed design refinements within this consultation, KCC welcomes the majority of the changes. However, there remains four key areas where we have concerns;

- 1. The impact of the scheme on the local and strategic highway network.**
The need for appropriate mitigation is imperative and it is vital Highways England fully identifies and mitigates the direct impacts the LTC will have on other areas of the highway network, such as the A228 and A229.
- 2. The impact on Shorne Woods Country Park**
Kent County Council remains strongly opposed to the 60 metre easement through Shorne Woods Country Park which is required for the diversion of a high pressure gas pipeline. We fully expect Highways England to work with the relevant utility provider to reduce the land take to the absolute minimum and provide appropriate compensatory planting and other mitigation to KCC's flagship Country Park.
- 3. The complete lack of environmental information**
It is disappointing that there remains a complete lack of detailed information on the proposed environmental impacts to be able to provide valuable



feedback and this is reflected within our response. With Her Majesty's Government's commitments to the environmental and climate change agendas, we would expect this information to be provided.

4. The adequacy of consultation

We also have concerns regarding the lack of engagement around the latest proposals and would encourage Highways England to engage with us at the earliest convenience to discuss the latest refinements in further detail. In particular, proper and meaningful engagement is needed in regard to the proposed new parking facility, NMU routes and the anticipated impacts of the utilities diversions.

Please find attached our response to the consultation questionnaire which sets out our comments in further detail.

Yours sincerely

Barbara Cooper

Corporate Director for Growth, Environment & Transport



Kent County Council's Response to the Lower Thames Crossing Design Refinement Consultation Questionnaire

1. Design refinements

South of the river in Kent

M2/A2 area proposals

Q1a. Do you support or oppose the proposed changes south of the river? Please refer to the Design refinements chapter of the guide.

Strongly support

Support

Neutral

Oppose

Strongly oppose

Don't know

Q1b. Please let us know the reasons for your response to Q1a and any other comments you have on the proposed changes south of the river.

Public Rights of Way

The latest plans show the creation of new/additional routes. While these new Non-Motorised User (NMU) links are welcomed, a number of existing Public Rights of Way (PRoW) do not appear on the plans. It is assumed that most of these PRoW will be retained, but we are aware that some paths will need to be diverted or extinguished to enable the development to proceed. To clarify the situation, it is requested that Highways England provides a map illustrating routes that will be retained, diverted, extinguished and created through this project.

With reference to the general arrangement drawings, the dashed pink lines are referred to as 'Footpath, Cycleway or Bridleway Route'. The legal status and classification of these routes should be clarified, as this will have implications for the type of public access available and the future maintenance responsibilities. Considering there is a lack of off-road opportunities in this area for cyclists and equestrians, it should be expected that the paths will become multi-user bridleway routes. If informal path links are going to be provided, these should be included on the access plan so that an assessment of the overall connectivity can be made.

The plans show that these 'Footpath, Cycleway or Bridleway' routes would be bisected by a number of new roads. Concerns are raised that these roads will deter path users, due to safety issues and difficulties crossing the carriageways. Taking this into account, Highways England should minimise and mitigate the number of 'at-grade' road crossings for NMUs which are created as a result of the LTC. It is



requested that Highways England clarify the road crossing infrastructure that will be provided to assist path users e.g. Pegasus crossing, subway, bridge, signalised controlled crossing etc.

On a positive note, the plans indicate that some maintenance tracks will 'double up' as publicly accessible routes for pedestrians, cyclists and equestrians. This approach is supported in principle, as it would increase the availability of off-road routes and improve connectivity.

Highways England is reminded that KCC's comments to previous consultations remain appropriate and it is disappointing these do not seem to have been considered or addressed. Furthermore, there is a continued lack of engagement by Highways England with KCC's Public Rights of Way team following the submission of the County Council's previous consultation responses. This lack of engagement is inadequate and it is essential Highways England engages KCC's Public Rights of Way team at the earliest opportunity to discuss the matters raised.

The LTC also provides an opportunity for Highways England to embed the Government's current thinking on Active Travel through enabling walking and cycling journeys on new PRow which would be a lasting legacy of this project.

Heritage Conservation

KCC welcomes where design changes reflect comments made at the supplementary consultation and the general reduction in the area of land required for the works but we consider that further refinements could, and should, still be made to benefit the historic environment. The lack of detailed information about archaeological potential limits our ability to make detailed comments on some of the design refinements. This is acknowledged in the consultation documentation where it is often stated that 'a detailed assessment would be included in the Environmental Statement'.

The following comments make reference to the key changes listed in the 'Guide to design refinement consultation' (July 2020).

In light of the design refinements to the position of the Thong Lane green bridge for ecological benefit, KCC encourages Highways England to review the possibility of retaining the undesignated Homes for Heroes structures on the west side of Thong Lane by re-positioning the existing road slightly further to the east and retaining utilities north of the existing curtilage for these buildings. The structures proposed for demolition (Nos. 37 & 38 with attendant outbuildings) are within the Thong Conservation area, have historic significance and should be protected from being demolished. The preservation of the paddock/garden of Westwood Farm (see Figure 3-15, page 39) indicates that this should be achievable.



KCC also encourages Highways England to demonstrate how their design refinements have satisfied relevant legislation, policy and guidance, such as the Listed Buildings and Conservation Areas Act 1990.

Furthermore, KCC would like to see further design refinements to reduce the potential impacts through Shorne and Ashenbank Woods. It should be noted that the revised landscape proposals and proposed ancient woodland mitigation and compensation still do not consider the results of archaeological evaluation which at the time of writing are still ongoing. Important discoveries of archaeological sites of a range of periods from prehistoric, to Romano-British and modern date are being revealed and the final scheme design should reflect these discoveries both in terms of our understanding of landscape history and with regards appropriate mitigation of specific heritage assets.

Removal of spoil

Clarification is required for the actual volume of chalk that will now be excavated from the cutting of the tunnel, including the volumes proposed to be disposed during, and after, construction of the crossing. Whilst Highways England's current plan is for the majority of the excavated materials, which are not re-used on site, to be transported by road, there is an opportunity for river-based transport to be used where possible to reduce the number of construction movements made by road, and this must be re-considered by Highways England. However, if materials are to be transported via the River Thames, there would be a requirement for new marine infrastructure, which may then have a direct impact on coastal access.

Construction impacts

Vehicle movements both during and after construction along the A227 Wrotham Road and the A226 Gravesend Road are a significant concern to KCC. These roads have been highlighted as being impacted from recent projects in the area and KCC asks Highways England to share the findings of its construction traffic modelling and actively discuss with KCC the appropriate mitigation that will be required throughout the construction phase to prevent adverse impacts on the existing highway network.

KCC also has concerns over HGV parking on the widened Thong Lane and Henhurst Road areas as well as others in the vicinity. There needs to be a clear strategy for dealing with unwanted and inappropriate HGV parking, including both legislation and physical restrictions, otherwise there will be a legacy of anti-social behaviour/parking. KCC would also insist government provides Highways England and KCC with the necessary enforcement powers to tackle cases of inappropriate lorry parking that will increase as a result of the new crossing and be exacerbated by the complete omission of facilities within the current proposals.

Furthermore, clarity is needed on the impacts of the utilities diversion works on the existing highway network.



Asset management

Currently it is unclear who will be responsible for the long-term maintenance of the Thong Lane Green Bridge structures and what planting methods will be used on the bridge. KCC would expect for these assets to be managed and maintained fully by Highways England, whom should also be liable for the cost of any future maintenance. Clarification is also needed as to whether Highways England has considered the possible risks of planting on structures over a high-speed road.

There is also the need for clarification as to who will be responsible for maintaining the noise barriers following construction. Again, KCC would see this as the responsibility of Highways England, and the scheme should not result in any additional pressure on the County Council's already limited highway maintenance budget. Furthermore, KCC would ask Highways England to consider using chalk bunds with topsoil and grass seed instead of fences to construct the noise barriers. KCC would like to see any waste materials from the construction of the Lower Thames Crossing recycled to provide noise bunding for properties close to the proposed route of the crossing or elsewhere on the Strategic Road Network. This excavated spoil can therefore act as noise restraint and reduce the impact on properties in the area.

Country Parks

It remains disappointing that the environmental bund from the original design along the Inn on the Lake to Brewers Road bridge section of the park is still not included within the design. KCC is concerned the noise from the road into the woods will have a detrimental impact on the country park, especially as 60m of woodland which would normally lessen the noise is proposed to be lost for the diversion of utilities.

KCC previously strongly opposed the 60m easement at Shorne Woods County Park which is required for the diversion of a high pressure gas pipeline, and the County Council continues to strongly oppose this element of the proposal. The loss of woodland this would cause remains a key concern to KCC and the requirement for a permanent 60m corridor within the SSSI has not been justified in the consultation materials.

Paragraph 5.29 of the NPS for National Networks states:

“Where a proposed development on land within or outside a SSSI is likely to have an adverse effect on an SSSI (either individually or in combination with other developments), development consent should not normally be granted. Where an adverse effect on the site's notified special interest features is likely, an exception should be made only where the benefits of the development at this site clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs. The Secretary of State should ensure that the applicant's proposals to mitigate the harmful aspects of the development and, where possible, to ensure the



conservation and enhancement of the site's biodiversity or geological interest, are acceptable. Where necessary, requirements and/or planning obligations should be used to ensure these proposals are delivered.”

Furthermore, the National Grid document 'Specification for Safe Working in vicinity of National Grid High Pressure Pipelines' (2014) defines an 'easement' for National Grid to lay, operate and maintain pipeline within a width of 6 to 25 metres. Therefore, KCC fully expects Highways England to provide commitment that the permanent gas pipeline easement will be as narrow as possible and, in any event, no greater than 25m. Due to the impact on the SSSI, the County Council would also expect that the area outside the permanent easement has trees retained or replanted.

Whilst KCC welcomes the provision of an additional new parking facility to support demand at Shorne Woods Country Park, there remains the need for proper engagement to determine who would be the responsible authority for maintaining and managing this facility. The proposed parking facility is too far from the main park entrance for this to be an appropriate access to the Country Park. In encouraging more use of the Shorne Ifield Road entrance to the park, it will be necessary to provide a more appropriate shared user route to and from the new parking facility as currently the existing path is narrow and cannot be widened.

Furthermore, the footpath link from the new mitigation woodland does not tie into the footpath into the country park so the current proposals would require people to walk along the road to make that connection. KCC encourages Highways England to review this element of the design and ensure these footpaths are connected.

North of the river in Thurrock and Essex

Tilbury area proposals

Q1c. Do you support or oppose the proposed changes in the Tilbury area? Please refer to the Design refinements chapter of the guide.

Strongly support

Support

Neutral

Oppose

Strongly oppose

Don't know

Q1d. Please let us know the reasons for your response to Q1c and any other comments you have on the proposed changes around the Tilbury area.

For the details regarding the proposed design changes around the Tilbury area, we defer to the view of those Local Authorities directly affected. However, KCC made a



number of general comments about these connections as part of our response to the 2018 and 2020 consultations and would like to reiterate these comments.

KCC remains disappointed by the removal of the previously proposed Tilbury junction. Local connections are vital to ensuring the forecast economic and regeneration benefits are achieved in Kent, Thurrock and Essex. A significant economic opportunity is being missed by these important local connections not being provided.

Furthermore, the absence of any rest and service facilities remains a concern for KCC. Inappropriate lorry parking is already a significant issue in Kent and the complete omission of any rest and service facilities will only further exacerbate the issue. Therefore, the County Council insists Highways England look at alternative options to deliver rest and service facilities at an appropriate location along the new route.

KCC would also insist government provides Highways England and KCC with the necessary enforcement powers to tackle cases of inappropriate lorry parking that will increase as a result of the new crossing and be exacerbated by the complete omission of facilities within the current proposals.

A13/A1089 area proposals

Q1e. Do you support or oppose the proposed changes in the area around the A13/A1089 junction? Please refer to the Design refinements chapter of the guide.

- Strongly support
- Support
- Neutral**
- Oppose
- Strongly oppose
- Don't know

Q1f. Please let us know the reasons for your response to Q1e and any other comments you have on the proposed changes around the A13/A1089 junction.

For the details regarding the proposed design changes around the A13/A1089, we defer to the view of those Local Authorities directly affected and who may adopt such new infrastructure.

However, KCC made a number of general comments about these connections as part of our response to the 2018 and 2020 consultations and would like to reiterate these comments. The County Council previously raised concerns that the proposed junction was not an all movements junction, with notable omissions being the ability



to travel westbound along the A13 or the leave the LTC to use the A1089. This remains the case within the latest scheme proposals.

Lower Thames Crossing/M25 area proposals

Q1g. Do you support or oppose the proposed changes in the area around the Lower Thames Crossing and its junction with the M25? Please refer to the Design refinements chapter of the guide.

- Strongly support
- Support
- Neutral**
- Oppose
- Strongly oppose
- Don't know

Q1h. Please let us know the reasons for your response to Q1h and any other comments you have on the proposed changes around the Lower Thames Crossing and its junction with the M25.

The local authorities in this area are best placed to assess the impacts of the proposed junction between the Lower Thames Crossing and the M25. KCC would defer to their opinions on this occasion.

M25 junction 29 area proposals

Q1i. Do you support or oppose the proposed changes in the area around the M25 junction 29? Please refer to the Design refinements chapter of the guide.

- Strongly support
- Support
- Neutral**
- Oppose
- Strongly oppose
- Don't know

Q1j. Please let us know the reasons for your response to Q1i and any other comments you have on the proposed changes in the area around the M25 junction 29

The local authorities in this area are best placed to assess the impacts of the proposed changes in the area around the M25 junction 29. KCC would defer to their opinions on this occasion.



2. Revised development boundary

Q2a. Do you support or oppose the changes to the proposed area of land that would be required to build the Lower Thames Crossing?

Strongly support

Support

Neutral

Oppose

Strongly oppose

Don't know

Q2b. Please let us know the reasons for your response to Q2a and any other comments you have on the proposed changes to land that would be required to build the Lower Thames Crossing. This includes feedback on the impact the project would have on any land that you may own or have another legal interest or right in.

In response to the 2020 supplementary consultation, KCC strongly objected to land required for the diversion of utilities encroaching the boundary of Shorne Woods Country Park, Brewers Wood (which includes tree species of international importance), Ashenbank Wood and other areas of ancient woodland adjacent to the A2. The loss of any woodland in this area, temporarily or otherwise, is wholly unacceptable to KCC.

KCC welcomes the progress made to the development boundary within the latest proposals which has reduced the amount of environmentally sensitive land impacted by the scheme, including the area of Brewers Wood with internationally significant tree species. However, the current design still includes a 60m easement within Shorne Woods Country Park for the diversion of a high pressure gas pipeline north of the A2, resulting in the loss of ancient woodland and severance of footpaths, cycleways and bridleway trails. This remains a significant concern to the County Council and we will continue to oppose this element of the proposal. KCC fully insists Highways England work with utility companies to reduce the size of this easement to the absolute minimum and, in any event, no greater than 25m. Due to the impact on the SSSI, the County Council would also expect that the area outside the permanent easement has trees retained or replanted. As included within KCC's response to the supplementary consultation, any negative impact on access to the park will also have a material effect on a KCC asset and an impact on its revenue stream. We will therefore expect to receive full financial compensation in addition to environmental mitigation and compensation.

Impact on Property

As per our response to the 2020 supplementary consultation, where impact on property is avoidable, a full compensation package for property and landowners



should be offered. It is essential that affected property owners, including those outside of the development boundary who have already been blighted by the proposal, are fully compensated for the loss of property value and inability to now sell if they need or want to move. This proposal has already caused considerable distress in the local community and there needs to be an urgent and open dialogue with those affected, both within the development boundary and those in close proximity to it.

Furthermore, KCC notes that there are a few areas where there appears to be proposed compulsory acquisition of land or rights over additional land and we assume that the requirements for s.42 consultation have been complied with.

Q2c. Do you support or oppose the proposals put forward regarding special category land and sports clubs?

Strongly support

Support

Neutral

Oppose

Strongly oppose

Don't know

Q2d. Please let us know the reasons for your response to Q2c and any other comments you have on the proposals regarding special category land and sports clubs.

KCC's position is based on the proposals in relation to Shorne Woods Country Park and the Cyclopark. KCC would defer to the views of Gravesham Borough Council in regard to the remaining open space and sports club proposals.

Shorne Woods Country Park

Shorne Woods Country Park is owned by KCC, therefore any loss of ancient woodland, severance of footpaths, cycleways and bridleway trails, and negative impact on access to the park will have a material effect on a KCC asset and an impact on its revenue stream. The County Council will therefore expect full financial compensation in addition to comprehensive environmental mitigation and compensation.

KCC welcomes the proposal to provide replacement woodland to the east of Brewers Wood, resulting in habitat enhancement and increased connectivity. However, the County Council would need to be fully involved in the design of the mitigation woodland and specification of the paths to ensure they are in keeping with current arrangements at the park. KCC would also need to ensure any designs



exclude features such as extensive dead hedging as this is often destroyed in the park and creates management issues.

A ten year management plan for the site will also be required whilst the land is establishing and it will be imperative that Highways England provide the County Council a commuted sum for the future management of this site should it become part of Shorne Woods Country Park.

Cyclopark

Significant investment has gone into the Cyclopark and it is an important leisure amenity and a lasting legacy benefit of the previous A2 widening/relocation around 10 to 15 years ago. The acquisition of rights over this land for utilities diversions must not have any form of adverse impact on this park.

Again, there has been minimal engagement from Highways England in regard to the impact of the proposed utilities diversions on the Cyclopark. It remains unclear within the current proposals whether the existing infrastructure on the site (such as the main visitor centre) will be negatively impacted during the diversion of utilities. This is unacceptable and it is vital KCC are fully engaged and aware of the anticipated impacts on an important community facility, of which KCC is also a landowner.



3. Environmental impacts and how we plan to reduce them

Q3a. Do you support or oppose the changes to the environmental impacts of the Lower Thames Crossing?

Strongly support

Support

Neutral

Oppose

Strongly oppose

Don't know

Q3b. Please let us know the reasons for your response to Q3a and any other comments you have on the environmental impacts of the proposed changes to the Lower Thames Crossing.

Biodiversity

The information within the 'Environmental Impacts Update' refers to the original Preliminary Environmental Information Report (PEIR) report which lacks the detail to enable meaningful comment. The update only highlights the design changes and details if they change impacts.

KCC disagrees with the expectation from Highways England that the proposed design refinements would not result in a change to the anticipated biodiversity impacts on Shorne Woods and Ashenbank Woods Site of Special Scientific Interest (SSSI). As the proposal will result in a direct loss of SSSI, KCC would expect that the effect on the SSSI will be greater than first anticipated within the PIER.

The Environmental Impacts Update report also states the following for most sections: "Mitigation has been updated and designed and appropriately and proportionately with the aim of maximising opportunities to increase the area's biodiversity value". Due to the land being lost and/or impacted by the proposed development, unless Highways England is proposing to implement biodiversity net gain, then this statement is incorrect. It may be that the proposals include mitigation/compensation for the impact on protected/notable species and habitats, but from a biodiversity value aspect there will still be loss.

Maps

The consultation contains maps showing the compensation/mitigation areas for Ancient Woodland and protected species. However until the finalised Environmental Statement (ES) has been submitted and reviewed, it will remain unclear if the proposed areas are appropriate or sufficient.

The submitted information has detailed that the green bridge locations have been amended to improve connectivity to habitats on either side. However, it is difficult to



determine whether these proposals are appropriate until detail is provided around which habitats are being connected.

Heritage Conservation

The following heritage conservation comments also make reference to the 'Environmental Impacts Update' (July 2020).

The document regularly states; "Expected Effects, Construction: There would be no significant change to the assessment of archaeological remains reported in the PEIR. This conclusion would be confirmed through a detailed assessment in the ES". This only appears to say that the assessment process will not significantly change. It is not clear whether the design refinements will have more or less of an effect on any heritage assets or archaeological remains. We are therefore not in a position to understand whether these design refinements are acceptable or appropriate as the document acknowledges that 'this conclusion would be confirmed through a detailed assessment in the ES' and the ES is not available to consider at the time of the Design Refinement consultation (July 2020).

KCC is also disappointed to see that expected effects on archaeology have not been considered in the following areas, despite archaeological field evaluation demonstrating that there are below-ground archaeological remains:

- Ancient woodland compensation between Claylane Wood and Shorne Wood
- Ancient woodland planting near the edge of Gravesend
- Ancient woodland compensation between Brewers Wood and Great Crabbles Wood, and south of HS1

Furthermore, the reduction in land take through Shorne Woods Country Park is welcomed; however, there will be a potential increase in the main works construction compound, which increases the potential for adverse effects on archaeological remains reported in the PEIR, and also presently unknown heritage assets and archaeological remains. KCC is not in a position to understand whether these design refinements are acceptable or appropriate as a detailed assessment is not available within the Design Refinement consultation. The NPS for National Networks states in paragraphs 5.120–5.142 that any Preliminary Environmental Information for heritage assets needs to be adequate for consultation and properly taken into account in scheme design.

It should be recognised from the comments above that if this design refinement consultation is the final opportunity to make changes to the scheme before a DCO submission, then in many areas the only course of action possible will be the excavation and recording of archaeological remains that will be destroyed by the works or the recording before demolition of buildings and structures that would be destroyed. There is therefore a risk that nationally important (or equivalent to nationally important) heritage assets and archaeological remains could be destroyed



when they should be preserved in situ. This would be contrary to planning policy and the Design Manual for Roads and Bridges (DMRB) and the financial costs for appropriate mitigation could be very considerable. This situation would be a result of the scheme timetable and process not allowing sufficient time for the appropriate evidence collection and assessment of significance of assets nor magnitude of effects to inform mitigation options, including design refinements to preserve heritage assets in situ where possible. Mitigation through detailed recording in advance of the destruction or loss of heritage assets will be necessary across the scheme but the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.



4. Other comments

We welcome any other comments you would like to make about the Lower Thames Crossing.

Road Safety

KCC supports the inclusion of emergency areas spaced at intervals of between 800 metres and 1.6km as this is in line with the recent Strategic Roads Update and smart motorways review which dictates a maximum spacing of 1 mile between emergency areas. To improve safety, emergency areas should be spaced at 800m apart where possible, rather than the maximum permitted 1.6km apart.

Wider Network Impacts

The traffic modelling shows that the wider highway network to the east of the new LTC, both local and strategic, will be put under increased pressure as a result of the new Crossing. Unless these roads and junctions receive capacity upgrades to relieve existing congestion and background growth, the induced and transferred traffic resulting from the LTC will constrain economic growth in the county. As a result, Highways England must develop the necessary wider network improvements within the next Road Investment Strategies.

However, other essential wider network improvements, including the A229 connection from the M2 at Junction 3 and the M20 at Junction 6, originally part of the DfT's Option C 'variant' for the LTC, have no commitment for development in RIS2 or RIS3, nor are any mitigation measures being proposed as part of the LTC scheme. This is wholly unacceptable and must be reconsidered by the DfT and Highways England. KCC is currently working up a bid for some local road improvements to the A229 to be delivered through the Major Road Network (MRN) and Large Local Major (LLM) scheme programmes, therefore it is essential that Highways England assist KCC in making the case to Government for this funding. However, funding available through these local road programmes (MRN and LLM) will not be sufficient to mitigate the impact of increased strategic road network traffic transferring between the M2 and M20 as a result of the LTC, therefore these impacts must be mitigated by Highways England.

Air Quality and Climate Change

The challenge of balancing the pressure of growth against the impacts on our environment and health is now more important than ever before. Road transport emissions are a significant source of both carbon emissions and the main cause for poor air quality across Kent and Medway. Whilst KCC remains supportive of the Lower Thames Crossing, it is imperative that a road building scheme of this size does not disbenefit the efforts of local authorities and central government to improve air quality and achieve net-zero carbon. KCC fully encourages Highways England to



maximise the opportunities from this scheme, not only to reduce congestion, but to also encourage the transition to ultra-low emission vehicles. Essential to this is to have infrastructure that is fit for the future in terms of electric vehicle charging and suitable walking, cycling and public transport provision. Highways England needs to ensure the Lower Thames Crossing contributes to achieving the ambitions of other Government policies and strategies, such as the Department for Transport's Cycling and Walking Investment Strategy.