

The Planning Inspectorate

To be submitted via the Examination Portal

10 June 2023

Dear Sirs

**APPLICATION BY NATIONAL HIGHWAYS FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE LOWER THAMES CROSSING**

**CLIENT: MULBERRY STRATEGIC LAND LTD**  
**AFFECTED PARTY REF: AP1581**

**SUBMISSION RE REQUEST FOR ADDITIONAL ISSUE SPECIFIC HEARING ON WCH ROUTES**

We are writing on behalf of our above client to respectfully request that the Examining Authority ('ExA') provide for an additional Issue Specific Oral Hearing on the Applicant's proposals for additional rights of way, referenced as WCH (walkers, cyclists and horse riders) routes.

We have discussed the issue with other agents representing our neighbouring affected landowners and in our case as option holders for the promotion of land affected by the proposed WCH routes and we jointly consider that this issue strongly merits an issue specific hearing and further that this would assist the ExA in minimising the time and expense that would otherwise be incurred if this issue were to be dealt with in other general hearings by affected parties on an individual basis separately.

This issue affects a number of principal landowners across the LTC scheme, which can be broadly summarised as follows:

- (i) The extent of new WCH routes proposed and the statutory basis for the additional WCH routes proposed; including the upgrading of footpaths to bridleways;
- (ii) The anticipated effects of new WCH routes on the quiet enjoyment of the affected landowner's property and use of the same;

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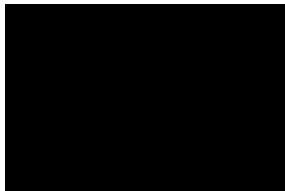
- (iii) The additional burden created by new additional WCH routes on the cost of management and security of land and property where additional WCH are proposed and adjoining land and property;
- (iv) The additional burden created by increased anti-social behaviour and concern regarding safety and biosecurity. Criminal activities arise from misuse of existing public rights of way. Any suggested enhanced public benefit arising from additional routes is outweighed by the impact to food security and impact on the Landowner's freehold and farming businesses.
- (v) Without prejudice to any standing objection to the proposed WCH routes, the principle of the Applicants proposed acquisition of freehold land on which additional WCH routes are proposed and the responsibility for maintenance of these post construction.

With the ExA's permission, we would reserve the right, to confirm the list of issues in advance of a hearing in order that best use of time can be made by those of us representing affected parties, the Applicant and the ExA. If this would be of assistance, we would be grateful if the ExA would also provide an indication of how far in advance of a hearing any written submissions would need to be submitted.

In order to further minimise time and cost, it is also proposed that our affected landowners would also appoint a single legal advisor (together with their agents) to represent them at the oral hearing and in the submission of any relevant written submissions.

We trust this will meet with the ExA's agreement and approval and also that it will find no objection from the Applicant as an appropriate means to address this issue.

Yours faithfully



M R Holland MRICS

Director

HOLLAND LAND & PROPERTY LTD (Agents for and on behalf of M H L Mott Esq)