



Kent countryside access forum

The Planning Inspectorate

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Kent Countryside Access Forum

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Ask for:

Your Ref: **TR010032**

Our Ref: LTC/WriRep/1/Jul23

Date: Monday 17th July 2023

Dear Sir/Madam

Lower Thames Crossing – Written Representation (Deadline 1)

General Comments.

During the original consultation by Highways England (now National Highways) back in 2016 we objected to the proposed new Lower Thames Crossing East of Gravesend (Option C). We feel this option was the worst of the 3 originally put forward in 2013.

The proposed Option B crossing site at Swanscombe was rejected due to the conflict with the Paramount/ London Resort development. With the creation of the SSSI on part of the Peninsula, this development looks extremely unlikely to now go ahead. Could this not be re-evaluated?

Why was a crossing East of Tilbury through to the Isle of Grain using an upgraded A289/ A228 not considered? This would have had less impact on the environment and could have served the large housing developments and existing industrial areas on the Isle of Grain.

We believe the proposed crossing at Shorne will provide little extra capacity but would significantly damage both the natural environment and the lives of many people living in, working in and visiting this part of North West Kent. The area through which it is due to be constructed is valuable countryside with good public access and a vital green space between the growing urban areas of Gravesham and the Medway towns. This area also has significant cultural and historical interest with its links to Charles Dickens, military heritage sites and a number of Listed Buildings. The proposed south of the river route would adversely affect several sites with special scientific and nature protection designation.

The present Dartford tunnels see the greatest congestion through constant closure due to hazardous loads, over height vehicles and the difficulty in clearing minor accidents and broken down vehicles. We are sure a new tunnel East of Gravesend would suffer from similar operational problems. In contrast, since the removal of the toll booths, the QE2 bridge generally flows freely. The underlying cause of congestion at Dartford, we believe, is deeper routed with lack of road capacity along the A13 and at its junction with the M25. With major transportation developments such as London Gateway, East of Tilbury we see the new crossing as simply wishing to transfer this problem to the already at capacity A2/M2 and A20/M20 routes. This has become even more relevant since the removal of the C variant A229 upgrade mentioned in the 2013 proposals.

Already the overwhelming amount of development within the area is putting terrible pressure on the natural environment and countryside. A major new route, of dubious strategic value, through this area is not welcome.

Despite this we have been working with National Highways throughout the DCO application consultation with the view that, if the route is to be built as proposed, we would want to keep the impact as low as possible and maximise any gains in countryside access through diversion, upgrading and creation of new rights of way and access.

Impact of the Development (South of the River).

i. Motorised Traffic.

The LTC A2/M2 junction looks unworkable in the space available and in relation to the adjacent junctions.

Without the upgrades to the A229, originally proposed as part of Option C -Variant, LTC is a road to nowhere. The predominantly freight traffic will be heading for the Channel ports but the M2/A2 is not the preferred route. There are poor links through to the M20 towards Folkestone and Dover.

Traffic on local roads, we believe something not investigated fully by National Highways, will greatly increase. These roads are predominantly narrow single carriage way and single track roads. This will especially be the case when there is congestion, an accident or other issue on the new crossing. When the existing Dartford Crossing is closed or severely delayed local roads around Thurrock and Dartford become gridlocked, often for many hours, after the crossing is reopened and then running normally.

ii. Non-motorised users (NMUs).

There are large areas of countryside and coastal access land around the proposed development site. With the increase in development in the County NMUs, whether recreational or local residents going about their daily business, find using local roads intimidating and feel in danger. This will of course become far worse both during and after construction of the crossing. There are also design issues that highlight this lack of thought for NMUs. There are proposals for a safe green bridge across the A2/ slip roads at Shorne but where NMUs would previously have to cross the quiet single track Darnley Lodge Lane (USRN: 15701235, sometimes called Thong Lane/ Old Watling Street) this road will become a busy single carriageway road linked through to Marlin Cross.

We cannot see any safe crossing of this new 'upgraded' road so NMUs can access the open spaces and public rights of way in Shorne and Ashenbank woods and Jeskyn's' community woodland.

We are sure there are other instances of this within the proposals, but the plans don't show enough detail or are unclear. The Tollgate A227/ A2 junctions, Hever Court Road/ Valley Drive/ Henhurst Road junctions and crossing the A226 to access the marshes to the north must all have suitably prioritized, safe and accessible crossings for NMU's.

Mitigation and Countryside Access Improvements

There have been a number of recent major infrastructure developments within the order area south of the river. Including the Channel Tunnel HS1 railway and A2 Widening. All promised many improvements to PRoW and countryside access but there are numerous examples of these promises being broken or poorly implemented. We have therefore consulted with National Highways throughout the planning process so far to advise and comment on their proposals.

The new and improved proposed routes for walkers, cyclists and equestrian are of course welcome. We are aware that the British Horse Society has been working closely with National Highways and are happy with the new routes and proposed surfacing. From experience we know that to maintain public access on these routes going forward the proposed designs must be implemented and it is vital that all of these new public rights of way are made Definitive Public Rights of Way at Bridleway Status as a minimum to protect public access.

In Shorne and Ashenbank Woods the resurfacing of Public Byways NS195 and NS311 are welcome but, it should be remembered that the section suffering from poor surface conditions has only been a problem since the byways were diverted and remodelled following the HS1 rail link project! NS195/311 are an important part of the mere 5% of Kent's PRoW network that are open to ALL traffic including horse drawn and light motorised vehicles. This use should not be restricted.

The Kent Countryside Access Forum (KCAF) is a statutory, independent body made up of volunteers from the local community who represent landowners and land managers (both public and private), access users (such as walkers, cyclists, horse riders, carriage drivers, motorized vehicle users) and other interests (such as health and conservation, access for those with disabilities, the police, parish councils). The purpose of the KCAF is to advise KCC (in particular the Countryside Access Service - CAS) and other relevant organisations on the management, enhancement and promotion of Kent's Public Rights of Way (PRoW) and green spaces for the benefit of the people of Kent and visitors to the County.

There are problems with how the proposals treat the National Cycle Routes affected by the development. Surfacing is a major concern; these are at present hard surfaced routes used by recreational and commuter cyclists using road bicycles. Cyclists do not want gravel/ loose surfaces for national Cycle Routes and many are concerned about sharing sections with equestrians and pedestrians. All routes should remain open and usable throughout construction work and if the tunnel is completed and operational.

To the southern side of the development area NCR177 is due to be diverted south of the A2 across HS1 and the A2 via the bridges that form Footpath NS195A then along part of Byway NS195. Cyclists should not be forced to dismount on the railway crossing and the surfaces of NS175A and NS195 are not suitable for a National Cycle Route.

NCR1 running along the Medway Canal to the north of the proposed tunnel entrance requires an improved surface and also needs to remain open during/ after construction. .

The creation of the new Chalk Park is welcomed by local people. The mitigation land set aside for nature conservation is also welcome but we would ask that public access is also provided.

We would like to see, as part of legacy projects from LTC more routes suitable for equestrian users from Cyclopark over the A2 at Hever Court Road/ Valley Drive/ Henhurst Road roundabouts through to Jeskyn's and Shorne. Although Public Right of Way NS175A was shown as a bridleway, both during the Channel Tunnel Rail link and A2 widening consultations, it was only given footpath status on completion. Local Parish Councils as well as NMU user groups have been trying to have this corrected for some years. Continually Railtrack/ HS1 have prevented this by saying their bridge is not suitable for ridden horses and won't have the bridge sides raised up.

There is also an opportunity for improved public access out to the England Coastal path. There are few places accessible to the public to join the path along this section.

Yours faithfully,

Richard Dickenson,
Vice Chair
KCAF

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