

National Infrastructure Planning

Sent by email only to:
LowerThamesCrossing@planninginspectorate.gov.uk

Your Ref: TR010032
Kent Downs AONB Unit Interested Party Ref: 20035310

31 October 2023



Kent Downs AONB Unit
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Dear Sir/Madam,

Application by National Highways for an Order Granting Development Consent for the Lower Thames Crossing

PROCEDURAL DEADLINE 6 SUBMISSION

Comments on National Highways submission at Deadline 5 - 6.2 ES Fig 7.19 - Photomontages - Winter Year 1 and Summer Year 15 (1 of 4) v3.0 (photomontage at VP S-03 ([link](#)))

The AONB Unit welcomes the update and submission of a photomontage from this location. We have concerns however that the baseline photographs were taken over four years ago and do not reflect the current situation on the ground; the vegetative planting to the rear (north of Harlex Haulage depot) has matured significantly since both the winter and summer photos were taken. Existing buildings within the Depot are, and would continue to be significantly more filtered by vegetative screening from this view than is shown in the baseline photos, particularly the left hand side of the Depot (when viewed from the S-03 viewpoint). This is shown as being more open to view at Summer Year 15 than it currently is and the image further fails to reflect how the existing vegetation planting would further screen views as it further matures. This is readily apparent when the baseline Summer Year 15 photo provided by the applicant (Figure 1) is compared with a photo taken by the AONB Unit in May 2023 from approximately the same location (Figure 2).

A further concern is in respect of the visuals being provided as two 90 degree images. For users of the footpath at Viewpoint S-03, the view is a panoramic one, southwards, and 180 degree imagery would help demonstrate the view as it is experienced in a more holistic way, as well as the changes to it arising from the scheme. Furthermore, no written commentary appears to have been provided by the Applicant in respect of any assessment of the impact on views following the production of the photomontages. The AONB Unit considers the photomontages illustrate how existing attractive panoramic views out to the south to the wider AONB landscape beyond the A2 corridor would largely be lost as a result of the planting, with views now being 'funnelled' down a narrow corridor, which would be a detrimental impact to recreational users of the AONB.

Anglesey
Arnside and Silverdale
Blackdown Hills
Cannock Chase
Chichester Harbour
Chilterns
Clwydian Range
Cornwall
Cotswolds
Gower
Cranbourne Chase and
West Wiltshire Downs
Dedham Vale
Dorset
East Devon
Forest of Bowland
Howardian Hills
High Weald
Isle of Wight
Isles of Scilly
Kent Downs
Lincolnshire Wolds
Llyn
Malvern Hills
Mendip Hills
Nidderdale
Norfolk Coast
North Devon
North Pennines
North Wessex Downs
Northumberland Coast
Quantock Hills
Shropshire Hills
Solway Coast
South Devon
Suffolk Coast and Heaths
Surrey Hills
Tamar Valley
Wye Valley

Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.



Figure 1 (Figure 7.19 from the ES - Baseline Photography - Viewpoint S-03 Summer Year 15)



Figure 2 - Photo from Viewpoint S-03 taken by the AONB Unit in May 2023 showing extent of maturing vegetation and the screening effects of this along northern boundary of the Harlex Haulage Depot.

We hope that these comments are helpful and clear but would be happy to provide further information if requested.

Yours faithfully

[Redacted signature]

Katie Miller, MRTPI
Planning Manager, Kent Downs AONB Unit

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