

## **TRO10032 LOWER THAMES CROSSING**

### **SUBMISSION AFTER HEARINGS: CAH 3-5, ISH 8-10) held between 17<sup>th</sup> and 24<sup>th</sup> October 2023**

**For Deadline D6 (31<sup>st</sup> October 2023)**

### **SHORNE PARISH COUNCIL (IP ref 20035603)**

A Parish Council representative attended the hearings (or listened to the recordings/viewed the transcripts) of the hearings held between 17<sup>th</sup> and 24<sup>th</sup> October 2023. This document provides details of Shorne Parish Council's verbal representations plus a range of comments on the discussions that took place. Hearings are discussed in date order and individual items are presented in the order of the discussion at the hearings.

**Issues around the Thong Lane Car Park came up in two of the hearings - to reduce confusing presentation we have combined them in one section at the end of this document. Please also refer to our separate response to ExA(2) Question 11.4.**

Thank you very much for considering our submitted comments.

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## **SECTION 1:**

### **CAH 3 (17<sup>th</sup> October 2023):**

#### **Item 3a: Gravesham Borough Council (GBC) representations:**

##### Future golfing provision:

- We have commented previously about golfing issues in a variety of DCO submissions.
- We support the representations from GBC that future golfing leisure provision should be as extensive as possible and with a contiguous layout that facilitates operational management.
- Tall screening will be needed to prevent golf balls from physically entering the A122.
- There are examples in other areas where golf courses cross major roads and such crossings are optimised by the roadway being tunnelled or in cut-and-cover. We have suggested to the Applicant previously that this could be considered locally. An example in Kent is Chestfield Golf Course on the A299 Thanet Way (Chestfield, Whitstable CT5 3PB).

##### **Action Point 17 (Applicant) - NMUs: Limitation of Motorised Vehicle Use of Bridleways:**

- Please see ISH10 where this topic was also covered.

### **CAH 4 (18<sup>th</sup> October 2023):**

#### **Item 3c: Rochester Bridge Trust (RBT):**

##### Land north of Lower Higham Road – drainage scheme:

- It would be better if the drainage pipe and all associated structures were to be removed and the land remediated once the pipe is no longer in use.
- If to be left in place then additional information is needed about how it is to be sealed off, otherwise concerns arise about possible longer-term impact on drainage and water distribution within or ingress into the marshes ecosystem.
- All above-ground structures should anyway be removed to reduce landscape impact.
- There is a statement that “The discharge pipe will be left in a condition agreed between the parties”. In that circumstance, the Environment Agency and North Kent Marshes Internal Drainage Board also need to agree that the situation is satisfactory and that there is no ongoing risk.
- However the discussion at the hearing from the Applicant was that the pipe is to be removed. This discrepancy needs clarification.

##### Other concerns:

- We note that RBT raised the same concerns as ourselves over flooding (Ref WR REP1-408, page 32) and potential contamination of the land, plus that the North Kent Marshes have to be considered as a single interconnected and interdependent ecosystem.
- We also support their comments about failure to return land to farming use despite that having been stated originally, and the lack of actual need for Chalk Park.

**ISH 8 (19<sup>th</sup> October 2023): CONSTRUCTION AND OPERATIONAL EFFECTS (NON TRAFFIC):**

**Items 3ai and 3aii Construction compound matters - The effect of noise, vibration and other disturbance on the local community:**

Adequacy of mitigation measures:

- We support the comments made by Gravesham Borough Council regarding adequacy of mitigation for residents of Polperro and the A226 traveller sites, and proximity of soil storage.
- Although the Applicant's response was to provide reassurance, this cannot be fully accepted as what will actually happen is not yet decided.
- However we are also very concerned for residents in Shorne West including Astra Drive and Riverview Park who will be very close to the works and also the haul road, as the protective provisions (bunds, plantings) do not seem sufficiently effective at noise reduction and are therefore inadequate.
- We also commented previously about adequacy of protective bunding and fences in relation to the cross-sectional views provided by the Applicant.

Adequacy of analysis:

- The Applicant referenced REP2-032 but we have commented elsewhere on the inadequacies of this document, especially regarding the discussions being "Ward-based" when the bulk of the very large previous Shorne-Cobham-Luddesdown ward is little affected overall unlike Shorne Ward/Parish itself. Please see our WR REP1-408, page 7 item 4.2.

Actions to be taken over excessive noise:

- We support GBC's comments as recorded on pages 34-35 of the transcript that the proposals are weak and lacking teeth.
- Activities that are too noisy must be stopped immediately while a solution is found.
- This happened in the area quite recently over pile-driving at Tilbury 2 – as said elsewhere, noise can travel widely in this open landscape.

Noise insulation provision and other mitigation measures as needed:

- We consider that noise insulation and other measures should be provided based on demonstrated need and not just predictions as these could be incorrect (likely in our view).
- We look forward to further information from the Applicant on their routine provisions.
- A good point was also made by Mr Malik for Thurrock Council, that noise insulation in caravans and mobile homes is lower than may be the case in standard houses, and therefore noise protection measures may need to be greater.
- Many properties in the area are "chalet-style", with rooms in dormer roofs, and these also may have greater susceptibility to noise impacts.
- The noise assessments need to relate to the actual housing stock that exists locally.

Worker accommodation:

- The Applicant has purchased a considerable amount of property locally, we assume this would be used for worker accommodation during the project.
- That would reduce pressure on the rest of the local housing market.
- The reference to 60 hyperbaric beds was noted. If the second TBM drive is from south to north then relevant workers will have additional travelling time to reach these.

**Item 4bi: Effect on Visitor Attractions:**

Impact on Crematorium access:

- There was discussion principally about a Crematorium in Essex but we just wanted to flag up about impact on Thamesview Crematorium which is just east of St Mary's Church at Chalk.
- There is likely to be impact from noise and visual impact, and any construction related congestion on the A226 yet we have not seen any input from the Crematorium management.
- We assume but would like reassurance that the Applicant has been in contact with them and made them aware that there could be adverse impacts.

Cascades Leisure Centre:

- GBC raised adverse impact on Cascades income due to the haul roads crossing point on Thong Lane.
- Another aspect that was not mentioned is the closure of Thong Lane south A2 overbridge and Thong Lane at the location of the Thong Lane north A122 overbridge. Both of these will each cause months of adverse impact.

**Item 5a: Noise - operational noise impacts and mitigation approach:**

- Please see comments under Items 3ai and 3aii on page 3 above.
- We note that there do not now (they existed in the plans originally) appear to be any noise barriers at all south of the Thames despite elevated roadways. We do not accept landscape aspects as being sufficient reason to omit noise barriers if the noise studies show that they would be beneficial. In our view bunding arrangements are also inadequate at present.

**ISH 9 (23<sup>rd</sup> October 2023): ENVIRONMENT AND BIODIVERSITY:**

**Item 3a: Guidance and methodology:**

- To reiterate regarding design of woodland planting, in our opinion it is protection of residents from noise and air pollution that should drive the design and not subjective opinions about landscape and views.

**Item 3b: Removal of Ancient Woodland and Veteran Trees:**

Wooded banks either side of Thong Lane at southern end:

- We had not realised until a plan was displayed at the meeting, that the wooded edges on either side of Thong Lane at its southern end are under threat due to proposed change in roadway level. It would be preferable for these wooded edges to be retained.
- SWCP raised an idea to relocate the proposed footpath to a different side of Thong Lane to avoid tree impacts in the Country Park/SSSI.
- What is being proposed, as well as suggested changes, needs greater clarification and we note that this has been requested through a post-hearing Action Point.

Position of the gas pipelines:

- We do not accept that the gas pipelines could not be placed under one lane of the two-lane northern connector road, and so reduce impact on the edge of SWCP.

## **ISH 10 (24<sup>th</sup> October 2023): TRAFFIC AND TRANSPORTATION ():**

### **Item 3ai A229 Blue Bell Hill:**

#### Future function of Blue Bell Hill (including already predicted journey delays) and the A2/M2 in general:

- We support KCC's concerns about Blue Bell Hill. They have expressed these very clearly and we share their frustration that obvious problems due to the project are not being solved by the proposals but are being instead left to the whim and chance of ever changing Transport Ministers in a situation of competing national priorities and funding allocations.
- We had independently of GBC come up with the same concerns about the journey delays shown in Tables 7.11-7.13 of the Transport Assessment. Clearly, a return trip to Maidstone, a common scenario as it is the County Town and gateway to other routes, is going to be very severely affected.
- This is directly predictable congestion which is being imposed upon residents through the LTC proposals rather than being "naturally" arising.
- From our reading, neither the various RIS strategies or the May 2023 update of the "Kent Corridors to M25" document actually propose anything definite that will solve problems being caused by the A122 scheme.
- The change to 100% funding would be welcome however 100% of nothing is still all that is presently agreed.
- The fundamental problem is lack of assurance over solutions being provided, especially as these need to be in place before the A122 opens.
- It is obvious that there is not going to be agreement achieved over these issues.
- We note that KCC's question (Transcript page 59) to the Applicant as to "... are they accepting the additional congestion and queuing on their slip roads, on their mainline, and the resulting safety, air quality and other impacts ..... that come with increased congestion" did not receive an answer at the hearing.
- Miss Laver's question about poor outcome for Blue Bell Hill etc adversely impacting the BCR was a very good one. We discussed something similar in REP3-201 starting near the top of Page 2.

### **Item 4: Public rights of way and non-motorised user routes:**

#### Protecting, and preventing antisocial use of NMU routes (representation made):

- This cross-refers to discussion at CAH3 and the subsequent Action Point 17.
- We support the representations from Mr Finnis and Mr Benton, farmers north of the Thames, as we experience the same problems south of the Thames from motorbikes and quadbikes etc, people coming in vans and large groups to invade various bits of land.
- The applicant is aware of this because there have been problems with the Southern Valley Golf Course site since it closed and they then took it over.
- We agree that the wider access needs, and fewer options for access limitation structures on bridleways can make prevention of undesirable access (particularly by motorbikes) difficult although we do not entirely share the view that problems are largely confined to bridleways compared to footpaths. We have problems with motorbikes accessing from roads directly into fields, and mis-use of footpaths, with the same anti-social and aggressive behaviours.
- As we raised, this will be a problem for the Applicant in protecting mitigation and compensation land, especially where there are meadows and open grassland areas.
- There is an in-built conflict between keeping antisocial users off the land while still allowing, and indeed facilitating, legitimate recreational use by the general public when access for bicycles, prams and other legitimate wheeled access is needed and because vandalism of fences and

gateway structures by such offenders is a common occurrence in order to circumvent preventative structures and gain unrestricted access.

- We look forward to hearing more about the measures that will be taken.

NMU route design issues (representation made):

- We support KCC's comments about the need to upgrade the HS1 bridge at "Hare's Bridge" to being a full NMU compatible structure. While it may be beyond the immediate remit of National Highways they should still be taking the opportunity and facilitating this in partnership with Network Rail as an essential link in the altered local paths network, with increased use, that the A122 project is causing. A "Legacy Project" ought to be possible.
- We disagree that the upgrade isn't necessary, particularly as that is what a wide variety of different organisations are all saying, or that other routes requiring diversions east or west are acceptable alternatives to a properly functioning network.
- KCC also made points about the NCR177 re-provision, and diversion routes during Construction requiring residents to walk on roadways.
- Regarding NCR177, that is part of the inadequate re-provision following the severance of the existing direct and straightforward route between Shorne West/Marling Cross and Thong/Shorne. The situation with NS167 is the same, and in both cases the replacement routes offered either to the north or the south are longer and less attractive – the convoluted and urbanised southern route is particularly discouraging for pedestrians and the less able.
- Having seen the Thames Chase bridge proposals in the design hearing, it does appear that south of the Thames we have been rather shortchanged in design and structure terms.
- There could be a much better offering south of the Thames, a much better solution to the national cycle route 177 provision, and much greater safety for all users if there was a "Thames Chase" style bridge across the A122 where it narrows down north of the LTC:A2/M2 junction. It would be interesting to see a cost comparison between such a bridge and what is otherwise proposed for NCR177.

Adequacy of NMU path user "surveys":

- We agree with KCC that manual counting methods are rather old-fashioned and that automated counting would have been preferable.
- We covered this point previously in REP3-201, starting at the bottom of Page 9.
- There are other methods that can also be used such as "Strava heatmaps" and Google mobile phone tracking.
- The data that was collected was actually as samples rather than surveys as the number of hours, days and months investigated were all too low.
- Additionally, data presented made it hard to understand which link of intersecting paths had been studied as the data gathered did not appear correct based on local knowledge.
- We are also aware that data collection was sometimes confounded by local residents deliberately skewing the results on particular paths when they knew that surveyors were about, and this may have diverted people away from other routes normally taken during that timeframe.
- An important question is about exactly how this poor quality and quantity of data was used in planning the proposed NMU routes network.

## **SECTION 2:**

### **AMALGAMATED THONG LANE CAR PARK ISSUES:**

#### **ISH8 Item 3b: Restoration of compounds:**

##### Persistence of compounds and buildings (ISH8):

- Mr Taylor made a very pertinent observation about works compounds in other schemes not having being cleared away and becoming permanent through passage of time.
- Locally, Compounds will be located in the Green Belt, with some also being in the AONB and even the North Kent Marshes ecosystem.
- The issue could perhaps be handled by relevant sites only being effectively given temporary and time limited planning permission, personal to the Applicant, with a requirement for removal within say 6 months of the scheme opening. Local Authorities could then take enforcement action. Maybe the “4 year rule” does not apply or could be disapplied?
- The Applicant mentioned possibility of there being permanent requirement for some compounds. It needs to be indicated from the outset as to exactly where these are, their size and intended usage and duration. The Applicant should signpost these in the documentation, and such sites should perhaps also require planning permission so that their use can be properly defined and controlled.
- We had also commented previously (and in our SoCG) that the satisfaction of the landowner should not be the only factor as regards land restoration post-works as a landowner could be satisfied by a less than satisfactory appearance of the land whereas local Councils have more wideranging concerns as well as responsibilities to local residents who may be adversely affected.

##### The Car Park at CA2 (ISH8):

- The Car Park in CA2 was mentioned by the Applicant in the context of discussion about persistence of Compounds.
- We strongly support the comments made by GBC concerning this – retention of the car park at CA2 is not justified, and will have impact on the SSSI, Green Belt and also the AONB.
- We are losing enough land to roadways and unwanted visible structures as it is.
- A Car Park is an urbanising structure, especially if accompanied by other features so there will be visual impacts (security concerns are likely to reduce the amount of screening that will be possible).
- There will also be concerns about traffic and general road safety impacts in this part of Thong Lane from drivers exiting the Car Park turning across the main traffic streams and pedestrians moving around without taking adequate care. Our experience of visitor parking at Brewers Road/Park Pale is that visitor behaviours are often remarkably blind to the hazards, especially when distracted by accompanying dogs or children.
- There are existing, more urban parking/developed areas where such structures could be better located. Expansion of existing facilities should be considered before the creation of new areas.
- There are other current parking problems for local parks, some of their car parks could be enlarged if more non-sustainable visitors arriving by car truly need to be accommodated. However, unlike SWCP, the other bodies managing SSSI’s locally recognise the damage that visitors do and therefore severely limit access.
- We question what other locations in the area have been considered as more viable alternatives for additional parking spaces. The Valley Drive/Gravesend East Compound, which anyway used to be a lorry park, might be a particularly suitable candidate.



KCC's representations about the CA2 Car Park (ISH8):

- KCC stated regarding their proposal for the Car Park that “**It’s not a car park for Shorne Woods Country Park and its visitors** but a proposed provision for the wider access and its attractions, providing parking for **people** who want to access the wider countryside.”
- KCC have stated previously that the purpose is to provide additional parking because of the overspill problems in Park Pale caused by the Country Park – it has never previously been described as being for any other purpose. We remain sceptical that additional parking in the locations that have been suggested (Shorne Ifield Road, and then Thong Lane) would make any difference at all to the Park Pale situation but will only serve to add more visitors to SWCP, which we believe to be KCC’s actual underlying aim.
- On Page 81 of the Kent County Council Written Representation REP1-243, point 11.8 states “KCC had some initial discussions with the Applicant regarding the potential for long term legacy of the LTC construction compounds. The possibility of utilising part of the A2 construction compound as **an addition car parking facility for Shorne Woods Country Park** once construction of the LTC is complete was discussed between KCC and National Highways.” Point 11.9 states” KCC supports the idea in principle, as it is hoped such car park could help leave a legacy for the **country park** and wider area, whilst also meeting the demands for **additional parking capacity at SWCP.**” Ideas may have changed over time but the documents clearly show that only parking for SWCP was under consideration initially.
- The car park has been stated to have 100 car spaces, with 12 horse box spaces to be added, so a very large installation. Examples mentioned of other facilities that might be provided are: Cycle hire, cycle washing, refreshments, pay and display with ANPR cameras, plus electric car charging has been mentioned elsewhere.
- Mr Taylor raised a very good point that the latter items bring a commercial element that would require planning permission.
- There followed evidence that KCC consider that Commercial activities are “.....ancillary to the main use as a car park....” giving the appearance that KCC are perhaps trying to use the Applicant and the Scheme in their own interests to try and circumvent planning controls that are intended to protect areas from inappropriate development. It would not be expected that a car park (let alone one having e.g. a café/restaurant) could be built in the Green Belt and immediately adjacent to an SSSI and AONB without full planning permission being required, which would allow controls to be placed on the development.
- We question whether the “people” referred to, who KCC wish to draw to the area, are local residents, Kent residents located to the east or south of Gravesham, or from other areas. Perhaps these “people” could be encouraged to visit other Country Parks elsewhere in Kent rather than only going to Shorne Woods, particularly if these other Parks were similarly developed as this would take the current excessive pressure off Shorne Woods.
- We are pleased to note (as on Page 68 of the ISH8 Transcript) that KCC appear to accept that the car park area might (will in our view) end up being removed and remediated.

KCC Conflicts of Interest; Suitability of guardianship for new land areas (ISH8):

- The various discussions are leading us to conclude that KCC has a conflict of interest problem between management of the SSSI for nature and their desire to maximise income generation. The discussion at the hearing and elsewhere gave the impression that SWCP is treated primarily as a “cash cow” (see financial impact below) rather than as a natural resource for conservation, and that KCC invoke SSSI status when it suits them to do so, but never as any restraint to their own development intentions.
- This also unfortunately leads to concern about whether KCC and its Country Parks Service can be trusted as suitable future guardians for additional land areas locally. Discussion is therefore needed about which body will be the best manager to take over from National Highways after



the scheme might be completed – someone who understands that there are local residents, and that visitors cause damage, is essential.

- We had already commented in REP3-201, Page 7 about the Applicant’s proposals for “Fenn Wood” although we are unclear as to the originators of the inappropriate design suggestions that had been made.
- This is what led us at ISH9 to express our concern at that there may be an aim from unknown quarters to turn the whole area into a Countryside Theme Park, irrespective of the opinions of residents and landowners and also those of GBC and the Parish Council.

#### **ISH8 Item 4bi: Effect on Visitor Attractions:**

##### Financial impact on Shorne Woods Country Park (ISH8):

- There was discussion about financial support and compensation to the Country Park for lost income, we support KCC in this matter regarding proven loss of income.
- Interesting information was provided about income streams at SWCP, which include:
  - Car parking through pay and display and annual season tickets.
  - Cafes, with three offers on site.
  - Venue hire, including a third-party provider through a partnership working relationship to deliver children’s birthday parties – we had not been made aware of this arrangement when SWCP applied to greatly increase the size of the children’s playground.
  - Retail and wood sales.
  - Trumper hire (all-accessible mobility scooters).
  - Events, education and training, including accredited training courses, Forest School and school visits and team building.
- We wonder what geographical limitations there are on the location of residence of persons using the Park in the above ways – are they all Kent residents and organisations? Are there any limitations on KCC’s development ambitions for the existing Visitor Centre?
- Over 40% of the overall Kent Country Parks income (of £1.5m, so over £600,000) was stated to come from Shorne Woods Country Park alone, and is used to subsidise other parks.
- It was stated that next year’s budget for SWCP is £845,000, and that by 2027 income might be £900,000. This ties in with us having been told previously that SWCP has to earn more than it costs.
- While it may be a “sign of the times” that such a blinkered focus on income is needed, that does not support the preservation and enhancement of the wildlife in the park.
- We remain astonished that the Park operates without any information on visitor numbers and geographical origins, or about how much income they are losing by not acting against visitors parking in Park Pale to avoid car park charges.

#### **ISH9 Item 5: Shorne Woods SSSI Impact of the proposed Car Park (including representations made at the hearing):**

##### General discussion (ISH9):

- We do not accept the statements made by either the Applicant or Kent County Council on this topic. The Applicant should not be facilitating an environmentally damaging development.
- The Applicant said that they will provide more information at D6, and we look forward to seeing that as hard information rather than subjective opinion and other assumptions, as we have previously been told by SWCP that they have no information about Park visitor numbers. The only information that KCC seem to have collected is about income.

- We would be very interested to see the results of sequential nature surveys showing that the fauna and flora of the Park is thriving in the face of the onslaught of greatly increased visitor numbers together with increased built environment.
- We would also be interested to see information about the geographical residence area of visitors using the SWCP facilities and local roads.
- The current situation is that the bulk of SWCP visitors (mercifully) do not stray far from the Visitor centre, in the south-east sector of the Park, but those that do have increased in number and are damaging and changing the nature of the paths, and their type of use, and the adjacent areas.
- Some areas as stated by SWCP have been cordoned off to prevent visitor access, however a walk in a natural environment of open woodland, even if keeping to the path, is different in ambience and preferable to walking one that is urbanised and heavily fenced on both sides. It should also be remembered that not all of the woodland and SSSI is SWCP land – it would be very regrettable if excessive visitor pressure caused other landowners to have to fence off their land too.
- At present, very few people will be accessing SWCP from the southern end of Thong Lane - many local people didn't even know that there was an entrance there. Most will be using NS 167 to reach the Park from Shorne West.
- In the future, with the severance of the footpath route from Shorne West, and the inadequate/off-putting replacement route from Marling Cross, we predict that access from Marling Cross will fall, with more residents instead using Jeskyns for recreation if on foot, or otherwise driving to the existing Visitor Centre or elsewhere.
- The proposed Car Park would create a new major entrance point and attract more visitors to the west side of the Park, encouraging them to enter and traverse through to the Visitor Centre using a currently low use route in a quiet and undisturbed area. It is not clear who these "people" are who will be parking there, especially with horse boxes, but we do not see why they should be invited into the area by a third-party, to the further detriment of local residents and other local wildlife conservation interests.
- Animal life will be disturbed by the increased busy-ness and with those wanting to move between fenced off areas being deterred. There will also inevitably be noise, littering and other forms of pollution created where there is none presently.
- We do not find it credible that the effects on the SSSI can be assessed as non-significant or it can be regarded as an "environmental enhancement" to convert woodland and paddocks to a car park and buildings.

Proposed facilities and alternatives (ISH9):

- As well as the post-Construction hardstanding area of an approximately 100 space car park, a Pegasus crossing facilitating access into the County Park and new connected multi-user pathway (including bridleway) on east side of Thong Lane being provided by the Applicant, KCC want to add 12 horse-box spaces plus various buildings such as a café/restaurant (presumably with an outside eating area too), toilets/showers, cycle hire and cycle washing, so a much greater land area than that previously used for parking and as has been shown on plans.
- There are already a variety of suitable facilities existing locally (plus pubs, other cafés):

Location	Facilities
Cyclopark (Gravesend Central N)	Parking, café, toilets, changing. Cycle hire and cycle washing (may be internal at present)
Nell's Café, and potentially with the Valley Drive NH compound (Gravesend East N)	Parking, café, toilets
Inn on the Lake Hotel	Parking, café/restaurant, toilets
Jeskyns (Gravesend East S)	Parking, café, toilets
Woodland Trust (Halfpence Lane S)	Parking
Cascades (Thong Lane N)	Parking, café, toilets

- We would therefore contend that additional/duplicate facilities are not needed in the area, that what is proposed is unnecessary duplication and competition with existing provision.
- We do not consider that it should be the function of either SWCP or KCC to be developing and operating the ancillary facilities described.
- We also raise concerns about safety issues due to people and animals unfamiliar with the area needing to cross the roads and the various overbridges and connector roads while contending with increased traffic levels.

Other points (ISH9):

- We consider that this proposal is inappropriate due to the location in the Green Belt (and immediately adjacent to the AONB/SSSI) where it will additionally impact on openness that is already being severely damaged by the project itself.
- If an independent business wanted to build such facilities in this location they would not get planning permission.
- The Car Park proposal should not form part of the Development Consent Order at all and we agree with Mr Smith that the land should just be reinstated.
- The land concerned hasn't been purchased, whether compulsory or voluntarily, in order to create another Visitor Centre for the Country Park, which is what KCC seem to be wanting to create.
- There is an increasing conflict of aims between local people who just want to live here in as quiet a way as possible, as they were used to previously, whereas others, who are non-resident, seem to want to turn the whole area into a Countryside Theme Park – we are not quite clear why, and following whose permission, the area should become a major visitor attraction for the whole of southeast London and other areas of Kent.

Other IP's contributions to the discussion and comments (ISH9):

- The Woodland Trust were concerned about increased visitor numbers especially cyclists, impacting adversely on their woodlands south of the A2, which the Car Park proposal would exacerbate further.
- We note that Woodland Trust only have a very small car park themselves on Halfpence Lane, which was originally only for members. Cobham-Ashenbank removed parking on Lodge Lane in Cobham. Ranscombe Farm Reserve also have only very limited parking. The point is that bodies who are dedicated to SSSI conservation restrict parking, and therefore visitor numbers, which contrasts adversely with the approach taken by KCC.
- We are grateful for Mr Pratt's subsequent question about whether increasing visitors to an SSSI site is environmentally beneficial or whether the site is likely to be damaged. In our view, that is already the situation (see Conflicts of Interest above) and will only get worse due to KCC's prioritisation of income over preservation.
- We accessed the Shorne Ashenbank Woods "ORNEC" document at <https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1001250&SiteName=&countyCode=24&responsiblePerson=&SeaArea=&IFCAAra=> The activities listed as likely to damage the Shorne and Ashenbank Woods SSSI includes at No 27 "Recreational or other activities likely to damage or disturb features of interest".
- We are also grateful for Ms Laver's comments pushing KCC over the need for a local planning application for any additional facilities, as it is only through that means that Conditions can be put in place to limit damage and control further expansion.