

## TRO10032 LOWER THAMES CROSSING

### RESPONSE TO WRITTEN QUESTIONS AT ExQ2 (10<sup>th</sup> October 2023) For Deadline 6 (31st October 2023)

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

#### Introduction:

We have reviewed all the written questions at ExQ2. There are several questions in which we have an interest but we will need to review the responses from expert IP's and the Applicant before making comments at a future Deadline. For some questions we have made comments in other submissions.

Thank you very much for considering our representations.

Shorne Parish Council,  
31st October 2023

#### Questions directed specifically to Shorne Parish Council:

Question:	
<b>ExQ(2) 11.4.1 And ExQ(2) 11.4.2</b>	<p><b><i>Shorne Woods Country Park - Retention of construction compound as a car park: AONB considerations</i></b> <i>It is suggested that the intention is for part of the construction compound in this location (Work No. CA2) to be repurposed as a car park.</i></p> <ul style="list-style-type: none"><li><i>• Is an additional car park in this location necessary?</i></li><li><i>• Should this facility be viewed as necessary, can its location be justified in AONB terms?</i></li></ul> <p><i>To the extent that additional visitors to this part of the AONB potentially could have negative implications from overuse on particular trees/paths, but additional parking provision may encourage additional visitor use and pressure;</i></p> <ul style="list-style-type: none"><li><i>• Can the Applicant signpost where the introduction of a new permanent car park is assessed within the submitted documentation and the AONB effects, if any, that are attributed to it?</i></li><li><i>• Is further mitigation required to be provided, or can it be demonstrated that it is accommodated within existing proposals? How is this secured?</i></li></ul>

**Shorne Woods Country Park - Retention of construction compound as a car park: SSSI considerations**

*With reference to the impact of the construction compound retention raised in Q11.4.1, there are potential impacts on the Shorne and Ashenbank Woods SSSI that also arise from this proposal. Natural England currently view these as underassessed.*

- *Is an additional car park in this location necessary?*
  - *Should this facility be viewed as necessary, can its location be justified in SSSI terms?*
  - *If there is a view that a permanent car park is to be created, the Applicant is requested to set out its latest view on the number of vehicles using the car park each day (moving on from the assessment in the ES of one trip each way per carparking space), to a breakdown of modes of access.*
  - *A statement of any mitigation measures necessary in respect of the SSSI designation should also be provided. Where would this be secured?*
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**Shorne PC Response:** Please also see the detailed comments in our submission following the October hearings (CAH 3, 4 and ISH 8, 9, 10). This partial response aims to answer the specific questions posed.

Is an additional car park in this location necessary?

- We do not consider that the proposed additional Car Park (and associated income generating facilities) is either necessary or appropriate in this location.
- By definition, this is a “non-sustainable” location as it is dedicated to vehicle based access.
- If additional parking space is needed then existing parking locations should be expanded.
- If additional “ancillary facilities” are genuinely needed, for themselves and not just as imagined income generation opportunities, then they should be provided at existing, already developed locations rather than by creating new centres that effectively compete.
- There is an assumption that the facility would only be used by persons visiting “the countryside” and not for other purposes, whether beneficial or detrimental. There is a risk that such a facility could be used for alternative purposes or act as a draw and gateway for antisocial behaviours in the mitigation and compensation areas as well as in the existing SSSI’s.
- There could also be problems caused by visitors arriving in greater numbers than can be accommodated and in large groups which could lead to new problems of parking in unsuitable locations.
- “Ancillary facilities” would require a greater land take than currently shown and there would need to be deliveries and waste collections etc in association. We are also concerned that there could be pressure for future enlargement of the parking area and expansion of built forms and commercial offerings on the site, extended hours use etc.
- The proposal seems to start from what former compounds might be available as an income generation opportunity and not from what is actually needed, certainly not by the local population.
- The location will itself negatively impact on wildlife connectivity and landscaping. It is not what is needed further to the great land loss we are already suffering in the area.

Should this facility be viewed as necessary, can its location be justified in AONB and SSSI terms?

- The proposed parking area is in the Green Belt, immediately bordering the Country Park/SSSI and the AONB.
- As such it would have a detrimental impact on openness and would not be expected to receive planning permission if applied for through normal routes. There will also be considerable impact visually from all the associated paraphernalia such as ANPR cameras, pay stations, signs, lighting, height barriers, fences, bollards on verges, double-yellow lines etc.
- It is on the very edge of the AONB but the AONB as a whole should decide whether visitors from outside the area are to be pulled in and where any Visitor Centres, if needed, should be located.
- The Country Park is only a small part of the overall contiguous Shorne Ashenbank and other woodlands, which includes privately owned land areas, that make up the overall complex of SSSI's. Leaving aside the income generation facilities, the intention seems to be to have additional parking that will draw in additional visitors to supposedly protected designation lands, in a focus location of both parking and visiting that does not presently happen. Just because land is within the county of Kent does not mean that KCC should decide unilaterally who visits it and by which entry route.
- KCC appear to have made this proposal without considering the adverse impacts of additional visitor numbers (including children and dogs) and new entry routes of visitors, their associated noise, litter, ground contamination and other pollution on the nearby SSSI's as well as SWCP. The area will become as degraded (in SSSI terms) and sterilised of sensitive animal life as KCC have already made the existing Visitor Centre area.
- The present parking area for SWCP herds visitors to the Visitor Centre area and, although the park is much busier overall, the bulk of visitors do not move far from there so the damage caused is relatively localised. The proposed parking area will cause visitors to focus on an area that is currently not much disturbed and from there to traverse the Park to the main visitor centre in much greater numbers.
- While fencing can be used to corral visitors to the newly urbanised paths, this of itself damages the nature of the SSSI's and wildlife will still be both disturbed and deterred.

Accommodation of mitigation:

- The parking area will need to be visually screened from all directions in order to blend into the landscaping, but there will then be a conflict with security concerns.
- It was expected that this area would be part of the overall landscaping, with woodland to replace the loss of Gravel Hill Wood.
- If a large land area is being handed to KCC then the equivalent area needs to be seen and evidenced as being added to the overall mitigation area provision.