



**DEADLINE 7 RESPONSE**  
**KENT DOWNS AONB RESPONSE TO**  
**National Highways Deadline 6 Submission**  
**9.152 Responses to the Examining Authority's Second Round of**  
**Written Questions (ExQ2)**

**Interested party Ref no: 20035310**

**ExQ2\_Q11.2.5 Green bridges**

The applicant provides several examples of other Green Bridges in the UK that have been, or are being, constructed and advises that *'Based on the precedent set by the recently consented projects above, the green bridge provision for the Project aligns with mitigation proposals for similar levels of habitat fragmentation that were identified for these highways projects'*.

Their response to this question fails to acknowledge that the proposed Green bridges for the Lower Thames Crossing (at least those proposed at Brewers Road and Thong Lane south) are intended to provide more than just ecological connectivity; they are proposed to provide mitigation for the increased severance of the AONB landscape. This is recognised at F.5.50 of the Planning Statement Appendix F, where the green bridges are set out as one of the proposed mitigation measures:

*'c. The provision of green bridges to enhance landscape continuity across the Project route'*.

The dual function of the green bridges to provide landscape as well as ecological connectivity is also confirmed at 2.4.129 of Chapter 2 of the ES ([link](#)) *'Green bridges are built over infrastructure such as roads or railways to provide landscape and habitat connectivity'*.

The intended dual purpose was also confirmed by the Applicant at ISH6 (transcript of ISH 6, page 53 [link](#)); Dr Long stated at this hearing that *'landscape character was also a factor in the use of green bridges. For example, within the Kent Downs AONB, the replacement of Thong Lane south and Brewers Road bridges to maintain the landscape connectivity across*

*the transport corridor and to reduce severance as well as to improve the walking, cycling and horse-riding experience.'*

Indeed it is the contention of the AONB Unit that the provision of Green bridges is one of the few possible mitigation measures available for impacts to the AONB, given the specific constraints of the Project.

The AONB Unit therefore maintains its view that the Green bridges benefiting the AONB need to be as visionary as possible and of a design and scale that fulfils their potential to reduce landscape severance and comply with their intended outcome, rather than being designed to mitigate ecological connectivity only.

#### **ExQ2\_Q5.2.2 Reduction in the extent of nitrogen deposition sites: Kent Downs AONB**

The AONB Unit considers the Applicant's response still fails to address previously raised concerns as to how the provision of the majority of nitrogen deposition compensation land north of the river, exacerbated by the reduction in sites in the AONB, can effectively compensate specifically for identified harm to the habitat quality of designated sites in the Kent Downs AONB.

#### **ExQ2\_Q12.2.1 –Landscape character: regrading of sensitivity and effects (sub area Cobham)**

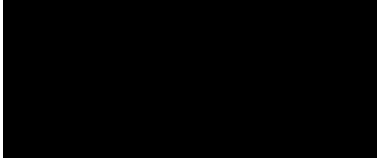
In their response, the Applicant advises that were the sensitivity of the West Kent Downs (sub area Cobham) LLCA to have been assessed as 'very high' rather than the current assessment of 'high', it would not have changed the Applicant's 2022 assessment of a moderate adverse significance of effect during construction or a slight adverse significance of effect during operation, based on the significance matrix in Table 3.8.1 of Design Manual for Roads and Bridges LA 104 Environmental Assessment and Monitoring (LA 104)5.

However, the regrading of the Magnitude of Effects between the 2020 and 2022 Assessment *has* resulted in a reduction in the Significance of Effects between the two assessments. As previously advised, the Unit does not consider there have been any significant changes to the Project within the amended Cobham Sub local character area boundary used in the Assessment. The reduction from Moderate Adverse Magnitude of Effect to Negligible at Year one and from Minor adverse to Negligible at Year 15 has resulted in reductions in the Significance of Effects from Large Adverse to Slight Adverse at Year 1 and from Moderate Adverse to Slight Adverse at Year 15.

#### **ExQ2\_Q12.3.2 - Representative viewpoints: regrading of sensitivity and effects**

In response to this question, the Applicant explains that the regrading of sensitivity of some of the viewpoints is as a result of their currently being affected by views of the existing transport corridor which reduces the sensitivity of visual receptors to the nature of the proposed change and that this approach follows published guidance on susceptibility to visual receptors provided at paragraph 3.4.1 of LA 107. The AONB Unit accepts this explanation and consequent downgrading of Visual Receptors affected by views of the existing highways infrastructure from Very High to High.

However, the AONB Unit does not agree that the design changes to the Project have resulted in the assessed level of reduction in Magnitude of Change reported in the two Assessments for many of the Visual Receptors in the AONB, which as noted in the Applicant's response, are generally of a minor nature.



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17 November 2023