

Date: 11 December 2024
Our ref: 496359
Your ref: -



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By email only, no hard copy to follow

Dear Transport Infrastructure Planning Unit

Planning Act 2008 and the Infrastructure Planning (Examination Procedure) Rules 2010

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

Request for comments from all Interested Parties

Natural England Interested Party reference number: 20034784

Thank you for your letter of the 28 November 2024 seeking any further comments from Interested Parties in relation to the submissions from the Applicant in their letter of the 28 November 2024, Gravesham Borough Council's undated letter and the letter from the Whitecroft Care Home dated 19 November 2024.

Natural England has no comments to make in relation to the submissions from Gravesham Borough Council or the Whitecroft Care Home but would like to provide some observations on the Applicant's letter which we have provided below.

We have read Annex A of the Applicant's letter which includes Active Travel England's advice and recommendations to National Highways on a number of matters which we have provided advice on previously.

The advice from Active Travel England in relation to the proposed diversion of National Cycle Route 177 through the Shorne and Ashenbank Woods Site of Special Scientific Interest (SSSI) during the construction phase of the project recommends in Section 3.2.3 that:

'As the NCN is used for year-round utility trips consideration should be given to providing suitable bound and sealed surface along with lighting for both the temporary and final alignment of the proposed diversions'.

Natural England expressed concern during the Examination that the nature and scale of the direct and indirect impacts to the SSSI from the National Cycle Route 177 diversion did not appear to have been fully considered by the Applicant. This is detailed within Section 5.1.7 of our Written Representation (Examination Document REP1-262), Section 7.1.8 of our

Deadline 2 response (Examination Document REP2-090) and remained a matter that was not agreed at the close of the Examination as detailed in Section 2.1.80 of our final Statement of Common Ground (Examination Document REP9A-014).

Should the scheme be modified to include additional measures, such as the sealed surface and lighting, detailed in the Applicant's letter of the 28 November, we would recommend a full consideration of the direct and indirect impacts to the SSSI and Kent Downs National Landscape be provided.

Natural England also notes that the advice provided by Active Travel England recommends the lighting of utility routes should be considered. We understand from the Applicant that the FP200 through the Bowaters scrublands area is not regarded as a 'utility route', and therefore there would be no proposals to install lighting along this stretch. We advised during the Examination that this area is regarded as supporting a nationally important breeding bird assemblage that is under consideration for notification as (part of) a Site of Special Scientific Interest (SSSI) and is therefore very sensitive to disturbance impacts (both during the construction and operation phase of the project). Consistent with our previous advice and noting the reference to lighting in the Annex of the Applicant's letter, Natural England would not support the installation of lighting through the area of the Bowaters scrubland along FP200.

Where additional lighting is being considered for any of the access routes, we would recommend that an assessment of any potential additional ecological and landscape effects is undertaken where impacts may result.

We trust these comments are helpful.

Yours faithfully

Sean Hanna
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