

Lower Thames Crossing - Design Refinement Consultation

Our response

This is the 6th consultation on the Lower Thames Crossing (including Environmental Scoping) since route selection in 2017, so much of the response follows inevitably repeats earlier comments. These comments are focussed on the consultation material rather than some of the wider issues that remain. The Council however remains opposed to the siting of the crossing east of Gravesend as referred to in previous consultation responses and set out in the [resolution passed](#) by the Council on 8 December 2015. The appendix contains the comments from our landscape consultant.

The major comment has to be that a whole series of incremental changes have been made over the years, but it is very unclear that there is any understanding of the cumulative impact of these and how they integrate together in terms of the landscape, ecology, management access and any other factors that may be relevant. This overview needs to be integral to the process and stating that it will be dealt with the Environmental Statement is not helpful. It is also highly desirable for National Highways to facilitate (though it cannot make happen) an overall management plan across the Cobham/Shorne area involving such parties as Plantlife, National Trust, Rochester and Cobham Park Golf Club, Cobham Hall School, Gravesham Borough Council, Woodland Trust, Forest England, and Kent County Council. All these, through their landholdings, have different rolls to play in obtaining the best landscape, ecological, recreational and historic environment plans for the area. These are matters of principal than cannot be left to detail to be sorted out post the DCO being granted, though there will be elements of design that can be. It needs to be much clearer what is mitigation for what and what is compensation for what.

The original route choice was made in 2017 and so much has moved on since then that the basis of any decision made then has to be seriously questioned. Costs have increased as it has been realised the scope and scale of the issues requires significant additional compensation and mitigation. The current proposals, allowing for the obvious shift in the level of detail, are not what was being proposed back then.

In examining the consultation, the Council has taken into account the main consultation documentation, the Response to the Community Impacts consultation and the related plans.

Key new features of potential significance to Gravesham in the current consultation include:

- Nitrogen deposition compensation sites
- Alterations to the woodland planting north of Shorne Ifield Road
- Chalk Park changes
- Reconfiguration of the drainage ponds east of the LTC from Thong Lane down towards the A226
- Widening of Thong Lane land bridge south to 40m and the proposed car park
- Removal of noise barrier at Park Pale (assumed to refer to item 17 in Figure 5-2 of the You Said We Did document of July 2021)
- Small changes to bridleways/footpaths/cycleways
- Addition of a Rendez-vous area to the plans
- Minor changes to red line boundary (most notably at Pepper Hill)

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- Remodelling of Tilbury Fields (visible from Gravesham)
- New junction north of the tunnel portal
- New access link from A13 to A1089

These will be dealt with in turn.

Nitrogen deposition

The nitrogen deposition issue is a new matter and from the supplied information it is not clear what and how the methodology has been used, since the areas of affected sites look very large though from the text the main area that is impacted is roughly a zone of 200m from the pollution source.

The area in Gravesham is some 55 ha, to which on the Kent side has to be added the extensive area of 104ha at the top of Bluebell Hill. The acceptance by the Lower Thames Crossing project that their scheme is going to have a significant impact on M2 and A229 corridors is to be welcomed.

The mitigation measures mentioned are 9m high fences, which are clearly unlikely to be practical and lowering/enforcing speed limits. The latter is referred to in relation to the M2 between J4-3. In relation to the design of the crossing as previously pointed out reducing the design speed to 50 mph would enable a much more compact and less damaging junction arrangement with the A2, which would be significantly less expensive and reduce the nitrogen deposition, air quality and a host of other impacts.

The wider historical Cobham Estate area is now being significantly impacted by new planting at:

- Chalk Park
- South of Shorne Ifield Road
- SW of Shorne
- East of Shorne (Swillers Lane)
- Park Pale area

Not included in what was the estate but clearly related to the overall area are:

- Crutches Lane (two sites)
- Land south of Church Road

The mitigation and compensation sites have rather grown with time in response to a variety of issues, such as the loss of ancient woodland and impact on the SSSI. The major question the Borough Council is what the overall strategy for all these areas taken in the round is in terms of:

- Landscape (including the historic landscape given the dramatic direct impact on the Kent Downs AoNB and its setting)
- Ecology (what is the diversity of habitats and how do they relate to what already exists and the underlying geology and what they are a mitigation/compensating for)
- Access – the opportunity to enhance access across the area over and above what is already proposed
- Future Management of these sites (how, by whom etc.)
- Impact on agriculture from the loss of substantial areas of land

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- Since some changes have been driven by archaeology whether this has been properly considered in relation to new proposed sites

In the proposals there is a lack of clarity as to what 'planting' means – in some places in the text there is references to tree planting. Given the range of sites involved, with their different geology and soils as well as historical and landscape contexts, there is no one size fits all approach that is appropriate. These sites can only be considered in detail in the context of **all** the proposed planting across the wider area, in particular Chalk Park, the land south of Riverview Park, around Thong, the landscaping of the A2 junction itself and the extensive area of new planting at Park Pale. This is a diverse area with high grade agricultural land, historic features and high value nature conservation sites wrapped over by the Kent Downs AoNB and its setting.

Church Road Ifield

Logical extension of the planting that is already proposed and linking up with the parts of Jeskyns west of Henhurst Road. However, the Council has already objected to existing agricultural land being lost in this area which has not historically been wooded. In discussions suggestions were made that additional planting (and access improvements) that could be made along the south side of HS1 west towards Pepper Hill to strengthen landscaping that is already there and directly related to the A2 corridor. So, there may be scope as part of a wider planting scheme that is not overfocussed on trees.

Shorne south

Currently this is two pasture fields on the NE side of Shorne Woods Country Park, which were historically part of the Cobham Estate, crossed by a footpath. Our landscape consultant suggests there may be more appropriate sites (see appendix), for example north of this site.

Shorne Swillers Lane

This is an extensive area of farmed land to the east of the village crossed by a footpath link. It is also crossed by a number of electricity lines which will restrict what can be done along those narrow corridors. Additional hedge with trees planting may be more appropriate approach though that would have to encompass a much larger area

Crutches Lane, Higham

This is two sites either side of the road from Higham to Three Crutches, which do relate to Great Crabbles Wood. It is however suggested that there would be advantage in extending the area to the west of Crutches Lane up to the main road as this is shown as woodland on historic mapping. It should be noted that Shorne Parish Council own and maintain Crabbles Bottom (an area bounded by Great Crabbles Wood, Crutches Lane, A289 and Bowesden Lane) and are concerned about how the proposals and the wider impacts could affect that land.

Summary – a range of sites has been suggested, some of which do have potential and form part of the wider Shorne/Cobham area. It is not however clear why the specific sites have been selected and what it is proposed to plant on them, and how that relates to wider landscape and other factors.

Shorne Ifield Road planting

The Council had previously expressed concern about the planting extending northwards from Shorne Ifield Road when there was an obvious, in terms of geography at least, field to the south. This intruded into an area currently in productive agricultural use. The field in

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question is actively in agricultural use but would form a logical extension of Shorne Woods and is a better 'fit'.

Chalk Park

The consultation proposes to expand Chalk Park by adding an area to the east of tunnel portal which was going to be go to agriculture. The stated intention is that this area would open chalk grassland, which is a habitat that is desirable to have. It does however raise the issue of what function(s) Chalk Park is proposed to perform. It consists essentially of chalk spoil from the cutting, deposited for the most part on chalk. It does involve disturbing fill currently onsite from the Southern Valley Golf Course, an issue that is currently being explored due to possible contamination. Less clear is what objectives from the Gravesham Open Space, Sport and Recreation Assessment and Strategy (including the loss of the Golf Course) it is intended to meet. The design is supposed to mimic the open fields with wooded heights found in the Shorne/Cobham Wood's area. This landscape feature is however on a much larger scale than Chalk Park. Related to this is the function of the area south of Riverview Park.

It should be noted that the Council has resolved to rebuild Cascades Leisure Centre on the existing site. It will be therefore a major node for the open spaces around it and links into Shorne Woods Country Park over the new land bridge, which will avoid to current issues experienced by pedestrians trying to use Thong Lane south of Riverview Park.

Reconfiguration of the drainage ponds

As originally proposed, there were a group of ponds proposed just to the east of Thong Lane running down the valley, and then a further group down towards the A226. Heritage issues have led to their relocation. As previously set out these are an alien feature on chalk as most of the time as surface water only occurs in times of extreme rainfall (and therefore a high water table). The various ponds in Shorne Woods and Cobham Park exist because of clays sitting on top of the chalk, and thus do not exist further down the slope. The drainage ponds are therefore an alien feature – but because of their location in a dry valley will be prominent feature in the landscape. They need to be designed to perform their function and contribute positively to the landscape and ecology, where most of the time they are likely to be dry.

Widening of Thong Lane land bridge

The Council welcomes the widening of the Thong Lane south land bridge to 40m into response to comments made by it and other parties. The strengthening of ecological connectivity between Shorne Wood and Ashenbank Wood is a positive development. It would be enhanced further if Brewers Road could be enlarged and in an ideal world that at Park Pale (where no change is proposed by LTC to the existing structure).

The plans now show the proposed car park off Thong Lane, close to the A2, which was previously located north of Thong. It is located in an area which will form the main base for Kent roads construction, so will require restoration in some way. The concern over the principle of the car park is more to do with the traffic it may draw onto Thong Lane since from the east side of Gravesend this will be the nearest car park or produce issues such as on street parking that occur round the existing Shorne Woods Country Park car park and at Jeskyns. The site is Green Belt and in the setting of the Kent Downs AoNB. So, whilst a suitably landscaped car park can probably be accommodated (subject to traffic), it is not an appropriate location for significant buildings or other ancillary uses. Hence why the Borough Council has expressed reservations about it and would point out the role that Cascades, with

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its car parking may be able to play in this regard. This would be able to access the area over the Thong Lane North land bridge and be better related to traffic from the urban area.

Park Pale

Deletion of the noise barrier is noted though it was not clear what function it would have performed given the lack of close receptors. It is noticeable in most of Shorne Woods Country Park the noise from the A2 can be heard in the background, which applies over a much wider area of Shorne and Cobham Park. Without new noise data it is not possible to give any meaningful feedback on the proposals, or any other of the noise measures (and by extension this applies as well to air quality).

Small changes to bridleways/footpaths/cycleways

The Council has no objections to these, and in particular would support the removal of bridleway status for the link into Michael Gardens. As background information the Council has just commissioned the preparation of a Gravesham LCWIP from consultants, which will examine the east side of Gravesend in both with and without LTC worlds as part of its Borough wide brief.

Rendez-vous area

The plans now show an area of 50 x 30m over the tunnel connected to the A226. The Emergency Services and Partners Group and looking at what these need to be and what facilities they do or do not need. The need for such a facility is understood but there needs to be greater clarity over what it is actually needed, how it is managed (in 99%+ of the time it is not used). The site is in the Green Belt and therefore it has to meet the relevant policy tests.

Changes to development boundary

These are for the most part minor, however there is a significant change at Pepper Hill where some of the highway of Pepper Hill and Roman Road has now been included. This is to allow an electricity cable to be installed from Northfleet East substation through to the works east of Gravesend. The change at this location will allow the cable to be placed in the highway rather than temporarily shutting the cycleway (NCR177) and potentially removing a significant amount of mature planting. Although it may increase disturbance to local residents during the short period whilst the work is done in the longer term this is a better solution. It is important that sufficient safeguards are in place via the Code of Construction practice to minimise disturbance to local residents.

Remodelling of Tilbury Fields

This site is visible from Gravesham across the Thames and sites in a generally flat landscape where the forts are main development on the riverside. The proposals will be up to 24m high whereas the existing levels go up to about 10m near the river and 15m further inland. This area is in the Green Belt and effects the setting of the various forts because of the sight lines and is introducing new landforms.

New junction north of the tunnel portal

The restoration of the junction arrangement, albeit National Highways are not proposing any external public highways, is a revision to original proposals. Thurrock Council and Port of Tilbury both aspire to a link into the port running due west, to which the Freeport should add demand. Such a route, due to the restricted nature of the proposed A13 junction, would offer a more direct route from south of the river into parts of Thurrock. It would be reasonable to assume that this could exist in year 15 and it should be subject to modelling run to see if this has any significant impact on the modelled flows across the crossings.

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The new junction also provides an opportunity to reconsider the earlier decision to delete any sort of service provision along the LTC. The route avoids the existing facilities at Thurrock and demolishes those that exist currently at Cobham South. Both Gravesham and KCC have expressed concern over the lack of service provision.

[New access link from A13 to A1089](#)

On the basis of the supplied information the Council has no comments to make on this.

[Other issues](#)

National Highways will be fully aware of the are a number of other issues on which the Council has concerns, some of which will need to be dealt with at the DCO Examination. There are however matters where some progress should be possible. Matters include (in no particular order):

- Infrastructure needed to support local economic benefits (for example heat extraction to support the new Cascades Leisure centre)
- Impact on the Green Belt which has been treated as landscape issue rather than the policy issue it is
- Allied with that, and as highlighted above, a comprehensive environmental package covering all aspects of the proposal
- Travellers site at Viewpoint on A226 where no provision is being made
- Draft Skills and training strategy which has been promised but not yet delivered, where the Council is keen to see a skills and training hub in Gravesham
- Accommodation strategy – which is an important input to understanding the implications for the local housing market of the construction phase, when taken in combination with other development across the area. The length of time involved has significant physical implications for local residents and businesses, which in turn may lead to health and wellbeing considerations.
- Impact on the local highway network – this is a matter raised by many consultees concerned about both on construction and operation the implications for the local highway network. On the operational side there is a particular concern over the implications when major disruption occurs (be that at the new crossing or Dartford). The Lower Thames Area Model is, inherently, not the most appropriate tool for looking at this and it needs a more nuanced approach
- Impact on local housing market
- Discounted charge for residents on both crossings (Dartford and LTC)

27 June 2022

Appendix A - V Hyland – Landscape comments

Identified Issues	Comments
<p>Tilbury Fields (area across the river from Shornemead Fort) proposed landform from tunnel spoil up to 24m high – going in plan to be star shaped with points towards Shornemead and Cliffe forts</p>	<p>This proposed landform is to be up to 24m high. At present, the area is low-lying, with a maximum land level of 10m in the immediate area near the river, and up to 15m at some points further inland.</p> <p>The introduction of a landform of this height and mass, in a flattish and open landscape, on the opposite side of the River Thames to Shornemead Fort, will introduce a new (and alien) landform to a highly visible area.</p> <p>There may also be implications regarding the landscape and visual impacts in the Green Belt. This proposal may result in a significant change to local and long views, and consideration should be taken to re-assess the landscape and visual impacts.</p>
<p>Impact of the new NOx planting areas (71Ha)</p>	<p><i>NB A compensation approach is proposed, as avoidance and mitigation are not possible – a landscape-scale approach plus a habitat management fund.</i></p> <p>General points, questions and conclusions:</p> <ul style="list-style-type: none"> • What is the purpose of this land acquisition? I.e. are the land parcels suitable for replacement uses to land to be affected? How will they be managed, and why? And who will own and manage them? • What other sites have been considered? I.e. what was the process for identifying suitable land parcels, and the criteria applied? • It is not clear how the uses of the new parcels of land relate to the proposed actions in the Landscape Assessment and KDAONB Management Plan • Will the acquisition of these land parcels have an effect on the ongoing viability of agricultural use on the remainder of the owners’ land? (What grade farmland?) • The idea of 9m high vertical barriers to help mitigate the effects of NOx would be unacceptable in terms of landscape and visual amenity. • Planting proposals for each of the proposed ecological compensation sites should reflect ecological and landscape requirements appropriate to the locality and be made in close

	<p>consultation with stakeholders. The land parcels should link with existing areas of land that form part of the habitat network in that area</p> <ul style="list-style-type: none"> ○ It should not be assumed that woodland cover is the most appropriate land cover type in these locations. For example, a mosaic approach, including woodland, shaw woodland, parkland, wood pasture or orchards may be more appropriate, and potentially the retention of some areas of arable or pasture use ○ NB There are lines of electricity pylons running through the sites, making the development of woodland cover problematic.
<p>Henhurst road</p>	<p>The proposed compensation land would abut land identified as proposed Ancient Woodland mitigation, and located close to Jeskyn’s Woodland, so there is some logic to this choice of site.</p> <p>However, the proposed compensation land (along with the proposed Ancient Woodland mitigation land to its immediate west) appears to lie largely outside of a Biodiversity Opportunity Area.</p> <p>My earlier report to GBC (Design Refinement Consultation - July 2020 - Comments on Environmental Impacts Update in relation to Landscape issues) may also apply to the current proposals: -</p> <p>My comments referred to an area of ancient woodland mitigation proposed to the south of HS1 at Church Road as being unsuited to the location, as it would result in a change to the landscape character in (the) location. However, there may be scope for a less intensive approach to woodland planting, which is more suited to the surrounding landscape, such as a mosaic of woodland, parkland and orchards; but this will require careful assessment and consultation with stakeholders.</p> <p>In addition, the boundary of the woodland area appears to have been determined by the extent of the (other field) boundaries and has resulted in a shape which may be alien to the landscape, if not sensitively developed.</p>
<p>South of Shorne</p>	<p>Shorne Ridgeway land: It is helpful - both ecologically and for future management - that the land directly abuts Shorne Woods Country Park and the SSSI along its south-western boundary.</p> <p>The land also lies partly within the KDAONB (the south-western part, bounded by a fence running north-west to south-east), and benefits from an existing right of way.</p> <p>The proposed land parcel also benefits from being within a Biodiversity Opportunity Area, so reference should be made to this work in selecting the most suitable habitat type(s).</p>

	<p>The proposed land-take helpfully includes a connection through to Woodlands Lane (vehicular access to the site will be important, to enable maintenance works).</p> <p>The current land use appears to be pasture, so the land may be better suited to conversion to a more natural habitat than if it were an arable site.</p> <p>There are other parcels of (horse) pasture to the north of this land, lying adjacent to the SSSI; were these areas considered, as they may also be suitable?</p> <p>Re historical maps, there is no cultural heritage precedent for the proposed woodland land use.</p> <p>As with the other land parcels proposed for compensation planting, and taking into account the historical land use, biodiversity opportunity mapping and landscape issues, alternative planting and habitat types may be more appropriate on this site than woodland cover.</p> <p>Land to the east of Shorne village: This is a large area of land in mostly arable use, with rights of way across the land.</p> <p>There appears to be road access, but no apparent access linkage to other publicly accessible sites.</p> <p>The site benefits from wildlife sites immediately adjacent to the north/north-west (The Warren) and along its southern and eastern boundary (Court Wood and Starmore Wood - Local Wildlife Sites and Ancient Woodlands) Connections may be possible through the latter sites to Great Crabbles Wood (SSSI).</p> <p>The land does not appear to lie within a Biodiversity Opportunity Area, and therefore may have limited potential to develop ecological planting/natural habitats.</p> <p>There are lines of electricity pylons running through the sites, which require easement areas along their length, making the development of woodland cover problematic.</p> <p>On historical maps, only one small area is shown as being wooded, with the majority in arable use or pasture.</p> <p>In common with all the proposed areas of (NOx) Compensation land, woodland cover is not necessarily the most appropriate land cover/habitat type for this location. Historic mapping and the Landscape Assessment for the area provides some support for this view.</p> <p><i>NB (from Landscape Assessment – Summary of actions for Shorne LCA)</i></p>
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	<p><i>“The dominance of the woodland and the ecological interest of this feature may be reinforced by creating woodland links within existing arable areas.</i></p> <p><i>Reinforce the character of historic settlements by controlling highway approaches into villages and creating sympathetic designs to fringe development.</i></p> <p><i>Reinforce the external elements of the historic cores to settlements”</i></p> <p><i>The document also mentions “some loss of hedgerow links in the peripheral arable land”</i></p>
<p>South of Higham</p>	<p>North-east of Great Crabbles Wood: 2 sites are proposed; one to the immediate west of Crutches Lane, with the potential to directly connect to Great Crabbles Wood and orchards, and one (to the east) separated from the other site by Crutches Lane.</p> <p>At this site, historical maps show woodland on the west side of Crutches Lane only and extending up to the Rochester Road at Gadshill. The continuation of the proposed compensation land to the west of Crutches Lane, to the A226, might help improve links with Court Wood, and access (WCH) links through to Shorne and Great Crabbles Woods, thereby providing the potential for wider circular routes.</p> <p>In addition, the land proposed to the east of Crutches Lane provides a good opportunity for the development of chalk scarp woodland ⁽¹⁾</p> <p>For the above reasons, the land parcels south of Higham, with the western parcel expanding to include land up to the A226, may be appropriate as compensation land.</p>
<p>Moving an area of planting north of Shorne Ifield Road to the south (due to the discovery of a medieval settlement under the fields AND as a result of community consultation regarding the preservation of views)</p>	<p>The site of the proposed relocation of mitigation planting lies immediately adjacent to Shorne Woods Country Park, so the integration of the site into the park is a possibility.</p> <p>The site is currently in arable use. The current land use permits glimpsed long views across the Thames to Essex. The proposal to develop woodland cover would block these valuable views.</p> <p>The land is not part of the adjacent SSSI and lies just outside of the KDAONB boundary.</p>

¹ Kent County Council’s KLIS mapping – biodiversity opportunity mapping

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	<p>An area of land to the immediate east of the land parcel is not included in this proposal. However, the inclusion of the additional piece of land would enable the new land parcel to meet SSSI land on its eastern and southern boundaries. Could this be considered?</p> <p>NB The proposed relocation of the land parcels is resulting in a straight red line boundary (north-south) to the area just north of the new land. It is not clear how this red line boundary will appear on the ground and may appear artificial.</p>
<p>Adding an area east of tunnel portal area to Chalk Park as chalk grassland (bit of Southern Valley Golf course east of LTC that was going back to agricultural land)</p>	<p>Generally, the purpose of Chalk Park is unclear. It is needed as a receptor for tunnel spoil, but its purpose as amenity open space and the benefits offered may need re-examination. Also, how will the land be managed and who will manage the site?</p> <p>The Park should provide real benefits, e.g. in addressing open space deficits and/or access needs in this part of Gravesham. (See also my earlier comments on the Construction Update Document July 2021)</p> <p>The new landscape to be created from the tunnel spoil is introducing an alien landform in this area. However, it is acknowledged that some screening of works and LTC infrastructure may be desirable for residents to the west of the scheme.</p> <p>Previous comments have included concerns at the period of time this land will be under construction and unavailable for public use.</p>
<p>Widening of the Thong Lane south land bridge by 10m, to 40m</p>	<p>Not found in the consultation documents only report of last consultation</p> <p>Although the widening of this bridge is to be welcomed, the Landscape Institute Technical Note and the NE review report recommendations (see below) provide a useful – and more generous – benchmark.</p> <p>See also earlier responses. The NE report* provides useful benchmarks and comparators, and identifies, inter alia, the importance of appropriate width, depth and gradients of green bridges.</p> <p><i>(From *Natural England Commissioned Report NECR181 Green Bridges - A literature review First published 27 July 2015) Width and length</i></p> <p><i>4.10 Bridges with aims to achieve connections at a landscape/ ecosystem level should be over 80m in width. Bridges which aim to achieve connections for species at a population level should be around 50m (published guidance recommendations range from 25m-80m, with an average of 50m). Bridges</i></p>

	<p><i>below 20m in width are not recommended as frequency of use has been found to be lower. A width to length ratio over 0.8 is recommended.</i></p> <p>The Landscape Institute issued helpful technical guidance ('Green Bridges - Technical Guidance Note 09/2015 December 2015' – Landscape Institute) which supports the NE document* findings.</p> <p>See also 'Additional comments' below.</p>
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Other issues identified in the consultation documents

Additional utilities/services through Claylane Wood Proposed service runs/utilities through this Ancient Woodland may further reduce the woodland cover and allow greater 'exposure' of the new junction and road infrastructure; with the potential to exacerbate the negative landscape and visual impacts in this key area.

Additional comments

In view of the number of iterations of proposals, and the changes made since this work began, a **re-evaluation of the (sum of) effects/impacts to the landscape character and visual amenity may now be required, to bring the work up to date.**

All new land acquisitions for the purposes of both Ancient Woodland compensation and ecological compensation, should make a positive contribution to biodiversity and landscape quality, and link with other areas of land that form part of the habitat network in that area.

Green Bridges: Comments have been made to previous iterations of the LTC consultation, regarding the importance of maximising the potential beneficial ecological, landscape and visual effects of green bridges. In particular, opportunities should be sought to develop green bridges at the sites of existing or proposed bridges, where they might provide 'gateways' into the KDAONB. This is particularly important along the A2/M2/HS1 corridor, where the LTC proposal will greatly increase the real and apparent severance of the KDAONB, in the short and longer term. The latest proposals have increased the width of the Thong Lane south bridge to 40m (see above for comments). However, more needs to be done to reduce some of the negative impacts of the LTC scheme. There are further opportunities within the A2/M2 corridor, to the east of this bridge, to develop existing bridges and create another 'gateway' green bridge to the KDAONB. It is understood that the Brewers Road bridge cannot be developed in such a way, for technical reasons, but **the Park Pale bridge should be considered as a priority.**

Future land management: This consultation has added 71Ha of potential ecological compensation land which will require development and ongoing management. This is in addition to the areas of Ancient Woodland mitigation land already identified in earlier proposals. Although the land will be acquired and owned by National Highways, it will require local management for the benefit of biodiversity, landscape and public amenity 'in perpetuity'. A masterplan approach to the whole area affected by the LTC, south of the River Thames would enable examination of the issues resulting from the LTC scheme and take a strategic approach to the development and integration of 'new' land parcels.

This area has a long history of partnership and cooperative working between land managers in the public and voluntary sectors, and good links with private land managers through these networks. However, with reduced funds available to the public and voluntary sectors, partnership working has become increasingly difficult to sustain. **In the future, in order to ensure the new areas of land are well-integrated and managed, it will be important to adopt a coordinated approach to land development and management.**

Finally, the consultation documents continue to **fail in providing visual materials** that might assist in aiding the observer to better understand the proposals. In particular, visual imagery showing the size, height and mass of the A2/LTC junction and associated road infrastructure, from the users' viewpoints has not been provided.