

THAMES CROSSING ACTION GROUP

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Kent Country Parks Strategy 2023-28 Consultation

Thames Crossing Action Group is a community group which represents thousands of people who are strongly opposed to the proposed Lower Thames Crossing (LTC). The £10bn+ LTC would be hugely destructive and harmful; it would not meet the project objectives, and is not fit for purpose.

We are responding to the Kent Country Parks Strategy 2023-28 Consultation¹ as we represent people in all areas, including those who live in and/or visit Kent, and as a group are very concerned about the impacts of the proposed Lower Thames Crossing on Kent Country Parks.

Response

We recognize and appreciate the importance of our Country Parks for both our natural environment, and also for our own health and well-being.

We congratulate Kent County Council (KCC) on having a Country Parks Strategy, and wanting to protect and enhance the parks for the benefit of the environment and all of us.

Now more than ever with climate emergency, the fact our country is one of the most nature depleted in the world, and at a time when we all need and appreciate the benefits of spending time in our natural environment it is critical that our Country Parks are protected and enhanced.

We cannot allow hugely destructive projects like the £10bn+ Lower Thames Crossing destroy and impact our parks and communities.

¹ <https://letstalk.kent.gov.uk/countryparksstrategy>

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Your Strategy

We strongly agree with KCC vision for the Country Parks service to provide an inspirational and sustainable countryside experience for Kent's residents and visitors.

It is important that the park network is well connected, high quality and biodiverse greenspace. We strongly agree with this.

It is important to sustain and manage visitor numbers to the parks, because the more people enjoy and benefit from the parks the more people will learn about our natural environment, it's benefits and importance, and want to save, protect and enhance it. We strongly agree with this, so long as it is done in a sustainable way, and there is no negative environmental impact due to the increase in numbers.

However, we also draw attention to the fact that both of the above aims would be negatively impacted by the proposed LTC, if it goes ahead, so we question KCC's support of the proposed LTC, and ask you to reconsider your support to ensure you comply with the above (and other aims).

In regard to the third aim to consolidate the financial sustainability of the Country Parks through maximizing self-financing and external funding opportunities. We understand and recognize the need to ensure there are adequate funds to cover and support the parks.

However, it is important that none of the funding comes as a result of KCC supporting destructive and harmful development projects, like the proposed LTC. This is not acceptable and would be highly contradictory to the strategy.

In addition to your detailed aims, we also believe that there should be high importance placed on ensuring the protection of our parks and natural environment, and KCC doing all they can to save and protect them from destruction and negative impacts. With respect we do not feel KCC have or are doing enough to voice concerns and opposition to the proposed LTC which would be hugely destructive and harmful, including direct loss and impact to Shorne Woods Country Park, and other important areas.

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Your Objectives

For Strategic Aim 1

Objective 1 – *Provide high quality parks that are maintained and improved in line with our management plans, statutory and grant obligations and that, where possible, the standards of our management are independently tested and verified.*

We strongly agree with this.

Objective 2 – *Our Country Parks are well connected through physical networks and collaborative partnerships to enable the best results for people, nature, and the environment.*

We strongly agree with this.

Objective 3 – *Maintain or, where possible, enhance biodiversity, heritage and landscape values of the sites ensuring that opportunities to connect communities to their value are provided.*

We strongly agree with this.

Objective 4 – Our Country Parks support the achievement of the outcomes of the Kent Environment Strategy, the Kent Biodiversity Strategy and the Kent Nature Recovery Strategy.

We question the Kent Environment Strategy, Kent Biodiversity Strategy, and Kent Nature Recovery Strategy, and whether they are adequate and strong enough when KCC are supporting such a hugely destructive and harmful project as the proposed LTC.

So, whilst we strongly agree that there is a need and should be an objective to achieve excellent results when it comes to environmental, biodiversity, and nature recovery strategy, we do not feel KCC are behaving in a way in keeping with what such strategies for these aspects should be, if for no other reason than because of the support of the proposed LTC.

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Additional comments on the above objectives

We would ask that if the standards are independently tested and verified that KCC ensure they listen to such advice and reports, and not simply treat it as a tick box exercise.

We see the importance of ensuring the parks are well connected, and of course the natural environment knows no boundaries of different land ownership, so it is vital that KCC work with other landowners/organisations to ensure the best outcome of working collaboratively in the best interest of the natural environment.

We would like to see the inclusion of 'save and protect' in this objective, as it is essential that KCC do all they can to ensure that everything possible is done to save and protect the parks, and the network that the parks fall within and connect.

With respect we find it hard to accept that a strategy such as the one being proposed would truly be achieved and respected. The fact KCC supports the LTC goes against what is being proposed in this strategy.

In regard to the other strategies we note that Kent Environment Strategy details the issue of increasing congestion on both roads and rail, and the impacts to the economy, health and environment.

We would prefer to see health and environment listed before the economy, because unless we have a healthy environment and healthy people, the economy is irrelevant. Try counting all your money when there is no clean air to breathe, clean water to drink, and healthy food to eat, and when the planet can no longer sustain our existence.

We question why KCC oppose Gatwick Airport expansion plans, but support the proposed LTC. The proposed LTC should be strongly opposed for all the same concerns about impacts to the environment and communities.

We note that the same document encourages a shift to active travel, and increases in the use of public transport. We support this and see it as a perfect link for the parks and encouraging visitors.

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However, again we stress that KCC are supporting the proposed LTC which fails to provide any provision for active travel, and would not be viable for public transport due to the poor design and lack of adequate connections.

In regard to more sustainable transport options, and the reference to rail in Kent being over capacity, we question why the Port of Dover is not connected by rail, and highlight that rail improvements between Ashford and Reading would negate the need for the proposed LTC, and enable more freight to be moved on more sustainable rail rather than roads.

The proposed LTC would not solve the problems at the Dartford Crossing, it would still remain over capacity, and we would also see an increase of around 50% in cross river traffic too, if LTC goes ahead.

Evidence shows that building new roads results in new traffic, induced demand, rather than actually reducing congestion and the associated pollution.

Also, Electric vehicles (EVs) and other non-fossil fuel vehicles do not solve the issues of air pollution or congestion. They all still emit deadly PM2.5, particles so tiny they get into our organs via the bloodstream. The whole proposed LTC route would fail against the proposed PM2.5 targets that are about to be enshrined into UK law.

Plus, if people believe these types of vehicles are greener and cleaner they are also more likely to use them more, resulting in more congestion.

The vicious downward spiral of road building just results in more traffic, more congestion and pollution, leading to further calls for more hugely destructive and harmful roads to be built.

The proposed LTC alone would emit 6.6 million tonnes of carbon, if it goes ahead. Not something to be supporting at a time of climate emergency. This has to stop.

It is also stated that biodiversity in Kent is declining. We also know that the UK is one of the most nature depleted countries in the world. This is just another reason why our Country Parks are so important and need to be saved and protected at all costs, and why KCC should be opposing projects like the proposed LTC.

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How do you expect the natural environment and biodiversity to thrive, and people to be able to enjoy places like Shorne Woods Country Park, if the proposed LTC goes ahead? It would create another barrier, in addition to the existing one created by the A2 and HS1. It would sever connectivity for people and nature. It would increase pollution and have a negative impact on people's health and well-being.

For Strategic Aim 2

***Objective 5** – Increase the accessibility of the countryside through the deployment of landscape management techniques, effective outward looking partnership working and improved facilities that seek to provide equity of access to quality greenspace to all Kent residents and visitors.*

We strongly agree with this.

***Objective 6** – Work with nurseries, schools, further education establishments and adults to provide environmental education and events that promote engagement with the natural world alongside supporting future sustainability and responses to the climate emergency.*

We strongly agree with this.

***Objective 7** – Provide and increase high quality volunteering opportunities including seeking new ways for communities to volunteer their time to the work of the Country Parks.*

We strongly agree with this.

***Objective 8** – Maximise the ability of Country Parks to meet the health and well-being needs of communities and contribute to good quality of life through strong cross partnership working with physical and mental health care providers.*

We strongly agree with this.

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Any additional comments

We agree with and support environmental education and events that promote engagement with the natural world. This should not be purely limited to youngsters, but provide opportunities for all to learn and enjoy knowing more about the natural environment and our parks.

We understand that an education area in Shorne Woods Country Park would be impacted if the proposed LTC goes ahead, which is unacceptable and another reason to oppose the LTC.

It is important that our parks are there for our communities, and also that we are there for our parks to ensure they are protected and taken care of. Community groups and volunteers should be welcomed, appreciated, valued, and listened to by KCC.

As evidence shows spending time in nature is extremely helpful and valuable to our health and well-being. It is essential that KCC's strategy for the Country Parks takes this very important aspect into consideration, and does all it can to ensure the ability of our parks in this regard.

This is just one of the many reasons KCC should not be supporting the proposed LTC, as it would greatly impact the ability of Shorne Woods Country Park to fulfil the needs of visitors and communities on health and well-being grounds. You notice the difference in the park currently when you get closer to the A2, it is ludicrous to support the addition of another huge road and all the traffic to the west of the park too.

Also, in regard to sustaining and managing visitor numbers to the parks, we need to see improvements and support for active travel and public transport access to the parks when possible.

The proposed LTC doesn't support cross river active travel and wouldn't be viable for public transport, so again limits the options for visitors from north of the river to visit country parks in Kent. It is essential that encouraging increases in visitors and visits to the parks doesn't have a negative impact on the natural environment.

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For Strategic Aim 3

Objective 9 – *Maximise the opportunities to generate income on the sites through catering, education, events and innovative paid for facilities and services whilst operating at maximum efficiency.*

Objective 10 – *Explore, develop and secure external funding opportunities that complement the work of the Country Parks.*

Objective 11 – *The portfolio of Country Park sites provides the ability for all to enjoy regardless of their age, health, race, religion, disability or gender and that your management supports equality, environmental protection and the achievement of your strategic aims at all times.*

As we have mentioned previously it is important that funding/income for the parks does not come from questionable sources.

There is a growing trend in large developers and companies buying carbon credit and using funding opportunities to greenwash harmful projects. KCC and the parks need to take this into account, as allowing and accepting such funding would be hypocritical and against the ethos of a strategy to protect and enhance our country parks and environment, especially if it were in exchange for support of such projects.

Our parks should be accessible and affordable for everyone, and we welcome generating income on sites through more sustainable and ethical options that support the parks and communities.

Conclusion

We welcome Kent County Council producing a Kent Country Parks Strategy 2023-28², and we support the need for such a strategy.

² <https://letstalk.kent.gov.uk/18416/widgets/52888/documents/31529>

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However, for it to be considered a credible strategy, and for it to be successful we will need to see actions to back up the intentions. Public perception is that all too often we hear about great strategies, but when it comes down to it those responsible fail to act to ensure the required outcome.

As we have highlighted throughout our response, there are numerous reasons why we feel such a strategy lacks credibility whilst KCC are supporting the proposed Lower Thames Crossing, which would be hugely destructive and harmful on so many levels.

In particular, in light of this being a consultation on our Country Parks, places like Shorne Woods Country Park are magical places that are so valuable to the environment, communities, and our health and well-being. We need a strong strategy in place to ensure they are protected and enhanced where possible and when needed.

Thames Crossing Action Group therefore call upon Kent County Council to please withdraw your support of LTC as part of the Kent Country Parks Strategy to ensure a healthy and sustainable future for us, our environment, and Kent's Country Parks.

This response was prepared on behalf of Thames Crossing Action Group by Chair, Laura Blake. More info on TCAG can be found on our website – www.tcaq.info and we can be contacted via email admin@thamescrossingactiongroup.com. Please do not hesitate to contact us if you wish to discuss any of our response, the proposed LTC, or the work of TCAG further. Many thanks.