

Coastal Access – Grain to Woolwich (GWO4 and GWO5)



Representations with Natural England's comments

April 2020

1. Introduction

This document records the representations Natural England has received on the proposals for GWO4 and GWO5 from persons or bodies. It also sets out any Natural England comments on these representations.

Where representations were made that relate to the entire stretch for Grain to Woolwich they are included here in so far as they are relevant to lengths GWO4 and GWO5.

2. Background

Natural England's compendium of reports setting out its proposals for improved access to the coast from Grain to Woolwich, comprising an overview and six separate length reports, was submitted to the Secretary of State on 5 June 2019. This began an eight-week period during which representations and objections about each constituent report could be made.

In these lengths, Natural England received 13 representations pertaining to length reports GWO4 and GWO5, of which three were made by organisations or individuals whose representations must be sent in full to the Secretary of State in accordance with paragraph 8(1)(a) of Schedule 1A to the National Parks and Access to the Countryside Act 1949. These 'full' representations are reproduced in Section 3 in their entirety, together with Natural England's comments. Also included in Section 4 is a summary of the 10 representations made by other individuals or organisations, referred to as 'other' representations. Section 5 contains the supporting documents referenced against the representations.

3. Record of ‘full’ representations and Natural England’s comments on them

Representation number:	MCA/GWO5/R/2/GWO1195
Organisation/ person making representation:	North West Kent Ramblers/ [REDACTED]
Route section(s) specific to this representation:	GWO-5-S005 to GWO-5-S042
Other reports within stretch to which this representation also relates:	N/A
Representation in full	
<p>Map GWO 5A shows the area of concern which are the banks of the River Darent and tributaries.</p> <p>Referring to Map GWO 5A in the consultation documents, the North Kent Ramblers think it is essential that a foot crossing is provided at or near the flood barrier at the north end of the River Darent.</p> <p>Whilst the Darent Valley Path is very pleasant, it is a huge detour for anyone wanting simply to continue on the Coastal Path.</p>	
Natural England’s comments	
<p>Natural England met with stakeholders in 2018 to explore the feasibility of a shared-use crossing over the River Darent, which could accommodate the England Coast Path. Whilst most stakeholders were supportive of the project, there were still significant constraints to implementation which hadn’t been resolved at the time of publication:</p> <ul style="list-style-type: none"> • Fixing an adjoining walkway to the Environment Agency’s existing Flood Barrier, at the mouth of the Darent, had been ruled out due to security concerns; • The minimum height of a new, standalone crossing to maintain historic navigation rights in the River Darent had not been agreed. The Port of London Authority is currently considering this issue; • Funding had not been secured by partners for either the construction or long term maintenance of a bridge. Costs from a recent feasibility study suggested that at least £1m would be necessary just for construction. <p>Given the above constraints and the relatively short development time for the England Coast Path, we were unable to propose a new crossing of the River Darent.</p> <p>As referenced in the Overview Report (Chapter 7: Future Changes), if a river crossing is developed in the future we would then consider realigning the trail to follow the crossing.</p>	

Representation number:	MCA/GWO Stretch/R/1/GWO0954
Organisation/ person making representation:	Ramblers, [REDACTED]
Route section(s) specific to this representation:	Whole stretch

Other reports within stretch to which this representation also relates:	GWO 1, GWO 2, GWO 3, GWO 5, GWO 6
Representation in full	
I am writing on behalf of the Ramblers to give our full support to the proposed route. As stakeholders, we have been involved and consulted throughout the process and are happy this is the best practical route.	
Natural England's comments	
We welcome the positive engagement from [REDACTED] during the development of our proposals and the supportive comment made by the Ramblers.	

Representation number:	MCA/GWO Stretch/R/2/GWO1176
Organisation/ person making representation:	Historic England/ [REDACTED]
Route section(s) specific to this representation:	Whole Stretch
Other reports within stretch to which this representation also relates:	GWO 1, GWO 2, GWO 3, GWO 5, GWO 6
Representation in full	
<p>We have no objections to the proposals. We note that the path runs slightly into or along the edge of just one Scheduled Monument (Cliffe Fort) however, as an existing path will be used in this area, there should be no ground disturbance or detrimental impact upon the scheduled site.</p> <p>We think that, given that most of the coastal path is to re-use existing footpaths, there is likely to be little new ground disturbance or harm to non-designated archaeological assets. However we recommend that you consult the county archaeologist with regards to impact upon non-designated assets.</p> <p>We would also like to stress that these comments relate only to the proposal within the county of Kent. The proposals which are relevant to London will be dealt with a separate team within Historic England and, if they have any comments, these will be submitted separately.</p>	
Natural England's comments	
<p>We welcome the positive engagement from Historic England during the development of our proposals – and their supportive comments. Throughout this process we have consulted with Historic England in both Kent and London, as well local officers regarding Historic Environment Records (in line with para 4.9.5 Coastal Access Scheme) to ensure that our proposals would not have a detrimental effect on designated and local heritage assets.</p> <p>We have not received any additional representations from Historic England in London or from local historic environment record managers.</p>	

Representation number:	MCA/GWO Stretch/R/4/GWO0095
-------------------------------	-----------------------------

Organisation/ person making representation:	Environment Agency, [REDACTED]
Route section(s) specific to this representation:	Whole stretch
Other reports within stretch to which this representation also relates:	GWO 1, GWO 2, GWO 3, GWO 5, GWO 6
Representation in full	
<p>Flood Risk/ Defences</p> <p>In principle, we accept the proposal but please review our response below regarding next steps to ensure the safety and integrity of the flood defences is not affected by the coastal path.</p> <p>The Environment Agency have an operational responsibility for managing the risk of flooding from main rivers, reservoirs, estuaries and the sea, as well as being a coastal erosion risk management authority. Additionally, we have a statutory duty under the Water Resources Act 1991, Southern Region Land Drainage Byelaws 1976 and the Environmental Permitting Regulations of England and Wales 2016 to assess and review any works done within 8 metres of fluvial main river and 16 metres of tidal defence.</p> <p>As the proposed structures fall within 16m of the tidal defences, a Flood Risk Activity Permit (FRAP) will be require before undertaking the establishment phase of the trail. Establishment works might include, resurfacing footpaths and excavations on embankments which could impact the integrity of the flood defence. Part of this application requires the submission of detailed designs and method statements for all of the proposed structures within this zone. This is to allow us to determine the distances of the proposed structures from the tidal defences and whether their implementation will impact the integrity of the defences or impede our access to undertake maintenance in the future. Consequently, we are unable to accept your proposals at this stage until we have received and approved the FRAP application.</p> <p>The application will need to address our concerns with the proposed barriers and gates we reviewed in the consultations drawings. We will need to know what type of gate, how they will be installed and where they will be installed in relation to the tidal defences to ensure the proposals do not inhabit access for inspection, maintenance and repair of the tidal flood defences.</p> <p>Please further note that any future roll-back and/or amendments to the coastal path due to coastal erosion will require a FRAP to review the situation on whether the new paths will affect the integrity of the defences and/or our buffer zone for maintenance access.</p> <p>For further information on how to apply for a Flood Risk Activity Permit, please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact our National Customer Contact Centre on 03702 422 549.</p> <p>In summary you will need to provide us with the following:</p> <ol style="list-style-type: none"> 1. 'About You' (Part A) https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-a-about-you 	

2. 'Application for an environment permit (Part B10)
<https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-b10-flood-risk-activities>
3. 'Charging and declarations' (Part F3)
<https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-f3-charging-for-flood-risk-activities-and-declarations>

Single activity applications incur a charge associated with the proposed activity category. Applications with multiple activities are calculated slightly different. The highest category is charged at 100% and each additional activity incurs a charge of 25% of its associated category. Please see attached guidance document for more information or visit:

<https://www.gov.uk/government/publications/environmental-permitting-charging-scheme>

Once you have submitted your application we can determine what fee you will be required to pay

- 1) Site plan showing the location and extent of the works
- 2) A management system describing your method of work and what you will do to manage risk, including:
 - a. The method statement which should:
 - Describe in detail the individual operations you intend to carry out on site, including how, when, where and for how long you will conduct each part of the activity
 - Include the sequence steps that will be performed to complete the proposed activity
 - Include all temporary and permanent works, including 'enabling works' that will support the main activity
 - b. The risk assessment should demonstrate that:
 - Your proposals will not increase flood risk, impact on drainage or harm the environment
 - You have considered all the risks from your activity and you have put measures in place to prevent any adverse effect to the environment, people and property
- 3) Pre-works photos and any supporting information

Further guidance on how to complete a management system and risk assessment can be found here:

<https://www.gov.uk/guidance/develop-a-management-system-flood-risk-activity-for-environmental-permits>

<https://www.gov.uk/guidance/flood-risk-activity-risk-assessment-for-your->

[environmental-permits](#)

Fisheries, Biodiversity and Geomorphology

We agree with Option 3 as the preferred option.

Please ensure the alignment of all paths allows not just for roll back of the route as part of managed realignment schemes as part of the delivery of the Thames 2100 plan, but also ensure that redevelopment opportunities allow the setting back of paths where possible to allow more space for water and estuary habitats adjacent to the River Thames. This is only likely to be a few metres, but the alignment of the path must allow for this flexibility.

Groundwater and Contaminated Land

It is unlikely that the proposals will cause impacts on groundwater, given the low key works required to implement any footpath, but any structure such as footbridges may be required to undertake detailed assessments if any piling works are required as part of construction.

With regards to potential contamination from historic contamination along some sections of the route way, this should be discussed with the local Environmental Health Officer as appropriate. Some sections pass through old Forts, gunpowder works, industrial zones and landfill tip sites, so there needs to be appropriate signage and warnings related to possible contaminated materials, although suitable surfacing may cut off direct pathways of contact.

Natural England's comments

We welcome the positive engagement from the Environment Agency during the development of our proposals – and the supportive comment in the Representation.

Flood Defences and FRAPs

Natural England and the Access Authority (who carries out the establishment works) discussed the need for Flood Risk Activity Permits (FRAP) with local Environment Agency officers in 2018. As a consequence, we reduced the number of proposed items to be installed on sea defences, and obtained bespoke and positive pre-application advice on our amended proposals, which only includes installing new steps and interpretation panels near the seawall, replacing stiles with gates and installing signs to existing infrastructure.

The Access Authorities will ensure all the relevant consents and permits are in place prior to any establishment works. This would also be the case if roll back proposals were to result in new infrastructure being required in the future.

Fisheries, Biodiversity and Geomorphology

As stated in our report (GWO 1 and GWO 2, the details of any roll back will be subject to any necessary Habitats Regulations Assessment. Where we have proposed roll back to incorporate the EA's proposals for future Managed Realignment, we will work alongside the Environment Agency to ensure that the future route will not be detrimental to the adjacent habitats and species.

Any new developments that could allow the ECP to move closer to the Thames would be considered by the relevant Local Planning Authority, which looks to protect and enhance the England Coast Path and also conserve important habitats and species

(under paragraphs 168 and 170 of the National Planning Policy Framework). Where the trail alignment is to be moved, Natural England will undertake a Variation Report.

Groundwater and contaminated land

We do not intend to carry out any works that will require piling.

In the development of our proposals (in line with para 8.26.4 Coastal Access Scheme), we have consulted with the local Environmental Health Officers where appropriate, and in particular on matters relating to creating new access on old landfills. Following on from their advice, we have subsequently agreed mitigation measures which have been included within our published proposals, particularly for GWO 4 – Map GWO 4a: Botany Marshes to Bell Wharf.

4. Summary of ‘other’ representations and Natural England’s comments on them

Representation ID:	MCA/GWO4/R/1/GWO0100
Organisation/ person making representation:	Fisher German ([REDACTED])
Name of site:	Esso Petroleum Co Ltd Pipeline easement
Report map reference:	Map GWO 4e: Littlebrook Power Station to Dartford Marshes
Route sections on or adjacent to the land:	GWO-4-S056
Other reports within stretch to which this representation also relates	N/A
Summary of representation:	
Any works within Esso’s easement, will require authorisation and supervision. Esso should be notified of any works within 50m of the pipeline.	
Natural England’s comment:	
Natural England does not intend to install any new infrastructure on Esso’s landholdings itself. We are proposing to install a standard waymarker post approximately 45m west of Esso’s landholdings.	
Kent County Council, the relevant Access Authority who will install the infrastructure, has standard risk assessments to ensure that there is no adverse impact on underground cabling. For installing a waymarker post 700mm into the ground, measures such as using a CAT scan before starting work and digging carefully are deemed appropriate to manage these risks.	

Representation ID:	MCA/GWO4/R/2/GWO0048
---------------------------	----------------------

Organisation/ person making representation:	Continuity Court (Freehold) Ltd/ [REDACTED]
Name of site:	Land belonging to Continuity Court (Freehold) Ltd and Sinclair Investments (Kensington) Ltd known collectively as Thameswaterside.
Report map reference:	Map GWO 4c: Greenhithe to Stone Marshes
Route sections on or adjacent to the land:	GWO-4-S031 to GWO-4-S035
Other reports within stretch to which this representation also relates	N/A
<p>Summary of representation:</p> <p><u>Barriers to access</u> The route GWO-4-S032 to GWO-4-S034 has two sets of steps. This is not consistent with the requirements of the Equality Act 2010 particularly as no other options were considered for site, as it was not documented in 4.3.12. [REDACTED] has proposed an amendment to the route GWO-4-S032 and GWO-4-S033 to take an inland route which does not have steps, will be in accordance with the Equality Act 2019 and be fair to all. This site should then also be included in section 4.2.4 in the discussion on inland diversion.</p> <p><u>Privacy</u> Route GWO-4-S032 and GWO-4-S033 will lead to a reduction in privacy for the residents of the site.</p>	
<p>Natural England's comment:</p> <p><u>Barriers to access</u> In developing our proposals for the England Coast Path we seek to balance the key principles set out in the statutory criteria for establishing the trail, namely: closeness to the sea (or estuary), sea views, safety and convenience (see section 4.1 of the Coastal Access Scheme). In doing this we always seek to avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.</p> <p>Where there is a choice of routes (and taking into account the key principles outlined above), we will generally favour the one that is accessible to the widest range of people or most easily adapted for that purpose (section 4.3.8 of the Coastal Access Scheme). In addition and where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with reduced mobility. This may simply include improvements to the information available about those sections of the route that are accessible to a range of people in order to inform personal choice (section 4.3.10 of the Coastal Access Scheme).</p> <p>Our proposals for this section follow these principles, not least to align the England Coast Path adjacent to the riverside wherever practicable. As such we have proposed that the route passes through a publicly accessible pedestrian area (GWO-4-S033) from the designated footpath DR2, to North Star Boulevard (GWO-4-S032). In doing this we are fully aware that the access to the publicly accessible pedestrian area from Footpath DR2, is via a broad flight of steps and, in light of [REDACTED] comments, we</p>	

have identified, and will signpost, an additional route for people with reduced mobility via footpath DS4 and Station Road to connect with the riverbank further on. This route is easy to follow and already has access rights along the public footway and ramp. It therefore does not require any amendment to the current proposals. We think this solution provides both the opportunity and necessary information for people to make the decision as to which route is appropriate to their abilities while clearly maximising access to the riverbank itself.

Privacy

We have been advised by the local authority, Dartford Borough Council, that the area where GWO-4-S032 and GWO-4-S033 are aligned is a “public access area” and this is documented in the section 106 for the development. We also note that the development has been well designed to accommodate public access. Although we do not expect a dramatic increase in use, we acknowledge that this may happen a little more often if the public access area becomes the coast path. However, we would expect the great majority of long-distance walkers to be responsible and respectful of residents’ privacy and focused on the views of the Thames.

We do not agree that any new impact on privacy would be significant or outweigh the desirability of affording views of the sea referred to in the coastal access legislation (see section 4.6 of the Coastal Access Scheme).

Relevant appended documents (see Section 5):

5A, 5B, 5C, 5D, 5E

Representation ID:	MCA/GWO4/R/3/GWO1197
Organisation/ person making representation:	Churchill Estates & Management/ [REDACTED]
Name of site:	Land belonging to Continuity Court (Freehold) Ltd and Sinclair Investments (Kensington) Ltd known collectively as Thameswaterside.
Report map reference:	Map GWO 4c: Greenhithe to Stone Marshes
Route sections on or adjacent to the land:	GWO-4-S031 to GWO-4-S035
Other reports within stretch to which this representation also relates	N/A
Summary of representation:	
Churchill Estates & Management are the Estate Management Company responsible to the landowners and the leaseholders for the maintenance of the site. The site management company is bound by contract to act for the leaseholders of individual flats as well as the owner of the land.	
The concerns relate to the route GWO-4-S032 and GWO-5-S033 passes close to the living room and bedrooms of residents of the site with a consequent loss of privacy.	

Natural England's comment:
Privacy
 We have been advised by the local authority, Dartford Borough Council, that the area where GWO-4-S032 and GWO-4-S033 are aligned is a "public access area" and this is documented in the section 106 for the development. We also note that the development has been well designed to accommodate public access. Although we do not expect a dramatic increase in use, we acknowledge that this may happen a little more often if the public access area becomes the coast path. However, we would expect the great majority of long-distance walkers to be responsible and respectful of residents' privacy and focused on the views of the Thames.

We do not agree that any new impact on privacy would be significant or outweigh the desirability of affording views of the sea referred to in the coastal access legislation (see section 4.6 of the Coastal Access Scheme).

Representation ID:	MCA/GWO4/R/4/GWO0243
Organisation/ person making representation:	David Lock Associates, on behalf of Swanscombe Development LLP
Name of site:	Land at Swanscombe Peninsula
Report map reference:	Map GWO 4a and Map GWO 4b
Route sections on or adjacent to the land:	GWO-4-S001 to GWO-4-S013
Other reports within stretch to which this representation also relates	N/A
<p>Summary of representation: Swanscombe Development LLP (SDLLP) supports, in principle, the designation and creation of a Coast Path. This reflects the requirement established under Policy CS6 of the Dartford Local Plan to incorporate a riverside foot and cycle path. Similarly SDLLP confirm that pre-engagement with Natural England took place which helped define the proposals.</p> <p><u>Route and Coastal Margin</u> It is noted that much of the proposed Coast Path route on the Peninsula from Botany Marshes through Broadness Salt Marsh and Bell Wharf does not utilise an existing walked route and effectively creates an additional route around the head of Swanscombe Peninsula.</p> <p>SDLPP supports the proposed exclusion of public access from the immediate riverfront of the Peninsula (Directions Map GWO 4A) on the grounds of public safety.</p>	

<p>Future development</p> <p>The majority of the land under the control of Swanscombe Development LLP (SDLLP) has been identified as a key development site for mixed use development and a leisure and entertainment resort. SDLLP welcomes the inclusion in the Overview Report (Chapter 7 Future Changes) and para 4.2.25 in GWO 4 of the potential need for changes to the access provisions at Swanscombe Peninsula. However, whatever form of re-development comes to fruition, it is likely that changes will be needed to the proposed route. The same level or enhanced access to the riverfront, whilst desirable, cannot be guaranteed in the context of technical, environmental or design constraints. It is therefore recommended that a flexible approach to potential realignment of the path is needed as part of a redevelopment.</p>
<p>Natural England's comment:</p> <p>In accordance with paras 5.5.4 - 5.5.7 of the Coastal Access Scheme, coastal access rights do not prevent any land from being developed or redeveloped in the future. We recognise that Gravesham Borough Council and Dartford Borough Council have allocated Swanscombe Peninsula for redevelopment (GWO 4 para 4.2.25). Natural England will therefore liaise with stakeholders, planners and developers on this Nationally Significant Infrastructure Project (NSIP), with the aim of maintaining a continuous and managed route along the coast, in this area.</p>

Representation ID:	MCA/GWO5/R/1/GWO0066
Organisation / person making representation:	Darent Industrial Park Estate (2002) Ltd [REDACTED]
Name of site:	Darent Industrial Park
Report map reference:	Map GWO 5e: Darent Estuary (West) to Erith Saltings
Route sections on or adjacent to the land:	GWO-5-S042 to GWO-5-S045
Other reports within stretch to which this representation also relates	N/A
<p>Summary of representation:</p> <p>The report does not take into consideration the fact that opening a route along the coastal path will allow not only legitimate interest, but could also invite unwelcome attention from persons with no interest in simply walking a coastal route. Of specific concerns are:</p> <ul style="list-style-type: none"> • Disturbing the wildlife, in general and around breeding seasons • Trampling of the vegetation in the area • Fly-tipping. This is already a considerable issue and keen to avoid any scenario that would add to issue • Potential impact on the flow of ditches/dykes in the area which the Industrial Park relies on for escape of water. 	
Natural England's comment:	

The proposed route from Darent Estuary (West) to Erith Saltings (Map GWO 5e) follows an existing public footpath. It is also a nationally promoted cycleway (NCN1) and the promoted Thames Path Extension Route. The latter is promoted both on the Transport for London and the Long Distance Walkers Association websites.

The route is a well maintained gravel footway which is a dual use cycle path. Although we do not expect a dramatic increase in use, we acknowledge that there may be more users if the public footpath becomes the Coast Path. However, we would expect the great majority of long-distance walkers to be responsible and respectful of the local environment and focused on the views of the Rivers Thames and Darent.

Disturbing the wildlife and trampling vegetation

[REDACTED] has not been specific as to which habitats and species may be disturbed by the Coast Path proposals. The habitats adjacent to GWO-5-S042 to GWO-5-S045 are not within a nationally designated wildlife site, however the Tidal Thames and Crayford Marshes, both locally designated wildlife sites, include the intertidal habitats and the seawall, respectively, in this area.

The mudflat and saltmarsh within the Tidal Thames site is proposed to be excluded from new coastal access rights, as it is not suitable for walking. Given the small increase in access and the existence of a well maintained gravel path through Crayford Marshes, it is unlikely that significant numbers of new users will stray from the path to disturb or trample either of these local wildlife sites. During the development of the England Coast Path we consulted with London Wildlife Trust who did not raise any concerns about our proposals.

Fly-tipping

We recognise that fly-tipping may be an issue across this area of Erith, however this anti-social activity is usually carried out by people using vehicles to deposit items adjacent to quiet and isolated roads (such as those leading to the Darent Industrial Park Estate, evidence 5A), and is unlikely to be motivated by the presence of walking routes. We are not aware of any evidence that where the use of existing promoted routes as the line of the England Coast Path produces any significant effects on incidents of anti-social behaviour. Indeed it seems likely that the presence of law-abiding citizens may have some reducing effect on such behaviour.

Potential impact on the flow of ditches

There are no plans to install significant infrastructure in this area as part of the Coast Path, aside from waymarkers and other signs. New users of the Coast Path or the maintenance of the surfaced trail in this area are also very unlikely to impact on the potential flow of the local dykes/ditches. [REDACTED] may be referring to fly-tipping in the ditches and dykes significantly inland from the seawall (see supporting evidence 5A and 5B), and subsequent effects on drainage for the industrial park. If this is the case, we do not believe that our proposals will increase incidents of fly-tipping, as explained above.

Relevant appended documents (see Section 5):

5F: Photograph provided by [REDACTED] showing fly-tipping and associated blockage of the dyke system in the area as referenced.

5G: Natural England's identification of the fly-tipping site in the Darent Industrial Park in relation to the Coast Path.

Representation ID:

MCA/GWO5/R/3/GWO1172

Organisation/ person making representation:	Dartford and Crayford Creek Restoration Trust/ [REDACTED]
Name of site:	Mouth of River Darent where it meets the Thames
Report map reference:	Map GWO 5a: Dartford Marshes to Darent Estuary (East)
Route sections on or adjacent to the land:	GWO-5-S005
Other reports within stretch to which this representation also relates	N/A
<p>Summary of representation:</p> <p>The Dartford and Crayford Creek Restoration Trust is dedicated to restoring the navigation of both Dartford and Crayford Creek, as well as litter picking the banks, keeping the footpaths clear, helping in the interpretation of the rich heritage of the two creeks.</p> <p>The Trust positively welcomes the enhancement and promotion of the footpaths and the route in GWO 5.</p> <p>The Trust is aware that there is a long term desire to have a shortcut at the mouth of the creek, and whilst the Trust is not opposed to that, would urge that any shortcut adequately addresses the current freedom of passage for yachts and other vessels. There are regular yachts visiting the creek and the Trust is keen to regenerate the wharves in Crayford Creek as a centre for youth training, apprenticeships and a space for historic vessels to be based. Any future obstruction at the mouth of the creek would affect the current usage and render any future regeneration of the creek impossible.</p>	
<p>Natural England's comment:</p> <p>Natural England welcomes the Trusts supportive comments for the route published in GWO 5: Dartford Marshes to Erith Saltings.</p> <p>There are no plans currently by stakeholders to propose a crossing. However if the project were to gather momentum then Natural England work constructively with all parties to ensure any proposals take account of our coastal access objectives in this area.</p> <p>Natural England met with stakeholders in 2018 to explore the feasibility of a shared-use crossing over the River Darent, which could accommodate the England Coast Path. Whilst most stakeholders were supportive of the project, there were still significant constraints to implementation which hadn't been resolved at the time of publication which included, <i>inter alia</i>, a defined minimum height necessary to maintain navigation rights in the Darent and Cray.</p> <p>As we have referenced in the Overview Report (Chapter 7: Future Changes), if this crossing is developed in the future then we would then consider re-aligning the trail to follow the crossing.</p>	

<p>Relevant appended documents (see Section 5): 5H: Dartford and Crayford Creeks – Creek Vision 5I: Dartford Creek Masterplan 5J: Dartford and Crayford Creek Restoration Trust Presentation, Dec 2016 5K: Photo of the River Darent Flood Barrier 5L: Photo of the air draft requirement for vessels on the River Darent</p>

Representation ID:	MCA/GWO5/R/4/GWO0223
Organisation/ person making representation:	Shell Pensions Trust Limited/ [REDACTED]
Name of site:	Thames Road Industrial Estate
Report map reference:	Map GWO 5c: Dartford Creek to Crayford Creek
Route sections on or adjacent to the land:	GWO-5-S020 to GWO-5-S023
Other reports within stretch to which this representation also relates	N/A

Summary of representation:
Shell Pensions Limited is the freehold owner of GWO-5-S023 and also land eastwards of this section. They are not clear whether other sections of the proposed trail on map 5c will also cross their land.

Safety of pedestrians
At present, there are minimal pedestrian movements in this area (notwithstanding that there is an existing footpath). There are vehicle and HGV movements within this area. It is not clear what steps have been taken to secure pedestrian safety and if visibility splays and zebra crossings will be secured as part of the proposals. At present there are no such crossings over the interchange road.

Responsibility for installation, replacement and maintenance of proposed ECP infrastructure
It is not clear who will be responsible for these costs, but Shell would not expect to have that responsibility. Shell is also concerned that they will be burdened with increased costs in respect of additional cleaning, works to secure pedestrian safety, such as lighting and visibility improvements.

Proposed Mitigation
Shell commenced discussion with Natural England but these have not been concluded in any way which addresses Shell’s concerns. Shell remains willing to continue these discussions. These concerns could be mitigated by confirmation from Natural England about what specific safety measures will be adopted for this section of the coastal path; and confirmation from Natural England that Shell Pensions Trust Limited will not be responsible for any capital, replacement or ongoing maintenance costs associated with the proposed coastal path.

Natural England’s comment:
The proposed route near Shell’s landholdings from Dartford Creek to Crayford Creek (Map GWO 5c) follows existing public footpaths and other public rights of way. The

Coast Path remains seaward of the industrial estate owned by Shell and there exists a fence line that clearly separates the industrial estate from the Coast Path at GWO-5-S020 to GWO-5-S023.

Safety of pedestrians

Although we do not expect a dramatic increase in use, we acknowledge that there may be more users if the public footpath becomes the Coast Path. Near the industrial estate, the Coast Path is aligned on pavements which separates walkers from the HGV traffic. Where the Coast Path crosses a side road (at the southern end of GWO-5-S023), the Coast Path follows dropped kerbs and has good visibility of the adjacent dual carriageway in order to cross the side road safely. In accordance with section 4.2.4 of the Coastal Access Scheme we have sought advice from the highway authority regarding the position of the road crossing. During many site visits with London Borough of Bexley they have raised no concerns regarding the safety of users along this trail as there are pavements, good visibility and the Coast Path follows existing routes.

We understand from discussions with Shell in 2017 that their principal concern was twofold:

- regarding people walking in the road adjacent to GWO-5-S023 instead of along its pavement,
- the existence of the Coast Path would attract more visitors from the urban area of Crayford, south of the dual carriageway, A206, (adjacent to GWO-5-S025), and that a new zebra crossing should be installed over the A206 to mitigate for this risk.

Natural England considers that by providing clear signage, visitors will want to follow the pavement along GWO-5-S023 rather than walk in the road with HGV traffic. Our proposals in this area follow existing highway pavements and public footpaths and do not cross the busy dual carriageway A206 adjacent to GWO-5-S025. Whilst we understand that a new pedestrian crossing in this area would benefit connectivity with the Coast Path, we do not consider a new zebra crossing is necessary for the safety of the trail. We have advised Shell to liaise directly with the London Borough of Bexley to discuss any opportunities to support highway improvements and pedestrian crossings in this area.

Responsibility for proposed ECP infrastructure

The responsibility for the installation and ongoing maintenance of the proposed England Coast Path infrastructure lies with London Borough of Bexley and not affected landowners.

Representation ID:	MCA/GWO Stretch/R/3/GWO1196
Organisation/ person making representation:	Private Individual
Name of site:	Whole stretch
Report map reference:	

Route sections on or adjacent to the land:	
Other reports within stretch to which this representation also relates	GWO 1, GWO 2, GWO 3, GWO 5, GWO 6
Summary of representation: [REDACTED] is a member of the public and a walker. They highlight that: <ul style="list-style-type: none"> • It would be a very positive step to improve access in this way, enabling people to understand and enjoy the estuarine Thames as it meets the sea. • The Thames Path finishes at the Thames Barrier so the Coastal Path would enable people to properly follow the Thames to the sea. • They are in favour of the proposal. 	
Natural England's comment: Natural England welcomes [REDACTED] supportive comment, as it recognises the additional recreational benefit of the Grain to Woolwich proposals to connect to the existing Thames Path National Trail and ensure there is a Source to Sea trail along the River Thames (see Overview Report Chapter 5(e)(iii) on recreational benefit).	

Representation ID:	MCA/GWO Stretch/R/5/GWO0195
Organisation/ person making representation:	Port of London Authority/ [REDACTED]
Name of site:	Whole stretch
Report map reference:	
Route sections on or adjacent to the land:	PLA Land within Grain and Allhallows, and Foreshore up –to mean high water (which affects coastal margins) for the full stretch of the Grain to Woolwich route
Other reports within stretch to which this representation also relates	GWO 1, GWO 2, GWO 3, GWO 5, GWO 6
Summary of representation: The PLA supports the proposed Grain to Woolwich England Coast Path stretch. The PLA shares Natural England's ambition to create a national trail by the River Thames from its source out to sea, at Grain and supports joining the Thames Path with the Coastal Path in order to achieve this. This is one of the PLA's aims as set out within its Thames Vision (2016). <u>Directions within the coastal margin</u> The PLA is pleased to note that the majority of the foreshore that is unsuitable for public access has been restricted from access under S25A. They also note that restrictions under S25A are reviewed every 5 years and would like reassurances that that the foreshore would remain restricted from public access after 5 years and that the PLA would be consulted on any changes.	

Public Right of Way (GWO 1 and Cliffe)

A query is raised as to whether Natural England will establish a right of way in this area, and what preparations would be made.

Access preparation period

The PLA is concerned that they would not benefit from reduced occupier liability until the end of the access preparation period. Clarity is requested regarding the period of preparation for coastal access rights, in order to address PLA's concerns over occupiers' liability during this time.

Fencing and notices at Cliffe and Allhallows

The PLA have asked for fencing and notices at Cliffe and notices at Allhallows to protect livestock, prevent people straying off the path and keep dogs to leads.

Indemnity, risk assessments and signage (a number of legal points have been raised by the PLA over these issues, so the representation text is written out in full below, rather than summarised. Key points have been put in bold)

In terms of signage, and in line with section 305 of the Maritime and Coastal Access Act 2009, there is a restriction on the duty of care owned by Natural England, particularly under s.305(1)(b) – i.e. the failure to erect signs and notices warning of obstacles or hazards, under para 6, Schedule 20 of the Act. This is of concern to the PLA as they are subject to a new public right of access over their property under the Coastal Margin and the exception under section 305 appears to heavily reduce Natural England's responsibility with regards to their own scheme. **For Natural England to impose such a charge over landowners yet contemporaneously seek to absolve itself of a duty of care to such landowner is of concern.** More clarity is needed on this point.

The PLA is concerned about the onerous task of being required to carry out extensive risk assessments over its property to erect signs and notices. As it seems to be discretionary for Natural England to erect signs or notices, and when they do there is no duty of care, the PLA would have the burden of ensuring any signs or notices are properly installed and furthermore they are installed where necessary. Considering the extent of the proposed coastal margin over the PLA's property this is no small task. **If Natural England wishes to move forward with this proposal the PLA will need an assurance that notices and signs will be erected by Natural England in accordance with the PLA's requirements and if costs are incurred by the PLA, Natural England will contribute towards such expenditure.**

The PLA could also receive a claim in respect of an accident involving a defect on the path, which did not have any signs erected. Whilst it is accepted that Natural England can seek refuge under Section 305 of the MCAA 2009, the PLA would simply be arguing a reduced/ nominal duty of care. In light of this, **the PLA considers that it will be necessary to enter into an arrangement with Natural England in relation to the erection/maintenance of notices and signs.**

Reduced liability (a number of legal points have been raised by the PLA over these issues, so the representation text is written out in full below, rather than summarised. Key points have been put in bold)

The points raised within Natural England's previous submissions in relation to liability are noted. There have also been a number of discussions between Natural England and the PLA on this matter.

In principle, it is the PLA's view that occupier's liability will be reduced pursuant to the Countryside and Rights of Way (CROW) and Marine and Coastal Access (MCA) Act. The caveat to that is that the PLA doesn't know the full extent until there is a claim. **The PLA can interpret the statute as best it can, however this does not always offer the protection that is necessary, and can often be misinterpreted.** For example, there are objects on PLA land which may or may not fall into the category of 'any physical feature'. We also note the CLA guidance states "*So whether a physical feature is man-made or natural, there is normally no liability for a risk resulting from its existence while coastal access rights are in force on the land in question*". Our emphasis on 'normally'.

Furthermore it is not guaranteed that the PLA would be completely absolved of any wrong doing if there was a significant safety risk on PLA land (whether the PLA knew or not) if the person involved/injured was using that feature (e.g. gate or stile) by its proper use. The reduced liability does not apply if the PLA is seen as being reckless, which in our view can be a particularly subjective term. Coupled with the issues surrounding signs and notices as mentioned above **there is a significant concern over the PLA's liability.**

Therefore, despite continuous dialogue with Natural England, it still stands that the PLA will have an increased amount of pedestrian traffic on its land and there is no guarantee that the PLA would be covered by the acts mentioned above. There will almost certainly have to be an increased amount of governance/risk assessment with regards to the areas included in the Coastal Margin. It is of note that if any pedestrian strays outside the coastal margin, the full force of occupier's liability will apply; the risk involved is members of the public will have access to PLA private property where they would not otherwise have if the Coastal Margin were not in existence **The PLA will require more protection against public access on its private property than an arbitrary boundary on a map; It will need to be made abundantly clear that the public are not allowed access to any PLA property outside the coastal margin.** This should also apply to any hazardous areas along the route. The PLA is particularly conscious that if there is any suggestion of an invitation to any member of public they would be classed as a visitor and the PLA will be subject to a higher duty of care.

Rollback proposals

The proposals are understood, and the PLA seeks early discussion over any implementation of rollback on their land.

Wharves and operational activities

- The PLA seeks to ensure that development around 'protected wharves' does not adversely affect them, and supports the proposed inland route in the vicinity of Northfleet Wharf, Old Sun Wharf, Lion Wharf and Johnson's Wharf.
- They consider it essential that appropriate fencing and signage is erected adjacent to the Clubbs Marine Terminal to advise of the industrial nature of the area to ensure public safety.

- There are a number of other operational activities, which are not safeguarded but that could be disrupted by the proposed route; the coastal margin should not interfere with the operational needs of any landowner. The PLA agrees that in these instances other arrangements should be made.

Public transport opportunities

There is an opportunity to promote the use of the River for passenger transport, close to Woolwich ferry and passenger piers. There may also be opportunities to promote other river transport in the future, for example the Thames Clipper between Gravesend and central London.

Natural England's comment:

We welcome the positive engagement from the Port of London Authority during the development of our proposals and their supportive comments.

Directions within the coastal margin

The mudflats and saltmarsh along the Thames are largely excluded from coastal access rights, particularly as the RNLI and Coastguard indicated that people have had to be rescued from these areas. Although we cannot pre-empt the future consideration that will be given to this issue at the time of the statutory review of directions, it would seem unlikely that these intertidal areas would become more suitable for public access over time.

As with any statutory review of directions, the Local Access Forum will be consulted at the time.

Public Right of Way (GWO 1 and Cliffe)

Natural England proposals secure a route around the English coast, which is a mapped trail line rather than a traditional 'public right of way'. Coastal access rights along the trail and within the associated coastal margin of the Grain to Woolwich reports will only come into force after each report has been approved by the Secretary of State (SoS) and the new access rights brought into effect by a commencement order on a date decided by the SoS.

Access preparation period

The Access Preparation Period is the period between approval of NE's proposals by the SoS and the coming into force of coastal access rights over the trail and margin. The period exists so that any necessary establishment works can be undertaken on the trail, and any other necessary preparations made, before any new rights come into effect. That being so, the occupier's liability regime remains unchanged during the Access Preparation Period.

It would not have made sense for the modification of the reduced occupiers' liability to have been triggered before the related access rights apply. It is clear from section 1(6A) of the Occupiers Liability Act 1984 that the modified liability applies 'at any time when the right conferred by section 2(1) of the Countryside and Rights of Way Act 2000 is exercisable'.

Fencing / notices at Cliffe and Allhallows

The trail crosses PLA owned land at both Allhallows and Cliffe. In both of these areas, the trail follows the existing coastal public footpath. Along parts of this route, the trail is

along the top of the seawall and the coastal margin extends landward to the base of the bank – where a distinct water-filled borrow dyke separates the inland grazing marshes from the trail. In our view, new fencing alongside the trail is not appropriate as walkers will continue to utilise the path in much the same way as they do now and generally not stray inland off the promoted route, with its sea views. The public are also familiar with encountering livestock along existing public footpaths in the countryside and the Countryside Code’s advice to keep dogs on a lead around farm animals. Given the existing use and status of the public right of way we do not consider additional signage is required along these parts of the route.

Indemnity, risk assessments and signage

The indemnity at section 305 of the Marine and Coastal Access Act was enacted by Parliament when the 2009 Act was being passed. Safety was a key consideration during the passage of the Act and is also highlighted within The Scheme (section 4.2), where a key principle is that visitors should take primary responsibility for their own safety when visiting the coast and for the safety of any children or other people in their care, and should be able to decide for themselves the level of personal risk they wish to take. In line with this principle, our approach to risk management is light touch, aiming to minimise any safety measures that would be restrictive on public enjoyment and instead align the trail carefully, with safety and convenience in mind. Our powers to erect fences, notices etc are used very sparingly, to warn or protect people from dangers that could not reasonably be foreseen. Limited use of signs along the trail and in the margin maximises their impact and effectiveness and reduces their aesthetic impact on the natural environment.

The courts are alert to the need to avoid burdening landowners with the need for signage, fencing etc, particularly in view of section 1A of the Occupiers Liability Act 1984, which says:

‘In determining whether any, and if so what, duty is owed by virtue of section 1 by an occupier of land at any time when the right conferred by section 2(1) of the Countryside and Rights of Way Act 2000 is exercisable in relation to the land, regard is to be had, in particular, to —

- (a) the fact that the existence of that right ought not to place an undue burden (whether financial or otherwise) on the occupier,
- (b) the importance of maintaining the character of the countryside, including features of historic, traditional or archaeological interest, and
- (c) any relevant guidance given under section 20 of that Act.’

The ‘relevant guidance’ in c) refers to the Countryside Code, part of which says:

- You’re responsible for your own safety and for others in your care – especially children - so be prepared for natural hazards, changes in weather and other events.
- Wild animals, farm animals and horses can behave unpredictably if you get too close, especially if they’re with their young - so give them plenty of space.
- Check weather forecasts before you leave. Conditions can change rapidly especially on mountains and along the coast, so don’t be afraid to turn back.
- When visiting the coast check for tide times on EasyTide - don’t risk getting cut off by rising tides and take care on slippery rocks and seaweed.

In light of this, we do not consider that new notices are necessary along the stretches of existing public right of way (already the promoted Saxon Shore Way) that the trail

will follow across PLA land. The Acts and Countryside Code guidance should reassure the PLA that coastal access rights should not create an additional burden on them, as a landowner.

Reduced liability

See our earlier comments under Indemnity, risk assessments and signage. Natural England considers that the CLA guidance quoted from here (which it and Defra commented on in draft while it was being prepared) represents a good overall summary of the legal effects where the special liability deal applies. Natural England has a stock of ‘End of Access Land’ symbols should the PLA require some of these to help avoid any public confusion as to the extent of the publicly accessible land within its land holdings.

Rollback proposals

If and when rollback is required, Natural England with the Access Authority, will choose a new route following discussions with landowners. Where rollback is foreseeable, early discussions with the PLA would be welcome.

Wharves and operational activities

Natural England worked with Wharf owners, including Clubb’s to agree the proposals, as outlined in the report. Clubb’s landholdings are already fenced and the proposed trail follows a well-used public footpath which is already a promoted long distance footpath – the Saxon Shore Way.

Public transport opportunities

The existing and future river transport opportunities the PLA mentioned may be of great interest to walkers of the England Coast Path National Trail. One way the PLA could promote these opportunities is through the National Trails website, which is visited by in excess of 1.3 million people per year, so it's the perfect place to advertise recreational opportunities along the both the new England Coast Path – and the existing Thames Path National Trail. Anyone can easily add information to this free website.

Relevant appended documents:

The PLA have referenced these documents which can be found online but were not sent as an appendix:

- The PLA’s [The Vision for the Tidal Thames](#) (2016)
- [Countryside and Rights of Way Act 2000](#)
- [Occupiers Liability 1984 Act](#)
- [Marine and Coastal Access Act 2009](#)

Representation ID:	MCA/GWO Stretch/R/6/GWO1199
Organisation/ person making representation:	The Inland Waterways Association (Kent and Sussex)/ [REDACTED]
Name of site:	Whole stretch

Report map reference:	
Route sections on or adjacent to the land:	
Other reports within stretch to which this representation also relates	GWO 1, GWO 2, GWO 3, GWO 5, GWO 6
<p>Summary of representation:</p> <p><u>Navigation</u> [REDACTED] supports the proposals in principle. However, the Overview report should include a statement that its proposals would not in any way restrict or harm commercial or recreational navigation and boating nor would it affect rights of access to the water, including moorings, wharfs and slipways.</p> <p><u>Ingress Pier - Map GW04b (S013 and S014) (and 'Overview Document' p32):</u> The Crest-Nicholson planning application (EDC/16/0067) to place a building between the River and a re-routed public footpath should be refused by EDC as it destroys the continuous River view. How can such inconsiderate development be prevented along other sections of the proposed trail?</p>	
<p>Natural England's comment:</p> <p>Natural England welcomes [REDACTED] support for the Proposals.</p> <p>Much of the land used for commercial or recreational navigation and boating would be excepted from new coastal access rights, if covered by buildings or their curtilage (or any of the other categories of land listed in Figure 1 of the Coastal Access Scheme). These provisions generally address concerns about the introduction of coastal access at particular sites. Our discussions with landowners and stakeholders (such as the Port of London Authority) during the preparation of the proposals, did not identify the need for any more specific interventions to manage access around boating facilities.</p> <p>The proposals would not affect other existing rights of access to water, wharfs and slipways. Where coastal access rights apply in the coastal margin, such as on slipways, this will be in addition to any other existing right of access or activity permitted by the landowner (para 2.4.13 Coastal Access Scheme). The new rights do not affect navigation rights or moorings in open water and we are not proposing any infrastructure which may obstruct navigation, or rights of access to the water, along the Thames or its tributaries.</p> <p>We did not consider it necessary to specifically note navigation and boating within the Overview, as we have taken full account of this alongside many other types of land use along the Thames.</p> <p><u>Ingress Pier</u> In accordance with paras 5.5.4 - 5.5.7 of the Coastal Access Scheme, coastal access rights do not prevent any land from being developed or redeveloped in the future. The determination of planning application EDC/16/0067 is decided by the local planning authority and not Natural England. Natural England will work constructively with</p>	

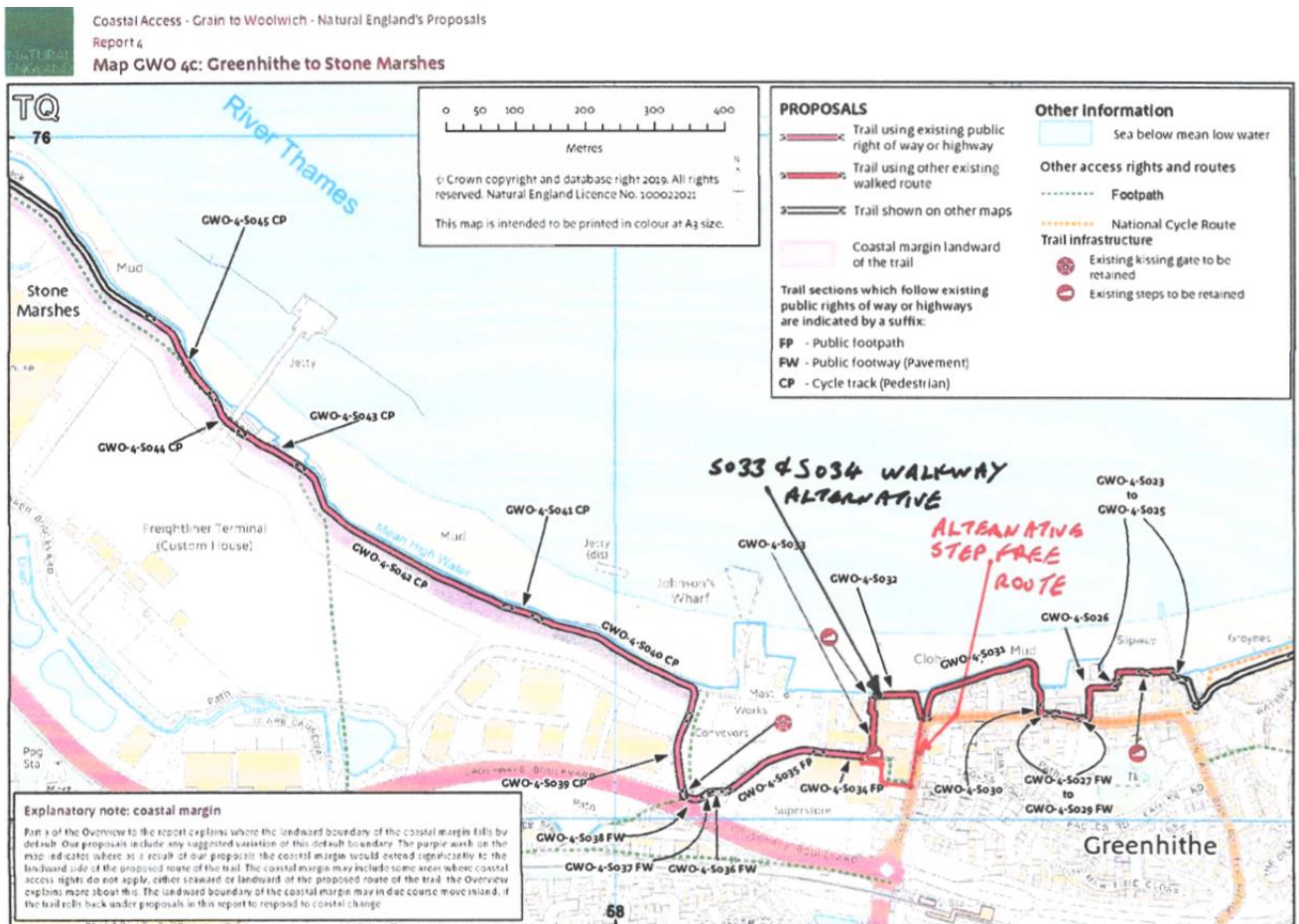
planners and developers with the aim of ensuring that planning proposals take account of our coastal access objectives in this area.

5. Supporting documents

- 5A MCA/GWO4/R/2/GWO0048: Letter to Natural England giving an alternative solution

This letter has been redacted from this record due to containing personal information.

- 5B MCA/GWO4/R/2/GWO0048: Map GWO 4c: Greenhithe to Stone Marshes with alternative route marked



- 5C MCA/GWO46/R/2/GWO0048: notes of a meeting on 01 July to discuss the issue on site

These notes have been redacted from this record due to containing personal information.

- 5D MCA/GWO4/R/2/GWO0048: Accessibility Note: Document highlighting the variations in disabled guidelines between Government Service manuals and the Natural England Accessibility Statement 4.2.8 & 4.2.9

Natural England Coastal Path

Accessibility Note

Report GW04

Accessibility:

4.2.8 There are few artificial barriers to accessibility on the proposed route. However, the natural coastal terrain is often challenging for people with reduced mobility and this is the case on sections of our proposed route because:

- The trail would follow an uneven grass or bare soil path around Swanscombe Peninsular;
- There are steps in places where it would be necessary to ascend/descend.

4.2.9 At various locations, existing steps and some path surfaces will be improved, so as to make them easier to use. We envisage this happening as part of the physical establishment work described below.

See part 6a of the Overview - 'Recreational issues' - for more information.

Gov.uk – Service Manual

Your service must be accessible to everyone who needs it. If it isn't, you may be in breach of the [Equality Act 2010](#).

This means you need to start thinking about how users might access and use your service before you design or build anything.

Accessibility is about making sure your service can be used by as many people as possible. Thinking about this from the beginning will help you:

- make sure that nobody is excluded
 - find out earlier if any parts of your service aren't accessible - problems usually cost less to fix if you find them early
-

- 5E MCA/GWO4/R/2/GWO0048 Note on raising an objection and representation at the junction GWO-4-S032 and GWO-4-S03

Natural England Coastal Path

Report GW 04 Section S032 to S034

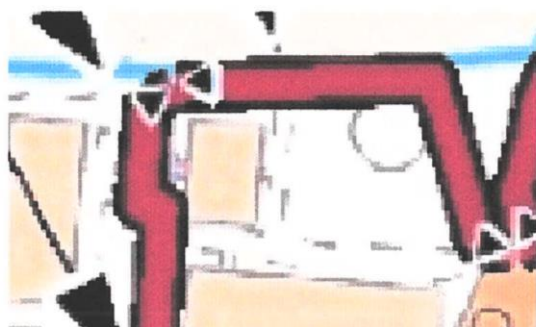
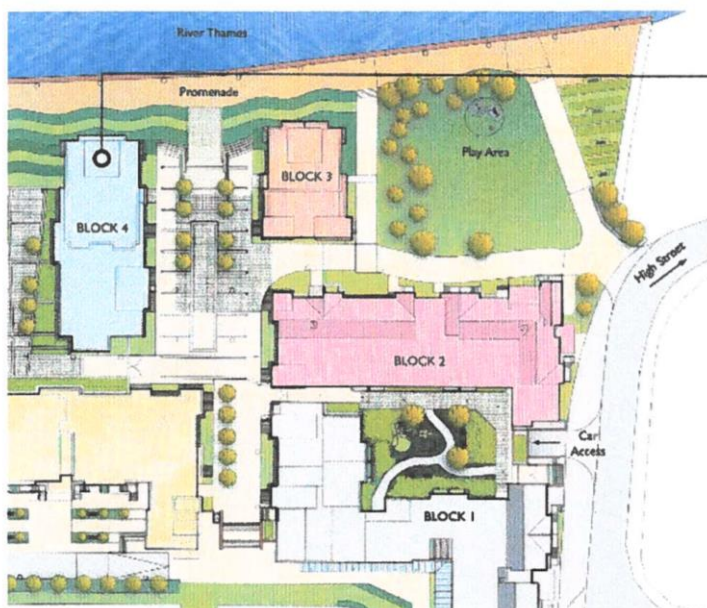
Location of GWO-4-S033 as it joins GWO-4-S032

Continuity Court (Freehold) Ltd has raised an objection based on the lack of disabled access on its land as the proposed route (as S 033 turn inland).

Natural England has pointed out that the land boundary between Blocks 3 & 4 (see diagram below) is offset towards block 3. However the published map clearly shows their proposed route adjacent to block 3 at the inland edge.

In the event that Natural England contends the proposed route skirts Continuity Court (Freehold) Ltd land the same point is raised as a Representation.

Furthermore the site was developed as a single entity and the path is used and treated as one pathway, so an objection is correct.



- 5F MCA/GWO5/R/1/GWO0066 Photograph showing fly-tipping and associated blockage of the dyke system in the area as referenced



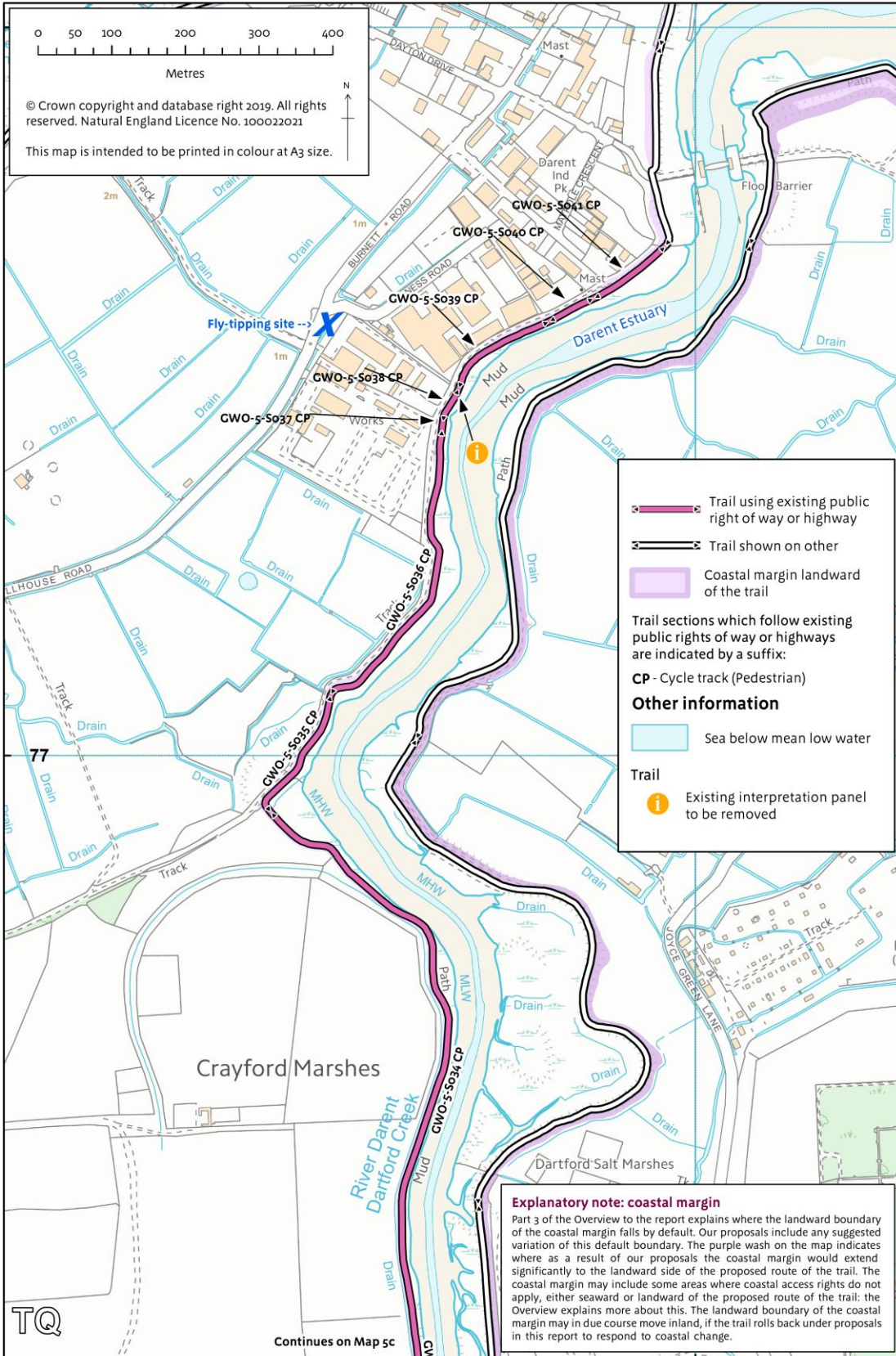
- 5G MCA/GWO5/R/1/GWO0066 Natural England's identification of the fly-tipping site in the Darent Industrial Park



Coastal Access - Grain to Woolwich - Natural England's Proposals

Report GWO 5

Natural England's identification of the fly-tipping site in the Darent Industrial Park in relation to the Coast Path



- 5H MCA/GWO5/R/3/GWO1172 Dartford and Crayford Creeks – Creek Vision



Creek Vision

Dartford and Crayford Creeks

Context – a green/blue corridor between development zones

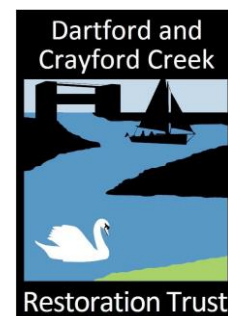
Both Bexley and Dartford Boroughs have identified “opportunity areas” along Thames and either side of the Green Belt corridor along the Creeks.

This vital corridor provides wild open space to balance increasingly built-up areas and the loss of undeveloped waterfronts.

This area is potentially very accessible on foot or cycle from Crayford, Dartford and Slade Green

It already links to established routes: Cray Riverway, Darent Valley Path, Thames Path, Green Chain Walk and National Cycle Network.

It’s importance for flood management and ecology is identified in the 2006 study “Managing the Marshes” and in 2012 the “All London Green Grid” Section 5.

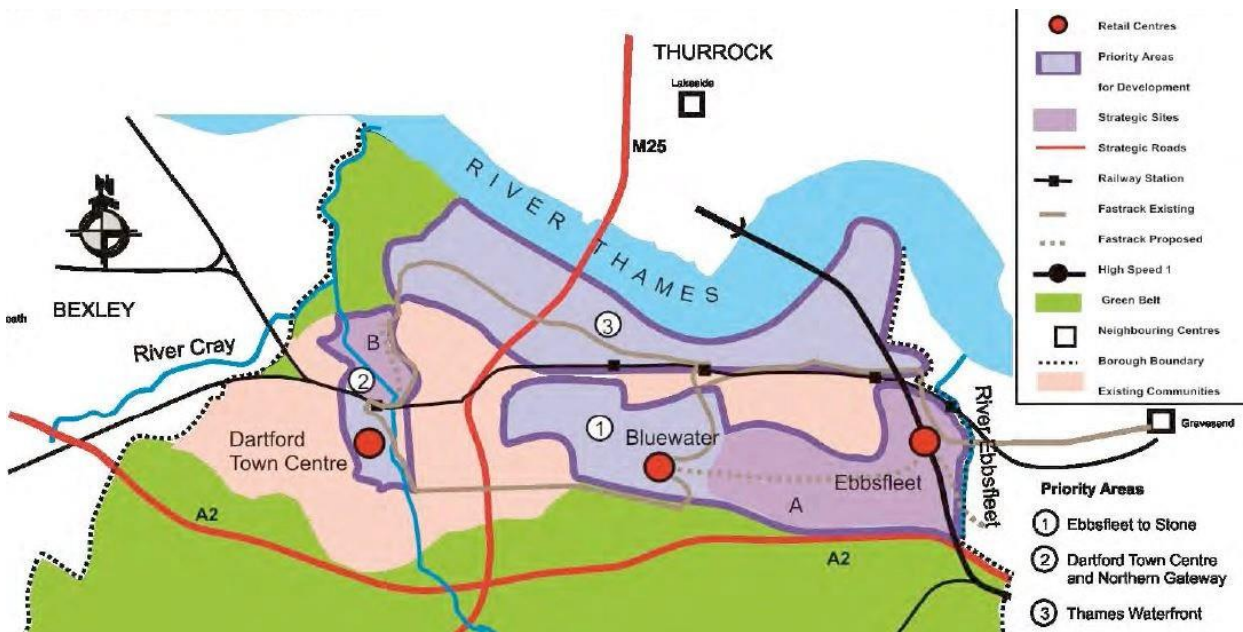


the

Opportunities for stimulating interest and engagement with the green/blue environment and heritage for a wide catchment area.



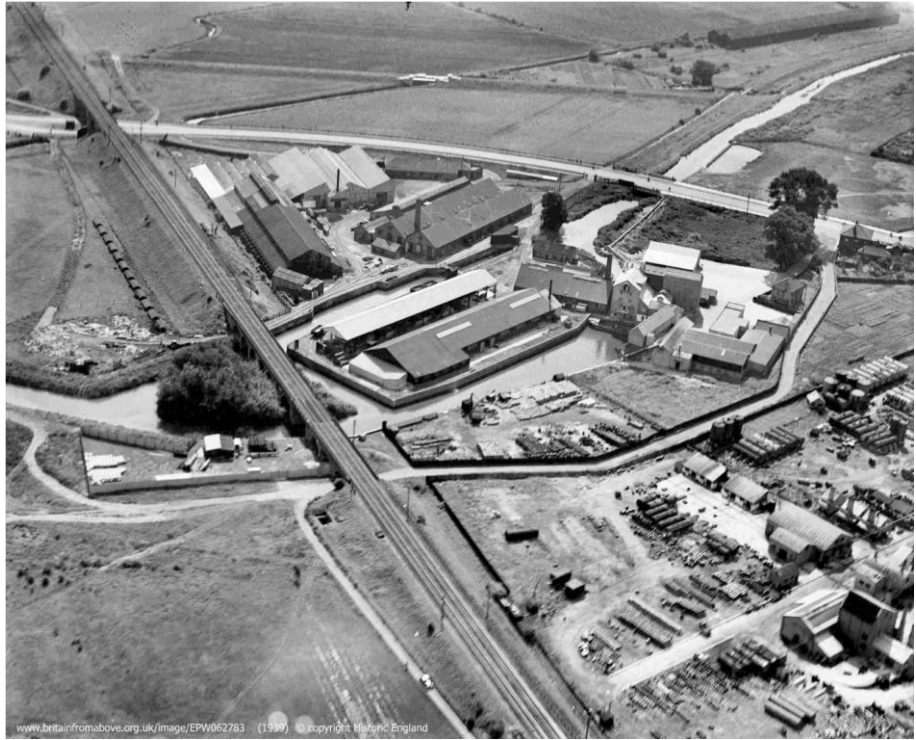
From Bexley Growth Strategy 2017 fig.6 showing the focus of new development



From Dartford Borough Council "Strategic Issues Consultation 2018" / "Core Strategy 2011"

**Crayford Creek
1939**

The Tucker Armoured Plywood Co Ltd Creek Mill Ply Works and Crayford Flour Mills 1939. Looking south towards Thames Road



**Crayford Creek
2016**

Creek and basins.
Looking south towards Thames Road

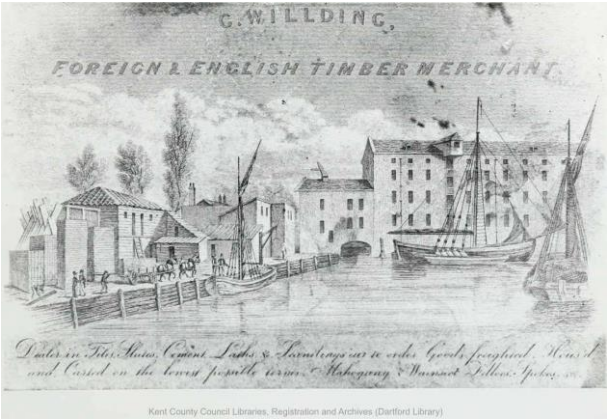


**Crayford Creek
2016**



Dartford Creek c.1830

G. Willding trade card. Foreign and English timber merchants



Dartford Creek 1921

Mill Pond and Burroughs Wellcome Chemical Works in foreground



Dartford Creek 2018

Long term

Suggested objectives for Crayford and Dartford Creeks that could evolve over a period of time.

Active waterways

Over the last 4 years a wide variety of boats have visited the Creeks with many of their owners making positive contributions to the locality as well as providing interest for passers-by.



The Trust proposes the progressive provision of boating facilities:

Returning the historic wharves and slipway to use mooring bollards/rings
Safety improvements electrical, water and sewage pump-out facilities.



Waiting buoys at the mouth of the Creek



This image has been redacted due to containing personal information

Ecological enhancement of wharf walls.



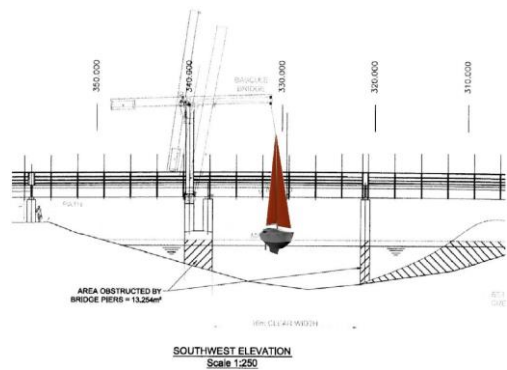
Creation of "Little Venices" in the more urban reaches

Ensuring that new bridges do not compromise navigation on the Creeks.

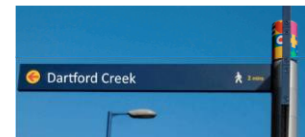
Removal of silt at selected locations

Restoration of Dartford Lock and possible impounding to raise the water level upstream.

Business and training opportunities as waterfront sites become available: stimulated by visiting boats providing maintenance and craneage.



Signing from towns and local neighbourhoods to the creeks. Seating / bins
 Visiting boats as businesses / gallery / performance or exhibition space.



Creating opportunities for getting afloat and enjoying a different experience through getting up close to the Creeks
 Training in the safe and responsible use of small water craft
 Seasonal river trips



Waterside events

Raising the level of amenity creates a "local destination" for residents reducing the frequency of longer road journeys to reach more distant destinations.

Negative perceptions of neglected post-industrial areas can be turned around



This image has been redacted due to containing personal information

Training and involvement of local communities and voluntary groups for ongoing maintenance. Planting and cultivation

Control of invasive species.

Clearing litter and rubbish in and around waterways

Public realm, education

Allowing quiet enjoyment within defined areas to protect an improving natural environment.

Information boards / publications to reveal the extensive variety of features along the Creeks:

Industrial heritage

Wharfage

Iron / timber mills paper / flour/ linseed / mustard mills brick and cement works barge building, pharmaceuticals tannery Joyce Green Aerodrome Ammunition works Howbury Manor Moated site The Long Reach Tavern Hospital ships



Create a Creek Visitor Centre / heritage / environment / education / café / toilets / training / water activity centre / boat house and slipway.

Essex Wildlife Trust / Cory Environmental Trust Visitor Centre at Stanford-le-Hope Deptford Creek Discovery Centre



Legacy for the 22nd century

Investigate opportunities for re-forestation in suitable locations (possibly on the restored landfill site to the south of Crayford Marshes) as a community project for bio-diversity contributing to the "Great Thames Park" (Thames Estuary 2050 Growth Commission). Referencing the lost "Petrified Forest" on the Thames foreshore at Erith where the remains of 15 different species of tree and shrub have been identified including alder, oak, poplar, elm and yew that had existed around 4500 years ago prior to increased tidal range and rising sea levels.



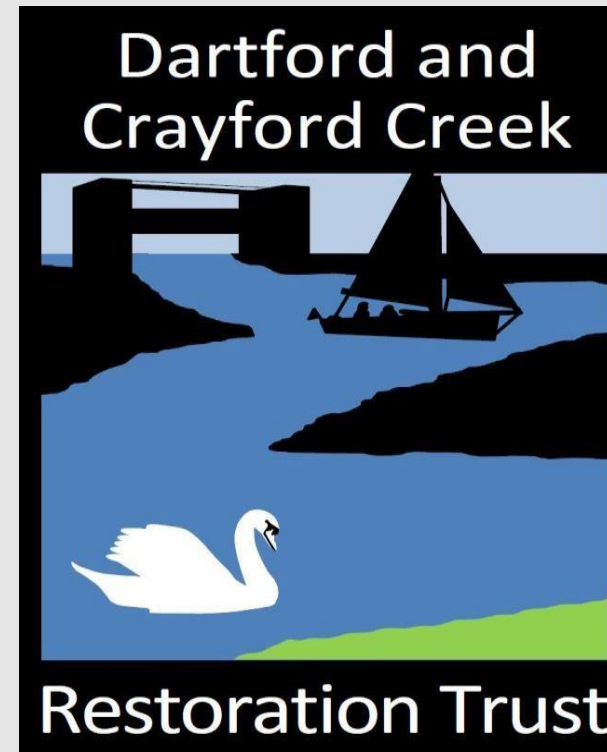
Appendix 1
 DARTFORD CREEK short / medium term



- 5I MCA/GWO5/R/3/GWO1172 Dartford Creek Masterplan

This page has been redacted due to containing personal information.

5J MCA/GWO5/R/3/GWO1172 Dartford and
Crayford Creek Restoration Trust
Presentation, Dec 2016



OBJECTIVES

Navigation

Ensure that developments by others are not detrimental to navigability of the Creeks.

Promotion and improvement of the Creeks as a destination / short term mooring for visiting leisure craft.

Care of the Creeks through community effort

Education / Appreciation of the natural environment and

CRAYFORD CREEK



BENEFITS FOR BEXLEY BOROUGH

Re-discovering and raising the profile of Crayford Creek as a significant asset.

Contributing to Crayford's identity.

Celebrating social and industrial heritage.



BENEFITS FOR BEXLEY BOROUGH

Vitality:

Crayford Creek as a focal point for community inspiration, engagement and involvement. Opportunities for conservation and education programmes.

Encouraging outdoor activity:

walking, cycling, running, fishing, canoeing, wildlife watching, photography, art, picnicking. For individuals, families, clubs and other networks.

Creating a destination called “Crayford Creek”:

an active river and well-maintained footpath to enhance the area as a destination.



This page has been redacted due to containing personal information.

POTENTIAL IMPROVEMENTS

Provision for moorings and landing at West (Vitbe) Basin



Safety measures: life rings, information/emergency contact signing.



POTENTIAL IMPROVEMENTS

Headroom gauges and depth gauges at Flood Barrier and Network Rail bridge.



Waiting Buoys at Thames entrance.



Navigation channel markers.

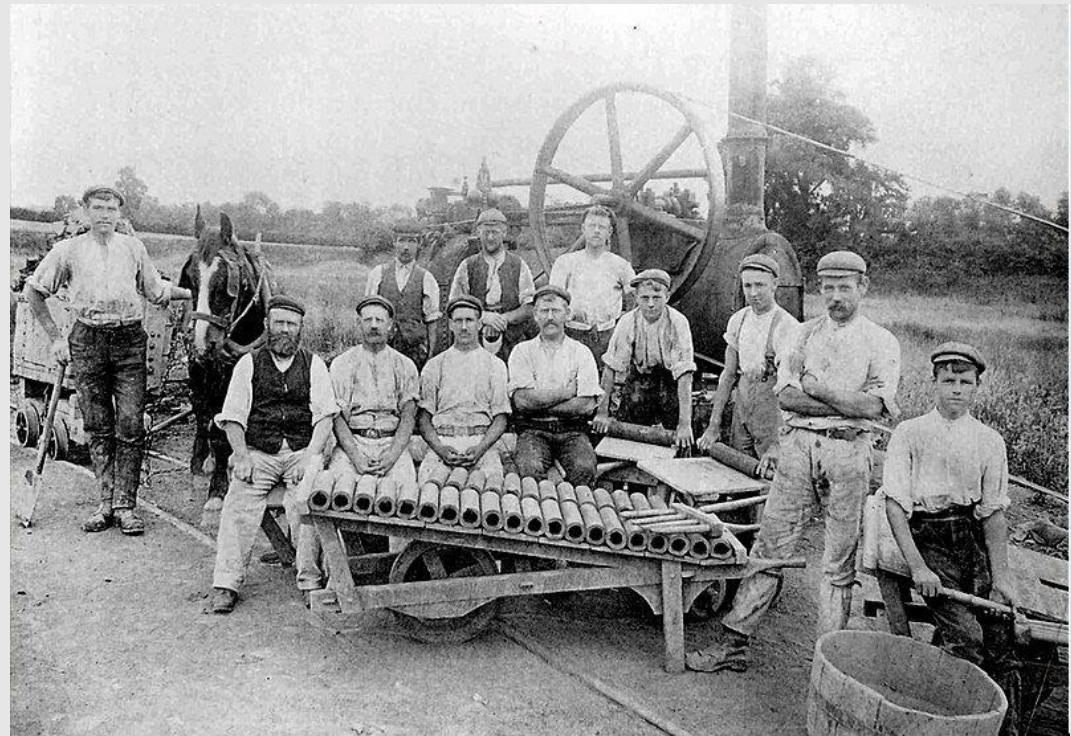


EDUCATION / PROMOTION

Community involvement:
audio histories, historical
research, flora and fauna
identification and monitoring.

Educational resources for local
schools:
environment, social history,
geography.

Connections between Creek,
Thames and Sea:
tides, transport, ecology,
pollution.

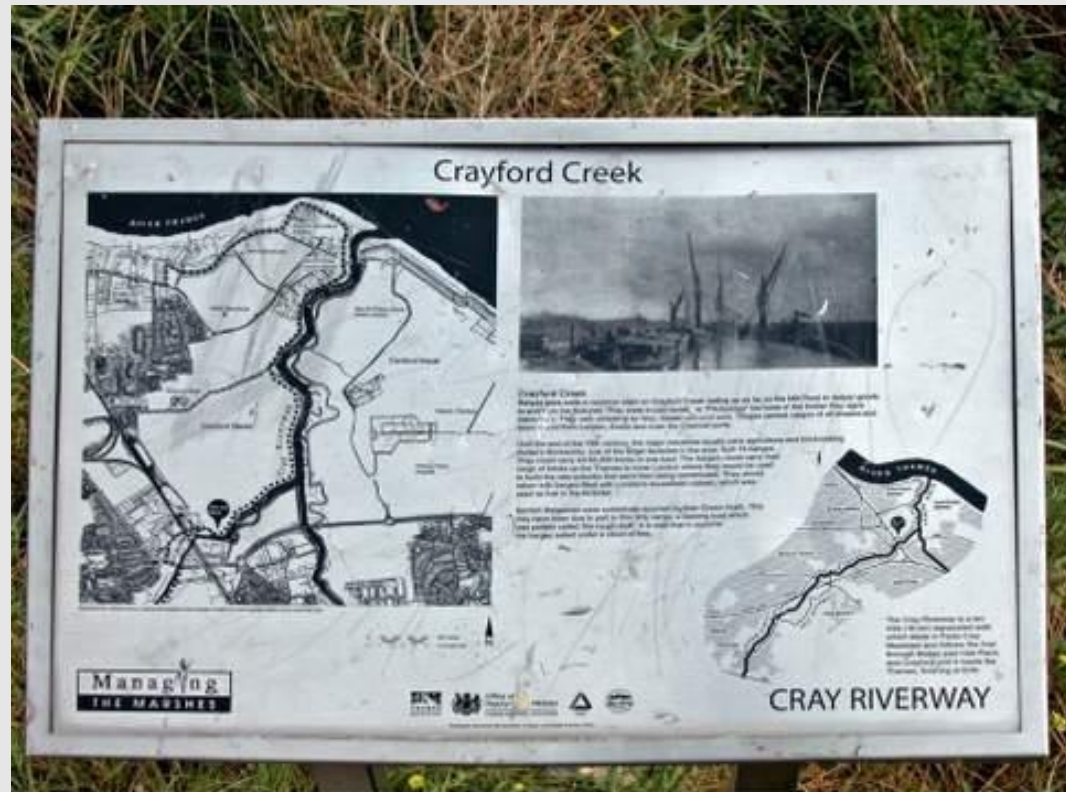


EDUCATION / PROMOTION

Signing to Crayford Creek



Reinstating missing heritage / ecology information boards.



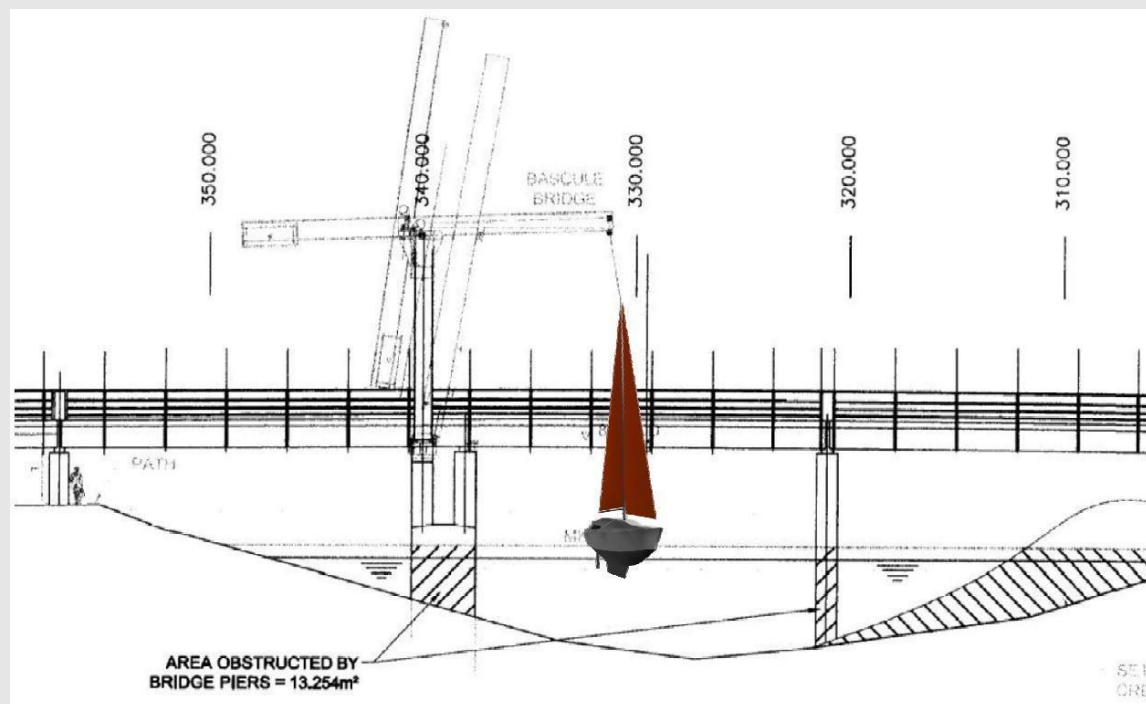
NEW LOCAL DEVELOPMENT

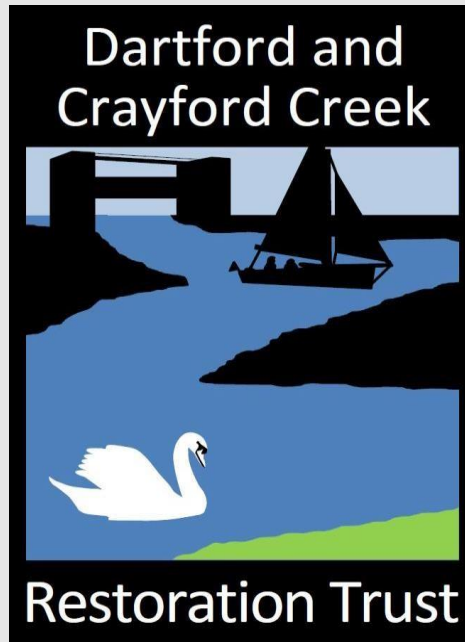
Dartford and Crayford Creek Restoration Trust as a partner in development.

Navigation unhindered by Thames Path bridge.



Navigation headroom for proposed freight terminal bridge





Thank you

- 5K MCA/GWO5/R/3/GWO1172 Photo of the River Darent Flood Barrier

This photo has been redacted as it contained personal information

- 5L MCA/GWO5/R/3/GWO1172 Photo of the air draft requirement for vessels on the River Darent

