

Evidence for the Land Use in England Inquiry

Introduction

Thames Crossing Action Group (TCAG) represent thousands of people who are opposed to the hugely destructive and harmful, not fit for purpose £8.2bn proposed Lower Thames Crossing (LTC). More info on us and our concerns and issues with the proposed LTC can be found on our website www.thamescrossingactiongroup.com.

This paper was prepared and submitted by Laura Blake, Chair of TCAG on behalf of the group in response to the Land Use in England Inquiry¹ on 20th April 2022. TCAG can be contacted via email – admin@thamescrossingactiongroup.com.

Reason for submitting evidence

As a group we feel very strongly and have serious concerns about the impact the proposed Lower Thames Crossing would have on our health and well-being, people's lives, homes, our communities, and the environment and biodiversity.

As well as of course the impacts to the land in and surrounding our communities. The impacts to greenbelt², woodlands³ (including ancient woodland), the fens, marshes, flood plains⁴, countryside, and Area of Outstanding Natural Beauty (AONB)⁵, and agricultural land⁶ (including grade 1 listed land).

It is for this reason that we felt it important that we respond to this consultation. We hope that our comments will be helpful and our voice will be heard as a representative of many members of the public who have concerns for many different reasons about the proposed LTC and other similar projects. We need the Government to hear us, and we need to see actions to back up the talk of ensuring a sustainable healthy future for all, which cannot happen if you continue to allow hugely destructive and harmful projects like the proposed LTC to go ahead.

¹ <https://committees.parliament.uk/committee/583/land-use-in-england-committee/news/161808/how-should-we-respond-to-increasing-demands-on-land/>

² <https://www.thamescrossingactiongroup.com/ltc-greenbelt-destruction/>

³ <https://www.thamescrossingactiongroup.com/impacts-of-ltc-on-forests-and-woodlands/>

⁴ <https://www.thamescrossingactiongroup.com/flooding-and-the-ltc/>

⁵ <https://www.thamescrossingactiongroup.com/ltc-impacts-to-area-of-outstanding-natural-beauty-aonb/>

⁶ <https://www.thamescrossingactiongroup.com/ltc-impacts-on-farming/>

Evidence

Pressures and challenges

1. What do you see as the most notable current challenges in relation to land use in England? How might these challenges best be tackled? How do you foresee land use in England changing over the long term? How should competing priorities for land use be managed?

1.1 - The biggest threat to land in England at this time is the huge amount of development, including hugely destructive and harmful road projects like the proposed £8.2bn Lower Thames Crossing.

1.2 - This along with the fact that nobody is monitoring the cumulative impacts of so many developments is having on our land in this country.

1.3 - We cannot simply keep destroying our land for the sake of development, especially development such as the proposed LTC which is not fit for purpose.

1.4 - More attention needs to be given to the impacts of these kinds of developments, including cumulatively. Now more than ever we need to be giving more importance to our food security, climate change, and the natural environment.

1.5 - As things stand now there is way too much development and proposed development, and if it continues even short term, let alone long term, the consequences will impact us greatly in a very negative way.

1.6 - Land use should be prioritised by its value towards a healthy sustainable future. This means more protection for farmland to be farmed in a sustainable manner, to ensure the best quality and levels of food security for our country, and also in the best way possible for the natural environment.

1.7 - Nationally Significant Infrastructure Projects (NSIPs) should no longer be treated any differently when it comes to their impacts to our land use and biodiversity. No more projects like the proposed LTC, which would be hugely destructive and harmful on so many levels, being pushed through just because it is deemed an NSIP. What is more nationally significant than ensuring a healthy sustainable future for all?

2. What are the key drivers of land use change which need to be planned for, and how should they be planned for? What is the role of multifunctional land use strategies in implementing these plans?

2.1 - The only changes to land use that needs to be considered and planned for as those that save and protect land for the betterment of a healthy sustainable future for us all. All too often financial gain appears to be the driver for land use changes, this has to be addressed and corrected. Sustainability, the natural environment and biodiversity have to be the key drivers in all decision making when it comes to the future of

our country, including land use. We cannot simply keep allowing more and more destructive and harmful projects.

3. How might we achieve greater and more effective coordination, integration and delivery of land use policy and management at a central, regional, local and landscape level?

3.1 - The problem at the moment is that each development project is considered alone. However, with so many different developments around the country we are seeing more and more destruction, harm, and loss to our valuable land.

3.2 - At present there is too much conflict between different organisations, departments, etc. One project/dept proposing one thing, whilst another is doing the complete opposite.

3.3 - There is too much priority given to so called NSIPs. What is more significant these days to the whole nation than climate change?

3.4 - We need a central department mapping all proposed developments throughout the country, and strategy and policy needs to be in place to take the cumulative impacts into account. Policies need to be updated to incorporate better protections for our land.

3.5 - We also need to ensure that as well as joined up thinking we have actions to back up all the talk. All too often we hear Government talking about doing this, that, and the other, but how often do we see real actions that result in truly positive change, especially when it comes to protecting the environment?

3.6 - There needs to be joined up thinking and actions from local through to national level. There needs to be a Minister or department to oversee and co-ordinate with all the relevant organisations and people. Better communications and listening more to NGOs and the public.

Farming and land management

4. What impacts are changes to farming and agricultural practices, including food production, likely to have on land use in England? What is the role of new technology and changing standards of land management?

4.1 - Projects like the proposed LTC, and many other different types of development have a huge negative impact on farming and agricultural practices, including food production. We're told we need new roads, like the proposed LTC, to move HGVs full of food and supplies that have been imported from overseas around our country. Yet our country could and should be far more self-sufficient in growing our own food. We cannot destroy our agricultural land with things like road projects to enable imported food to be transported long distances, with increased environmental impacts, when we can and should be using the land to grow food more locally. We need to put more importance on ensuring sustainable local farming for our country's food security and supplies.

Nature, landscape and biodiversity

6. What do you see as the key threats to nature and biodiversity in England in the short and longer term, and what role should land use policy have in tackling these?

6.1 - Development and so called economic benefit/growth are huge threats to nature and biodiversity in England. Land use policy needs to tackle this on all levels for all development, including NSIPs, to ensure a healthy sustainable future, and to save and protect our land, nature and biodiversity. Policy needs to take into account the true value of our land and biodiversity, and prioritise it over financial economic growth/value. Without a healthy sustainable planet to support us, clean water, and food to eat what use is money?

7. What are the merits and challenges of emerging policies such as nature-based solutions (including ecosystem and carbon markets), local nature recovery strategies and the biodiversity net gain requirement? Are these policies compatible, and how can we ensure they support one another, and that they deliver effective benefits for nature?

7.1 - One of the biggest issues is attempts to greenwash these huge projects⁷. Also, that there is the fact that there is a never ending spiral of land take. With projects such as LTC, because it is so hugely destructive more land is needed and taken as 'mitigation'. Not that you can ever truly mitigate such destructive projects. Where does it end?

7.2 - Translocation of species to areas that already have healthy ecosystems cannot be expected to continue to take more and more translocated species. How would we like it if more and more people came to live in our home? How would we feel if the supermarket couldn't get any more stock regardless of how many new customers it got? This is what happens with more and more land being taken, more species being translocated.

7.3 - With biodiversity net gain there is also the issue of how trustworthy ecology surveys are that are carried out to assess a baseline of biodiversity in an area. Who is to say whether baseline surveys are true representations and adequate representations? Who is to say whether 'biodiversity' actually results in a true net gain? Biodiversity cannot be used as a get out jail free card by developers, because there is always a cost in one form or another.

7.4 - Buying biodiversity credits or allowing mitigation etc to be located elsewhere to suit the needs of the developer should not be allowed. Any mitigation must be adequate and in close proximity to where the loss and harm is being inflicted.

7.5 - We cannot allow more and more land to be developed, especially when there are other alternatives available. Where does the end of land take for mitigation end? As soon as you take land to mitigate for one

⁷ <https://www.thamescrossingactiongroup.com/he-community-woodland-nothing-to-do-with-ltc/>

thing, more land is needed to mitigate that land loss and so the downward spiral continues, with more and more land and all the associated biodiversity is impacted.

7.6 - National policies need to be reviewed and updated to ensure they are kept up to date with new requirements and legislation. Co-ordinated and joined up thinking and actions are needed. We currently have one Government body/strategy working to do one thing, whilst another is working against it. For instance we hear lots of talk about Government targets to plant trees, at the same time as way too many trees are being potentially lost if projects like the proposed LTC go ahead.

7.7 - When discussing reviewing and updating policies we also need to ensure that whilst that is happening the policies are being suspended. This is not the case currently, and it is simply allowing too many projects to be pushed through the process, and to be examined upon outdated policies which are not compliant with UK law and commitments. This should not be allowed.

Environment, climate change, energy and infrastructure

8. How will commitments such as the 25-year environment plan and the net zero target require changes to land use in England, and what other impacts might these changes have?

8.1 - 25YEP includes aspects such as:

- Clean air
- Clean and plentiful water
- Thriving plants and wildlife
- Reducing harm from environmental hazards
- Using resources from nature more sustainably and efficiently
- Enhancing beauty, heritage and engagement with the natural environment
- Mitigating and adapting to climate change

8.2 - And obviously Carbon Net Zero by 2050.

8.3 - All these points and more are the reasons why we so strongly opposed the proposed Lower Thames Crossing, because it is so hugely destructive and harmful, on top of the fact it would not be fit for purpose.

8.4 - The proposed LTC alone would exceed the proposed new levels for PM2.5 and worsen air quality in areas that already suffer with illegally high levels of air pollution. It would pollute the watercourses in the vicinity of the proposed route. It would destroy and negatively impact plants and wildlife. It would destroy and negatively impact greenbelt, ancient woodland, agricultural land (including grade 1 listed land), and so much more. It certainly wouldn't enhance anything, would have a negative impact on heritage, and greatly impact engagement and enjoyment of the natural environment on so many levels. There is absolutely no way that the destruction and harm of such a project could be mitigated. And as it is estimated to emit over 5 million tonnes of carbon, on top of all the other destruction and harm it would be completely irresponsible and unethical to progress with such a project at any time, let alone in a time of climate emergency. It has to be stopped.

8.5 - We need to better assess the use of land and environmental impacts with immediate effect to ensure these commitments that Government have made are reached if not improved upon. This means we need to assess the cumulative impacts to land. A road here, a road there. A housing development here, a housing development there. A solar farm here, and solar farm there. They all mount up, and there are more sustainable options for all that have less impact on our valuable land and environment. We cannot allow so many hugely destructive and harmful projects as is currently being proposed to go ahead.

8.6 - We need to prioritise the natural environment over economic growth and benefit. Especially since often the estimated economic growth and benefits don't actually materialise with these huge and destructive projects.

9. How should land use pressures around energy and infrastructure be managed?

9.1 - Just because a project is given a Nationally Significant Infrastructure Project (NSIP) status does not mean it should be allowed to overrule or supersede the commitments to climate change and the natural environment.

9.2 - First and foremost the priority has to be protecting the natural environment, because unless we do everything else will be pointless. Try counting your money when there is no clean air to breathe! A healthy sustainable future has to be our priority.

Conclusion

12. Which organisations would be best placed to plan and decide on the allocation of land for the various competing agendas for land use in England, and how should they set about doing so?

12.1 - We need joined up thinking and actions to back up the words from Government. It is therefore vital that there is a Minister or similar to oversee, map, monitor and co-ordinate between various departments and organisations to ensure the safeguarding of our land.

12.2 - We need action NOW to stop the destruction and harm to our country's land use for development. We need to be taking into account the true value of our land, and to save and protect it to ensure a healthy and sustainable future for all. We need to stop projects like the proposed LTC.

Thank you for allowing us the opportunity to present our paper to you in relation to this public inquiry. We hope you will find it of interest and helpful to all aspects on which you were seeking evidence. Please don't hesitate to contact us should you wish to discuss further.