

TCAG Environmental Targets Consultation Response

Introduction

Thames Crossing Action Group (TCAG) represents thousands of people who are strongly opposed to the proposed Lower Thames Crossing (LTC). The £8.2bn LTC would be hugely destructive and harmful; it would not meet the project objectives, and is not fit for purpose.

This paper was prepared and submitted by Laura Blake, Chair of TCAG on behalf of the group in response to the Environmental Targets Consultation¹ on 30th April 2022. TCAG can be contacted via email – admin@thamescrossingactiongroup.com. We do not need our response to be confidential.

Reason for submitting evidence

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

We definitely agree that we need a world-leading Environment Act to ensure a health sustainable future for all.

Having reviewed the proposed targets in the consultation materials we felt it essential to respond, as sadly we do not feel that the targets are anywhere near ambitious enough.

Not only are we living in a time of climate emergency, but we know the true extent of the impacts of the hugely destructive and harmful proposed £8.2bn LTC. It is essential for us to continue fighting LTC and doing all we can to ensure a healthy and sustainable future, including doing all we can by responding to this consultation in the hope of a better future for all.

¹ <https://consult.defra.gov.uk/natural-environment-policy/consultation-on-environmental-targets/>

Responses to consultation questions

Target proposals for biodiversity on land

- Increase species abundance by at least 10% by 2042, compared to 2030 levels.
- Improve the England-level GB Red List Index for species extinction risk by 2042, compared to 2022 levels.
- Create or restore in excess of 500,000 hectares of a range of wildlife-rich habitats outside protected sites by 2042, compared to 2022 levels.

6. Do you agree or disagree that the proposed combination of biodiversity targets will be a good measure of changes in the health of our 'biodiversity'?

- Disagree

7. [If disagree] What additional indicators do you think may be necessary?

These targets are not in line with the Government's 25 Year Environment Plan (25YEP) promise to leave future generations with a natural environment that is in a better condition.

The 25 Year Environment Plan included a target for 75% of Sites of Special Scientific Interest (SSSIs) to be in good condition by 2042, but that is a non-statutory, non-binding target. This target has not been included in the proposals.

The Government should set a wildlife target to increase the abundance of species (marine and terrestrial) by at least 20% by 2042 over 2022 levels.

The target to increase the abundance of wildlife by 10% by 2042 over 2030 levels is too weak and uncertain. It could mean that wildlife is less abundant by 2042 than it is now, after another decade of decline. This falls short of the promise to pass on nature in better condition.

The target for 500k hectares of habitat creation/restoration is a gross figure and doesn't take into account net losses, so we could see an overall loss.

Government cannot continue to push ahead with hugely destructive and harmful projects like the proposed Lower Thames Crossing. The proposed targets are poor as is, when you take the loss that will continue to arise from projects like the LTC, if it goes ahead the future becomes even bleaker. We need and deserve better.

2030 and long-term species abundance targets

- Halt the decline in species abundance by 2030.
- Increase species abundance by at least 10% by 2042, compared to 2030 levels.

8. Do you agree or disagree with the level of ambition of a 10% increase proposed for the long-term species abundance target?

Disagree

9. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

We again draw attention to the fact that projects like the proposed LTC need to be stopped. You are attempting to set targets to improve species abundance with one hand, and then threatening to proceed with hugely destructive and harmful projects like the proposed LTC with the other hand.

We need more actions to back up the talk. We need better protections for nature, and for these new targets to have had any chance of improving things Government must halt all projects like the proposed LTC that would create irreparable damage and harm.

Long-term species extinction risk target

- Improve the England-level GB Red List Index of species extinction risk by 2042, compared to 2022 levels.

10. Do you agree or disagree with the ambition proposed for the long-term species extinction risk target to improve the England-level GB Red List Index?

Disagree

11. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

Whilst we support improvements to protect and assist nature, we need more than lists being improved, we need actions to ensure more species do not need to be added to the list, and that species on the list can recover enough to be taken off the list.

The level of ambition we need is actions to ensure that we shouldn't need such a list because we are protecting and enabling nature to recover.

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We need to see changes that mean that species that are on the list are truly protected at all levels, including from NSIPs. We always say you could find something so rare (extinct) as a Dodo and National Highways (and other developers) would still just say they would translocate it.

We cannot keep allowing projects that destroy nature and habitats to be destroyed and negatively impacted. How can we expect any species to ever make it off of the list when we continue to destroy so much?

Environmental mitigation of these huge projects will never be adequate. How can it be? All that is happening is more and more of the little nature we have left is being squeezed into smaller and smaller pockets.

How would we like it if more and more people came to live in our homes? How would we like it if our supermarkets got lots more customers and were unable to source more stock for the shelves? This is ultimately what we are doing to the natural environment every time we allow another project to proceed.

Whilst it is important to have such lists, they need to serve as a form of protection to species on all levels (including from NSIPs), there have to be actions to ensure that species can recover well enough to be removed from the list.

Long-term wider habitats target

- To create or restore in excess of 500,000 hectares of a range of wildlife-rich habitat outside protected sites by 2042, compared to 2022 levels.

12. Do you agree or disagree with the level of ambition of 'in excess of 500,000 hectares' proposed for the long-term wider habitats target?

Disagree

13. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

The target for 500k hectares of habitat creation/restoration is a gross figure and doesn't take into account net losses, so we could see an overall loss.

Government cannot continue to push ahead with hugely destructive and harmful projects like the proposed Lower Thames Crossing. The proposed targets are poor as is, when you take the loss that will continue to arise from project like the LTC, if it goes ahead the future becomes even bleaker. We need and deserve better.

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14. Do you agree or disagree that all wildlife-rich habitat types should count towards the target?

- Agree

15. [If disagree/Don't know] Are there any habitat types that you think should not count towards the target?

- N/A

16. What reasons can you provide for why these habitats should not count towards the target?

Please provide reasons why these habitats should not count towards the target.

There are no reasons that any kind of habitat should not count towards the target, because we need to protect and support all biodiversity and habitats for a healthy sustainable future.

However, that is not to say that we should only concentrate on already biodiversity rich areas, the balance and spread of biodiversity rich habitats should stretch across the whole country and not be limited to areas that are already highly protected, we need an overall improvement.

Target proposals for biodiversity in the sea

- 70% of the designated features in the MPA network to be in favourable condition by 2042, with the remainder in recovering condition, and additional reporting on changes in individual feature condition.

17. Do you agree or disagree with the level of ambition proposed for the Marine Protected Area target?

Don't know

18. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

Whilst our remit as a group representing those opposed to the proposed LTC does not technically cover any area of sea, it does cover the Thames Estuary area. The Estuary has marine species present, and we believe that such areas should be given a level of protection too. Such areas are often left as almost no-mans-land without

anyone really taking ownership in regards to species protection, as too often in the Thames Estuary the priority is business and trade, as opposed to nature.

Abandoned Metal Mines

19. Do you agree or disagree with the level of ambition proposed for an abandoned metal mines target?

Don't know - Since this aspect is in no way relevant to our objectives as a group we decline to comment.

20. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

N/A

Nutrient Pollution

21. In addition to the proposed national target, we would like to set out ambitions for reducing nutrient pollution from agriculture in individual catchments. Do you agree or disagree that this approach would strengthen the national target?

Don't know - Since this aspect is in no way relevant to our objectives as a group we decline to comment.

22. [If disagree] Why don't you think ambitions for reducing nutrient pollution from agriculture in individual catchments will strengthen the national target?

N/A

23. [If agree] Why do you think ambitions for reducing nutrient pollution from agriculture in individual catchments will strengthen the national target? What factors should the government consider when setting these ambitions?

N/A

Nutrient pollution from wastewater

24. The target needs to allow flexibility for water companies to use best available strategies to reduce phosphorus pollution, including the use of nature-based and catchment-based solutions. Do you agree or disagree that the proposed target provides this flexibility?

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Don't know - Since this aspect is in no way relevant to our objectives as a group we decline to comment.

25. [If disagree] What reasons can you provide for why the target doesn't give this flexibility?

N/A

26. Do you agree or disagree with the level of ambition proposed for the nutrient targets?

Don't know - Since this aspect is in no way relevant to our objectives as a group we decline to comment.

27. [If disagree] What reason can you provide for why government should consider a different level of ambition?

Please provide reasons for why government should consider a different level of ambition.

N/A

Water Demand

- Reduce the use of public water supply in England per head of population by 20% by 2037.

28. Do you agree or disagree with the level of ambition proposed for a water demand target?

Disagree

29. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

We don't believe that water protections should be limited to only demand issues. Where are the targets for ensuring we don't keep seeing our water polluted by waste, sewage, and pollution from other means, including PM2.5?

The target outlined for water demand should not only be set for households, but also companies too.

The proposed LTC would use large amounts of water for the tunnel boring machines and many other aspects of construction if it goes ahead. If it does go ahead it would also add to the pollution levels of our rivers and watercourses. PM2.5 from the traffic would end up in our water, impacting not only humans but also nature. The LTC tunnels would also have pump discharge into the River Thames, which again

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would have PM2.5. Water pollution as well as demand is a serious issue that we need to fact and address.

We also need to consider the changes that projects like the proposed LTC bring to our water levels, the impacts they bring to the environment, not only with pollution, and water consumption, but also their impact on things such as flooding².

Now more than ever we need to be doing all we can to ensure we address climate change, we cannot keep pushing ahead with such hugely destructive and harmful projects as the proposed LTC. We need to do all we can to slow down and reverse the damage that has been done as quickly as possible, otherwise the severity of climate change is only going to worsen and that includes things like erratic weather patterns which also impact our water supply.

It is not as simple as putting the onus on households as suggested in the target, there is far more to it. Government need to take more responsibility, and ensure that their plans and projects are not having negative impacts. Again we state that the proposed LTC should be stopped.

Target proposals for woodland cover

- Increase tree canopy and woodland cover from 14.5% to 17.5% of total land area in England by 2050.

30. Do you agree or disagree with the proposed metric for a tree and woodland cover target?

Disagree

31. Do you agree or disagree that short rotation coppice and short rotation forestry plantations should be initially excluded from a woodland cover target?

Agree

32. Do you agree or disagree with the proposed inclusion of trees in woodlands, as well as trees in hedgerows, orchards, in fields, and in towns and cities?

Agree

33. Do you agree or disagree with our proposed level of ambition for a tree and woodland cover target?

Disagree

² <https://www.thamescrossingactiongroup.com/flooding-and-the-ltc/>

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34. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

These targets are not ambitious enough. More is being invested into hugely destructive and harmful projects like the proposed LTC than in tree planting and protection.

We need targets that will help us reach Carbon Net Zero by 2050. We need targets that help stop the decline in nature by 2030. We need targets that help us clean up the air we breathe.

The proposed LTC would see a large loss and impact to trees, woodland, hedgerows, including ancient woodland. The estimated carbon emissions are over 5 million tonnes. It would destroy and impact the natural environment.

We need quality tree planting, native trees, trees that are best for wildlife. We need them to be well connected, to create habitats and links between existing woodlands, so nature can thrive.

We also need to see a stop to the destruction of the trees, woodland, and hedgerow that we already have. And we most definitely need to see better protection for our ancient woodland, and long established woodland.

With ancient woodland once its gone its gone, we need better protection of our woodlands at all levels (including from NSIPs) to ensure we have more tree and quality native woodland cover in the country as quickly as possible, and with no further destructive loss to the valuable existing trees and woodland.

Target proposals for resource efficiency and waste reduction

- Reduce residual waste (excluding major mineral wastes) kg per capita by 50% by 2042 from 2019 levels. It is proposed that this will be measured as a reduction from the 2019 level, which is estimated to be approximately 560 kg per capita.

35. Do you agree or disagree with the proposed scope of the residual waste target being 'all residual waste excluding major mineral wastes'?

Disagree

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36. [If disagree] What reasons can you provide for why the government should consider a different target scope?

Again any target cannot simply be putting the onus on households, it needs to be on companies etc too.

Government should also consider the impacts of waste with projects like the proposed LTC. The proposed route passes through areas where there are historic landfill sites, some of which are toxic.

We are very aware of these landfill sites, the risk they pose to the environment and our health, and also the issues of coastal erosion and the waste that gets released from these landfill sites.

How much waste would a project like LTC create? Not only through disturbing waste sites during construction, but also waste from construction. Plus if it did go ahead NH do not seem to take their responsibility to keep the road network clean. Whilst we do not condone fly tipping or littering, rubbish along roadsides is an issue that needs to be addressed.

Proposed metric for reducing residual waste

37. Do you agree or disagree that our proposed method of measuring the target metric is appropriate?

Disagree

38. [If disagree] What reasons or potential unintended consequences can you provide or foresee for why the government should consider a different method?

All the pressure is on public again, and not developers like NH with LTC. Also waste in LA areas can be from other sources, such as roads, which are not necessarily waste from local residents. Whilst we do not look favourably on fly tipping and littering, roads like the proposed LTC would see an increase in areas suffering with littering.

39. Do you agree or disagree that local authorities should have a legal requirement to report this waste data, similar to the previous legal requirement they had until 2020?

Don't know – see above

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40. Do you agree or disagree with the level of ambition proposed for a waste reduction target?

Don't know - Since this aspect is in no way relevant to our objectives as a group we decline to comment.

41. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

N/A

42. Do you agree or disagree with our proposed metric for considering resource productivity?

Don't know

43. [If disagree] What reasons, or potential unintended consequences can you provide for why the government should consider a different metric and what data exists to enable reporting for this alternate metric?

We again comment on the impacts from construction of the proposed LTC if it goes ahead. More needs to be done to ensure that proper adequate consideration is given to the consequences of projects like the proposed LTC.

44. Of the possible policy interventions described, which do you think will be most effective to meet a resource productivity target? Please specify whether these policies would be most effective if implemented nationally or regionally, and whether measures should be product or sector-specific.

- N/A

Target proposals for air quality

- Annual Mean Concentration Target ('concentration target') – a target of 10 micrograms per cubic metre ($\mu\text{g m}^{-3}$) to be met across England by 2040.
- Population Exposure Reduction Target ('exposure reduction target') – a 35% reduction in population exposure by 2040 (compared to a base year of 2018).

45. Do you agree or disagree with the level of ambition proposed for a PM2.5 concentration target?

Disagree

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46. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

As stated in the consultation documents, air pollution poses the biggest environmental risk to public health and is a particular risk to vulnerable groups, including the elderly, the very young, and those with existing health conditions. It can also impact on the natural environment, damaging habitats, impeding the ecosystem services we rely on, and contributing to climate change.

Toxic air contributes to 36,000 premature deaths every year.

The impact of air pollution costs the NHS up to £20 billion per year.

Frustratingly, the Government kept delaying this bill. Environment Minister Rebecca Pow [pledged](#) in January 2021 that "...we will achieve Royal Assent before COP26". Clearly this did not happen, so the lack of duty of care to our health and wellbeing is already being neglected. We now need targets and plans to improve air quality for everyone as a matter of urgency.

The proposed targets are again not in line with the Government's 25 Year Environment Plan (25YEP) promise to achieve clean air by:

- Meeting legally binding targets to reduce emissions of give damaging air pollutants. This should halve the effects of air pollution on health by 2030.

Note 2030 being the target year, not 2040.

The World Health Organization recommends that concentrations of PM2.5 not exceed an annual mean concentration of 5µg/m³. There is no safe level for PM2.5.

Recent research from Clean Air Fund³ and Imperial College London⁴ found that if the government implements planned environmental, transport and clean air policies, air pollution levels could fall within the recommended interim target from the World Health Organization of 10µg/m³ across most parts of the UK by 2030.

In total, the health and economic benefits, including reduced pressure on the NHS and higher productivity, could be worth up to £380bn between 2018 and 2134.

UK100, the network of local leaders across the UK committed to ambitious action of clean air, argued that the government's plan to meet WHO limits by 2040 is '*not just lacking in ambition, [but] it is a dereliction of duty*'.

³ <https://www.cleanairfund.org/publication/uk-healthy-air/>

⁴ <https://www.imperial.ac.uk/school-public-health/environmental-research-group/research/modelling/pathway-to-who/>

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The LTC Statutory Consultation was in 2018. By 2019 it was apparent that the proposed LTC route would fail against WHO-10 standards for PM2.5 as they were then.

But when concerns are raised National Highways just bats it back saying WHO standards are not legal requirement levels in UK, and ignore the fact that what they are proposing is completely detrimental to our health and wellbeing. They have since buried their head in sand, despite knowing that new air pollution levels will be enshrined in UK law by the end of Oct 2022.

Public perception is that NH and the Government are likely attempting to push the LTC Development Consent Order (DCO) application through prior to that, and then declare that they don't have to worry about it.

And it's not just the impacts to us, but also to the natural environment that need to be taken into account and addressed. PM2.5 pollutes everything since the particles are so tiny they can infiltrate everything.

We need and deserve better, we should all have the right to breathe clean air, access to clean water, and a healthy environment for all biodiversity. The Government cannot continue to push ahead with such hugely destructive and harmful projects as the proposed LTC.

We need not just targets but also genuinely robust plans to ensure legally binding targets are reached if not improved upon.

47. Do you agree or disagree with the level of ambition proposed for a population exposure reduction target?

- Disagree

48. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

- See above comments

Conclusion

In conclusion Thames Crossing Action Group believe that the proposed targets are, we're afraid, greatly lacking ambition, and are not adequate to ensure a healthy sustainable future for us or the natural environment.

Our natural environment needs to be better protected, we deserve to be able to breathe clean air, have access to clean water. The whole ecosystem is connected

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and enables our existence. We need to ensure the targets reflect this important factor.

Now more than ever we cannot simply carry on as if it is business as usual when it comes to these matters. Government cannot continue to push ahead with projects like the proposed LTC. Hugely destructive and harmful projects, especially ones that are not fit for purpose⁵ like the proposed Lower Thames Crossing should be halted immediately.

We need targets, plans, and actions to back up all the talk of an Environment Act that would be world-leading. We need a real plan to reach Carbon Net Zero. We need more ambitious protection for our natural environment. We at very least need WHO-10 standards for PM2.5 by 2030 if not sooner.

Please reconsider your proposals and ensure a truly world-leading Environmental Act that ensures a healthy sustainable future for all.

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

⁵ <https://www.thamescrossingactiongroup.com/ltc-not-fit-for-purpose/>