

Nature Recovery Green Paper Consultation

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.

Please consider the following our official response to the Nature Recovery Green Paper Consultation¹. We do not need our response to remain confidential. We are responding as a Community Action Group.

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 it is essential to restore nature and halt the decline in species abundance by 2030.

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 for ourselves and the natural environment, including doing all we can by responding to this consultation in the hope of a better future for all.

Our Response

We are afraid that we have found this consultation to be very technical rather than clear and informative as consultations really should and need to be. We have done our best to interpret the information available, and also to provide our feedback on what we feel is the relevant and important info that needs to be considered to ensure nature recovery and to halt the decline in species abundance by 2030.

¹ <https://www.gov.uk/government/consultations/nature-recovery-green-paper>

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Our Comments

If we are to look to protect nature and halt the decline in species, we need actions to back up all the talk. We need actions and protections not processes. We need decisions being made on more than what we call designated sites.

When you come down to the basics nature doesn't care what you call the site where it lives. In fact nature probably doesn't even see it as a 'site' it is habitat, it is home! The important thing is that it is healthy and protected to enable nature to thrive.

Much of the destruction and impacts on nature comes from humans and development. Some of the worst developments are Government projects, including Nationally Significant Infrastructure Projects (NSIPs). Projects like the proposed Lower Thames Crossing (LTC).

If you want to make changes to site designations we point out that a good first step would be to ensure that all important sites are protected from all development, including NSIPs. All too often the declaration of NSIP seems to equate to huge amounts of destruction and harm to our natural environment and nature. What is actually Nationally Significant is the need to protect and ensure nature recovery throughout the country.

Another NSIP in our region is the London Resort theme park. We question how a theme park can or should ever be considered nationally significant, especially when it would destroy such an important site for nature. These kinds of sites need stronger protections.

With the proposed LTC there would be so much destruction and harm on so many levels and to so many different types of important habitat.

Irreplaceable ancient woodlands for example that should be protected at all costs, as they simply cannot be replaced, they are priceless.

We need Government to back up all the talk about protecting the natural environment and biodiversity with real actions. Processes and intentions, however good, will not be good enough, we have to see action as a matter of urgency.

If you want to talk about protecting these important sites, protecting nature, and things like 30x30 then halt the hugely destructive and harmful projects like the proposed LTC.

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We're living in a time of climate emergency, and the realities of that are impacting everything, and the results of climate change are already being felt. This too has an impact on nature and the natural environment of course, as well as our own lives.

We need Government to acknowledge just how important it is, and to act accordingly. As mentioned before this is more nationally significant than many of the so called NSIPs that Government are proposing.

It concerns us that proposals include giving more power to Secretary of States, because of the risks of some politicians potentially having vested interests in certain aspects.

There should be at very least joint power, whereby the Secretary of State works with and takes advice from the likes of Natural England(NE) and/or the Office of Environmental Protection(OEP).

It is essential that these kinds of bodies are given adequate funding to ensure they have the resources needed to carry out their work and make sure the necessary actions are taken to protect nature and enable and support nature recovery.

We know from experience of dealing with the threat of the proposed LTC that with such projects there seems to be the belief that environmental mitigation will be sufficient, and translocation is acceptable, regardless. This is not and should not be the case.

Compare what we are doing with these measures to our own lives.

How would we like it if more and more people came to live in our homes? It wouldn't be deemed acceptable by us or anyone to have ever increasing amounts of people living in our homes.

Why do we consider it any different for nature? Why is it deemed acceptable to keep squeezing more and more species into smaller and smaller spaces?

How would we feel if more and more people were shopping at our regular supermarket, yet the store was unable to source any additional stock for everyone?

Again, why do we consider it acceptable to be doing this to nature? More and more species are being translocated into smaller and smaller sites that have finite resources, food supplies, and habitat for living in.

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Also when considering environmental mitigation, where does the vicious circle end? When do we stop robbing Peter to pay Paul? A project such as the proposed LTC needs land for mitigation for the loss and impacts to another section of land. That mitigation land has to come from somewhere, so how are those that lose the land for mitigation purposes compensated? Should more land be taken to mitigate the impacts to them also? Where does it stop?

In the above scenario it is not just the compensation to the land owner, it is also the impacts to nature that need to be given more consideration and taken into account.

Nature needs connectivity too, it cannot be isolated into smaller and smaller pockets if it is to survive and thrive. Many species are migratory, territorial, and/or have considerable foraging routes/areas, and/or habitats.

More importance needs to be given to the cumulative impacts of developments to the natural environment. We are seeing more and more development of various sizes, in our region. Who is monitoring the cumulative impacts of all these various projects? As far as we can see only the public, and that is becoming more and more apparent as networks such as the Community Planning Alliance grow rapidly. We see the bigger picture, but when will the Government address this and ensure adequate protections are in place?

Another issue is that with these large projects is whether adequate ecology surveys are being carried out. After all who really is able to monitor and check, especially with so much development being proposed and being carried out. NE are suffering from cutbacks, and operating with limited resources, at a time when such bodies are most needed.

Why didn't the ecology surveys of the proposed London Resort show that the site was actually so important? Why did it take campaigners to identify and fight for the SSSI status? Isn't this what ecology surveys should be about?

We have serious concerns that proper care and consideration is not being given, that adequate surveys are not being carried out. It shouldn't be up to campaigners to identify and fight for such designations and protections, we need processes and actions in place to ensure that our natural environment is protected, and cannot be put to one side for the sake of development.

This is not something that can wait, our natural environment needs us to act now and urgently.

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It is not just for the sake of wildlife either, because there is obviously the fact that we are all connected in one way or another. We need a healthy thriving natural environment to support a healthy and sustainable future.

We need our Government to lead the way and provide the protection and support to our natural environment. This is why hugely destructive and harmful projects like the proposed LTC should be halted immediately. We need a future where our natural environment is treated with the respect it deserves and is not considered as an afterthought.

Many who know the story of Easter Island, where the people kept destroying the trees and habitat to carve and transport the huge moai statues around the island, would laugh at how those people could be so silly as to destroy so much of their own island that it became uninhabitable. We could and should learn from such mistakes, yet we continue to do similar on a much bigger scale.

How can we believe that we will ever realise the ambitions to protect nature and halt the decline of nature abundance if at the same time as trying to do so, we are continuing to destroy and negatively impact so much?

Our natural environment is what is really Nationally Significant. We need to prioritise our natural environment over so called NSIPs like the proposed LTC, which is simply not fit for purpose².

We would like to thank you for the opportunity to take part in the consultation, and hope you will find our responses helpful. Should you wish to discuss any of our comments, or indeed our opposition to the proposed Lower Thames Crossing, please do not hesitate to contact us – admin@thamescrossingactiongroup.com

² <https://www.thamescrossingactiongroup.com/ltc-not-fit-for-purpose/>