

THAMES CROSSING ACTION GROUP

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Hole Farm Community Woodland Consultation

Introduction

Thames Crossing Action Group represent 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.

Reason for responding

We are responding to this consultation as we feel that since National Highways are attempting to greenwash the LTC project by association with Hole Farm Community Woodland¹ we needed to voice our concerns and comments.

Response

When National Highways first mentioned Hole Farm Community Woodland they stated publicly that it was part of their plans to improve biodiversity along their major routes.

It was also stated that Hole Farm Community Woodland would be progressed regardless of whether the proposed LTC went ahead or not.

Greenwash

We find it highly unacceptable that National Highways have attempted to greenwash the proposed LTC by associating it with the Hole Farm Community Woodland project.

There have been claims that Hole Farm Community Woodland site is next to the proposed LTC route. This is not true it is alongside the M25.

It has been described as environmental mitigation and compensation for the proposed LTC, this is again disingenuous.

¹ <https://www.forestryengland.uk/hole-farm>

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It is also misleading, unacceptable, and creative accounting to be considering the same site as a site to improve biodiversity alongside National Highways major routes, in this instance the M25, that will go ahead regardless; as well as it being considered environmental mitigation and compensation for the proposed LTC.

The Hole Farm Community Woodland Consultation document 30 Aug² misleads by suggesting that the woodland is in the LTC area. Again, this is not true. Hole Farm Community Woodland would be to the north of the junction 29 of the M25/A127, and the proposed LTC is to the south of junction 29 of the M25.

You state in the same document, "*The shared vision for this partnership between organisations is to "deliver a legacy of inspirational multi-purpose forest creation projects that will enhance and integrate the Lower Thames Crossing landscape for the environment and wellbeing".*"

There is nothing about the proposed LTC that is for the environment and well-being, the complete opposite is actually true.

It is mentioned that Hole Farm Community Woodland would be an LTC legacy. The legacy that the proposed LTC will provide, if it goes ahead, is the destruction and impacts to our natural environment, millions of tonnes of carbon emissions³ at a time of climate emergency, the loss of thousands of acres of agricultural land, increased traffic and associated congestion and pollution, and a huge bill to taxpayers' for a project that won't solve the problems at the Dartford Crossing, and is not fit for purpose.⁴

Lack of public transport access

The Hole Farm site is not easily accessible by public transport, so the creation of the woodland would result in growing numbers of additional cars on the local roads.

In particular the fact that the proposed LTC and other destructive developments are wiping out so much of the natural environment in the region, people will need to travel further afield if they wish to spend time outdoors.

The lack of easily accessibility by public transport becomes even more apparent to those impacted by the proposed LTC in Thurrock and Kent for instance.

²

https://www.forestryengland.uk/sites/default/files/documents/HoleFarm_Public_Consultation_Document_30Aug2022.pdf

³ <https://www.thamescrossingactiongroup.com/ltc-carbon-emissions/>

⁴ <https://www.thamescrossingactiongroup.com/ltc-not-fit-for-purpose/>

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Your consultation document comments on the Hole Farm site being close to the M25 and A12, again suggesting that people will use roads to visit the woodland, adding yet more traffic to the road network.

This is not a suitable location to be accessible by more sustainable travel means, such as public transport and active travel.

This aspect needs to be addressed if the woodland is progressed.

Air pollution and health impacts

More traffic as a result of the creation of the woodland, will also mean more air pollution.

You are also obviously proposing creating a woodland where people will spend time to enjoy the outdoors next to the extremely busy M25, which will also experience extra traffic as a result of the proposed LTC.

We acknowledge both the benefits to health and well-being of spending time in the great outdoors, and that trees clean the air that we breathe.

However, this doesn't stop concerns over the levels of air pollution that would be present in such close proximity to such a busy road, especially as it would be decades before the trees mature.

Tree planting

On the topic of tree planting, we are very aware that National Highways are planning on using Hole Farm as a nursery to plant trees to later be removed and relocated along the LTC route, if the road goes ahead.

We feel that the public are being misled about this, as we do not feel Forestry England have been making this fact clear.

To be making promises about tree planting for a community woodland, knowing that many are very likely going to be planted and then relocated outside of the community woodland, for the benefit of National Highways with the LTC, if it goes ahead, is disingenuous to say the least.

We also question whether there will be attempts to claim tree planting more than once. For example, would you be claiming the original tree being planted for Hole Farm, and then recounting it as a new tree plant if it is then relocated for the benefit of the LTC?

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It has also not been made clear where all the trees would come from, and on what scale and time frame they would be planted.

Biodiversity

We are aware that ecology surveys had not been completed when the relevant public workshops took place.

Considering the project was originally billed as being to improve biodiversity along National Highways major routes, in this case the M25, we are concerned and question how National Highways can make such a claim without having completed ecology surveys for baseline data.

How can you/National Highways state you will improve biodiversity even knowing what the baseline already is?

The consultation document mentions the baseline ecology survey. Yet it appears to be predominantly a desktop survey. This means that it may not be a realistic representation of the biodiversity in reality.

If the project goes ahead, it is essential that every care is taken to ensure no harm is done to the existing wildlife on and visiting the site.

Also, if National Highways and Forestry England claim to care about biodiversity and the natural environment we again ask how they can propose and support such a hugely destructive and harmful project as the proposed LTC?

Nitrogen deposition

We know from the LTC Local Refinement Consultation that nitrogen is one of many concerns about the proposed LTC and its impacts on the natural environment.

By proposing a new woodland so close to the M25 and all the traffic is it really an area that is suitable for a community woodland to thrive, or will it suffer from the effects of nitrogen deposition? What protections will be put in place?

Agricultural impacts

At a time when food security is as serious national issue we question the loss of any agricultural land.

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We have concerns that nobody is monitoring the cumulative loss and impacts to agricultural land in the UK.

The high levels of development destroying and impacting our agricultural land and natural environment is simply not sustainable.

Whilst we appreciate that rewilding is necessary since our country is also one of the most nature depleted in the world, consideration and care is also needed in regard to food security.

Agriculture can be carried out in more sustainable nature friendly ways, it does not have to be one or the other.

The proposed LTC would also destroy thousands of acres of agricultural land, including grade 1 listed land.⁵

There is a vicious circle of loss of agricultural land leading to more food needing to travel more miles. When the miles travelled are road freight this then further congests the already busy and often congested roads. Ludicrously this then leads to calls for more roads to be built, leading to further destruction and loss of yet more land.

The additional land take for environmental mitigation and compensation is also then likely to lead to the loss of yet more agricultural land, and so the vicious circle continues.

At very least if Hole Farm Community Woodland is progressed there needs to be inclusion of some sort of foods, whether it be fruit trees or some kind of sustainable farming/allotment inclusion.

If refreshments are going to be made available onsite, then it could include foods grown on the site to encourage an interest in sustainable food supply, and food security, as well as reducing food miles travelled.

We question the information provided on natural capital in the consultation document.

We would be interested to know what value you put on the lost food security through the loss of agricultural land.

Also, you mention financial growth in the figure quoted, but fail to recognise or acknowledge that we cannot eat money instead of food that would no longer be able to be grown on the site.

⁵ <https://www.thamescrossingactiongroup.com/ltc-impacts-on-farming/>

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Food security is rightly something that needs more focus and consideration, and that includes the loss of agricultural land for all and any reason.

Forestry England's support of the proposed LTC

We are very disappointed that Forestry England seem content to associate themselves with supporting such a hugely destructive and harmful project as the proposed LTC.

You are supposed to be a government body in place to protect our nations forests, woodlands, and trees.

The proposed LTC would destroy woodland including ancient woodland, and trees including ancient, veteran, and notable trees. Why are you not doing more to protect them?

You are meant to be for the climate and nature. The proposed LTC is predicted to emit over 7 million tonnes of carbon emissions if it goes ahead, in it's first 60 years. How is that in keeping with responsible behaviour at a time of climate emergency?

Thames Chase Community Woodland is a Forestry England site. It is a woodland planted for and by the local community as a means of compensation when the M25 was built.

Yet as the woodland starts to reach a stage of maturing National Highways are back with another destructive road project that would destroy and impact Thames Chase and many other woodlands and trees.

Again, we ask why are Forestry England not voicing concerns? Why are you not doing more to protect our nations woodlands and trees?

This support of the proposed LTC does not put Forestry England in a good light.

Inadequate consultation

We question the adequacy of the consultation for Hole Farm Community Woodland. We feel there has been much misleading information shared in regard to the proposed woodland.

There was not adequate information available at the time of the public workshop events. For example, ecology surveys had not even been completed at the time, so you weren't even able to provide evidence of what the baseline was for the site.

Info on the webpage for Hole Farm has often been out of date.

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You have added the 15 page Consultation document (dated 30 Aug 2022) towards the very end of the consultation period. Prior to that there was only very limited info, and a very basic design plan.

When the final consultation events were mentioned the consultation document was not linked on the page, it has only been added since, with no notification of it being added.

We also note that the page stated that the consultation info would be available at Thames Chase to view until the end of September, but there was no closing date for the consultation listed until the last minute.

There has been a distinct lack of communication with those that registered for the public workshop events. We have not received notification of the closing date of the consultation, or the addition of the consultation document since it was added to the site.

We do not find it acceptable that you are promoting the woodland as though it is associated with the LTC project, yet only promoting the consultation for the woodland on an extremely local level as though it is simply a local woodland project.

Conclusion

We are extremely disappointed and concerned that far from protecting our national forest, woodlands, trees, and natural environment, Forestry England are supporting the hugely destructive and harmful proposed Lower Thames Crossing.

We would ask that you reconsider your support, and at very least ensure that National Highways stop attempting to associate Hole Farm Community Woodland to greenwash the proposed Lower Thames Crossing, with immediate effect.

If Hole Farm Community Woodland is to be progressed, you need to acknowledge the loss of agricultural land and the impact that will have at a time when food security is a major and very serious issue.

It is essential that if the woodland is being progressed that it is made clear to members of the public National Highways intentions to use the site as a nursery for the proposed Lower Thames Crossing, and the impact that will have on the planting and maturing of a community woodland.

Full and careful consideration needs to be given in regard to how people will visit the woodland and the impacts that would have on local roads, communities, and the environment.

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If it does go ahead, provision and protections need to be put in place so that there cannot be a repeat of Thames Chase Community Woodland, whereby it comes under threat by yet another National Highways road project.

We call upon you to disassociate Hole Farm Community Woodland from the proposed Lower Thames Crossing project, as anything else is disingenuous.

The association with the proposed Lower Thames Crossing tarnishes both the Hole Farm Community Woodland project and the reputation of Forestry England.

And finally, we ask that Forestry England actually reconsider your support of the proposed Lower Thames Crossing, since it would be so hugely destructive and harmful, and destroy and impact so many woodlands including ancient woodland, and trees including ancient, veteran and notable trees, as well as the terrible impacts to our natural environment, since after all you are the government body responsible for protecting our nations woodlands and trees.

Response prepared on behalf of TCAG by Laura Blake, Chair
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