

I am sorry I was unable to attend the hearings in person but have managed to catch up with both days 1 and 2 from the on-line transcripts and recordings.

Day 2 was of particular interest to me as someone who has been actively birdwatching and enjoyed all aspects of natural history on both the Crossness Nature reserve/Norman Road Field since the late 1990s and the former Thamesmead golf course since its closure in 2014.

The Applicant justifies this carbon capture application to assist the UK Government achieving its Climate Crisis objectives. The United Nations, leading Environmental/Conservation Bodies (e.g. World Wildlife Fund, Royal Society for the Protection of Birds, Birdlife International) speak in terms of the Climate and Biodiversity Crises – recognising the two being intrinsically linked. Hence the two recent COP meetings in Azerbaijan (climate - COP29) and Georgia (Biodiversity COP16). Sadly, the Applicant, Cory, seems to believe it can achieve the former by disregarding the latter when destroying part of a rich and rare habitat at Crossness Nature Reserve.

Crossness Nature Reserve/Norman Road Field. There has been a constant theme from the Applicant (Cory) to degrade the quality of each of these sites/habitats. At one point Mr Fox even suggested that part of the nature reserve to be lost was “just a small area”. I do not consider 11% a small area.

I would respectfully ask that the Applicant is, once and for all, told to cease trying to mislead the Examiner, the other interested parties and the general public that on approval they will increase the size of the nature reserve. They won't. I would suggest there isn't a mathematician in the country who could help them do so.

At this time there is a block of green space adjacent to Norman Road (to the east), Eastern Way (A2016) (to the south) the River Thames (to the North) and the Thames Water Sewage Treatment works (to the West). The wildlife that uses that area for breeding, feeding, roosting and passage migration is not interested in the size of the area in hectares or acres; it just knows it is suitable for their needs. Where else in Greater London can you find breeding barn owls, water voles and shrill carder bees in one area?

The wildlife cannot name the various parts of that green space. I can and will just for clarification - Seawall Field, Parsley Field, West Paddock, East Paddock, Stable Paddock, Lagoon field, Island Field, Protected Area (all managed by Thames Water and designated by London Borough of Bexley as a Local Nature Reserve in 1997, I was at the ceremony and reception. The area was established under a S106 agreement in 1994 for 99 years) and Norman Road Field (managed by Peabody is not a designated Local Nature Reserve, however it is also subject to a S106 agreement). I've gone to the trouble to name each of those areas on behalf of the wildlife as the wildlife doesn't recognise names or designations it just sees most suitable areas for its survival.

It is impossible for the Applicant to remove the East Paddock, Stable Paddock and any other parts of the area and try and convince you, The Examiner, that they will present a larger nature reserve after their enhancement works. The Applicant seems to be playing with words/designations in referring to the whole site they hope to manage as a nature reserve, comparing it with what is currently designated and that which isn't (Norman Road Field). I don't believe it is within the Applicant's gifts to decide what is and what isn't accredited with formal designations (Local Nature Reserve) so it cannot begin to justify this continuing misinformation.

To summaries the above – the Applicant must not be allowed to continue with the false idea that they will provide a larger area for wildlife to live – they just cannot – they are trying to fool everyone and please don't let them do it anymore.

Both the designated Crossness Nature Reserve and Norman Road Field are managed under S106 agreements. Surely they cannot be double counted against this new development. It is incumbent upon London Borough of Bexley surely to explain to the Examiner why Thames Water have funded a Reserve Warden and undertaken their obligations since 1997, managing the reserve as required but Peabody have singularly failed to maintain their obligations. It could be that LBBexley don't have the resources to monitor such obligations. Can LBBexley give a guarantee they could monitor any new S106 obligations?

Mr Fox for the Applicant seemed to be very muddled as to how they would manage the new site in relation to the Thames Water Protected area on the west side of the Public Footpath should the proposal were to go ahead. He said the Applicant considered it but “felt that Thames Water wouldn’t welcome it”. My understanding is that Thames Water and the 800+ Friends of Crossness don’t welcome any of this proposal where it impacts on a well-managed nature reserve.

Former Thamesmead Golf Course – in 2019 I made a detailed proposal through London Borough of Bexley to Peabody for the formalisation of the former Golf Course into a nature reserve with the former club house to become a community hub and environmental education centre. A meeting took place with The Senior Regeneration Manager of Peabody to discuss the proposal which at the time was considered worthy of future discussion. I was advised my proposals did fit in with Peabody’s medium term plans although they did have longer term plans for some additional housing and building on the perimeter of the golf course. I took a senior RSPB Reserves Manager to view the site. His response was that it would require a little ongoing management but otherwise it was rewilding itself and would require not a great deal of investment for the biodiversity of the site. Of course development of buildings would be something else. These meetings were not minuted. The Covid Pandemic came along and despite my following this up with Peabody, I was eventually side-lined with the following statement from the Director of Landscaping and Placemaking

“Many thanks for getting in touch. We are commencing a project to look at the old golf course called Pathways to the Thames. This project working with Sustrans and the GLA is focussed on early steps in this part of Thamesmead with an emphasis on accessibility. You can find more info hear and links to a questionnaire where you can contribute”

The Pathways to the Thames hardly fulfilled my originals plans or discussions with Peabody. However I did indeed follow up and participated in the Community Focus Group for the Pathways project. Nothing has come of this proposal.

Peabody published their Living in the Landscape – Thamesmead Biodiversity Action Plan 2021 – how much of that has been achieved on the Golf Course since? Grand ideas for the Crossway Boardwalk and Wetlands. Nothing has happened

Why has Peabody reneged on its plans and responsibilities? Why are they not represented at the Hearings? It seems to me Peabody are relying on the destruction of a well-managed Crossness Nature Reserve to benefit their own inactions over the years.

Why do we have to rely on the Applicant, Cory to explain the inactions of Peabody and put forward the Applicant’s plans to mitigate against the loss of an already well managed nature reserve?

The Applicant is claiming their enhancements of the Golf Course would be under a 30 year S106 agreement. Why should we have any confidence in what the Applicant says when it is prepared to trash two existing S106 agreements, one of which still has 69 years to run?

Where do Peabody’s plans for more housing around the golf course play into this S106. Why aren’t they being required to confirm they buy into the Applicant’s proposal?

Have Peabody just been waiting for such an opportunity presented by the Applicant to resolve all their biodiversity plans and responsibilities? Will they mis-manage them as well as they have the Block 5 – Norman Road Field?

The Applicant, in their proposals for the Golf Course, seems to have overlooked that until 70 years ago this area was Thames Grazing Marsh, not a golf course or housing estates. In relation to the loss of grazing marsh at Crossness the Applicant had the audacity to say they could provide “a better solution” (day 2, part 2 at 55 minutes).

All the above confirms the desire of most persons I’ve seen/heard responding that the Applicant did not fully consider the implications of their plans, disregarded the removal of man-made structures (warehouses) as

they would be too costly and think that with some shifty use of words and ecological assessments, many of which have been rebutted, they could walk all over a regionally important site for biodiversity.

The Secretary of State must consider these plans and proposal with the utmost scepticism and even if minded to approve a carbon capture plant, it must not be at the expense of such an important habitat that has existed for decades and which is rich in biodiversity.

Thank you for the opportunity to respond to the hearings.

Ralph Todd
26th November 2024