

Deadline 6 Submission in response to Exa Request for information to  
Riveroak Strategic Partners (RSP)  
Natural England (NE) and therewith Kent Wildlife Trust (KWT)

3rd May 2019

Dear Sirs

**Environment and Biodiversity Impacts, RSP DCO Application Manston TR020002**

The statement at 3.1 in the Statement of Common Ground (SoGC) between the Applicant (RSP) and Natural England (NE) reads:

**3.1 This section of the SOCG describes the matters agreed between the parties. EIA Approach and Method 3.1.1 Natural England acknowledges and agrees that the results of the EIA are appropriate, and in particular that: (a) the assessment represents a reasonable “worst case” approach;”**

I would respectfully submit that this is not a sufficiently accurate or robust statement by NE.

This statement has not changed since the first SoCG dated 22/2/19.

The subsequent changes to noise contours and fleet mix questioned by ExA ExQ2 5/4/19 must render this statement out of date, at best.

At worst it can longer be regarded as “evidence based”.

Without examining further the impacts of the changes in noise contours and taking into account their concerns regarding these changes, I do not see how this statement can continue to be justified.

Furthermore, there remains a significant number of matters not agreed between RSP and NE none of which have changed or progressed over the past 3 deadlines.

Despite this, the SoCG has not been revisited and/or revised to reflect what must be a growing concern on the part of NE (and KWT) that RSP are either unable or unwilling to provide the necessary information.

I am not suggesting a lack of will on the part of NE to support wildlife and biodiversity in this very special part of the country.

I would suggest, rather, that the lack of resources and funding available to NE and similar bodies (see Prospect Report 30/1/19 Annexe 1) has rendered them unable to meet the demands of this DCO application, and others, with appropriate energy and impartiality in line with their mission statement:

“Natural England is a non-departmental public body. **Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.**” (*emphasis added*)

In light of this, I submit that the NE response is inadequate. Serious issues remain unaddressed and unexamined, possibly due to resource constraints.

With the unopposed acceptance in Government of the Climate Change Emergency motion, statutory bodies charged with protection of the environment must ensure that they are doing everything in their scope and power to do so.

When asked to examine the a DCO application for a the detrimental effects of a polluting and unnecessary air cargo hub on precious and internationally protected wetlands and species,, bodies such as NE must step up to the line and ensure that **every** opportunity is taken to question **in depth** those areas where the necessary information has not been forthcoming.

If they do not do this, they cease to fulfil their designated role.

Yours faithfully

Deborah Shotton  
Ramsgate resident and interested party.

## England's natural heritage at risk

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# England's natural heritage at risk from funding cuts

England's natural heritage is at risk after almost a decade of real-term pay cuts, four consecutive years of funding cuts and the impact of Brexit

🕒 30 Jan 2019 📌 Civil service, Environment



That is the finding of a Prospect report, ['The State of Natural England'](#), which shows that the agency does not have the resources it needs to continue to adequately fulfil its responsibilities.

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### SEARCH PROSPECT NEWS

The report also sheds light on just what those responsibilities are, and the excellent work Natural England workers do on a daily basis.

Over the past year Prospect, the main union for workers in Natural England, spoke to its members about their experiences at work. What we found is an agency at crisis point.

Natural England is the body responsible for maintaining and protecting England's natural environment.

It is responsible for:

- protected sites such as national parks and Sites of Special Scientific Interest
- countryside stewardship, helping farmers and landowners enhance the biodiversity of their lands
- planning and development policy
- the marine environment
- ramblers' favourites like the England Coast Path and
- many more things which make our natural heritage what it is.

Natural England is at risk because its funding has been slashed, its workforce reduced and because the needs of Brexit are taking over all other priorities in government.

Since 2010 Natural England's core grant has been halved. Over that time, the agency has gone from more than 2,500 staff in 2010 to, we estimate, just over 1,500 staff at the financial year end 2019, with the bulk of the reduction in the last year.

Workers in Natural England have been subject to a 1% pay cap for eight years and have been blocked from advancing through the pay grades.

This is the reality of government austerity and its effect on agency staff – highly qualified workers facing financial hardship, increased workloads, loss of pension accrual, terrible morale and looking to move elsewhere for a better deal.

Successive ministers have made things worse by undermining and attacking the independence of the work of agency experts.

Prospect is calling for:

- Natural England's wide and important remit for people and nature to be properly recognised and funded
- its autonomy as a non-departmental public body to be meaningfully restored
- the damage caused by the pay cap to be reversed and pay progression, based on skills and competency, to be restored

- to achieve pay parity with the rest of the Department for the Environment, Food and Rural Affairs, particularly for pay scale minima and maxima
- to no longer be covered by the civil service pay guidance and be subject to an independent pay review body.

Garry Graham, Prospect deputy general secretary, said: “Michael Gove likes to talk about England’s green and pleasant lands, but under his leadership of DEFRA they are being put at risk.

“Cuts have left Natural England at the point where its workers are saying that they don’t have enough people or resources to do the things they need to do.

“If we are to be able to regulate our own environment properly after Brexit it is also vital that we cultivate and maintain the skills to do so domestically – we will no longer be able to rely on the EU to do bits of it for us.

“It is a government’s responsibility to safeguard the countryside for future generations. But once biodiversity is lost it cannot easily be regained.

“Now is the time for the government to act, give Natural England the resources it needs, and give its dedicated staff the recognition and the pay that they deserve.”

Visit our [campaign webpage](#) 'Standing up for Natural England' for more information.

# prospect

Prospect is the trade union for professionals. We provide work related advice, support and services.

Prospect's members are engineers, scientists, managers and specialists in areas as diverse as agriculture, defence, education and children's services, energy, environment, heritage, shipbuilding, telecoms and transport.

We are the largest union in the UK representing professional engineers.

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