

“The future of all life now depends on us” - Sir David Attenborough, Blue Planet 2018.

We are living in a time of increasing threat to the natural environment, both through climate change and the threat to biodiversity.

The Government declared, unopposed, a Climate Change Emergency in May 2019.

The whole World is waking up to the combined effects of pollution, waste, poor land management and unthinking, unplanned development on the structures of this planet which support us all.

Dr Cristiana Paşca Palmer, Executive Secretary of the UN Convention on Biological Diversity, has said:

“By 2020, the end of the current UN Decade on Biodiversity, the world’s biodiversity is set to have declined by two-thirds. This unprecedented rate of destruction jeopardises not only the amazing variety of life on Earth, but the prospects for human development and well-being. We need a paradigm shift in the way that humans interact with nature; we need transformative change and a systemic approach to address the root causes of biological destruction.”

As we approach the end of this DCO examination process, I am increasingly appalled at the completely inadequate protection being considered by the Applicant, and enforced by the responsible agencies, for the internationally important SSSIs and SPAs which are entitled to protection under UK and EU legislation respectively.

The following is the “mission statement” from the RSPB website:

“The RSPB is the country’s largest nature conservation charity, inspiring everyone to give nature a home. Together with our partners, we protect threatened birds and wildlife so that our towns, coast and countryside will once again teem with life.”

Alison Giacomelli, the Natural England case officer working on the Manston DCO has an RSPB background.

The following is the “mission statement” from Natural England’s website:

“We’re the government’s adviser for the natural environment in England, helping to protect England’s nature and landscapes for people to enjoy and for the services they provide.”

The Applicant has failed to carry out the requisite HRAs, through mismanagement of their right to access the land in question to be able to do so.

Both Kent Wildlife Trust (KWT) and Natural England (NE) seem prepared to let this pass.

Alison Giacomelli has written to me to the effect that NE’s approach is “robust”. I do not believe this demonstrates a “robust” approach. Quite the opposite, in fact.

The Applicant has not supplied to NE or KWT the revised flight paths and noise contours which would enable NE’s assessment of the effects of noise and pollution on Pegwell and Sandwich Bays to be evidence based. Therefore Alison Giacomelli’s assertion to me that their approach is not only “robust” but also “evidence based” again misses the mark.

The submissions by the residents of Nethercourt, which are before the Examining Authority, both standing alone and as an attachment to the Ramsgate Town Council submission, make clear the “lived” experience both of aircraft noise and of pollution from aviation fuel in the air and in water.

It is essential that the precious, unique, biodiverse internationally important feeding and breeding grounds lying under the proposed flight paths are accorded the utmost protection.

Alison Giacomelli has reported that the stated aim of the relevant agencies is to “grow” the populations of red-listed and protected species in these areas.

Yet the only mitigation which is being expected of the Applicant is to involve itself in the “Recreational Mitigation Plan” currently being drafted by Thanet District Council to protect these areas.

Despite having emailed Iain Livingstone and Amanda Berry on two occasions this week to ask for details of this plan, I have to date received no reply, so I am unable to allude to its proposals with any accuracy.

I have emailed to ask Mr Broderick to be so kind as to address this lack of information by means of a question from the Examining Authority, and would request the Authority's permission to re-submit this submission once I have the requisite information to hand.

In the meantime I can only surmise that, perhaps, the Applicant is being asked to contribute to the cost of new signage; maybe some fencing and gates, which will be used by TDC to restrict the access of the public to these areas.

This raises several points for me and for anyone else who really cares about these areas and the flora and fauna they support.

Firstly, I cannot imagine, whatever the TCD plans may involve, that the mitigation will be in the least onerous for the Applicant, either financially or in terms of effort.

I suggest that the Applicant's time and money would be better spent on a proper, diligently exercised, assessment of the true effects of their proposed airport development on these areas.

Secondly, the RSPB, KWT, Birdlife and Natural England depend on information supplied to them about bird life, their numbers and habitats by members of the public who have knowledge and interest, often significantly surpassing that of the officers of the bodies concerned. For public access to be restricted is wrong in so many ways; these are ancient rights of way, Crown Lands and foreshore, to which the public have long had access and the vast majority of whom treat them with respect and hold them in deep affection.

Thirdly, in this time of Climate Change and biodiversity emergency, this can never be the "right" choice; we should be doing everything we can to protect these areas from pollution by filthy, toxic aviation fuel and constant high level noise disturbance.

A weak-willed and apparently spineless agreement that contribution to an as yet unpublished and possibly unformed mitigation plan by TDC will suffice as mitigation for the potentially enormous and irreversible damage caused by low-flying cargo planes is simply not good enough.

This most especially in light of the fact that TDC is not renowned for its care of the environment, as close scrutiny of the activities at Ramsgate Port and, even more recently, its destruction of wildlife habitats in Margate clearly demonstrate.

When I spoke to Alison Giacomelli she informed me that “we [NE] are not allowed to object to the DCO”.

I would argue, as my final point here, that this is a mistaken approach, given the special circumstances of this DCO application.

This generic NE approach to the application process predicates that the application will be for a Government-sponsored and supported NSIP, where the DCO and Examination process exist to facilitate necessary development.

This Application does not fit that mould. It is an attempt by a consortium of private individuals to use the DCO process to remove land from its rightful owners. It is not Government-sponsored, despite Sir Roger Gale’s assertions to the contrary, and it has yet to prove itself to be necessary.

It flies, instead, in the face of the current Government position on climate change and the protection of our indigenous species.

As such, I would propose that this DCO demands stout opposition from those bodies charged with the protection of our wildlife.

In refusing to oppose it strenuously, NE and its partners are complicit in the insult perpetrated by the Applicant in its evident and arrogant lack of care for the environment it seeks to poison.

These bodies are betraying the trust vested in them by the public and, more importantly, failing fatally those they are employed to guard who have no means of protecting themselves from the damage this new airport would inflict on them.

Deb Shotton
13th June 2019

