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26<sup>th</sup> November 2024

**Interested Party Reference Number- 20048828**

**RE: Application by Cory Environmental Holdings Limited (CEHL) for an Order Granting Development Consent for a Construction and operation of carbon capture plant, storage and marine export terminal at Belvedere.**

Buglife would like to make the following additional representation concerning this application.

In addition to Buglife's relevant representations submitted on 30<sup>th</sup> May 2024, Buglife has signed a Statement of Common Ground (8.1.28), dated 21<sup>st</sup> October 2024. Buglife are also meeting with the applicant on the deadline date for the written representations (26<sup>th</sup> November 2024) to discuss the proposals further.

Impacts on nationally important invertebrate assemblages in the Thames Estuary South Important Invertebrate Area

Buglife remain concerned about the impact on the invertebrate populations within the Thames Estuary South Important Invertebrate Area (IIA) due to the loss of a 2 ha area of the Crossness Local Nature Reserve to the proposals. The Outline Landscape Biodiversity, Access and Recreation Delivery Strategy (Outline LaBARDS) states *"This proposal allows for the ongoing Crossness LNR management to be retained and the additional benefits of a single and enlarged LNR to be secured through the Proposed Scheme."* Whilst the scheme may result in a larger area of LNR from a legal standpoint, the area of habitat actually available for use by invertebrates will have decreased. As this site is functionally linked to other sites within the IIA, the loss of habitat on this site is likely to have much wider impacts on invertebrate populations within the region, particularly in the context of the continuing loss and erosion of many high-quality invertebrate sites within the Thames Estuary.

As far as Buglife are aware, there is no threat to management being able to continue at Crossness LNR and therefore this is not a benefit from the proposals. From the most recent data available (Terrestrial Invertebrate Survey Report 2020-21, Colin Plant Associates, November 2021), the reserve currently supports six Specific Assemblage Types of invertebrates in favourable condition associated with a range of habitats across the site. The Terrestrial Invertebrate Report (Appendix 7.8 of the Environmental Statement (ES)) highlights that the site as a whole supports the best examples of the range of the eleven Habitat Elements that were considered in the survey. Survey Area 2 in the report is the area that will largely be lost to the development footprint supported five of the best examples of these Habitat Elements that are considered of importance to invertebrates.

The adjacent habitat in Norman Field currently acts as a further habitat resource to invertebrates and therefore does not comprise a new or expanded area of habitat. In fact, the Terrestrial Invertebrate Report (Appendix 7.8 of the Environmental Statement (ES)) indicates four different Habitat Elements that are already considered 'Good Quality' examples in the survey area that included Norman Field, including nectar resources which are of key importance to species such as the Shril Carder Bee (*Bombus sylvarum*). The report states these examples are "*Likely to be a predominant factor in supporting characteristic and specialised invertebrate assemblages*".

It is therefore unclear if the enhancement measures, as set out in the Outline LaBARDS will effectively mitigate for invertebrates for the overall habitat loss.

#### Land use conflicts and mitigation concerns.

The land at Crossness is already subject to a Section 106 agreement of which the intention was to secure the whole area as a nature reserve until 2093 as compensation for development. A new Section 106 agreement is proposed for this scheme with the intention this will provide the mechanism to secure the future of the site. It is difficult to have confidence that these agreements will be upheld when the previous agreements in place for the LNR are not being kept in order to facilitate a further development.

Buglife highlight in our relevant representation that Norman Field, the key focus for mitigation and enhancement proposals, was used for mitigation for the Veridion Park development. The applicant states in the Environmental Statement that 20 years have passed since the site was used for this purpose. Since the introduction of mandatory Biodiversity Net Gain (BNG), sites are required to be managed for a minimum of 30 years to compensate for developments and in this context, this point remains relevant. Land that has been used for mitigation for biodiversity impacts should be protected, particularly in the context of the recognised biodiversity crisis.

The main mitigation and enhancement proposals on site are to enhance the condition of the retained habitats, primarily the enhancement of coastal floodplain grazing marsh from poor to moderate condition. Proposals for the offsite BNG Opportunity Area are still not detailed or the area confirmed to be included as part of the mitigation and enhancement. It is currently unclear how the enhancement of this Area is likely to benefit the species that make up the assemblage at Crossness LNR and the Norman Field Site. The Response to Relevant Representations states that for terrestrial invertebrates, there is expected to be residual negligible impacts once all mitigation is implemented. Buglife argues that there is insufficient information and consideration of requirements of important species to be confident that this is the case.

Whilst improving the condition of a habitat may be likely to improve the species associated with that habitat, the habitat mosaic is key in supporting a diverse invertebrate assemblage. Habitat management plans should give consideration to Priority Species under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, species such as the rare Shril Carder Bee and Brown-banded Carder Bee (*Bombus humilis*) found at the site. It would be beneficial to see the proposals discussed in specific relation to these species to ensure confidence that their populations can be maintained in this reduced habitat area.

The Outline LaBARDS provides no discussion or targeted consideration for invertebrates and therefore appears to assume that the changes will be of benefit to terrestrial invertebrates. 'Planting mixes' are mentioned but there is no detail on the mix to be used, its source or how it will be established.

Overall, despite the further information submitted, Buglife remain concerned that the proposals do not adequately mitigate for the habitat loss from the development or give enough consideration to ensuring the future viability of particularly important invertebrate species such as the Shril Carder Bee.

Yours sincerely



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Programmes Manager