

By email only: [decarbonisation@corygroup.co.uk](mailto:decarbonisation@corygroup.co.uk)

28th November 2023



Dear Cory,

### **RSPB view**

The RSPB thanks you for the opportunity to feed back regarding your decarbonisation facility plans at Crossness. The RSPB objects to the proposals for a decarbonisation plant at Crossness Nature Reserve which would damage and destroy much of this important part of the Erith Marshes Site of Metropolitan Importance for Nature Conservation, which also lies within the Thames Estuary South Important Invertebrate Area<sup>1</sup>. While the RSPB clearly recognises climate breakdown as a very serious issue and we support efforts to address it, the ecological crisis is also very serious and efforts to address climate change cannot come at a cost to declining wildlife and rare habitats, as would happen if the proposals for Crossness went ahead.

### **Development that harms the rich wildlife of Crossness is not truly green**

Crossness Nature Reserve is well known, well-managed and much-loved by the community as a wildlife site. As a natural capital asset, it is already a natural carbon store and helps protect Bexley from flooding. It is a rare and precious remaining fragment of the once extensive Thames Marshes, with a corresponding portfolio of rare and declining animals and plants that call it home. Notable species using the site include Barn Owl and Skylark, while Lapwing regularly breed close to the proposed development location. Regarding Lapwing, 'the London Area and the south-east now have one of the lowest population densities for this species in Britain' (The London Bird Atlas 2017). Lapwing is red-listed as a Bird of Conservation Concern<sup>2</sup>. Disturbance and landscape alterations to the area due to the proposed development would put the Crossness population of this vulnerable species, and other birds, at risk. Shril Carder Bee, a rarity now restricted to a few mainly Thames Estuary locations, is another important species found on site and threatened by the development plans. Scarce invertebrates are a key feature of the site, and it is important that the precious mosaic of habitats at Crossness, so important for invertebrates when taken together (Crossness NR lies within Buglife's Thames Estuary South Important Invertebrate Area), are not damaged by the loss and alteration of any key component parts. In addition, there are Water Voles, Southern Migrant Hawker dragonflies and rare marsh plants found in few other London area locations, amongst a long list of uncommon or range-restricted plants and animals. The list of birds that have occurred at

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<sup>1</sup> [Important Invertebrate Areas - Buglife](#)

<sup>2</sup> [bocc-5-a5-4pp-single-pages.pdf \(bto.org\)](#)

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**RSPB England Headquarters**  
First Floor  
One Cornwall Street  
Birmingham  
B3 2JN

Tel: 01767 693 777  
Facebook: @RSPBEngland  
Twitter: @RSPBEngland  
[rspb.org.uk](http://rspb.org.uk)



The RSPB is part of BirdLife International, a Partnership of conservation organisations working to give nature a home around the world.

Crossness Nature Reserve is remarkable, with for example many rarities and regular visits from birds that are scarce in London such as Marsh Harrier and Bearded Reedling, as well as passage migrants such as Wheatear and Whinchat which favour the paddocks and open areas.

A great deal of time, community effort, dedication and money has been put into creating and enhancing wildlife habitats at Crossness Nature Reserve, and it is well-studied and much visited. It would be regrettable and sadly ironic if the mosaic of important wildlife habitats and the vulnerable wildlife currently present at Crossness were to be damaged for 'green' reasons. It is doubtful that you would get the positive publicity Cory are surely hoping for by harming this popular and biodiverse location.

### **The harm of building at Crossness outweighs the benefits and would be poor PR for Cory**

The UK's nature is in a parlous state, we are one of the most nature-depleted countries in the world and the recent State of Nature Report tells us the grim news that one in six of our wild species are at risk of extinction<sup>3</sup>. We also refer you to the Lawton Principles<sup>4</sup>, that sites for nature need to be bigger, better, and more joined up if we are to start to address the biodiversity crisis. Given that Cory's plans would result in significant loss of or damage to valuable marsh and grassland habitats, as well as indirect impacts, it is the RSPB's view that Crossness is not a suitable location for the decarbonisation plant. The local community is clearly opposed to any harm to the site and the plant should be sited elsewhere. By siting the development at another, much more sustainable, location, Cory could avoid causing ecological harm and would avoid a bitter fight and a great deal of criticism - instead gaining praise from the public by showing you are listening to their views and by capturing the carbon emissions in a place where there will be a net benefit to the environment.

We hope this is helpful. Please do not hesitate to contact us should you have any questions.

Yours sincerely,

**Joseph Beale FBNA MCIEEM**

RSPB Conservation Officer, Kent and Essex

[Joseph.Beale@rspb.org.uk](mailto:Joseph.Beale@rspb.org.uk)

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<sup>3</sup> [State of Nature 2023 - report on the UK's current biodiversity](#)

<sup>4</sup> [Making Space for Nature: \(nationalarchives.gov.uk\)](#)

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