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28th November 2023

To whom it may concern,

RE: Decarbonisation Project Consultation- installation of Carbon Capture Facilities, Belvedere.

Buglife - The Invertebrate Conservation Trust would like to make the following comments on Cory's decarbonisation consultation.

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

The current project proposals will directly impact 2ha of Crossness Local Nature Reserve (LNR), a site that falls within the Thames Estuary South Important Invertebrate Area (IIA). IIAs are nationally or internationally significant places for the conservation of invertebrates and the habitats upon which they rely. The site at Crossness is part of a network of sites that have become increasingly fragmented due to development and Buglife is concerned of the cumulative impacts on important invertebrate sites within the Thames Gateway.

Buglife has reviewed the Preliminary Environmental Information Report (PEIR) provided by Cory (October 2023) and welcomes the recognition of the importance of Crossness LNR for both terrestrial and aquatic invertebrates. Buglife notes that invertebrate surveys are ongoing and expects them to be a comprehensive dataset across an entire survey season to enable a robust impact assessment to be made. Buglife would anticipate that historical data will also be considered to provide a more informative baseline of the value of the site. Buglife is aware that ongoing construction works for the adjacent 'Riverside 2' facility could also be affecting habitats on the reserve, such as negatively impacting on the water quality of recently surveyed ditches and reducing their apparent quality.

Relatively recent data from Thames Water provides figures of 69 notable species of terrestrial invertebrates from the reserve which include the European Vulnerable Moss Carder Bee (*Bombus muscorum*) and several Priority Species under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, including the Shrilk Carder Bee (*Bombus sylvarum*), Brown-banded Carder Bee (*Bombus humilis*) and Phoenix Fly (*Doyrcera graminum*). Data from the Terrestrial Invertebrate Survey report 2020-21 (Colin Plant Associates, November 2021) was run through the Pantheon invertebrate analysis database and this highlighted the favourable status of six Specific Assemblage Types, those associated with: rich flower resource, scrub edge, bark and sapwood decay, reed-fen and pool, open water on disturbed mineral sediments and undisturbed fluctuating marsh. This indicates the importance of the

wide variety habitats present at the reserve to the invertebrate assemblage. Of particular concern is the loss of habitat for the Shril Carder Bee, a species which requires a network of flower-rich sites, so can suffer from the progressive loss of sites, as has been the case in the Thames Estuary.

The PEIR has identified “*The aquatic macroinvertebrate species present within the Site are important on a National level*” and that “*Preliminary results suggest high conservation values of macroinvertebrate communities in North Dyke and Norman Road River*”. Rare species that have previously recorded in a 2019 Aquatic Invertebrate Survey of the reserve (Colin Plant Associates, July 2019) include the Vulnerable Lesser Spangled Diving Beetle (*Graphoderus cinereus*) and two Near Threatened water scavenger beetles, *Hydrochus ignicollis* and *Hydrophilus piceus*. The scheme will result in the loss of 756m of the ditch network which will be difficult to adequately mitigate for.

Loss of a Site of Importance for Nature Conservation and associated Priority Habitats

Crossness LNR is part of Eith Marshes Metropolitan Site of Importance to Nature Conservation (MSINC), an important remaining area of grazing marsh on the Thames, with a wildlife-rich ditch system. Belvedere Dykes MSINC and River Thames and Tidal Tributaries MSINC, also falls within the site. There will be permanent loss and impacts to these sites from the proposals.

The PIER identifies three Habitats of Principal Importance (HPI) for conservation within the site: Coastal and Floodplain Grazing Marsh, Lowland Mixed Deciduous Woodland and Intertidal Mudflats. Buglife is unclear why other habitats listed as HPI under the NERC act and identified as being present on site have not been flagged as HPI in the report. These habitats are River, Reedbed, Standing Open Waters and Open Mosaic Habitats on Previously Developed Land (OMHPDL). It is important that all HPI impacted by the proposals are identified and impacts on them fully assessed.

The PIER has already assessed that the effects of habitat loss are negligible after on-site and off-site habitat creation and enhancement. This is of concern as the mitigation plans are not developed and “*subject to change depending on their feasibility*” and therefore the residual effect would need to be reassessed for the Environmental Statement.

Land use conflicts and mitigation concerns

The PIER has identified a wide range of impacts on terrestrial and aquatic invertebrates during both the construction and operational phases. Some of the impacts highlighted in the PIER included adverse effects from; loss of habitat, degradation and fragmentation of habitat, decrease in water quality due to pollution and Artificial Lighting at Night (ALAN).

Buglife is concerned that there are multiple conflicting land use issues with the direct loss of Crossness LNR from the scheme. Firstly, Thames Water highlight in their consultation response that Crossness LNR was secured by a Section 106 agreement for a period of 99 years from 1994 as compensation for the “*Sludge Powered Generator planning permission*”. In addition to this conflict of use, one of the main proposals to mitigate impacts is the ‘enhancement’ of Norman Field, adjacent to Crossness Nature Reserve. Norman Field already supports the HPI Coastal and Floodplain Grazing Marsh, as well as a network of ditches and scrub habitat. Buglife understands that this land was already used for mitigation for the Veridian Park development in Thamesmead within the last decade, so it is not appropriate for it to be utilised again for another development.

Buglife is also concerned on how 'enhancement' of Norman Field can compensate for loss of habitats, considering the habitats the Field already supports and the likelihood that some notable and/or Priority Species of invertebrates could be present. It is important that assessment is undertaken of the current invertebrate interest of the proposed 'Environmental Mitigation Opportunities Areas' to understand the value of these areas for invertebrates in their own right and the impacts of any mitigation scheme so that genuine uplift is provided.

Whilst Buglife is aware that the mitigation proposals are not fully developed, there is real concern that there will be overall loss of important invertebrate habitats and potentially ongoing adverse impacts on the Thames Estuary South IIA that supports a nationally important assemblage of invertebrates.

Please do get in contact if you require any further information.

Yours sincerely

A handwritten signature in black ink, appearing to read 'JR', written in a cursive style.

Jamie Robins
Programmes Manager