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**SUMMARY**

Swanscombe Peninsula in north Kent is a highly diverse nature site designated by Natural England as a SSSI (Site of Special Scientific Interest) in 2021. It, and local business land important for employment, is threatened by a mega-theme park 135 times the size of Wembley Stadium, proposed by London Resort Holdings Company (LRCH). The area has more breeding birds than any of the major wetland nature reserves in south east England, many rare plants and over 1,700 invertebrate species, many of which are rare and vulnerable to extinction. These include the Distinguished Jumping Spider found only here and at one other place, and birds such as nightingales, cuckoos, kingfishers, ravens and marsh harriers, as well as animals such as the much-declined water vole, lizards and otters. Its biodiversity, described by Natural England as “incredible”, is the fortuitous result of its mixture of former industrial land and survivals of traditional grazing marsh, which creates a rich mosaic of habitats supporting species like the brown banded carder bee, in an area insulated from the effects of fertilisers and pesticides used in intensive farming. It is an urban wilderness and ‘green lung’ much valued by many local people. LRCH has a Development Agreement with the BBC to supply IP for its rides. Government made the London Resort a NSIP (Nationally Significant Infrastructure Project) meaning a Minister can directly decide whether or not to grant planning permission through a Development Consent Order (DCO).

## PART 1

### The Threat to Swanscombe Peninsula's 'Incredible' Nature, and Employment

London Resort Company Holdings Ltd (LRCH) has applied for planning permission to develop a mega theme park on Swanscombe Peninsula on the Kent bank of the River Thames not far east of the M25 Dartford Crossing.

Swanscombe Peninsula has a rare mixture of habitats, soils and topography supporting a very high biodiversity including open-mosaic habitats with many rare invertebrates (over 1700 species on site), mammals such as water voles and otters, plants such as man orchids and a greater number of breeding bird species than any wetland nature reserve in south east England including kingfisher, nightingale, lapwing, marsh harrier and cuckoo. Natural England has described its variety of life and conditions as 'incredible'[1]. Over 70 scientists and senior and former staff from conservation bodies called for the site to be a SSSI in February 2021[2].

As it became increasingly clear that Swanscombe Peninsula is of extraordinary biodiversity, the development has been opposed by conservation groups Buglife, RSPB, Kent Wildlife Trust and CPRE Kent, together with local community campaign groups including Save Swanscombe Peninsula ([www.saveswanscombepeninsula.org.uk](http://www.saveswanscombepeninsula.org.uk)).

Unusually for a commercial project, the proposed theme park was made an NSIP[3] (Nationally Significant Infrastructure Project) by government in 2013, which took it outside the normal Local Authority planning process and put it under direct central government control. The fate of Swanscombe Peninsula is therefore now a test-case of the UK Government's new commitment to halt loss of biodiversity by 2030[4].

Natural England announced its intention to notify Swanscombe Peninsula as a Site of Special Scientific Interest (SSSI) on 11 March 2021. Normally that would protect the site against most development but a NSIP is designed to fast track projects with government backing. LRCH objected to the designation on 12 July 2021. NE confirmed SSSI designation on 10 November[5].

The vast majority of land which LRCH wants to use is now covered by the SSSI designation.

The Peninsula is home to the Distinguished Jumping Spider which occurs at only one other place in the UK, at West Thurrock marshes on the other side of the River Thames. Both sites are small remnants which support plants and animals of the once extensive river terraces and

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1 <https://www.gov.uk/government/news/swanscombe-peninsula-gets-national-recognition-as-an-sssi>

2 <https://www.kentwildlifetrust.org.uk/news/call-swanscombe-marshes-be-designated-site-special-scientific-interest>

3 It is seeking a Development Consent Order (DCO) from the National Planning Inspectorate, rather than normal local authority Planning Permission, as the LRCH project was granted NSIP status by government in 2013 (Nationally Significant Infrastructure Project)

4 <https://www.gov.uk/government/news/landmark-environment-bill-strengthened-to-halt-biodiversity-loss-by-2030>

5 <https://www.gov.uk/government/news/swanscombe-peninsula-confirmed-as-site-of-special-scientific-interest>

grazing marshes of the Thames Estuary, almost all of which has been developed. It's regularly used for recreation by local people.

The proposal would create a theme park twice the size of any other in England and would feature six roller coaster rides, light shows, themed experience zones, 500 new houses, new roads, car parks for 7,750 cars, hotels with 3,500 rooms, a conference centre, and water park. The 465ha LRC scheme is led by 'PY' Gerbeau best known for his time at Eurodisney and the Millennium Dome and is backed with Kuwaiti money.

LRC claims the resort will be sustainable and is 'pursuing' a net-zero carbon goal (which appears to only refer to operational emissions). Aside from those retained by objectors to the SSSI designation, few if any ecologists believe that there is even a remote chance that the wholesale damage that would be caused by the development could be compensated for by translocations or habitat creation elsewhere. Quite apart from the enormous biodiversity involved and the high level of connectivity between the habitats for on the Peninsula, many of the species have specific and demanding habitat requirements.

At the time of writing over 26,000 people have signed a Buglife [petition](#) at the 38Degrees site urging 'the Secretary of State to reject this unnecessary and ill thought out application'. 3,700 have signed a [petition](#) at change.org by the Save Swanscombe Peninsula group calling on the BBC to withdraw from supporting the scheme with its Intellectual Property in the form of TV programmes and characters. Over 1,000 have signed a [petition](#) at change.org by the same group, calling on London Resort Company to withdraw. Save Swanscombe Peninsula has a public [Facebook Group](#) of 1100 members. The campaign is supported by numerous writers, broadcasters, naturalists and artists including Richard Mabey, Kate Blincoe, Aka Kwesia, David Lindo, Kabir Kaul, Kate Bradbury, Stephen Oliver, Dave Goulson, Isabella Tree and Michael McCarthy.

If the Planning Inspectorate grants permission it will give LRCH compulsory purchase powers enabling it to take over business estate land currently used by local businesses, which thousands of local people depend on for their jobs.

In 2014 BBC Studios signed an agreement with LRCH about providing its Intellectual Property for rides etc at the theme park, such as Dr Who, Sherlock or Top Gear. BBC backing for the project is being used to promote it and attract investors.



*Swanscombe Peninsula is rich in wildflowers thanks to its unusual low nutrient soil, these in turn support many rare bees and other insects*



*Save Swanscombe Peninsula campaigners October 2021*



Local children at a nature day supporting the campaign



North Kent birder Barry Wright has recorded many birds at Swanscombe Peninsula. Top right, peregrine, lower left, Raven, lower right, Siskins.





Nature Patrol  
@NaturePatrol

...

@sspcampaign Beautiful day walking around Swanscombe Marshland ☀️ plenty of nature wildlife to enjoy 🐝 🕷️ 🌈 #WildlifeWednesday ❤️



9:10 PM · Oct 27, 2021 from Stone, South East · Twitter for iPhone

Save Swanscombe Peninsula SSSI Retweeted



Laura Edie @Laura\_Edie8 · Oct 30

...

A beautifully poignant poem from the perspective of a bee & how wildlife would feel if they were to lose their home 💔 🐝 It's about time #LondonResort listened to our local children's voices, took their hands off this natural oasis & left it alone for future generations to enjoy!



You and 9 others



5

26



A child's story about Swanscombe Peninsula from a bee's perspective



*Aerial shot of the Peninsula*



*Campaigners with M25 Dartford Crossing behind. The bottle is of a local cider made to support the campaign.*



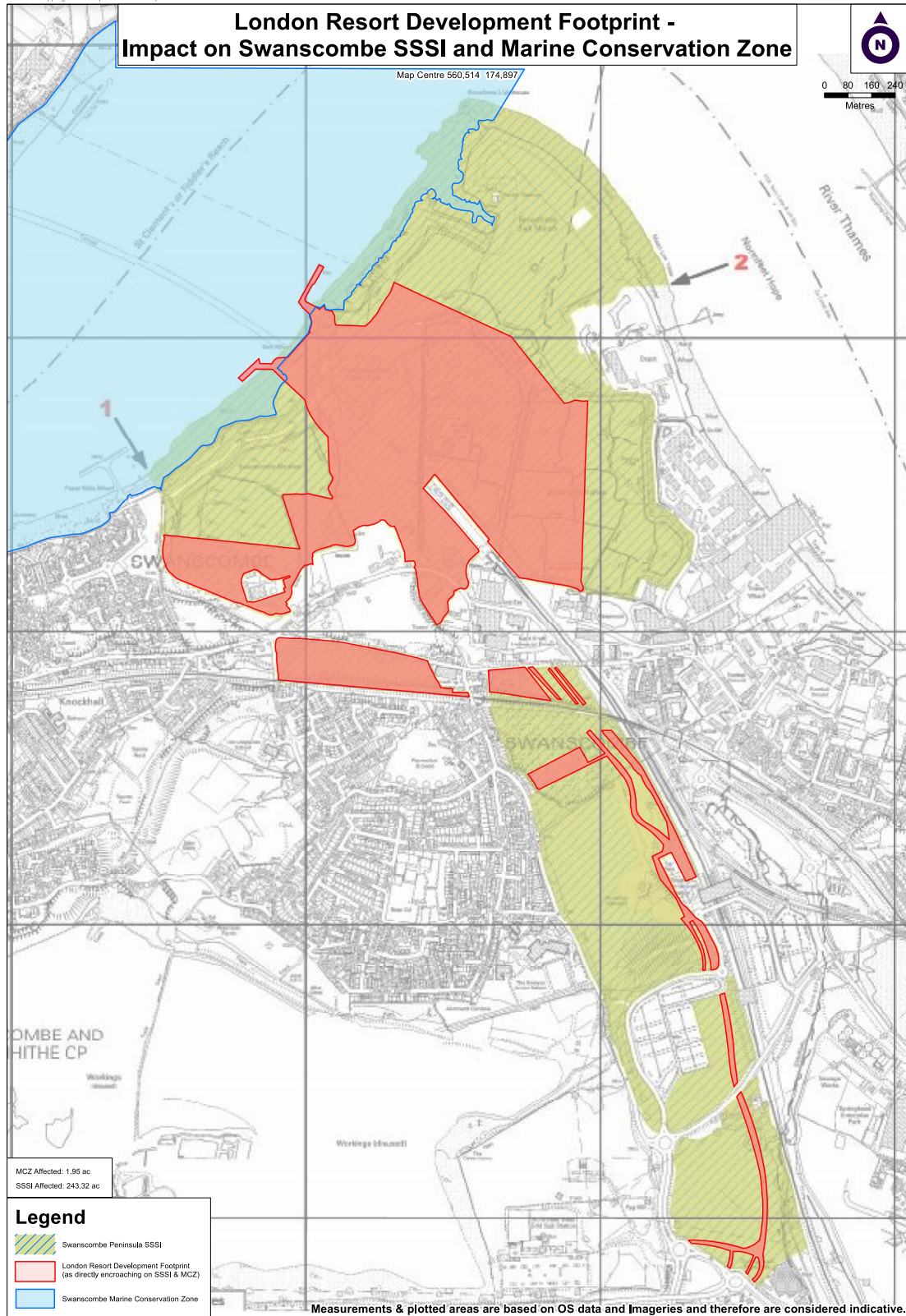


*Water Vole – aka “Ratty” from Wind in the Willows. Water Voles have been lost from 70% of their former UK haunts but still have a home at Swanscombe Marshes. Photo - "Water Vole" by Peter G Trimming is licensed under CC BY 2.0*

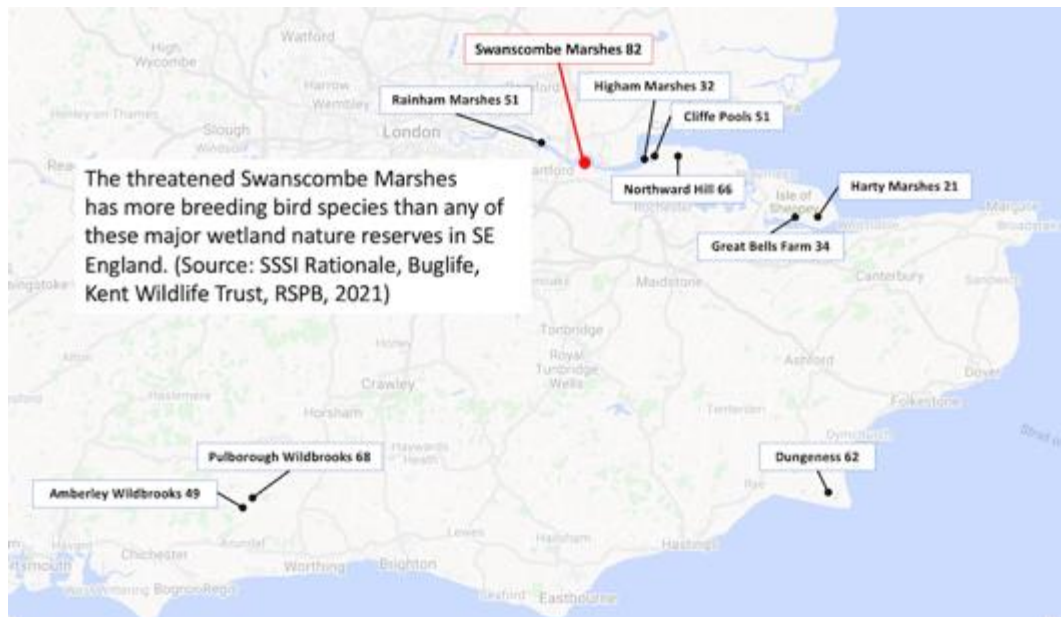


*CGI image of the proposed theme park from LRCH. Its area is 135 times the size of Wembley Football stadium. It would create considerable light pollution and have other damaging effects on the remainder of the SSSI outside the direct footprint.*





*Green shows the initial SSSI designation (little changed), red shows the direct hard impact of the LRCH proposed theme park, blue shows the Marine Conservation Zone in the adjacent River Thames*



*The Peninsula has more breeding birds than any of these other major nature reserves*



*2021 photos from Swanscombe Peninsula top left – Grasshopper Warbler; bottom left Brown Banded Carder Bee, bottom right Man Orchid and Wall Brown Butterfly. The main twitter account is @sspcampaign*



## Local Employment

Three local industrial estates lie inside the proposed development area, outside the SSSI. This local business ecosystem is also threatened, and many businesses oppose the development.

*Kent Online [6]*

... Almost 4,500 jobs will be under threat if a Paramount resort is built, according to business owners facing eviction from industrial estates on land earmarked for the attraction ....

The businesses, which have formed the lobbying body the Peninsula Management Group, are landowners and tenants at the Northfleet Industrial Estate, Kraft Kent Estate and Manor Way Business Park, near the Swanscombe Peninsula.



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6 <https://www.kentononline.co.uk/kent-business/county-news/putting-thousands-of-jobs-at-91969/>



## **‘An Urban Wilderness’**



A quiet lake on the Swanscombe Peninsula, threatened by the proposed London Resort



Broadness Harbour is hidden away towards the tip of the peninsula



One of the colourful, ramshackle huts which have colonised this remote, shallow creek.

*From a photo essay by Ian Tokelove [7]*

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7 <https://www.remotelondon.com/swanscombe-peninsula-london-resort-theme-park-threat/?fbclid=IwAR2eegDrxme0f4mgSwetn8ViTYzCM46OfuUsn6S85yc6G4BStyr9GAqXNU0>



*Common Seal hauled out on the Peninsula*

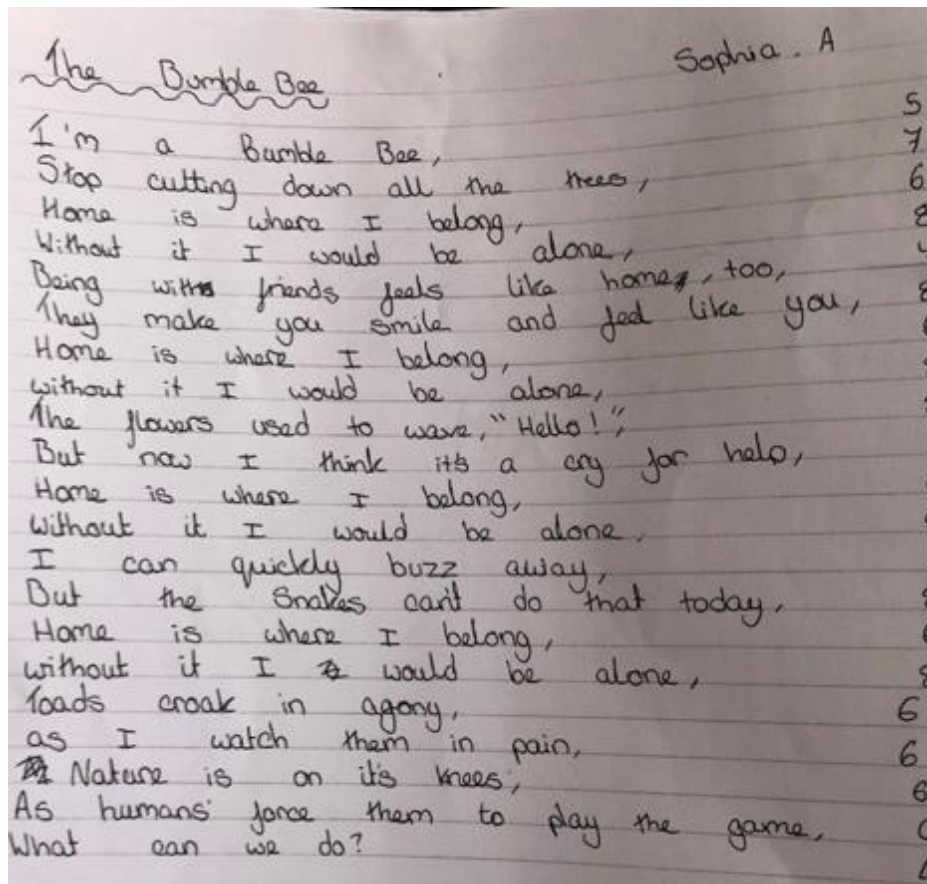


Save Swanscombe Peninsula SSSI



78

10 comments 42 shares



Local school child Sophia A's poem about a bee's view of Swanscombe Marshes



Save Swanscombe Peninsula open Facebook Group

<https://www.facebook.com/groups/491352531869205/about>

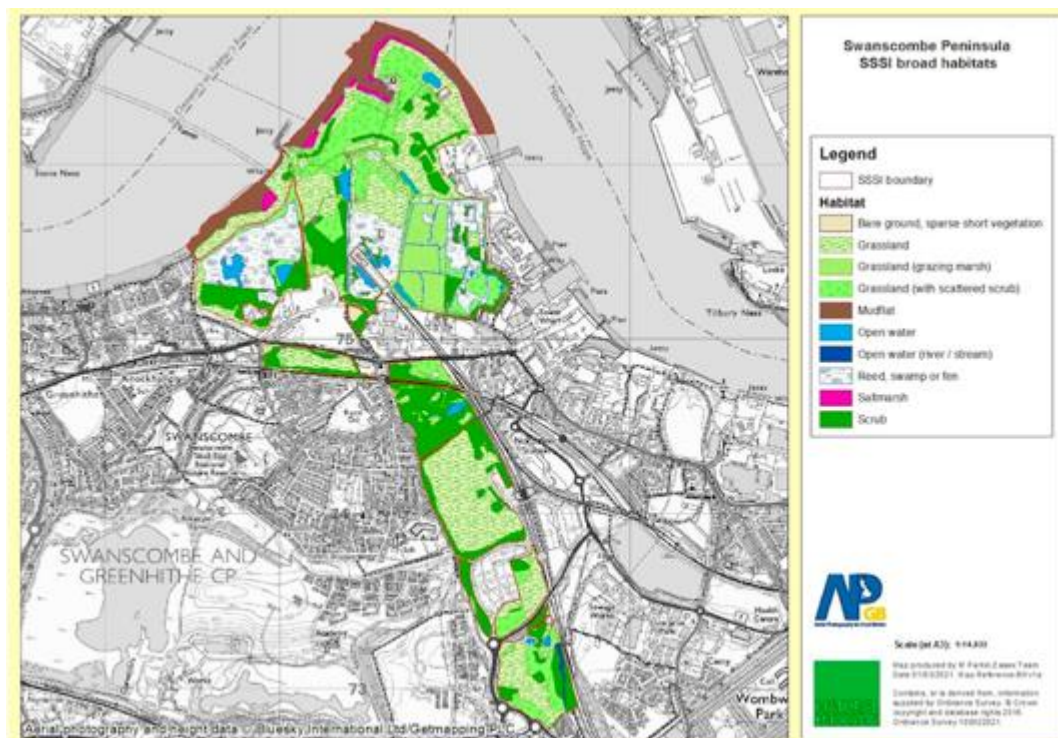


## Part 2 The Value of Swanscombe Peninsula - Further Information

*Extracts from the Officers Report to the Board of **Natural England** at the hearing into the (confirmed) designation of the area as a SSSI, 10 November 2021:*

... Habitats include chalk pits, free-draining grassland, scrub, wetlands, grazing marsh, mudflats and saltmarsh. It is of special interest for its nationally important assemblages of invertebrates, assemblages of breeding birds, populations of five species of vascular plant and its geological features

... Swanscombe Peninsula SSSI is a corridor of habitats connecting Ebbsfleet Valley with the southern shore of the River Thames between Dartford and Gravesend. Industrial processes such as engineering, power generation, landfill and dredging have left a legacy of low nutrient and often toxic substrates which have developed into bare open ground habitats with low scrub cover. The peninsula also supports wetland, grazing marsh, scrub, mudflats and saltmarsh habitats (see map below). These habitats, coupled with a mild climate, provide ideal conditions for certain species and assemblages of plants, invertebrates and breeding birds



### [plants]

... The site supports populations of five nationally scarce species of vascular plant, the first four of which are also 'Vulnerable' to extinction in Great Britain. These are divided sedge *Carex divisa* and slender hare's-ear *Bupleurum tenuissimum* both of which are associated with coastal grazing marsh and transitional grassland, and yellow vetchling *Lathyrus aphaca* and Bithynian vetch *Vicia bithynica* which are associated with open grassland areas across the site.

A sustainable population of the nationally scarce round-leaved wintergreen *Pyrola rotundifolia* subsp. *maritima* is found amongst denser scrub ...

**Yellow vetchling** *Lathyrus aphaca*.  
Photograph courtesy of John Martin.



**Divided sedge** *Carex divisa*.  
Photograph courtesy of John Martin.



### [invertebrates]

... The site supports over 1,700 species of invertebrate and four nationally important assemblages. Brownfield areas support assemblages of species chiefly associated with bare sand and chalk and open short swards. These assemblages are rich in bee and wasp species which use the open substrates for nesting, prey collection and basking, and the rich wild flower resource for nectar and pollen. Significant species within the assemblage include the critically endangered distinguished jumping spider *Sitticus distinguendus* and rare five-banded weevil-wasp *Cerceris quinquefasciata*.

Wetland areas, primarily Black Duck Marsh and ponds resulting from construction of the CTRL support assemblages chiefly associated with open water on disturbed mineral sediments and saltmarsh and transitional brackish marsh. These wetlands support 84 species of water beetle. This represents over a quarter of the UK water beetle fauna. This richness derives from a mix of fresh and brackish water. Species of note include the nationally scarce *Enochrus halophilus*, which is generally associated with brackish pools and ditch saltmarsh and the nationally rare great silver water beetle *Hydrophilus piceus*, found in marshes, drains and especially coastal grazing marshes ...

**Distinguished jumping spider**, *Sitticus distinguendus* (bare sand and chalk assemblage). Photo courtesy of Ian Hughes.



**Chalk carpet moth**, *Scotopteryx bipunctaria* (open short sward assemblage). Photo courtesy of Butterfly Conservation/Stuart Reed.



## [Breeding birds]

... The wetlands, grasslands, scrub, saltmarsh and intertidal mud within the SSSI support two nationally important breeding bird assemblages, one associated with lowland open waters and their margins, lowland fen and lowland damp grassland, the other with lowland scrub ...

The fen and swamp habitats of Black Duck Marsh and the CTRL wetlands support marsh harrier *Circus aeruginosus* and water rail *Rallus aquaticus*. Wetland habitats across the site also support reed bunting *Emberiza schoeniclus*, sedge warbler *Acrocephalus schoenobaenus*, bearded tit *Panurus biarmicus* and reed warbler *Acrocephalus scirpaceus*, with the last of these often providing host nests for cuckoo *Cuculus canorus*. The wetland mosaic with scrub supports Cetti's warblers *Cettia cetti*.

Botany Marsh West is a surviving fragment of a formerly more extensive grazing marsh, providing damp grassland habitat for lapwing *Vanellus vanellus* and greylag goose *Anser anser*. Shelduck *Tadorna tadorna*, little egret *Egretta garzetta* and grey heron *Ardea cinerea* utilise a number of wetland habitats and forage within the intertidal habitats of the adjacent River Thames. Little egret and grey heron nest in a heronry south of Black Duck Marsh. The water bodies, particularly the larger examples within the CTRL wetlands and Black Duck Marsh also support a number of breeding waterfowl including pochard *Aythya ferina*, tufted duck *Aythya fuligula*, gadwall *Mareca strepera*, shoveler *Spatula clypeata*, mute swan *Cygnus olor* and little grebe *Tachybaptus ruficollis*.

Scrub varies in density across the site. Species such as grasshopper warbler *Locustella naevia* prefer scattered patches in open habitat, while nightingale *Luscinia megarhynchos*, bullfinch *Pyrrhula pyrrhula* and garden warbler *Sylvia borin* favour areas of denser scrub. Long-tailed tits *Aegithalos caudatus* favour areas of scrub with more open margins, whilst linnets *Linaria cannabina* and lesser whitethroats *Curruca curruca* are typically associated with the scrub mosaic of the former landfill tips and areas north of the CTRL wetlands, respectively ...

**Bearded tit.** *Panurus biarmicus*  
Photo courtesy of Alan Drewitt.



**Marsh harrier** *Circus aeruginosus*.  
Photo courtesy of Philip Ray.





*Extract from Rationale for the SSSI designation of the Swanscombe Peninsula – Report by Buglife, Kent Wildlife Trust and RSPB*

... The Swanscombe Peninsula is located in the centre of the Thames Estuary and benefits from the estuary's unique climate, which is more continental than the rest of the UK (Map 1). Low rainfall causing soil water deficit, mild winters, and higher than average temperatures and sunshine levels in summer help to maintain dry, open habitats. These allow wildlife with Mediterranean elements to develop, many at the northerly limits of their range and unable to survive elsewhere in the UK. Much of the important wildlife in the Thames Estuary is associated with dry, flower-rich, open grasslands on nutrient-poor sands and gravel traditionally found in the former Thames Terrace Grassland communities.

However, agricultural improvement and development pressure have led to widespread losses of these former Thames Terrace Grasslands and other terrestrial habitats, resulting in this characteristic fauna being increasingly dependent on the network of open habitats that develop on brownfields. Such wildlife-rich brownfield sites develop as a result of abandonment and periodic disturbance across sites with low nutrient status and drought stress, creating diverse flower-rich mosaics. Many brownfield features mimic semi-natural habitats such as the Thames Terrace Grasslands that have now been lost from the wider landscape.

However, not all brownfields are wildlife-rich, with the term often referencing any previously developed land. Criteria have been developed to identify wildlife-rich brownfields, which are then referred to as Open Mosaic Habitats on Previously Developed Land (OMHPDL), a habitat of principal importance in Section 41 of the Natural Environment and Rural Communities Act (2006).

The erection of high flood defences and coastal squeeze have also led to the loss of many of the coastal wetland habitats that support significant biodiversity in the Thames Estuary. Where brownfield habitats supporting flower-rich, nutrient poor soils and wetland features are found in close proximity, forming a tight mosaic of diverse habitats and underlying substrates and hydrology, sites can become refuges for high densities of rare and endangered species. In addition, the unique combination of Mediterranean climate, and the long-term presence of flower-rich, sparsely vegetated habitats adjacent to wetland habitats that makes Thames Estuary brownfields of such national biological significance.

The Swanscombe Peninsula and adjacent estuary supports a unique mosaic of coastal habitats, grasslands, scrub and wetlands that have developed as a result of the site's complex human history. The diversity of habitats, size and position within the Thames Estuary allow it to support an extraordinarily rich fauna and flora. The Swanscombe Peninsula is one of the last remaining large brownfield habitats in the Thames Estuary. Due to the pace and extent of development of these habitats in the region it is extremely vulnerable. A large part of the terrestrial site is identifiable as OMHPDL, a habitat which is suffering from significant losses in the Thames Estuary. Indeed, in the six years between 2007 and 2013, 51% of key brownfield biodiversity sites identified were either lost, damaged, or under threat from an existing planning permission in the Thames Estuary. The current rapid destruction of these habitats is

occurring despite the widespread recognition of the nationally important invertebrate assemblages associated that are being lost

The site supports a nationally important assemblage of terrestrial invertebrates, populations of aquatic invertebrates of high conservation value, and a nationally significant population of the Tentacled lagoon-worm (*Alkmaria romijni*), the habitat of which is protected under the Wildlife & Countryside Act (WCA) (1981). In total there are over 250 invertebrate species of conservation concern, and 49 red listed species, including the Critically Endangered Distinguished jumping spider (*Attulus distinguendus*) – figures thought to be higher than on any other OMHPDL site in the UK. It also supports a regionally important breeding bird assemblage including 15 red-listed Birds of Conservation Concern and 12 Species of Principal Importance, 13 nationally scarce vascular plant species, including 5 red-listed species, and populations of reptiles, bats, Water vole (*Arvicola amphibious*) and Otter (*Lutra lutra*). The overall value and uniqueness of the site with its mosaic of habitats is demonstrated by the sheer taxonomic breadth of the species of conservation concern ...

*Extract from **Buglife** - London Resort Nationally Significant Infrastructure application- Buglife Relevant Representations*

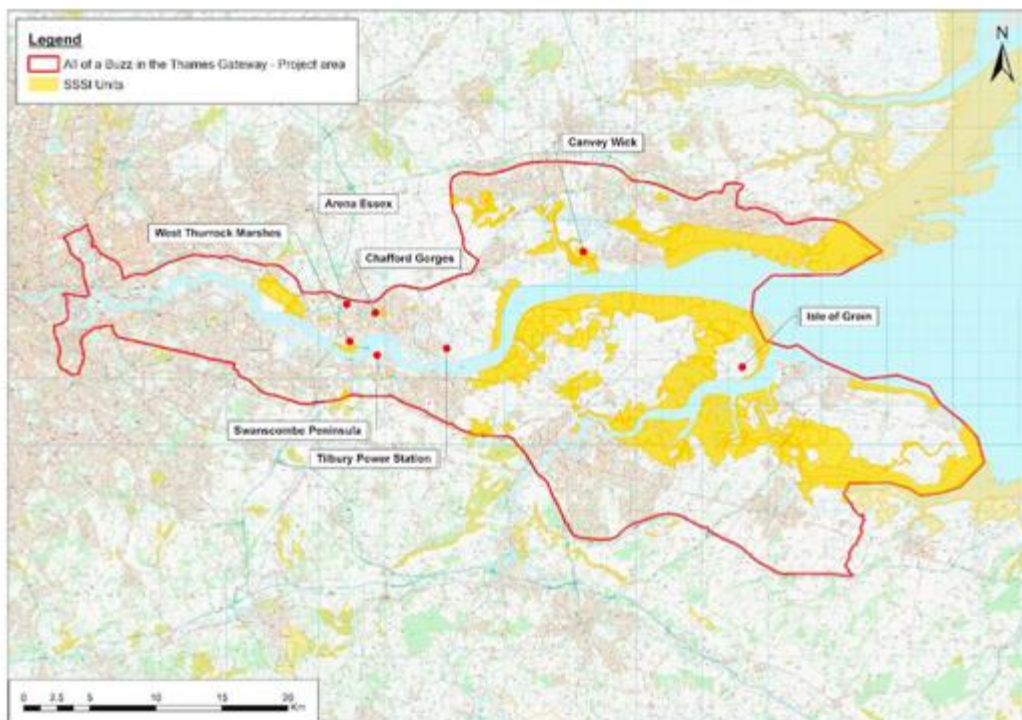
... The Swanscombe Peninsula supports a nationally significant assemblage of invertebrates, which includes over 250 species of conservation concern (Red Data Book or Nationally Scarce), even without the inclusion of 2020 survey data. This exceeds the assemblages at both Canvey Wick and West Thurrock Marshes, long considered to be the best national examples of OMHPDL habitat and key sites in the Thames Estuary for invertebrates. Being home to the longest list of red-listed and nationally scarce invertebrate species of any wildlife-rich brownfield site in the UK means that the site is demonstrably of national significance ...

...The site supports the Critically Endangered Distinguished jumping spider (*Attulus distinguendus*), one of only two UK populations. The loss of the Swanscombe Peninsula's OMHPDL habitats would threaten the long-term future of this spider as a UK species. The site also supports the Endangered Duffey's bell-head spider (*Praestigia duffeyi*), the Vulnerable Orange-striped water beetle (*Graphoderus cinereus*) and several Near Threatened invertebrate species. The site also boasts an impressive list of invertebrate Section 41 species, that are indicative of the site's potential importance: Sea aster mining bee (*Colletes halophilus*), Brown-banded carder bee (*Bombus humilis*), Phoenix fly (*Dorycera graminum*), Black-headed mason wasp (*Odynerus melanocephalus*), Five- banded weevil wasp (*Cerceris quinquefasciata*), Saltmarsh shortspur beetle (*Anisodactylus poeciloides*), Yellow-striped bear-spider (*Arctosa fulvolineata*), in addition to a number of declining Lepidoptera species ...

... The proposed development undermines the government's commitment to protect 30% of the UK's land for nature by 30% and its commitment to Nature Recovery Networks and the 25 Year Environment Plan's commitment to "effectively linking existing protected sites and landscapes". The SSSI network and protection of habitats of principle importance must underpin the government's approach to halting biodiversity declines ...

[regional context – many other similar sites have been destroyed or damaged and reduced in area]

- Canvey Wick SSSI – now a joint RSPB, Land Trust and Buglife nature reserve and under conservation management ... corner of the SSSI was destroyed when a road was built through the SSSI.
- West Thurrock Marshes – Over a quarter of the site is now developed, including half of the most important invertebrate habitat ...
- Chafford Gorges – Mostly now under housing development, but with several areas retained as scattered SSSI and Local Wildlife Sites, managed by the Essex Wildlife Trust ... many of the best remnants of habitat small and fragmented.
- Isle of Grain NP – c.80% of habitat is expected to be destroyed by an approved application.
- Arena Essex – A planning permission is currently being considered which would lead to the loss or gradual reduction in value of most key areas of the site.
- Tilbury Power Station, including Lytag Brownfield Local Wildlife Site (Tilbury 2) – The majority of the ash fields around the power station have now been 'restored' to arable land or have outstanding planning permissions. The Lytag Brownfield Local Wildlife Site and much of the associated habitats are expected to be lost as a result of the approved Tilbury 2 Nationally Significant Infrastructure Project.



*Map of key brownfield/OMHPDL sites in the Thames Estuary and the SSSI network within the 'All of a Buzz in the Thames Gateway' Area of Search. Contains Ordnance Survey OpenData © Crown copyright.*

[Red or Amber (rare) listed birds breeding at Swanscombe Peninsula:]



... Bearded Tit, Black Redstart, Bullfinch, Cuckoo, Dunnock, Gadwall, Grasshopper Warbler, Greylag Goose (feral), Grey Wagtail, House Sparrow, Kestrel, Kingfisher, Lapwing, Linnet, Marsh Harrier, Marsh Tit, Mistle Thrush, Nightingale, Oystercatcher, Pochard, Reed Bunting, Shelduck Shoveler Skylark, Song Thrush, Spotted Crake, Starling, Stock Dove, Swift ...

[Nationally scarce plants at Swanscombe Peninsula]

... Brackish watercress, Roundleaved wintergreen, Yellow vetchling, Hairy vetchling, Bithynian vetch, Sickle medick, Slender hare's-ear, Golden samphire, Man orchid, Divided sedge, Annual beard-grass, Borrer's saltmarsh grass, Stiff saltmarsh grass ...

... The site supports exceptional populations of Common lizard (*Zootoca vivipara*) and Slow worm (*Anguis fragilis*), with the London Resort's Ecology Baseline Report stating that "*The extent of the wetland habitat and waterbodies within the Kent Project Site has the potential to support large numbers of amphibians and records suggest that smooth and palmate newt, common toad and common frog are present.*" The site would also qualify as a Local Wildlife Site due to the presence of breeding populations of both Water vole and Dormouse (*Muscardinus avellanarius*), and the site is considered locally important due to an assemblage of at least nine bat species, including the Nationally Rare Barbastelle (*Barbastella barbastellus*) ...

*Extract from Initial representation by **Butterfly Conservation***

... Our interests relate to, but not exclusively, the range of Lepidoptera (butterflies and moths) found at the site. We are particularly interested in the presence of the Wall butterfly, Chalk Carpet moth, and the micro-moth *Pammene agnotana*

The Wall is widely distributed in England but rarely occurs in large numbers. Over the last decade it has declined in distribution substantially in many inland areas of central England. Populations remain in coastal areas, including along the south shore of the Thames estuary, where brownfield land contributes to its presence

Chalk Carpet moth occurs on unimproved calcareous grassland, cliffs and quarries and in other places where there is sparse vegetation and an abundance of bare ground. The moth has been observed to seek out patches of bare ground basking and roosting. This moth has undergone a significant reduction in its distribution since 1990

*Pammene agnotana* is a rare moth confined to a few areas of southern and south-east England, and East Anglia. The moth is associated with isolated and old Hawthorn trees, and ancient hedgerows

It is our view that the Swanscombe Peninsula is not an appropriate place for the development of a theme park and would irretrievably lead to damage of the wildlife interests that the site holds, including for the moths and butterflies described.

*Extract from - London Resort Nationally Significant Infrastructure (NSIP) application - **Kent Wildlife Trust** Relevant Representations*

... The order limits lie almost entirely within the Swanscombe Peninsula SSSI, and we estimate that this scheme will result in the direct loss of in excess of 100ha of SSSI land, equating to the loss of almost 40% of the SSSI. This percentage does not account for further degradation of remaining habitats due to hydrological changes, light and noise pollution, inappropriate management and fragmentation.

Loss of SSSI on this scale would be unprecedented. KWT strongly believe that this application and the associated Environmental Statement must be reviewed in light of the SSSI designation, and a commitment to no loss or damage to SSSI land must be made. On this basis, it is our view that the Swanscombe Peninsula is not an appropriate site for development. The approval of this scheme would set a dangerous precedent and on this basis the development should not be permitted in this location ...

... Biodiversity net gain

Principle 4 of Natural England's Biodiversity Net Gain (BNG) user guide states that "The metric focuses on widespread species and typical habitats. Area based habitats are considered a suitable proxy for widespread species found in typical examples of different habitat types. - Protected and locally important species needs are not considered through the metric, - Impacts on protected (e.g. SSSIs) and irreplaceable habitats are not adequately measured by this metric, and will likely require separate consideration." Paragraph 1575 of the Environment Bill explanatory notes states that "it is generally agreed in practice that development cannot claim biodiversity net gain in cases when development results in land take from statutory protected sites. [...] the biodiversity net gain requirement for development on such sites is additional to any existing legal or policy requirements for statutory protected areas and their features." On the basis of the designation of Swanscombe Peninsula SSSI it is not appropriate to apply BNG to this application to justify its environmental credentials ...

*Extract from Application by London Resort Company Holdings for an Order Granting Development Consent for the London Resort (BC080001)- Relevant Representation from **CPRE Kent***

CPRE Kent wishes to register its objection to this scheme. We acknowledge the importance of employment provision within the Thames Gateway but consider the negative environmental impacts of this scheme unacceptable.

...

- Environment/Biodiversity
  - The notification of the site as a SSSI is a significant change which reflects the importance of the site's biodiversity. The application should be re-considered in the light of this notification.

- We are aware of, and concur with, the concerns expressed by Buglife, KWT and the RSPB over the threat to the habitats and important species of the peninsula and its water environment and the deficiencies of the proposal in ensuring BNG.
  - CPRE has mapped light intrusion and tranquillity. The proposed site benefits from a degree of tranquillity and dark skies that are unusual for the area, and these features would be destroyed by the proposed project.
  - Dartford and Gravesham already suffer from some of the worst air quality in the SE.
  - We are concerned at the implications of raising the formal flood defences at Black Duck Marsh and the introduction of new secondary flood defences and new raised ground on adjoining areas.
- Transport
    - Visitors and staff will place significant strains on the transport network, both roads and public transport. It is not clear that the impact of peak travel (at weekends and school holidays) has been adequately assessed. It is also uncertain that the consequences of visitors and staff choosing not to use public transport as projected has been assessed.
    - There remains uncertainty over the delivery of the Lower Thames Crossing, not least in the light of the pending legal challenge of the Government's current Road Investment Strategy. It is uncertain how this will affect the modelling undertaken by the applicant.
  - Sustainability
    - The applicant acknowledges that water availability will be an issue. The wider south east region is categorised by the Environment Agency as an area of serious water stress, a situation that will be exacerbated as the projected levels of housing development are delivered.

*Extract from Application by London Resort Company Holdings for an Order Granting Development Consent for the London Resort (BC080001)- Relevant Representation from **RSPB***

... The RSPB objects to the application by the London Resort Holding Company Ltd (the Applicant) for the proposed London Resort development (the application). If granted, this application will represent one of the largest single losses of a Site of Special Scientific Interest (SSSI) in England and the largest in recent history. We calculate that this would comprise the direct loss of over 100 hectares of the Swanscombe Peninsula SSSI (the SSSI) combined with significant indirect damage caused to other parts of the SSSI within and adjacent to the footprint of the development. Such large-scale loss of a nationally important wildlife site is wholly incompatible with the site's SSSI status and in direct conflict with the Applicant's claim to create a world class entertainment resort founded on sustainable principles. To achieve this, the proposal needs to be relocated to a more suitable, alternative location.

Such destruction would contradict several key elements of Government policy and guidance with regard the protection of the natural environment. These include:

- commitment to protect 30% of the UK's land for nature by 2030;
- the Government's 25 Year Environment Plan, including its approach to Nature Recovery Networks, which states "*we will develop a Nature Recovery Network providing 500,000*



*hectares of additional wildlife habitat, more effectively linking existing protected sites and landscapes”;* and

- the national planning policy framework protection afforded to SSSIs. For example, NPPF paragraph 175b states that development likely to have an adverse effect on a SSSI should not normally be permitted. Given the scale of the destruction that would be caused by this scheme on the SSSI, the benefits of the scheme’s location would not outweigh damage caused to the SSSI and the broader impacts on the national network of SSSIs ....

... The RSPB is gravely concerned about the major impacts the development proposals will have on all of the SSSI’s notified assemblages, both in terms of direct loss of habitat and the indirect impacts during construction and the operation of the site, for example noise, lighting, pyrotechnics, hydrology, (water supply and quality) and recreational disturbance.

The application pre-dates the SSSI notification and so takes no account of the SSSI in its Environmental Statement. Such a fundamental change in the formal recognition of the peninsula’s importance for nature conservation, means that significant parts of the applicant’s Environmental Statement are no longer relevant. In our non-statutory consultation response (September 2020), we expressed concerns about the viability of this location due to its environmental sensitivity and other alternatives sites available.

The RSPB considers that the Environmental Impact Assessment (EIA) will now need to be revised ...

... Currently the applicant commits to providing Biodiversity Net Gain (BNG) by way of compensation for damaging direct impacts on the natural environment. As with the Government’s emerging BNG system, this does not take account of indirect impacts and impacts on species.

The Department for the Environment, Food and Rural Affairs (Defra) is clear that any development taking land from protected sites cannot claim to be delivering BNG ...

*Extract from objection by **Doug Hilton** – regarding impact on local businesses*

My Name is Douglas Hilton. I represent Vitesse Investments Ltd, Buckland Dartford Ltd and am a director of the peninsula management company (PMG)

I am the principle director of the above two companies that own land on what I will refer to as ‘The Northfleet Estates’. These include the Kent Kraft Estate, Manor Way Business Park, the Northfleet Industrial Estate and the Rod End Estate. I am in addition in close contact with several other companies.

My commercial involvement with these estates extends back more than thirty years ...

... I played a significant role in the final negotiations with Union Railways when they cut the estates in half for the HS1 railway line and then in helping to rebuild the estates afterwards.

I have been involved with these theme park proposals and LRCH since the inception and know most of their development team. I was a founder member of business group PMG (Peninsular Management Group), remain a director and have been the only one to discuss the so called 'offer of enhanced compensation' with LRCH and to pass comments thereon (which they have ignored)...

... General 'hub' nature and importance of these estates to the surrounding area:

These estates contain 140 plus businesses and operate across a wide range of business types. Many are family businesses.

LRCH have never liaised with businesses in any meaningful way as they are required to do in order to obtain the grant of compulsory purchase powers over them. They know it is not the case despite their DCO application claims to have done so...

... Based on what happened when the railway came through these estates in 2000, it will mean that at least 75 % or more of these businesses will not survive. A loss of over 100 companies and 2,000 plus jobs.

We estimate that there are currently around 8-900 full time people actually working on the estates every day. This does not include staff that are employed by management companies based on the estate but get sent work in other places such as builders and electricians etc. It does not include the substantial numbers of part time staff, businesses that rely on supplying the estates with products, or those that rely on the products of the estates for a living. It does not include businesses that work elsewhere and use the estate as an essential goods storage depot or rely on the essential waste tipping facilities that are part of Kent's strategic waste hub.

These estates are in effect the service, storage and maintenance hub for many other businesses and wider society and not just simple industrial units. Rip these estates out and you tear out the service centre and essential heart of the community and the city we are building between Dartford and Gravesend ...

A snapshot of businesses on the estate today would include: car repairers, MOT bays, specialist paint suppliers, highly specialist engineering companies, steel fabricators, dairy suppliers, coach hire, car sales, plant hire, building material suppliers, marble craftsmen, demolition contractors, office and general cleaners, several types of vital waste industries, car breakers, printers, couriers, car sales, steelworkers, charity HQ's, joiners, electrical engineers, ready mixed concrete firms, plumbers, cleaning firms, food storage, bottle blow moulders, bridal fabric suppliers, scaffolders, entertainment companies, joinery companies, chocolatiers, take away food suppliers and a vast array of other large and small niche businesses including storage and distribution companies that are a vital central resource for many other businesses and cheap serviced office accommodation. The cheap office accommodation combined with either container storage or the storage and distribution companies are the breeding ground for growing future captains of industry.

Some say this is a very unusual mix and that the estates are not of the new and shiny kind. Well, it is a very rare and unusual mix. Sorry to the new and shiny brigade but these estates

are entirely suitable for the vital purposes they serve and it is the very blight caused by these theme park proposals that has been stopping more new employment units being built and supressing the estates. My own companies have new units on the drawing board that are being held up, there are eight on the Rod End Estate and a further four acres just waiting for this blight to go away.

Only if these estates get wiped out will local areas realise just how much of a loss to the cohesion of the area and the number jobs and wide range of services they have lost.

There isn't anywhere else for these businesses to go locally as will be proved to the inspectorate. Even LRCH recognise this. The other point is that many of these businesses, especially motor trade and waste are never accepted on modern estates. Where will the waste hubs go let alone the rest? It is nothing short of economic and social vandalism for LRCH to propose a non-essential theme park for which there is no demonstrated demand and in the process propose to gut the essential services out of an area and throw them away with no offer of relocation.

This NSIP application should never have been granted due to manifest misdeclaration. They never stated that any businesses were in the way or that there would be thousands of job losses on the Northfleet Estates. The applicant should be made to reapply for an NSIP under the prevailing conditions ...



*Businesses in the Peninsula Management Group on existing local industrial estates are threatened by the theme park proposal (Story from Kent Online 2015 [8]).*

8 <https://www.kentononline.co.uk/kent-business/county-news/jobs-threatened-by-theme-park-43901/>



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