

Marian Spain
Natural England
County Hall
Spetchley Road
Worcester
WR5 2NP

8th February 2021

Dear Marian

Re. Urgent SSSI Designation of Swanscombe Peninsula

We hardly need to remind you that biodiversity is in crisis, or that wildlife populations, particularly of insects, are in steep decline. We are sure you are also aware that many habitats and specialist species are increasingly rare and their fragmented populations are at risk of extinction.

Many brownfields in the Thames Estuary have become harbours for rare and threatened estuarine and coastal species that were once found more widely. But they have not been safe harbours, we have seen many sites destroyed, and only two extensive areas of Open Mosaic Habitat on Previously Developed land in the area remain intact and free from development permissions – one, Canvey Wick in Essex, is an SSSI and the other, Swanscombe Peninsula, in Kent, is imminently threatened with destruction to make way for a theme park.

The purpose of SSSIs is to safeguard, for present and future generations, the diversity and geographic range of habitats, species, and geological and physiographical features, and where Natural England is of the opinion that land is of special interest by reason of its flora, fauna, or geological or physiographical features, it is the duty of Natural England to designate an SSSI.

Recent surveys have revealed that the Swanscombe Peninsula is unique and home to more red-listed and conservation concern species than any other site in the UK. The attached "*Rationale for the SSSI designation of the Swanscombe Peninsula*" (Buglife, Kent Wildlife Trust and RSPB 2021) demonstrates beyond a shadow of doubt that the site is of very high national significance for a number of biological features. There is an opportunity to put in place a blue-green belt of wildlife protected land stretching across the Thames from Swanscombe to Thurrock.

In our experience there has rarely, if ever, been a stronger case made for the SSSI designation and protection of a wildlife site. We urge you to urgently consider the evidence and recognise the special interest of the Swanscombe Peninsula. We trust that Natural England will be resolute in its impartial consideration of this site and recognise that its protection is in the national interest. It is important not to condone any development that would damage any part of the site, as this would jeopardise the integrity and importance of the site. The whole site should be designated as an SSSI as soon as possible.

We would be pleased to discuss the case with you and assist with any further information that you may require. We look forward to hearing about progress on this matter.

Yours sincerely

Organisations

Matt Shardlow MPhil, CEO Buglife
Evan Bowen-Jones, CEO Kent Wildlife Trust
Emma Marsh MAPM FRSA, Director RSPB England
Dr Craig Bennett, CEO The Wildlife Trusts
Richard Benwell, CEO Wildlife & Countryside Link
Ian Dunn, CEO Plantlife
Gill Perkins, CEO Bumblebee Conservation Trust
Dr Tony Gent PhD CBiol MRSB, CEO Amphibian & Reptile Conservation
Julie Williams DChA FMAAT , CEO Butterfly Conservation
Crispin Truman, Chief Executive CPRE
Dr Hilary Newport, Director CPRE of Kent
Kit Stoner, Chief Executive Bat Conservation Trust
Lynne Farrell, President Botanical Society of Britain & Ireland
Dr Mark Avery, Co-founder Wild Justice
Dr Stephen Judd, President British Entomological and Natural History Society
Dr Geoff Oxford, President British Arachnological Society
Linda Biddle BA PGCE, Chair Rutland Natural History Society
Dr Robert Wolton, Chairman Dipterists Forum
Tom E Tew DPhil FRSA FRSB MCIEEM, Chief Executive, NatureSpace Partnership
Shaun Leonard BSc MSc MIFM, Director Wild Trout Trust
Rosemary Hill BSc (Hons), Secretary Conchological Society of Great Britain & Ireland
Dr Gus Jones, Convener Badenoch & Strathspey Conservation Group
Janette Ward BSc (Hons) FRSA, Chair Campaign for National Parks
Dr Duncan Sivell, Chairman, The British Myriapod and Isopod Group.

Former Statutory Agency Officers (NC = Nature Conservancy, NCC = Nature Conservancy Council, EN = English Nature and NE = Natural England)

Barbara, Baroness Young of Old Scone RSE CEnv, Former Chairman of EN, CEO RSPB and CEO Environment Agency
Dr Andrew Brown CBE, Former EN CEO and Chief Officer JNCC
Andrew Wood MPA, BA, Former NE Executive Director, Science & Evidence
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John Hopkins MSc PhD, Former NE Principal Science Advisor (winner 2020 CIEEM medal)
Dr. Margaret Palmer MBE, Former JNCC Head of Species.
Dr Roger Mitchell FRSB, Former EN Head of Species and Biodiversity
Dr Chris Gibson FBNA, Former NE Principal Adviser
Dr Robert Wolton, Former EN and NE Manager and author of SSSI notification guidance
Alan Stubbs, Former NCC Terrestrial Invertebrate Specialist
Roger S. Key BSc PhD FRES (hon), Former EN and NE Head of Invertebrate Conservation
Martin Tither, Former EN Head of Private Office
Dr Martin Drake PhD, BSc, Former NCC and EN Entomological Specialist
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Dr Stephen Ward PhD, Former Scottish Natural Heritage Senior Species Conservation Officer
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Paul Toynton BA, Former EN and MoD Ecologist

Peter Schofield MA, Former Regional Officer, NCC (Former Chair Wildlife Trusts and VP Eurosite)

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Hilary Ward BA Hons (Cantab.), Former EN and NE Conservation Officer

John Bacon BA, Former EN Senior Land Manager

Tom Wall, Former NE Senior Site Manager

Frank Mawby, Former EN NNR Manager

Other expert individuals

Prof. Michael Crawley FRS, Imperial College London, Trustee of the Botanical Society of Britain and Ireland and Chair of BSBI Science Committee.

Ian Sims PhD FRES FLS MRSB MIES Eur ProBio CEnv, Librarian British Entomological and Natural History Society

Andrew Halstead MSc FRES, Former Royal Horticultural Society Entomologist

Geoffrey Kitchener MA, Chairman of Kent Botanical Recording Group, Kent recorder for Botanical Society of Britain & Ireland.

Jill Goddard CEnv, Chair of Trustees and Managing Director, Creekside Education Trust. Former Chief Executive, Thames Estuary Partnership, former London Wildlife Trust trustee, former Ecological Regeneration Manager, Lewisham Council.

Dr Johnny Birks BSc PhD, Former Chair of The Mammal Society

Nigel Spring MA Cantab PGCE, Director EuCAN CIC, Founder and former Director of The Kingcombe Centre

Dr Jessica Neumann BSc MSc FHEA, Lecturer in Environmental Management, University of Reading

Dr Judith John, Chair Bromley Biodiversity Partnership Sub-group, Conservation Officer Orpington Field Club, Former Bromley Countryside Officer, and Member of the Darwin at Downe World Heritage Site team

Bill Whitaker, Orpington Field Club, Former Chair British Herpetological Society Conservation Committee, Former Trustee of Amphibian & Reptile Conservation and Former Kent Reptile & Amphibian Group Committee member.

Richard Grimshaw BSc (Hons), Former member London Wildlife Trust Board of Trustees

Angela Pooley, Coordinator Local Friends of the Earth Group

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Dr Peter Stroh, Scientific Officer & England Officer Botanical Society of Britain & Ireland

cc. Rebecca Pow MP, Defra.

Robert Jenrick MP, MHCLG