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24 June 2025

Dear Marian

Tilbury 3 is one of the last great biodiverse brownfield sites in the Thames Gateway, but is under threat from development. We are calling on Natural England to take urgent action to designate the site as a Site of Special Scientific Interest (SSSI) to ensure that this nationally important, irreplaceable site is not destroyed.

For 20 years, Buglife has been championing the importance of brownfield habitats for invertebrates. We were instrumental in securing the future of Canvey Wick Site of Special Scientific Interest (SSSI), the first brownfield designated specifically for its invertebrates, and played a crucial role in the development of the Open Mosaic Habitat on Previously Developed Land (OMHPDL) habitat selection criteria and subsequently the first inventory of the habitat.

In recent years, Natural England has rightfully recognised that the brownfield habitats of the Thames Estuary are home to nationally important populations of invertebrates and has included the selection of SSSIs in Essex and Kent in its [public designation programme](#). This was an essential step given the vulnerability of large wildlife-rich brownfields in the area to development, from both industry and urban expansion- as outlined in our 2013 report, [The State of Brownfields in the Thames Gateway](#), that revisited sites assessed as part of the English Nature supported [All of a Buzz in the Thames Gateway](#) project. Buglife welcomed the high profile designation of the [Swanscombe Peninsula SSSI](#) in November 2021, despite the shadow cast by the London Resort's Nationally Significant Infrastructure Project (NSIP). Similarly, Buglife also welcomes Natural England's commitment to surveying and mapping the invertebrate interest of the region to inform a [potential North Thames Estuary & Marshes SSSI](#). This is a positive step and acknowledges the urgent need to designate the best remaining Thames Estuary sites and ensure a coherent ecological network is retained, to form the basis of a 30 by 30 network, and to halt and reverse biodiversity loss by 2030.

However, the recent submission of an application for Tilbury 3 to Thurrock Council (25/00598/FUL) has put the last of the large remaining brownfields that is undeveloped and unprotected at risk. This site includes some of the last remaining extensive areas of Pulverised Fuel Ash (PFA) from Tilbury Power Station, that Natural England has long recognised is an exceptional habitat resource - one that is also finite due to changes in industrial practices. Surveys associated with Tilbury 3 have shown that these ashfields and the surrounding areas are home to at least 1,196 invertebrate species, including an impressive 185 with a conservation status

Saving the small things that run the planet

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- over 15%. Such a high proportion of species of conservation concern indicates that the site is not just an important brownfield site, but one of the best. The independent invertebrate surveys submitted with the Tilbury 3 application, undertaken by the respected entomologist Mark Telfer, state unequivocally that, *“This extremely high percentage of Key Species is a strong indication of a site of very high conservation importance for invertebrates in a national context.”*

Adjacent brownfield habitats have already been lost to the Tilbury 2 NSIP, including the former Lytag Brownfield Site Local Wildlife Site (LoWS). At the time, Natural England said that the Lytag Brownfield Site *“could be considered to be of sufficient quality to meet the designation requirements of a Site of Special Scientific Interest (SSSI)”*. Natural England went as far as to state publicly that *“Natural England will be adding the site to our designations’ pipeline, consistent with the requirements of our designations’ strategy”*. However, it failed to do so, and the site has since been destroyed. It is notable that Mark Telfer’s Tilbury 3 invertebrate assessment states clearly that, *“The Tilbury 3 survey area is clearly of greater conservation importance for invertebrates than the Tilbury 2 survey area”*. This is reflected in his survey data, which clearly lays out the comparisons between the Tilbury 3 and Tilbury 2 survey data:

“In comparison, the Tilbury 3 survey area supported more Key Species and Rare Key Species (185 and 35, versus 159 and 31), higher percentages of Key Species and Rare Key Species (15.47% and 2.93%, versus 11.4% and 2.2%), more Species of Principal Importance (10, versus 6), and higher quality Pantheon assemblages (SQIs of 160, 146 and 340 for ‘open habitats’, ‘wetland’ and ‘coastal’ broad biotopes respectively, versus 147, 138 and 294).”

These impressive statistics include 10 species listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, such as Shrill Carder Bee (*Bombus sylvarum*), Brown-banded Carder Bee (*Bombus humilis*), Five-banded Weevil-wasp (*Cerceris quinquefasciata*) and Sea Aster Mining Bee (*Colletes halophilus*). The site is also home to the Critically Endangered Stripe-eyed Paragus (*Paragus albifrons*) and the Vulnerable Great Sneak-spider (*Harpactea rubicunda*), both known from only a handful of sites, alongside a host of other Endangered, Vulnerable and Near Threatened species.

Natural England has the opportunity to avoid a repeat of the disastrous loss of the Lytag Brownfield Site LoWS and the network of other habitats in Tilbury 2, by taking urgent action to designate the Tilbury ashfields as a SSSI. The potential for designation has already been made clear by Natural England in its response to the Tilbury 3 Scoping Opinion dated 1st November 2024 and submitted to Thurrock Council (24/01023/SCO). This report references *“a project that Natural England is undertaking with respect to considering the extension of the Mucking Flats & Marshes SSSI to incorporate additional land under consideration as to its special status and qualities, which would, if notified, be known as the ‘North Thames Estuary & Marshes’ SSSI”*. It goes on, with reference to the application site, to state that, *“in this respect, it should be noted that there are overlapping Government objectives for land within the red-line boundary, both for Freeport and UK’s commitment to protect and conserve a minimum of 30% of land and sea for biodiversity by 2030, known as the ‘30x30’ target alongside broader statutory targets for nature recovery set within the Environment Act 2021. Natural England has completed the majority of survey work required to inform this project, and is currently assessing the datasets arising. We expect to make a decision on the North Thames Estuary & Marshes area in 2025.”*

Has Natural England reached a decision on the proposed inclusion of red line boundary areas as part of a North Thames Estuary & Marshes SSSI? With the recently submitted planning application, Buglife is urgently seeking clarity on Natural England’s position. Designating the site as a SSSI would be a vital step in Natural England’s commitment to protecting the best wildlife sites in the Thames Estuary. This action is in line with the Natural England position in its Scoping Opinion response that, *“We are advocating that this will include the retention in situ of priority core areas of high wildlife value, connected with corridors of land and other*

stepping stones which would enable a Freeport zone porous to wildlife, which is able to make a meaningful contribution to nature recovery outcomes in this area.” It is abundantly clear that the ashfields and associated habitats in the Tilbury 3 area must be a part of the priority core areas and are in urgent need of retention to ensure that they can play a role in Thurrock’s nature recovery plans.

Natural England has been developing a publicly accessible evidence base for at North Thames Estuary & Marshes SSSI for a number of years, including surveys and assessments specifically commissioned for this purpose back in 2022. With the evidence it has gathered and that has been made available to the local team as part of the planning application, it is clear that a sufficient evidence base exists for Natural England to step in and appropriately consider the site for SSSI designation.

Natural England has acted on previous occasions to preserve nationally important sites through SSSI designation despite lingering development threats, both at Swanscombe Peninsula as already noted and at Lodge Hill as an extension of the Chattenden Woods SSSI. Buglife urges Natural England to again fulfil its important function of protecting England’s most important wildlife sites as a priority.

We would welcome the opportunity to discuss this with you.



Andrew Whitehouse
Head of Operations