



Allia Future Business Centre,
London Road, Peterborough, PE2 8AN

E-mail: info@buglife.org.uk

By e-mail only: CoryDP@planninginspectorate.gov.uk

14th October 2025

Interested Party Reference Number- 20048828

RE: Application by Cory Environmental Holdings Limited (CEHL) for an Order Granting Development Consent for the Cory Decarbonisation project.

Buglife would like to make the following additional representations in response to the additional information submitted by the applicant. Buglife maintains the points raised in our last submission dated 26th November 2024. These comments relate only to the new information provided.

Off-site Ecological Requirement Delivery Options

It is disappointing that the delivery of Biodiversity Net Gain (BNG) requirements have yet to be secured at this late stage. Whilst both on-site and off-site options are still being explored, Buglife would highlight that opportunities should be taken to secure BNG delivery where it will be most beneficial for biodiversity.

Buglife recognises that the Open Mosaic Habitat (OMH) area to be delivered is small, but as Figure 19 from the Outline Landscape Biodiversity, Access and Recreation Delivery Strategy (Outline LaBARDS) illustrates, the habitat will consist of largely linear and narrow strips. This will not be able to contain the diversity of features or be as functionally valuable to invertebrates compared to one larger area of habitat. Buglife considers that it is unlikely that these strips are likely to achieve OMH in moderate condition as anticipated in the BNG calculation.

An offsite option to deliver one larger area of OMH at Thamesmead Golf Course may be more beneficial and Buglife welcomes that the applicant is still aiming to secure this site for any off-site BNG provision. Regarding other sites identified for potential off-site delivery of OMH, it is important to establish the current habitat baseline, including value for invertebrates, to ensure that habitat creation would bring genuine biodiversity uplift. For this reason, Thameside Nature Discovery Park is not suitable as it has both already been secured as off-site delivery for ecological restoration by multiple other schemes and already supports important habitats and species present.

Buglife is unclear why OMH is not a habitat included within the schedule of management proposals for landscape and habitat works in the Outline LaBARDS. This casts further doubt on if it will be achievable

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to create OMH in moderate condition as there has been no information provided on the substrates, methods of vegetation establishment or how this habitat will be managed to maintain its interest.

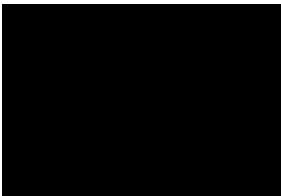
Erith Marshes – Net Loss of Metropolitan Sites of Importance for Nature Conservation Land

The loss in area of this Erith Marshes – Net Loss of Metropolitan Sites of Importance for Nature Conservation (“MSINC”) Land is an adverse impact from the proposals. The applicant proposes management measures that will aim to bring biodiversity benefits to the parts of the SINC and Norman Road Field as compensation, but it is important not to discount the impacts of direct habitat loss.

Buglife would welcome further steps to secure spatial compensation that will have beneficial impacts *now*, such as the expansion of the Thamesmead Golf Course SINC. This would be preferable to solely relying on a qualitative improvement of habitats or for restoration at the decommissioning stage. However, restoration at decommissioning should also be incorporated as the applicant has proposed in 2.1.5 of the ‘Applicant’s Response to the Secretary of State’s request for Information: 9.37’ Report.

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

Yours sincerely



Saving Sites Officer