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21st March 2024

Dear Katherine Parkin

RE: 20221064. Outline planning application with all matters reserved, except for the primary means of access and road layout, for a phased mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation / remediation works, and the development of residential units (Use Class C3), Class E uses including floorspace for retail Class E(a)), food/beverage and drinking establishments (Use Class E(b)), local services (Use Class E(c)), indoor sport/recreation/fitness (use Class E(d)), healthcare space (Use Class E(e)), creche/nursery uses (Use Class E(f)), office floorspace (Use Class E(g)(i)), a new multi-use stadium with associated business and leisure facilities (sui generis), hotel (Use Class C1), community uses floorspace (Use Class F2). The phased redevelopment will include other sui generis uses, delivery of open space and significant realignment of the road network including the A226 Galley Hill Road / Stonebridge Road / Lower Road with hard / soft landscaping, car and cycle parking provisions, infrastructure works, ancillary and associated works. | Northfleet Harbourside - Land Surrounding Ebbsfleet United Football Club, Stonebridge Road, Northfleet

Buglife- The Invertebrate Conservation Trust would like to make the following additional comments on the above planning application, whilst maintaining the objection outlined in its previous submissions, the most recent of which was dated 26th September 2023.

This submission relates to the new information provided by the applicant in February 2024 titled 'Northfleet Harbourside –Response to Natural England and Kent County Council Ecology'.

Buglife remains concerned that impacts to the nationally important invertebrate assemblage of the adjacent Swanscombe Peninsula Site of Special Scientific Interest (SSSI)¹ are not being addressed. Buglife reiterates that both Artificial Lighting at Night and overshadowing effects could have adverse impacts on the assemblage the SSSI supports.

Artificial Light at Night (ALAN)

Buglife remains concerned that impacts of ALAN during the operational phase of the development on the notified invertebrates features of the SSSI are not being addressed before determination. It is concerning that the applicant states *"In general, residential buildings would not emit high levels of light spillage, as lights are typically off at night, or blinds/curtains are likely to be drawn"*. This appears to be based solely on

¹<https://consult.defra.gov.uk/natural-england/swanscombe-peninsula/results/swanscombepeninsulassissummarymapconfirmed19nov2021.pdf>

judgement and not backed up by supporting evidence. These assumptions should not be used to determine the significance of impacts from ALAN, in fact, a worse-case scenario should be used for impact assessment. Whilst boundary vegetation is welcomed, this is likely to mitigate for light spill at ground level only. Buglife understands that the applicant is committed to implementing best practice approaches for reducing light spill, but Buglife reiterates that all impacts to a designated site and its notified features are a material consideration in a planning application, so a full lighting strategy should be reviewed prior to a decision being made. Even small increases in ALAN can have multiple potential impacts on invertebrates, many which can lead to changes in activity², mortality and disruption to life cycles³ and this development must show that it will not increase light levels on the SSSI.

Overshadowing impacts

The applicant has determined that the effect associated with overshadowing from the proposals will be negligible. Their determination is based on the majority of the affected habitat likely to be affected by overshadowing consisting of scrub, and that overshadowing will predominantly occur in March, with reduced effects in the summer months. The applicant has also speculated that the overshadowing may be beneficial, stating that *“it will create variety in the microhabitat present on the site that will favour some species and create further opportunities for diversity in the invertebrate assemblage as well as potential relief during extreme temperatures.”* Many of the species recorded in the SSSI are thermophilic, so any activity that leads to shading and potentially reducing temperatures and altering microclimates must be avoided. Creating areas of shady habitat is not what the majority of the site’s interest requires and nor has it been identified anywhere as a habitat feature that would improve the site’s notified features. Buglife would reiterate the importance of scrub as an important component of Open Mosaic Habitat on Previously Developed Land (OMHPDL), providing shelter and foraging resources to many species. However, its expansion should not be at the expense of open habitats. At present, key habitats for invertebrates are likely to be impacted by overshadowing. Buglife would argue that the development should be designed to prevent overshadowing impacts on the SSSI through changing the location or height of the buildings on the SSSI boundary as there is no evidence base to rule out adverse impacts.

Despite further information being provided by the applicant, Buglife asserts that the proposals still present a potential threat to the integrity of Swanscombe Peninsula SSSI. Buglife urges Gravesham Council to insist that a suitable lighting strategy is developed prior to determination to ensure there no impacts to the nationally important invertebrate assemblage of the SSSI. Additionally, Buglife believes the development design should be altered to prevent impacts from overshadowing, therefore preventing potential adverse impacts on habitats and invertebrates of the SSSI.

Buglife maintains its objection to the proposals until these issues are resolved and it can be conclusively shown there will be no negative impacts on Swanscombe Peninsula SSSI invertebrate assemblage.

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

Yours sincerely



Jamie Robins

² <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10797752/>

³ [Impact of artificial light on invertebrates Final_docx \(buglife.org.uk\)](#)

