Sites of Importance for Nature Conservation (SINC) partial review paper

Consultation Statement and updated boundary changes

Local Plan Regulation 18 stage submitted sites

October 2021

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1. Purpose of this paper

1.1 This paper describes the process undertaken by London Borough of Bexley [the Council] when agreeing changes to the sites of importance to nature conservation (SINC) land-use designation, shown within the adopted SINC Report 2016.

1.2 **Part 3** of this paper introduces the approach taken in selecting sites and agreeing changes to SINC boundaries. **Part 4** includes a summary of the approach to site surveys including details of site surveyors. **Part 5** of this paper sets the Council's response to representations made during the six-week public consultation on the 'Draft proposed changes to SINC' which closed on 7 May 2021. **Part 6** includes the 'final schedule of changes to SINC' and a map for each boundary change.

1.3 This paper provides the information needed for the London Wildlife Sites Board (LWSB) to review the SINC site selection process undertaken by the Council and confirm, or otherwise, that the process is consistent with the guidance set out in the LWSB advice note.

1.4 The agreed changes will be adopted by the Council and the SINC Report updated. The Council is preparing a new Local Plan for London Borough of Bexley. The submission policies map, prepared alongside the Draft Local Plan, will be updated to reflect the final changes to SINC.

2. Executive summary

2.1 In total, seven changes to SINC boundaries are being taken forward by the Council, comprising:

(1) an extension of the Crayford Rough Metropolitan SINC
(2) an extension of the Norman's Wood Borough SINC to include a pond at Dartford Road
(3) an amendment to the Edendale Road Local SINC boundary resulting in removal of part of the existing SINC, and extension to include an additional area within the SINC
(4) a reduction in the size of the Erith Quarry Borough SINC to reflect new the permitted development footprint
(5) a reduction in the size of the Whitehall Lane Borough SINC removing the amenity grassland
(6) a new designation for a Local SINC at Our Lady of the Angels Woodland
(7) a new designation for a Local SINC at Parish's Pit Woodland

2.2 The final schedule of proposed changes is set out in **Table 3**.

2.3 The SINC land-use designation is an additional consideration in planning decisions. The Council's Development Plan, formed of the Mayor's London Plan and Bexley's Local Plan, have planning policies relating to SINCs, such as London Plan Policy G6 on biodiversity and access to nature, Bexley's Core Strategy Policy CS18 Biodiversity and geology, Unitary Development Plan policies TS10, TS18, TS19, WAS3. These policies and associated guidance are considered by the planning authority when determining planning applications. Draft Local Plan Policies SP9 and DP20 on biodiversity and geodiversity in developments also relate to SINC, once adopted the Draft Local Plan will replace Bexley's Core Strategy and Unitary Development Plan. The purpose of these policies is 'not only to secure the protection of SINC from harm or loss but also help to enhance them and their connection to wider ecological networks.' This approach is supported by national policy and guidance.

3. Introduction

3.1 As part of the review of its Local Plan, the Council held a public 'call for sites' exercise, which was conducted in mid-2017. Residents, landowners and other interested parties were asked to submit details of sites that they wanted to be assessed for future development potential or change of land use designation, including potential SINC land use.

3.2 All sites submitted to the Council from the call-for-sites exercise were assessed for their suitability to accommodate the proposed use. The site assessments and Council's recommendations for land use were included within the local plan Regulation 18 stage consultation paper 'Preferred approaches to planning policies and land-use designations' that was publicly consulted upon in early 2019.

3.3 The consultation also provided an opportunity for landowners and interested parties to provide comments on existing SINC shown within the adopted SINC Report 2016 and submit requests to amend SINC boundaries.

3.4 Ultimately, 14 sites were identified from the process to be considered for SINC designation changes or for boundary amendments. Land Use Consultants (LUC) were appointed to undertake an independent ecological assessment of the 14 sites, assessing each site against the standard SINC criteria. The purpose of this ecological assessment was to determine whether the sites had met the criteria to be afforded a SINC land-use designation. The methodology used by LUC in assessing sites has been replicated in **Part 4** of this paper, providing context on the approach to site survey including details of surveyors. **Appendix 1** sets out the complete ecological assessment by LUC.

3.5 The Council summarised and tabulated LUC's findings and recommendations and added the Council's considerations of the findings and proposals for the 14 sites. Ten of the 14 sites were proposed to be updated, either incorporating boundary changes or the designation of new SINC, and maps were produced that illustrated the proposed boundary changes. **Appendix 2** sets out this work.

3.6 To ensure the assessment benefitted from additional consideration by individuals and organisations with knowledge of the sites and of nature, the Council undertook a six-week public consultation on the findings, recommendations and proposed changes. The Council invited comments from interested parties on the survey data, approach to surveys, recommendations and conclusions contained within the independent ecological review (**Appendix 1**) and on the Council's proposals (**Appendix 2**).

3.7 This consultation was targeted at those who had an interest in the land and those who had an interest or expertise in nature conservation although comments were welcomed from anyone who had an interest. The closing date of the public consultation was Friday 7 May 2021.

3.8 **Part 5** of this paper sets of a summary of comments received during the public consultation, and the Council's responses to these comments. Thirteen responses were received during the consultation.

3.9 As a result of the evidence received from the public consultation, the Council has revised its approach to three sites, which had previously been recommended for designation. These are:

- Land at Former Borax Works (centre of the site)
- Veridion Park Industrial Estate (grassland habitats to the west)

- Belvedere Gas Holders/Southern Gas Network

3.10 These three sites are no longer proposed for SINC designation. In total the Council has agreed to make changes to SINC boundaries of seven sites (set out in paragraphs 2.1 and 2.2 above). **Part 6** of this paper provides details of these changes and includes final boundary change maps.

4. Summary of the approach to site survey including details of surveyors

4.1 LUC was appointed in August 2019, by the Council to undertake a partial review of Bexley's SINC. The report of this work is set out at **Appendix 1**. This contains the habitat surveys and reviews of 14 sites within the borough, comprising;

- new sites adjoining existing SINCs currently without SINC status, which may meet designation criteria
- existing SINCs, which may have changed in condition to such an extent that the current designation for all or part of the site may not be appropriate
- potential new SINCs where sites may meet designation criteria

4.2 The approach to the site surveys including details of surveyors can be found within the methodology section of **Appendix 1**. The methodology is set out below.

Desk Study

4.3 To provide additional background and to highlight likely features or species groups of interest, a study of available biological records was undertaken within a 50m radius from each site. This included statutory and non-statutory sites and existing records of protected and/or notable species of relevance to the site. The following resources were used:

- biological records provided by Greenspace Information for Greater London
- previous ecological reporting conducted by third parties (where applicable)
- the adopted Bexley SINC Report (December 2016)
- Multi-Agency Geographical Information for the Countryside (MAGIC)
- Ordnance Survey (OS) mapping
- aerial photography

4.4 LUC produced a Green Infrastructure Study for the Borough and as part of this study conducted Open Space surveys and assessments. The Open Space surveys and assessments were reviewed as part of the desk study to ensure they are in line with the recommendations of LUC's Partial Review of SINC within Bexley (**Appendix 1**).

Survey

4.5 The surveys comprised a rapid form of Phase 1 Habitat Survey in accordance with Joint Nature Conservation Committee (JNCC) methodology. This included mapping the sites broad constituent habitats. Detailed target notes were taken for notable habitats only. Where notable habitats were found plant species were recorded and assessment of the frequency of each species was given using the DAFOR scale. Rare and notable species or features of interest were also recorded within the target notes.

4.6 Surveys were conducted by Amy Coleman BSc ACIEEM, Mungo Nash BSc Grad CIEEM and Dara Dunlop BSc over multiple visits in September 2019, and one site surveyed in early October 2019.

4.7 The sites were also subject to an assessment using the Greater London Authority's (GLA) Open Space and Habitat Survey Methodology, adopted in the Mayor's Biodiversity Strategy, 2002, updated in 2004 , and then again within Appendix 5 of the London Environment Strategy, 2018. This methodology comprises part of a process also adopted in the Mayor's Biodiversity Strategy, 2002, then in the London Environment Strategy, 2018, and subsequently updated in an Advice Note developed by the London Wildlife Sites Board (LWSB), 2019 , by which London Boroughs should select and approve SINCs. This process was specifically designed to enable the identification of SINCs, including the criteria:

- representation
- habitat rarity
- habitat richness
- species richness
- size
- important populations of species
- ancient character
- recreatability
- typical urban character
- cultural or historic character
- geographic position
- access
- use
- potential
- aesthetic appeal

4.8 Given the subjective nature of the GLA assessment methodology and criteria, field-based assessments were also based on the professional judgement of experienced ecologists.

4.9 Following completion of the surveys, a workshop was held with the Project Director, David Green MCIEEM, to develop recommendations and ensure consistency during the assessment.

4.10 Mapping showing 'Ecological Constraints and Opportunities' is presented in the **LUC report** alongside the partial SINC review recommendations. The mapping was colour coded to show ecological value of habitats within the site and identify potential of these habitats to support protected species. These were assigned as high potential (green), medium potential (orange) and low potential (red).

Assessment Limitations

4.11 Surveys were undertaken at a suitable, but sub-optimal, time of year for habitat survey and vegetation identification. However, this was not considered to pose a significant constraint, as GLA methodology requires classification of habitats, which can be achieved with a high degree of confidence in September.

4.12 Direct access was not available for site 7 'Land to the North of the River Cray, East of Maiden Lane, Crayford.' The desk study identified hardstanding and building habitats on site. These habitats were easily identified from aerial imagery and are of negligible ecological potential. Furthermore, previous ecological reporting for this site was made available, which was used to inform the assessment. Given the high confidence in the information provided through the desk study, it is considered valid and robust to inform the assessment.

5. Consultation Statement

5.1 To ensure the assessment benefitted from additional consideration by individuals and organisations with knowledge of the sites and of nature, the Council undertook a six-week public consultation on the proposed changes to the sites of importance to nature conservation (SINC) land-use designation in Bexley. The Council invited comments from interested parties on the survey data, approach to surveys, recommendations and conclusions contained within the independent ecological review of some of Bexley's designated SINC (**Appendix 1**); and the Council's subsequent schedule of proposed changes and maps setting out proposed boundary changes (**Appendix 2**).

5.2 This consultation was targeted at those who have interest in the land and others who have an interest or expertise in nature conservation, including a mix of local natural history experts and representatives of "Friends of…" groups and other local groups with an interest in land management; representatives of statutory agencies such as Natural England and Environment Agency and relevant NGOs such as London Wildlife Trust; and other relevant Council officers from planning and parks teams. However, comments were welcomed from anyone who had an interest. The closing date of this consultation was Friday 7 May 2021.

5.3 13 responses were received during the public consultation period. Five responses were received from landowners and/or consultants; in addition, responses were received from the Bexley Natural Environment Forum (BNEF), Bexley Civic Society, three local nature conservation experts/ specialists/ manager, and one resident. Both Natural England and the Environment Agency responded with no comments on the proposed SINC changes. Representations were received on both the survey approach and individual sites.

5.4 **Table 1** provides a summary of representations relating to the survey approach and the Council's response to these. The main concern raised was around the timing of the surveys being undertaken at a sub-optimal time of year. However, this is not considered to pose a significant constraint, as surveys were undertaken at a suitable time of year for habitat survey and vegetation identification.

Summary of consultation representations	Council response
In general terms, BNEF is in agreement with the findings of the report but had a number of comments in terms of clarification of details and changes it would like to see. BNEF noted that it is encouraging to see that a number of new SINCs have been recommended for designation, although in BNEF's opinion there should be no reduction in the area of any existing SINC.	Noted. Comments requesting clarification of details and changes relate to individual sites (site ID 2, 4, 5, 7, and 10). These have been summarised and addressed in **table 2**. The Council has agreed to amend the SINC boundary of site ID 10 following consideration of the BNEF comment.
BNEF noted that it was disappointed that no local groups appear to have been consulted or contacted in respect of the surveys. There are a number of people in the borough who have many years of accumulated expertise of ecological, biodiversity and species knowledge that would have provided important input.	Noted. The 6-week public consultation has provided an opportunity for local groups to comment on the surveys. The process applied to this SINC partial review is the same one used in the 2016 SINC review. Previous meetings of the LWSB approved this process without comment.
A local nature conservation specialist confirmed that they did not have any issues with the survey work done for the review.	Noted

Summary of consultation representations	Council response
A local nature conservation manager appreciated the opportunity provided by the Council to allow ecologically aware parties to comment on the SINC review document. Noting that, it is a very welcome document, and it is encouraging to see that LB Bexley are looking to strengthen and protect sites within the borough that have the most biodiversity interest.	Noted
A local nature conservation manager was concerned that the SINC review is based on site visits conducted in Sept and Oct 2019, a sub-optimal survey by its own admission, when only a Phase 1 Habitat Survey could be conducted as opposed to a full suite of ecological surveys. Although some sites will have existing biological records submitted to record centres and therefore available to the consultants, many of these sites will have had little or no such records submitted. However, although the individual did not think this review could necessarily identify species richness, the individual accepts that Phase 1 surveys will have identified important habitat types that might be linked to a loose assessment of species richness.	The LUC Partial Review Report (**Appendix 1**) sets out the limitations of the review (see paragraph **4.11** above), concluding that surveys were undertaken at a suitable, but sub-optimal, time of year for habitat survey and vegetation identification. This was not considered to pose a significant constraint, as GLA methodology requires classification of habitats, which can be achieved with a high degree of confidence in September. Surveys were undertaken in accordance with the LWSB Advice Note.
A local conservation expert noted their main concern would be that the two surveys, habitat surveys, were undertaken in September and October. As you will appreciate this is at the end of the flowering season for most vegetation and coming to the end of the active season for many amphibians, reptiles, Lepidoptera, Odonata and especially breeding birds. There was no species survey undertaken at all. In para 2.12 LUC acknowledge it is "sub-optimal time of year for habitat survey and vegetation assessment."	The LUC Partial Review Report (**Appendix 1**) sets out the limitations of the review (see paragraph **4.11** above), concluding that surveys were undertaken at a suitable, but sub-optimal, time of year for habitat survey and vegetation identification. This was not considered to pose a significant constraint, as GLA methodology requires classification of habitats, which can be achieved with a high degree of confidence in September. Surveys were undertaken in accordance with the LWSB Advice Note.
One resident queried whether ecological surveys had been undertaken on four limited green areas in Upper Belvedere, including: 1. The Green areas around Stream Way, past the Allotments from Stream Way down to Brook Street 2. The area of ground around All Saints Church and the Vicarage in Nuxley Road Belvedere 3. The Recreation Ground in Brook Street, Northumberland Heath 4. The Recreation Ground in Upper Belvedere adjacent to the Belvedere Library and Community Centre	The areas of Streamway, Chapman's Land and Erith Cemetery, along with Hollyhill Open Space are within existing SINC designations, however none of these exiting SINC or other sites queried were submitted during the public 'call for sites' exercise, which was conducted in mid-2017, or the local plan Regulation 18 stage consultation in early 2019, which provided the opportunity to submit sites and comment on existing SINC. Therefore, these sites were not considered as part of the partial SINC review.

Table 1: Analysis of representations made on survey approach

5.5 **Table 2** provides a summary of representations relating to individual sites and the Council's response to these. As a result of the representations, the Council has updated the schedule of changes to SINC, the updated schedule can be found in **Part 6** of this paper.

Analysis of representations made on sites

Site ID	Site name	Partial SINC Review – recommendation and proposed action consulted upon	Summary of consultation representations	Council response to representations	Proposed action
1	Land at Former Borax Works (centre of the site)	Designate as a borough SINC	A landowner strongly objected to new SINC designation which benefits from two significant and extant planning permissions, is also designated as a Primary Employment Area. The representation considered that a SINC designation would consequently, unreasonably and contrary to development plan policy, restrict any future development potential. A Local nature conservation manager supported the proposed SINC extension due to the notable Open Mosaic habitat present A local nature conservation specialist supports the proposed designation, noting high value open mosaic habitat, the importance of the site for breeding skylark and the presence of Shrill Carder Bee in immediate vicinity. A local nature conservation expert welcomed the proposed designation, noting the fragility and rarity of this habitat type in the Borough. The three supporters above challenged the potential to recreate the habitat through the proposed planning consent. Bexley Civic Society generally agree with SINC review recommendation	Following review of representations received, it is apparent that the landowner is currently actively progressing the two extant planning consents including outline planning consent 15/02926/OUTM for a Data Centre, and the Riverside Energy Park Development Consent Order (REP DCO), in which this site has been authorised for use as a construction compound. Biodiversity enhancements will be delivered elsewhere to offset the biodiversity impact. The REP DCO Requirements 4, 5 and 6 are all concerned with landscape and biodiversity. The developer has gone a long way in progressing proposals for biodiversity offsetting as part of the REP DCO, with construction now due to begin in 2022. Whilst the Council recognises the ecological value of this site, following consideration of representations and other evidence, the Council has determined that a SINC designation would not be appropriate for this site, and has therefore revised the proposed action.	Do not designate as the SINC
1	Land at Former Borax Works (ditches)	Retain the Metropolitan SINC	Bexley Civic Society generally agree with SINC review recommendation The proposed retention of the SINC designation was supported by local nature conservation experts	Noted, the Council supports the retention of the SINC designation. This area of the site is of SINC quality.	Retain the SINC
2	Veridion Park Industrial Estate (Reedbed habitats)	Retain the Metropolitan SINC	Bexley Civic Society generally agree with SINC review recommendation A local nature conservation expert highlights that the ditches/reed beds of Erith Marshes are so important for UK's fastest declining mammal, the water vole, every effort must be made to maintain, improve and extend the ditch network. Local nature conservation specialist supports the proposal for inclusion of the stated land in the SMINC BNEF notes that this site is an opportunity for Bexley to designate a site where biodiversity gains can be made to offset loses that have occurred over the last few years.	Noted, the Council supports the retention of the SINC designation. This area of the site is of SINC quality.	Retain the SINC
2	Veridion Park Industrial Estate (Grassland habitats to the west)	Extend the Metropolitan SINC	The landowner objects to the proposed SINC extension. The representation includes a technical note on a botanical survey undertaken in May 2021 and ecologist's memo discussing how the site compares against SINC criteria. The ecologist determines that there is no strong and compelling ecological or practical basis for extending SINC, noting that there would only be logic in extending the SINC designation to cover the entire grassland if there was also a realistic prospect of ever regrading and rewetting the site, and reintroducing grazing. The ecologist refers to the strategic industrial land designation, planned business park development and landowner interest. The landowner highlights that the proposal is not justified from an ecological perspective, the site does not meet the SINC criteria and has no recorded material changes in ecology since the last SINC review. The landowner also states that the SINC designation would conflict with other strategic and local land use objectives to deliver employment space on a site of regional importance for industrial capacity. There is no evidence that demonstrates the site is surplus to meeting the employment needs of London/Bexley. The representation also highlights that the designation would frustrate the delivery of business space approved in 2012, which will be	It is recognised that the principle of development on the site has been accepted through an approved active outline planning consent 10/00063/OUTEA . New evidence obtained through the public consultation, around the deliverability and viability of the existing scheme and the development of the site in the longer term is persuasive. The landowner is actively progressing with plans to develop this site and implementing ecological enhancement and management measures offsite to offset the impact of the development. Whilst the Council recognises the ecological value of this site, following consideration of representations and other evidence, the Council has determined that a SINC designation would not be appropriate for this site, and has therefore revised the proposed action.	Do not extend the SINC

Site ID	Site name	Partial SINC Review – recommendation and proposed action consulted upon	Summary of consultation representations	Council response to representations	Proposed action
			accompanied by substantive ecological works and improvements to existing SINCs and the enhancement and creation of new habitat outside of approved development plots. A local nature conservation specialist notes the Partial review findings support the position of conservationists at planning application stage, disagrees with the arguments about development. BNEF notes that this site is an opportunity for Bexley to designate a site where biodiversity gains can be made to offset loses that have occurred over the last few years. A local conservation manager supports the extension of SINC to include species-rich grassland areas to the west of the site which is important in its own right and also its connectivity to the wider Erith Marshes. A local nature conservation expert welcomes the acknowledgement of the importance of the species rich grassland with the proposed SINC extension. Bexley Civic Society generally agree with SINC review recommendation		
2	Veridion Park Industrial Estate (Grassland habitats to the east)	Do not extend the SINC	Bexley Civic Society generally agree with SINC review recommendation A local nature conservation specialist notes that it would be ideal to bring the eastern section up to SINC quality. BNEF sees no reason that the SINC could not be extended to include the eastern grasslands, which could then be enhanced. This site is an opportunity for Bexley to designate a site where biodiversity gains can be made to offset loses that have occurred over the last few years.	Noted, whilst the Council recognises that many sites have opportunities for ecological enhancement, only those sites that provide a significant contribution to the ecology of an area are identified as SINC. This site is not considered to be of SINC quality. This site is subject to the same planning consent as the Grassland habitats to the west – see above.	Do not extend the SINC
3	Greenfield land adjacent to Crayford Rough	Extend the Metropolitan SINC	A representation prepared by the landowners' ecologists, enclosing a letter, PEA and PBRA report, recommends the SINC is not extended given the limited ecological benefit this is likely to incur and considering the significant opportunities for enhancing the existing SINC associated with development of this area, benefits of which are likely to greatly outweigh the impacts of the area lost and therefore will provide overall greater long-term benefits to biodiversity, than through SINC extension. An extended Phase I habitat survey Feb 2021 confirmed no significant changes since 2014, when the site is subject to a previous planning application, 15/00830/FULM, with a resolution to grant, a material consideration in any future planning application. Further Phase II surveys have commenced. Botanical and reptile surveys have been undertaken in 2021. The representation questions whether the area meets criteria for 'important populations of species, with insufficient information provided to support SINC qualification. While semi-improved grassland habitat is acknowledged to be rare within the borough, this only forms a small portion of the site, and is threatened by scrub encroachment, and are likely to be lost in the absence of management. The majority of the area is formed of broadleaved woodland and scrub. The woodland area is in poor condition with ground flora indicative of high-nutrient soils. Local nature conservation specialist supports the proposed SINC extension and agrees with the finding of the partial SINC review. The individual confirms the presence of common lizard, in potentially large numbers. The individual has identified that half the Pyramidal Orchids on Crayford Rough as a whole are within this area, and the only area of the Crayford Rough where the individual	It is noted that the site forms part of planning application 15/00830/FULM, to which a planning decision has not been issued, to date. The site is essentially a continuation of the existing SINC, the habitats are one and the same and are within the same boundary features. Notwithstanding both botanical surveys by LUC (September 2019) and TG (April 2021) were carried out during sub-optimal survey season several rare plant communities were identified within the SINC extension area. These included yellow vetchling and orchids recorded both by the LUC and TG. The site is likely to support a range of breeding birds. If scrub / woodland / ephemeral habitat within the extension area is lost, these habitats cannot be successfully mitigated by provision of bird boxes. Species such as chiffchaff, greenfinch, blackcap, common whitethroat, lesser whitethroat, linnet and meadow pipit will not typically take up resident in boxes. A good population of common lizard is likely to be present within both the extension area and habitats within the remainder of the proposed development footprint. Development of this area would not only result in direct habitat loss but will also likely have a detrimental impact on the common lizard population, with increased recreational pressure and predation from cats and dogs. Although the site is succeeding to scrub and woodland this does not diminish its importance for nature conservation as this rich mosaic of habitats is also a	Extend the SINC

Site ID	Site name	Partial SINC Review – recommendation and proposed action consulted upon	Summary of consultation representations	Council response to representations	Proposed action
			identified Bee Orchids, noting this to be a rare plant in the borough, and the best site for them. The individual identifies the high floristic value more generally, as spelt out in the report, particularly for members of the Pea family. Local nature conservation manager agrees with SINC extension Bexley Civic Society generally agree with SINC review recommendation	criterion for SINC selection (Habitat richness). There are various options that can secure enhancement of the existing SINC habitat management and provide long-term benefits to biodiversity, without decreasing in the size of the current green space. The loss of native scrub, herb rich grassland and presence of protected species cannot be adequality mitigated for with short term management of remaining areas of SINC and inclusion of small areas of biodiverse roof, introduced shrub and tree planting. The SINC extension and riparian habitats within the remainder of the proposed development area also provide ecological connectivity for the adjacent River Cray Site of Metropolitan Importance for Nature Conservation. These habitats provide a supporting functionality to an important wildlife corridor which contains the River Cray, reservoirs, pasture, woodland and heathland. In summary after reviewing the representations and other evidence the Council maintains the recommendation that the proposed extension of Crayford Rough SINC be included within Crayford Rough Site of Metropolitan Importance for Nature Conservation because the extension area functions as a key component of the SINC and is considered crucial in maintaining the SINCs ecological integrity and to ensure the favourable conservation status of the site and surrounding biodiversity of the Borough. As such, the Council has determined that a SINC designation would be appropriate for this site, and therefore supports the extension of the SINC boundary.	
4	Stoneham Park, Medway Road	Do not extend the SINC	Bexley Civic Society generally agree with SINC review recommendation BNEF considers that the reasons for not extending the SINC are insufficient, and there is no reason not to designate as SINC, noting that inclusion would benefit adjacent SINC, result in larger SINC and lead to biodiversity increases, particularly with new management regime. Local nature conservation specialist does not disagree with the findings but notes that the Council should expand and buffer existing SINCs by protecting and improving the wildlife value of adjacent land; referring to SINC review finding that relaxation of mowing regimes would potentially provide ecological opportunities.	Noted, whilst the Council recognises that many sites have opportunities for ecological enhancement, only those sites that provide a significant contribution to the ecology of an area are identified as SINC. This site is not considered to be of SINC quality.	Do not extend the SINC
5a	Land at Tile Kiln Lane	Do not designate as SINC	Bexley Civic Society generally agree with SINC review recommendation BNEF query the presumption that because a site may currently be of lower ecological status and species poor that it could not be enhanced by including it in an extended SINC A local nature conservation expert believes that this site deserves a SINC designation, noting that when cultivated there is less biodiversity but when fallow and especially in winter this site provides important feeding and foraging habitat for a wide range of winter bird species notably finches, bunting, stock doves and jackdaws. Local nature conservation specialist unfamiliar with the site but in principle supports the protection of all such sites for potential to increase wildlife value, local food growing and/or renewable energy opportunities	Noted, whilst the Council recognises that many sites have opportunities for ecological enhancement, only those sites that provide a significant contribution to the ecology of an area are identified as SINC. This site is not considered to be of SINC quality.	Do not designate as SINC

Site ID	Site name	Partial SINC Review – recommendation and proposed action consulted upon	Summary of consultation representations	Council response to representations	Proposed action
5b	Land at Dartford Road (pond habitat)	Extend the SINC	Bexley Civic Society generally agree with SINC review recommendation A local nature conservation expert supports the recognition of the habitat creation on this site and the SINC designation BNEF query the presumption that because a site may currently be of lower ecological status and species poor that it could not be enhanced by including it in an extended SINC Local nature conservation specialist is not familiar with the site but is happy to back inclusion of the site within the neighbouring SINC, based on partial review and experience at Thames Road Wetland.	Noted, the Council supports extension of the SINC designation on this site. This site is of SINC quality.	Extend the SINC
5b	Land at Dartford Road (habitat to the east)	Do not extend the SINC	Bexley Civic Society generally agree with SINC review recommendation BNEF query the presumption that because a site may currently be of lower ecological status and species poor that it could not be enhanced by including it in an extended SINC Local nature conservation specialist unfamiliar with the site but in principle supports the protection of all such sites for potential to increase wildlife value, local food growing and/or renewable energy opportunities	Noted, whilst the Council recognises that many sites have opportunities for ecological enhancement, only those sites that provide a significant contribution to the ecology of an area are identified as SINC. This site is not considered to be of SINC quality.	Do not extend the SINC
5c	Land between Dartford Road and Tile Kiln Lane	Do not designate as SINC	Bexley Civic Society generally agree with SINC review recommendation BNEF query the presumption that because a site may currently be of lower ecological status and species poor that it could not be enhanced by including it in an extended SINC A local nature conservation expert would have liked to see this included in a SINC Local nature conservation specialist unfamiliar with the site but in principle supports the protection of all such sites for potential to increase wildlife value, local food growing and/or renewable energy opportunities	Noted, whilst the Council recognises that many sites have opportunities for ecological enhancement, only those sites that provide a significant contribution to the ecology of an area are identified as SINC. This site is not considered to be of SINC quality.	Do not designate as SINC
5d	Land South of Vicarage Road and Tile Kiln Lane	Do not designate as SINC	Local nature conservation specialist unfamiliar with the site but notes the partial review highlights the site is a suitable candidate for targeted biodiversity improvements, which is the sort of thing that should be brought out rather than seeking to prioritise development. Bexley Civic Society generally agree with SINC review recommendation BNEF query the presumption that because a site may currently be of lower ecological status and species poor that it could not be enhanced by including it in an extended SINC A local nature conservation expert would have liked to see this included in a SINC	Noted, whilst the Council recognises that many sites have opportunities for ecological enhancement, only those sites that provide a significant contribution to the ecology of an area are identified as SINC. This site is not considered to be of SINC quality.	Do not designate as SINC
6	Belvedere Gas Holders / Southern Gas Network	Designate as a new SINC	Landowners strongly object to the proposed SINC designation on the site, which does not reflect the sites current ecological status. The landowner has a statutory duty to dismantle the on-Site gasholders by 2029, regular maintenance involving vegetation clearance is required to keep clear access routes to underground gas mains so that in an emergency the mains can be excavated and repaired if there is a gas incident. The landowner's ecologist undertook survey works during 2018 and 2019, to guide clearance works which facilitated maintenance and access to the gas pipe network; along with surveys to inform the proposed gasholder decommissioning works and potential future site redevelopment. Recent survey work undertaken show that the site's	New evidence has been put forward through the public consultation relating to the landowner's statutory duty to dismantle the on-site gas holders, keep clear access routes to underground gas mains so that in an emergency the mains can be excavated and repaired if there is a gas incident is persuasive. This involves regular maintenance involving vegetation clearance to keep clear access routes. Whilst the Council recognises the ecological value of this site, following consideration of representations and other evidence, the Council has determined that a SINC designation would not be appropriate for this site, and has therefore revised the proposed action.	Do not designate as SINC

Site ID	Site name	Partial SINC Review – recommendation and proposed action consulted upon	Summary of consultation representations	Council response to representations	Proposed action
			current ecology value is low following clearance work. In addition, the Site is a former utility site that is surplus to requirements, located within the Bexley Riverside Opportunity Area and Thames Gateway, allocated in the Regulation 18 as a new housing site, as such, it is a prime source of land to help deliver the Borough's housing requirement. Three representations were received from local nature conservation experts agreeing with the proposal to designate the site as a SINC, due to the value of the woodland present and connectivity. One noted that the entire site should be included, as the habitat compliments the woodland. Bexley Civic Society generally agree with SINC review recommendation	The site has been allocated in the Draft Local Plan under reference SA7 BEL05 Belvedere Gas Holders, for residential development with green, open spaces. Any future development proposals will need to demonstrate compliance with development plan, including biodiversity policies, adherence to the mitigation hierarchy, and demonstration of measurable net gains for biodiversity, detailed Ecological Impact Assessments would be needed to guide the design. Long-term management, protection, and enhancement of biodiversity would need to be secured through implementation of a well-designed scheme.	
7	Land to the North of the River Cray	Do not extend the SINC	Bexley Civic Society noted that the ecologists were not able to access the site to undertake the SINC assessment, and also noted that the site is an important link between nearby open land and the Cray wildlife corridor, increasing the overall area in which wildlife can roam. BNEF noted that the initial survey which supported the planning application were carried out in January, so baseline survey information was lacking. A local nature conservation expert is disappointed this is not considered important for designation Local nature conservation specialist notes that protection of the site, would have increased width of SINC corridor along river and provided protection for Water Voles, foraging Bats etc, however, noted the site has been proposed for development.	Noted, whilst the Council recognises that many sites have opportunities for ecological enhancement, only those sites that provide a significant contribution to the ecology of an area are identified as SINC. Long-term management of an ecological buffer zone adjacent to the River Cray has been secured through planning consent 19/00941/FULM. Lack of direct access to this site is noted in the SINC review assessment limitations, however, the assessment is considered valid and robust. This site is not considered to be of SINC quality.	Do not extend the SINC
8	Land at Jubilee Way	Retain the SINC	Landowners contests the retention of this site as SINC, referencing ecological reports provided at the earlier consultation stage as having a different outtake Bexley Civic Society generally agree with SINC review recommendation A local nature conservation expert is pleased to see this site retained as a SINC Local nature conservation specialist notes the lack of public access but from outside the fence, is happy to support the SINC designation.	Noted, independent ecologists considered all the ecological information submitted at the previous consultation stage, before reaching a decision on the proposed recommendation to retain the SINC. This site is of SINC quality.	Retain the SINC
9	Erith Quarry	Retain part of the SINC, and remove part of the SINC	Bexley Civic Society noted the stark message about the amount of SINC lost due to development. A local nature conservation expert supports the partial designation and partial retention, noting disappointment in the SINC that has been lost through development. Local nature conservation specialist reflects on the loss of a once fabulous site for development. Local nature conservation manager agrees supports the SINC designation, although not directly familiar with the site, is aware of its unique habitat richness and biodiversity interest, whilst also disappointed to see the reduction of the SINC due to development given its prior ecological value, size, status, and difficulty to recreate.	Noted, the site is subject to an approved planning consent 14/02155/OUTM. The Ecological Mitigation and Management Plan secured through condition includes provisions to maximise the ecological value of retained and created habitats in the long-term.	Retain part of the SINC, and remove part of the SINC

Site ID	Site name	Partial SINC Review – recommendation and proposed action consulted upon	Summary of consultation representations	Council response to representations	Proposed action
10a	Urban Open Space at Whitehall Lane	Retain part of the SINC, and remove part of the SINC	Bexley Civic Society generally agree with SINC review recommendation BNEF understand the reasoning behind removing the amenity grassland from SINC but would prefer the whole site to remain within the designation, with enhancements; and would like to see the perimeter hedgerow to remain within the SINC designation, if designation is changed. A local nature conservation expert welcomes the recommendation, especially given reptile populations present. Local nature conservation specialist disagrees with the partial SINC review statement as to low floristic diversity, which underplays the reasonable number of species present within the 'rough' part of the site, with those such as the abundant Black Knapweed and Wild Carrot being very valuable for pollinators. Does not agree with the reduction in the size of the SINC, wanting instead to see a change in the management regime of the mown grass part, an opportunity to increase the amount of Lizard habitat. The Council should be increasing the size and buffering of SINCs and improving adjacent areas for wildlife. Local nature conservation manager agrees with the recommendation due to favourable grassland and the reptile population that it supports. One representation simply noted that an element of the REP DCO is to lay electricity cable that will run from the main site at Riverside to Littlebrook Substation in Dartford Borough Council to the REP facility in Belvedere. This will come very close to some this SINC. These works have been authorised by the REP DCO and are intended to be implemented with construction starting in 2022.	Comments requesting retention of the western part of the site are noted. Whilst the Council recognises that many sites have opportunities for ecological enhancement, only those sites that provide a significant contribution to the ecology of an area are identified as SINC. The western part of the site is not considered to be of SINC quality; therefore, the boundary change reflects this. However, the Council recognises that the perimeter hedgerow is notable and a habitat of principle importance. Therefore, the Council supports the BNEF request to retain this within the SINC boundary.	Amend boundary to retain perimeter hedgerow. Retain part of the SINC, and remove part of the SINC
10b	Urban Open Space at Howbury Lane	Do not designate as SINC	Bexley Civic Society generally agree with SINC review recommendation A local nature conservation expert noted that they were not familiar with the site but appreciated the assessment Local nature conservation specialist unfamiliar with the site but in principle supports the protection of all such sites for potential to increase wildlife value, local food growing and/or renewable energy opportunities	Noted	Do not designate as SINC
10c	Urban Open Space at Lincoln Close	Do not designate as SINC	Bexley Civic Society generally agree with SINC review recommendation A local nature conservation expert noted that they were not familiar with the site but appreciated the assessment Local nature conservation specialist unfamiliar with the site but in principle supports the protection of all such sites for potential to increase wildlife value, local food growing and/or renewable energy opportunities	Noted	Do not designate as SINC
11	Former Allotments at Howbury Lane	Retain the SINC	Bexley Civic Society generally agree with SINC review recommendation A local nature conservation expert noted that they were not familiar with this site but appreciate assessment Local nature conservation specialist makes note of a planning application at the site	Noted	Retain the SINC

Site ID	Site name	Partial SINC Review – recommendation and proposed action consulted upon	Summary of consultation representations	Council response to representations	Proposed action
12	Edendale Road (Cheviot Close and Venners Close), Barnehurst	Retain part of the SINC and extend it, and remove part of the SINC	Bexley Civic Society generally agree with SINC review recommendation A local nature conservation expert noted that they were not familiar with this site but appreciate assessment and welcome SINC extension A local nature conservation specialist has been unable to visit this site as it is private, but is happy to support proposed boundary extension, however, would call for a change in the management regime rather than de-designate the northern part of the SINC. The individual also notes that common' Lizard survives at Grasmere Rd allotments, to the west, and it is possible that there is a population here.	Noted, whilst the Council recognises that many sites have opportunities for ecological enhancement, only those sites that provide a significant contribution to the ecology of an area are identified as SINC. The northern part of the site is not considered to be of SINC quality; therefore the boundary change reflects this.	Retain part of the SINC and extend it, and remove part of the SINC
13	Our Lady of the Angels Church Woodland	Designate as a new SINC	Bexley Civic Society generally agree with SINC review recommendation A local nature conservation expert noted that they were not familiar with this site but appreciate assessment and welcome the SINC designation. Local nature conservation specialist supports the SINC designation, and notes that the woodland supports a population of Purple Hairstreak butterflies	Noted	Designate as a new SINC
14	Rail Corridor and Sandbank between Fraser/Bexley Rd, Bronze Age Way and Sandcliffe Rd	Designate as a new SINC	Bexley Civic Society generally agree with SINC review recommendation A local nature conservation expert noted that they were not familiar with this site but appreciate the assessment and welcome the SINC designation. Local nature conservation specialist supports the SINC designation, which contributes to rail-side wildlife corridor. Local nature conservation manager agrees with the proposal to designate One representation simply noted that an element of the REP DCO is to lay electricity cable that will run from the main site at Riverside to Littlebrook Substation in Dartford Borough Council to the REP facility in Belvedere. This will come very close to some this SINC. These works have been authorised by the REP DCO and are intended to be implemented with construction starting in 2022.	Noted	Designate as a new SINC

Table 2: Analysis of representations made on sites

6. Final proposed changes to the SINC land-use designation in Bexley

6.1 Part 6 of this paper updates the Council's proposed changes included within the consultation document (**Appendix 2**).

6.2 **Table 3**, below, includes a summary of LUC's ecological assessment findings and recommendations (**Appendix 1**) for the 14 assessed sites, along with the Council's response to the review's findings and recommendations after taking into consideration representations made through the six-week public consultation, set out in **Part 5** of this paper.

6.3 **Table 3** includes the Council's final schedule of changes to Bexley's SINC. As a result of the evidence received from the public consultation, the Council has revised its approach to three sites, which had previously been recommended for designation. These are:

- Land at Former Borax Works (centre of the site)
- Veridion Park Industrial Estate (grassland habitats to the west)
- Belvedere Gas Holders/Southern Gas Network

6.4 These three sites are no longer proposed for SINC designation. The perimeter hedgerow has also been retained within the SINC designation within the Urban Open Space at Whitehall Lane, as a result of comments received during the public consultation.

6.5 In total, seven changes to SINC boundaries are proposed, comprising:

(1) an extension of the Crayford Rough Metropolitan SINC
(2) an extension of the Norman's Wood Borough SINC to include a pond at Dartford Road
(3) an amendment to the Edendale Road Local SINC boundary resulting in removal of part of the existing SINC, and extension to include an additional area within the SINC
(4) a reduction in the size of the Erith Quarry Borough SINC to reflect new the permitted development footprint
(5) a reduction in the size of the Whitehall Lane Borough SINC removing the amenity grassland
(6) a new designation for a Local SINC at Our Lady of the Angels Woodland
(7) a new designation for a Local SINC at Parish's Pit Woodland

6.6 **Figures 1 to 14** contain site maps and aerial images for each site where a new or updated boundary has been proposed by the Council in **Table 3**. The site maps include the survey site ID and name in the figure title, and visually display the type of change proposed by the Council. The aerial images include the proposed SINC number and name in the figure title, and visually displays the proposed SINC boundary

Recommendations for the sites in the partial review of SINC

Site ID	Site name	Related SINC number and name	Partial SINC Review - Summary Findings	Partial SINC Review - Recommendations	Summary of Council response to Partial SINC Review findings and recommendations after considering public consultation representations	Council's proposed action	Change to SINC designation?	Change to SINC citation?	SINC boundary changes?	SINC number and/ or name changes?
1	Land at Former Borax Works (centre of the site)	Adjacent to M041 Erith Marshes	The centre of the site is considered a notable example of open mosaic on previously developed land within the borough, which is a habitat of principle importance. The site is used by a wide range of species, many of which are of notable status in London. Habitats within the centre of the site are of Borough Grade II SINC quality.	SINC extension	Noted, following consideration of consultation responses and other evidence, the Council has determined this site should not be designated. It is apparent that the landowner is currently actively progressing the two extant planning consents including outline planning consent 15/02926/OUTM for a Data Centre, and the Riverside Energy Park Development Consent Order (REP DCO). The developer has gone a long way in progressing proposals for biodiversity offsetting as part of the REP DCO, with construction now due to begin in 2022. See table 2 for details of public consultation responses.	Do not extend the SINC	N/A	N/A	N/A	N/A
1	Land at Former Borax Works (ditches)	Within M041 Erith Marshes	The ditches that bound the site are of Metropolitan SINC quality and should remain within the designation. These habitats provide connectivity within the wider Erith Marshes Metropolitan SINC and the Crossness Nature Reserve, and likely contribute towards the favourable status of these sites.	SINC retention	Agree, Long-term management of this ditch habitat and an ecological buffer zone have been secured in the reserved matters application 15/02926/OUTM02, approved in June 2020, and conditions attached to the outline planning consent for a Data Centre.	Retain the SINC	No change	Update	No change	No change
2	Veridion Park Industrial Estate (Reedbed habitats)	Within M041 Erith Marshes	Reedbed habitats within the site are in favourable condition and should remain part of the Erith Marshes Metropolitan SINC. Reed bed habitats are of value to a number of notable species, and the section which bisects the site is a notable example of this habitat within the borough.	SINC retention	Agree.	Retain the SINC	No change	Update	No change	No change
2	Veridion Park Industrial Estate (Grassland habitats to the west)	Adjacent to M041 Erith Marshes	Grassland habitats to the west are in good condition and similar to habitats found within the adjacent Erith Marshes Metropolitan SINC. These habitats support the function of the current designation and are of high ecological value.	SINC extension	Noted, following consideration of consultation responses and other evidence, the Council has determined this site should not be designated. New evidence obtained through the public consultation, around the deliverability and viability of the existing scheme and the development of the site in the longer term is persuasive. The landowner is actively progressing with plans to develop this site, originally approved under outline planning consent 10/00063/OUTEA, and is implementing ecological enhancement and management measures offsite	Do not extend the SINC	N/A	N/A	N/A	N/A

Site ID	Site name	Related SINC number and name	Partial SINC Review - Summary Findings	Partial SINC Review - Recommendations	Summary of Council response to Partial SINC Review findings and recommendations after considering public consultation representations	Council's proposed action	Change to SINC designation?	Change to SINC citation?	SINC boundary changes?	SINC number and/ or name changes?
					to offset the impact of the development. See table 2 for details of public consultation responses.					
2	Veridion Park Industrial Estate (Grassland habitats to the east)	Adjacent to M041 Erith Marshes	Grassland to the east was noted as rank, of lower quality and not a notable example within the borough and therefore is not suited for inclusion into the Erith Marshes Metropolitan SINC.	No Change	Agree.	Do not extend the SINC	N/A	N/A	N/A	N/A
3	Greenfield land adjacent to Crayford Rough	Adjacent to M123 Crayford Rough	Habitats on site are similar to those of the adjacent Crayford Rough Metropolitan SINC and likely contribute towards the functionality and favourable status of this site, making it suitable for inclusion. Essentially the site forms an ecological continuation of the SINC and habitats on site are likely to support populations of notable plant species, birds and reptiles.	SINC extension	Agree	Extend the SINC	Metropolitan	Update citation and SINC name	Update	Rename to M123 Crayford Meadows
4	Stoneham Park, Medway Road	Adjacent to BxBII28 Perry Street Farm	Supports common and widespread habitats. However, it is recognised that the site holds some value for local residents in the close vicinity of the site. Inclusion of the site with the adjoining Perry Street Farm SINC would not benefit the status of the adjoining SINC, which supports a richer assemblage of habitats and species.	No Change	Agree.	Do not extend the SINC	N/A	N/A	N/A	N/A
5a	Land at Tile Kiln Lane	None	It is recognised the site is valued by local residents for its aesthetic appeal. However, despite being notable in size, the site is of limited ecological value to the wider borough and comprises highly disturbed agricultural habitats.	No Change	Agree.	Do not designate as SINC	N/A	N/A	N/A	N/A
5b	Land at Dartford Road (pond habitat)	Adjacent to BxBII27 Norman's Wood and Tile Kiln Lane	The site is a good example of pond habitat which is scarce within the borough, and includes marginal reedbed, a habitat of principle importance. Despite its recent creation, habitats on site are of notable ecological value which will likely increase as the habitats mature, and therefore suitable for inclusion into the adjoining Normans' Wood and Tile Kiln Lane SINC. The site also provides amenity and recreational facilities, although it should be noted that these are restricted due to ticketed entry.	SINC extension	Agree.	Extend the SINC	Borough Grade II	Update	Update	Rename to BxBII27 Norman's Wood, Tile Kiln Lane and Cypry Angel Pool, Dartford Road

Site ID	Site name	Related SINC number and name	Partial SINC Review - Summary Findings	Partial SINC Review - Recommendations	Summary of Council response to Partial SINC Review findings and recommendations after considering public consultation representations	Council's proposed action	Change to SINC designation?	Change to SINC citation?	SINC boundary changes?	SINC number and/ or name changes?
5b	Land at Dartford Road (habitat to the east)	Adjacent to BxBII27 Norman's Wood and Tile Kiln Lane	Habitat to the east of the site is species poor tall ruderal and scattered/dense scrub. This habitat is widespread and common within the borough and is of relatively lower value than the wetland habitat to the west and therefore does not merit inclusion into the SINC designation in its current condition.	No Change	Agree.	Do not extend the SINC	N/A	N/A	N/A	N/A
5c	Land between Dartford Road and Tile Kiln Lane	None	The site comprises entirely of poor-semi-improved grassland adjacent to woodland and wetland habitats. Grassland habitats were noted as species poor and did not represent a good example within the borough. The site is aesthetically pleasing however has limited access and is currently managed by the landowner for private use.	No Change	Agree.	Do not designate as SINC	N/A	N/A	N/A	N/A
5d	Land South of Vicarage Road and Tile Kiln Lane	None	The site is intensively grazed, is of low ecological value and supports a limited range of habitats and species. However, it is accepted the site provides a large area of open space and attractive views across the borough, which are likely valued highly by users.	No Change	Agree.	Do not designate as SINC	N/A	N/A	N/A	N/A
6	Belvedere Gas Holders / Southern Gas Network	None	Woodland to the south of the site was noted as species rich, suitable to support a wide assemblage of breeding birds, is a notable example within the borough, and meets the criteria for SINC designation. The site is separated from the nearby Erith Marshes Metropolitan SINC by a major road, which presents an ecological barrier, and is not considered suitable for inclusion into the Erith Marshes Metropolitan SINC. However, given the value provided to the adjacent green corridor of Belvedere rail corridor it should be considered separately as a new Borough Grade II SINC. Habitat to the north of the site, noted for its botanical richness, does not comprise a notable example of open mosaic on formerly developed land by itself due to its small size and limited carrying capacity.	New SINC	Noted, following consideration of consultation responses and other evidence, the Council has determined this site should not be designated. New evidence has been put forward through the public consultation relating to the landowner's statutory duty to dismantle the on-site gas holders, keep clear access routes to underground gas mains so that in an emergency main can be excavated and repaired if there is a gas incident is persuasive. This involves regular maintenance and vegetation clearance required to keep clear access routes. See table 2 for details of public consultation responses.	Do not designate as SINC	N/A	N/A	N/A	N/A
7	Land to the North of the River Cray	Adjacent to M106 River Cray	Habitats on site were of low ecological value, common and widespread and are not	No Change	Agree.	Do not extend the SINC	N/A	N/A	N/A	N/A

Site ID	Site name	Related SINC number and name	Partial SINC Review - Summary Findings	Partial SINC Review - Recommendations	Summary of Council response to Partial SINC Review findings and recommendations after considering public consultation representations	Council's proposed action	Change to SINC designation?	Change to SINC citation?	SINC boundary changes?	SINC number and/ or name changes?
			considered suitable for inclusion into the adjacent River Cray SINC to the south.							
8	Land at Jubilee Way	Within BxBII23 Sidcup Rail sides	The assessment found the site to support high value habitats that are of Borough Grade II SINC quality, contributing to the provision and maintenance of ecological connectivity across the borough through the dark corridor of the rail side. The width of the site is considered to provide a notable contribution towards the ecological functionality of the designation, which if significantly impacted cannot be recreated offsite and would present a permanent loss of habitat connectivity. The site was also noted for its attractive views to rail users and screening provision.	SINC retention	Agree	Retain the SINC	No Change	Update	No change	No change
9	Erith Quarry	Within BxBI04 Erith Quarry and Fraser Road	The site supports a rich mosaic of habitats, therefore an additional 'buffer zone' of tall ruderal habitat, grassland and bare ground habitats should also be included within the recommended designation boundary change, to preserve the habitat richness of the site. Species rich semi-improved neutral grasslands and woodland periphery habitat are suitable to support a rich assemblage of species. The examples on site are notable examples within the borough. These habitats are difficult to recreate, are of a notable size and are of Borough Grade I SINC quality. The majority of the site however comprises a new housing development (in various stages of construction). The construction footprint does not support habitats of notable value and is not of SINC quality.	Partial SINC de-designation; and Partial SINC retention	Agree. The site is subject to an approved planning consent 14/02155/OUTM. The Ecological Mitigation and Management Plan secured through condition includes provisions to maximise the ecological value of retained and created habitats in the long-term.	Retain part of the SINC, and remove part of the SINC	No change	Update	Update	No change
10a	Urban Open Space at Whitehall Lane	BxBII15 Slade Green Recreation Ground	Grassland to the east likely continues to support a notable population of common lizard and is in favourable condition, of Borough Grade II SINC quality, despite being subject to recreational pressures. This grassland offers open views for residents of notable aesthetic value. Hedgerow along the south boundary is also notable and a habitat of principle importance. Grassland to the west was heavily mown amenity grassland and was not suitable to support populations of	Partial SINC de-designation; and partial SINC retention	Agree, following consideration of consultation responses, the Council has determined the perimeter hedgerow should also be retained within the SINC designation – See table 2 for details of public consultation responses.	Retain part of the SINC, and remove part of the SINC	No change	Update	Update	BxBII15 Rename to Whitehall Lane Open Space

Site ID	Site name	Related SINC number and name	Partial SINC Review - Summary Findings	Partial SINC Review - Recommendations	Summary of Council response to Partial SINC Review findings and recommendations after considering public consultation representations	Council's proposed action	Change to SINC designation?	Change to SINC citation?	SINC boundary changes?	SINC number and/ or name changes?
			common lizard for which the east of the site is noted for. It therefore is not suitable for SINC status.							
10b	Urban Open Space at Howbury Lane	None	Habitats on site are common, widespread and are not suitable for SINC selection.	No Change	Agree.	Do not designate as SINC	N/A	N/A	N/A	N/A
10c	Urban Open Space at Lincoln Close	None	Habitats on site are common, widespread and are not suitable for SINC selection.	No Change	Agree.	Do not designate as SINC	N/A	N/A	N/A	N/A
11	Former Allotments at Howbury Lane	Within BxBII14 Rail sides from Bexleyheath to Slade Green Triangle	The Rail sides from Bexleyheath to Slade Green Triangle SINC is designated for its mosaic of dense scrub, rough grassland and scattered trees. The site visit found similar habitat on site and supported a rich mosaic of habitats suitable to support a wide assemblage of invertebrates, breeding birds, reptiles and badger. The site was situated within an important commuting corridor for wildlife and contributes towards the functionality of the SINC and its favourable status.	SINC retention	Agree.	Retain the SINC	No change	Update	No change	No change
12	Edendale Road (Cheviot Close and Venners Close), Barnehurst	BxL11 Edendale Road, Bexleyheath	None of the habitats were notable within the borough. However, woodland is of local importance to a wide assemblage of common and widespread species (including badger, breeding birds, invertebrates and bats). Mature oak trees within the woodland were of a notable age and provided additional habitat and species richness to the woodland. The woodland is hard to recreate, as planted woodland would take a considerable amount of time to mature and develop the species and structural diversity required to provide equivalent value to the mature woodland found on site. Habitat adjacent to Venners Close is considered suitable for SINC designation through extension of the existing SINC. Tall ruderal and scattered scrub habitats to the south were of local importance to invertebrates and breeding birds and support the function of the current SINC. Grassland habitats to the north of the site are common, widespread and species poor and	Partial SINC de-designation; partial SINC retention; and SINC extension	Agree.	Retain part of the SINC and extend it, and remove part of the SINC	No change	Update	Update	BxL11 Edendale Road and Cheviot Close

Site ID	Site name	Related SINC number and name	Partial SINC Review - Summary Findings	Partial SINC Review - Recommendations	Summary of Council response to Partial SINC Review findings and recommendations after considering public consultation representations	Council's proposed action	Change to SINC designation?	Change to SINC citation?	SINC boundary changes?	SINC number and/ or name changes?
			are not suitable for SINC status. However, it is recognised that these habitats have educational value to the local scout group.							
13	Our Lady of the Angels Church Woodland	None	The site is comprised entirely of woodland that, despite its small size, is considered a notable example, of meeting the criteria for SINC quality. Dominated by oak, with a species diverse scrub layer and dynamic structure, the site likely supports a diverse range of common and widespread species. The site is functionally linked with the nearby Erith Quarry SINC and is suitable to support breeding populations of Red List species including house sparrow and song thrush, which are potentially present within the nearby Erith Quarry SINC.	New SINC	Agree.	Designate as a new SINC	Borough Grade II	New	New	BxBII31 Our Lady of the Angels Woodland
14	Rail Corridor and Sandbank between Fraser/Bexley Rd, Bronze Age Way and Sandcliffe Rd	None	The woodland habitat on site forms a notable area of rail side habitat, meeting the criteria for SINC quality. This habitat was noted as species rich and structurally diverse and hard to recreate. The position of the site along the railway cutting provides added value of connectivity, which is site specific and cannot be recreated. Linear treelines and dense scrub to the north and south of the central woodland are comparatively species poor in composition and in places comprise non-native species such as leylandii and are therefore not suitable for SINC selection.	New SINC	Agree.	Designate as a new SINC	Borough Grade II	New	New	BxBII32 Parish's Pit Woodland

Table 3: Final Schedule of changes to the SINC land-use designation



Figure 1: Survey site 3 - Greenfield land at Crayford Rough showing proposed extension to adjacent SINC



Figure 2: M123 Crayford Rough SINC showing amended boundary



Figure 3: Survey site 5b - Land at Dartford Road showing proposed extension to adjacent SINC



Figure 4: BxBII27 Norman's Wood, Tile Kiln Lane with Cypry Angel Pool, Dartford Road SINC showing amended boundary



Figure 5: Survey site 9 - Erith Quarry SINC showing proposed boundary changes



Figure 6: BxBI04 Erith Quarry and Fraser Road SINC showing amended boundary

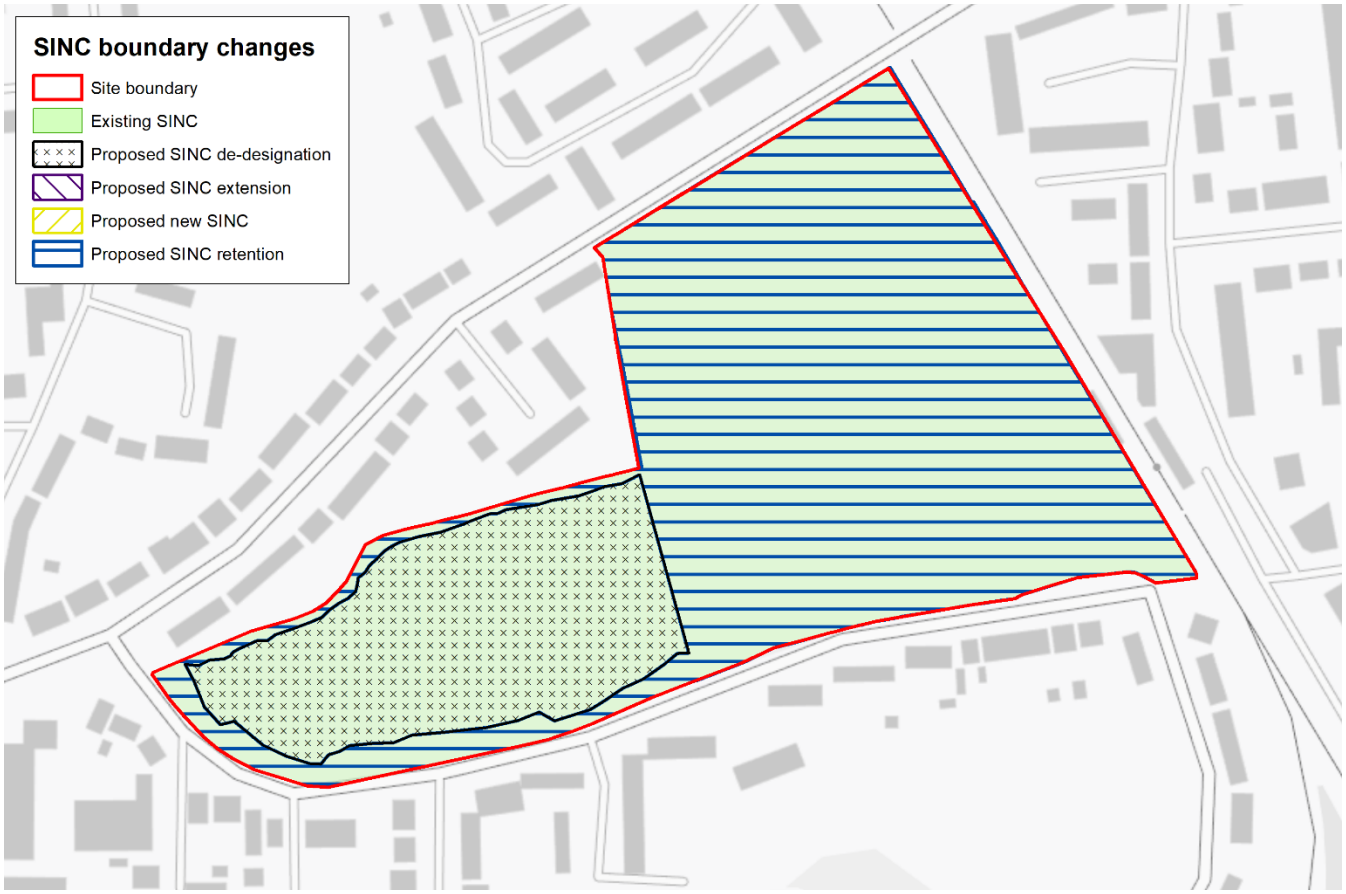


Figure 7:Survey site 10a – (renamed) Whitehall Lane Open Space SINC showing proposed boundary changes



Figure 8: BxBII15 (renamed) Whitehall Lane Open Space SINC showing amended boundary



Figure 9: Survey site 12 - Edendale Road (Cheviot Close and Venners Close) showing proposed boundary changes



Figure 10: BxL11 Edendale Road and Cheviot Close (renamed) SINC showing revised boundary



Figure 11: Survey site 13 - Our Lady of the Angels Church Woodland



Figure 12: BxBII31 Our Lady of the Angels Woodland SINC – proposed new designation



Figure 13: Survey site 14 - Rail corridor and sandbank between Fraser Rd/Bexley Rd, Bronze Age Way and Sandcliffe Rd



Figure 14: BxBII32 Parish's Pit Woodland SINC – proposed new designation

Appendix 1: Partial review of SINC, Land Use Consultants ecological assessment, Jan 2020

Refer to the independent ecological assessment of the 14 sites, which has been published alongside this paper.

Appendix 2: Sites of Importance for Nature Conservation (SINC) partial review paper, LBB consultation document, March 2021

Refer to the consultation document, which has been published alongside this paper.