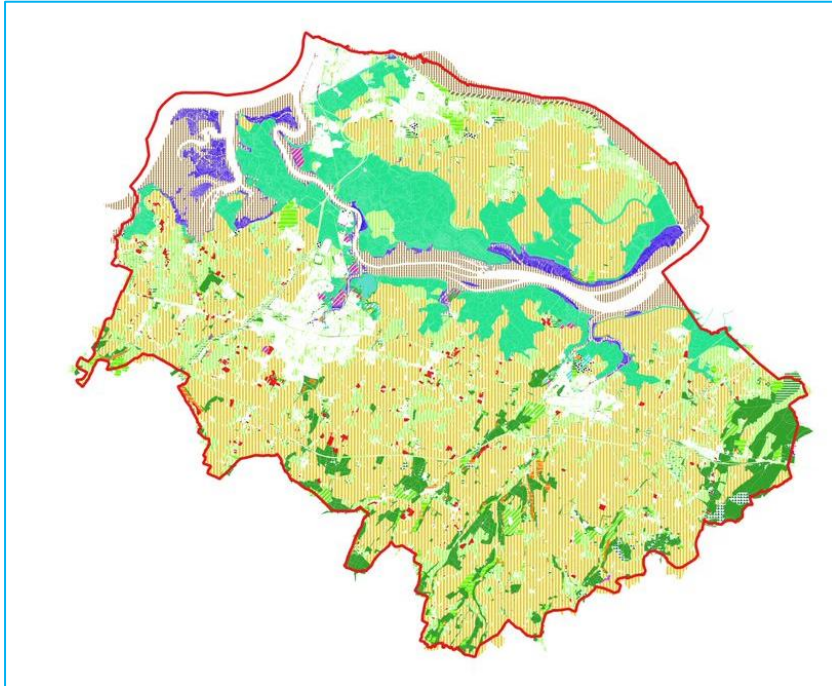




# Swale Biodiversity Baseline Report in Preparation for Requirements of the Environment Bill



## Biodiversity Baseline Report KWT Consultancy Services



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## Report Verification

<b>Client</b>	Swale Borough Council.
<b>Site / job</b>	The Boundary being that of The Borough of Swale.
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## Quality Assurance

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This report has been prepared in accordance with British Standard 42020:2013 “Biodiversity, Code of practice for planning and development”.

This report has been prepared by KWT Consultancy Services for the sole use of the client.

All opinions expressed are the true and professional bona fide opinions of K WT Consultancy Services. They do not constitute professional advice and the client may wish to seek professional legal interpretation of the relevant wildlife legislation referenced in this report.

Any information provided by third parties and referred to within this report has not been checked or verified by KWT Consultancy Services unless otherwise expressly stated within this document.

## EXECUTIVE SUMMARY

This report presents the results of a mapping exercise to record a biodiversity baseline for the Borough of Swale. The purpose is to provide guidance on how Swale Borough Council (SBC) can meet the requirements of the forthcoming Environment Bill, and how these requirements can be incorporated into the emerging Swale Local Plan. In particular, it focuses on the establishment of a Local Nature Recovery Strategy (LNRS) across the Borough and how this can be used to inform the delivery of Biodiversity Net Gain (BNG). The mapping exercise has three components:

- i) A baseline map of the distribution of different habitat types across the Borough
- ii) An assessment of the relative importance of these habitats classified according to high, medium and low priority
- iii) Identification of the most important areas for biodiversity in the Borough, in order to form the basis of a future Swale LNRS

Based on this mapping exercise, this report sets out the following key recommendations:

1. In anticipation of the Environment Bill, SBC should develop a LNRS to guide the formulation of its Local Plan, particularly for the allocation housing sites, specific policy for delivering BNG, and general policy on biodiversity that will guide planning decisions. Based on the findings of this report it is recommended that this LNRS should cover three Nature Recovery Priority Areas centred on the Swale Estuary, the North Downs and Blean, with an additional Borough-wide strategy for Traditional Orchard Priority Habitat. This should include specific targets for retaining and enhancing existing priority habitats in these areas, as well as creating new habitats, to be formulated in further work.
2. When allocating sites to go into the Local Plan, specific attention should be given to this LNRS. Policy for sites that coincided with Nature Recovery Priority Areas should include provisions to avoid negative impacts on habitat networks and highlight opportunities for creating and enhancing habitat through onsite BNG and Green Blue Infrastructure in order to meet LNRS targets.
3. Policy for delivering offsite BNG should be framed around enhancing Nature Recovery Priority Areas. Where possible any offsite BNG requirements should be met within the boundaries of Nature Recovery Priority Areas and involve meeting specific targets to restore, expand and connect existing areas of priority habitat. It is recommended that further work is undertaken to maximise the effectiveness of offsite BNG by targeting in areas where it will have the greatest impact. This includes developing a register of potential BNG sites, analysis of likely demand for offsite BNG and identification of where BNG can be used to meet other policy targets relating to climate change and green and blue infrastructure.
4. The maps contained in this report provide a useful tool to planning officers in assessing the biodiversity impacts of individual planning applications. In particular it is recommended that the maps are used for: quickly identifying where development will lead to a loss of important habitat; advising on the wider impacts of proposed developments on landscape-scale ecology (both in terms of threats and opportunities); identifying where pre-application “site trashing” may have taken place; identifying where applicants are failing to use the Biodiversity Metrics correctly; advising applicants on the best strategy for delivering offsite BNG in order to maximise biodiversity and other benefits.

# Contents

	Executive Summary	
1	INTRODUCTION	2
1.1	Commission	2
1.2	GIS	2
1.3	Mapping Data Set	2
1.4	Report	2
2	POLICY AND LEGISLATIVE RATIONALE	4
2.1	The 25 Year Environment Plan	4
2.2	Biodiversity Net Gain	4
2.3	Local Nature Recovery Strategies	5
3	COMPILING HABITAT MAPS – METHODOLOGY AND LIMITATIONS	6
3.1	Part 1 – Baseline Assessment of Habitats	6
3.2	Part 2 – Classification of high, medium and low habitat value	8
3.3	Part 3 – Identifying Nature Recovery Priority Areas	9
4	NATURE RECOVERY PRIORITY AREAS	12
4.1	Priority Areas	12
4.2	Swale Nature Recovery Priority Area	12
4.3	North Downs Nature Recovery Priority Area	13
4.4	The Blean Nature Recovery Priority Area	14
4.5	Borough Wide Priority – Traditional Orchards	14
5	APPLICATION AND RECOMMENDATIONS	16
5.1	Local Nature Recovery Strategy	16
5.2	Policy Relating to Strategic Land Use	16
5.3	Delivering Offsite BNG	18
5.4	Guidance for planning officers dealing with individual planning applications	19
6	REFERENCES	22
APPENDIX A:	Figure 1 - Habitat Types	23
APPENDIX B:	Figure 2 - Habitat Distinctiveness	24
APPENDIX C:	Figure 3 - High Distinctiveness Habitat	24
APPENDIX D:	Figure 4 - Biodiversity Opportunity Areas	25
APPENDIX E:	Figure 5 - Nature Recovery Priority Areas	25
APPENDIX F:	Figure 6 - Swale Priority Area Habitats	26
APPENDIX G:	Figure 7 - Swale Nature Recovery Priority Area Habitat	26
APPENDIX H:	Figure 8 - North Downs Nature Recovery Priority Area Habitat	27
APPENDIX I:	Figure 9 - North Downs Priority Area Designations	27
APPENDIX J:	Figure 10 - Blean Nature Recovery Priority Area Habitats	28
APPENDIX K:	Figure 11 - Blean Nature Recovery Priority Area Designations	28
APPENDIX L:	Figure 12 - Distribution of Traditional Orchard Habitat	29
APPENDIX M:	Figure 13 - SHLAA with Nature Recovery Priority Areas	29
APPENDIX N:	Recommendations on SHLAA Sites	30

## 1 INTRODUCTION AND BRIEF

### 1.1 Commission

Kent Wildlife Trust Consultancy was commissioned by Swale Borough Council (SBC) to undertake a mapping exercise covering the whole Borough in order to inform the Council's approach to meeting the biodiversity requirements of the forthcoming Environment Bill. In this respect particular attention should be given to how the delivery of Biodiversity Net Gain (BNG), both on and off site, can contribute to meeting the objectives of any future Local Nature Recovery Strategy (LNRS) established within the Borough. Our contract comprised two main elements: the production of a GIS mapping data set and the preparation of an explanatory report.

### 1.2 GIS

The GIS mapping dataset should include the following three aspects:

- Undertaking a baseline assessment of habitats present within the Borough that is compatible with BNG requirements
- Undertaking an assessment of the relative biodiversity value of land within the Borough that is compatible with BNG requirements
- Identifying and describing key Nature Recovery Priority Areas within the Borough for habitat creation and enhancement to support the delivery of BNG within a future Borough-wide LNRS

### 1.3 Mapping Data Set

The accompanying report should demonstrate the relevance of the mapping data set for:

- Advising on local planning policy relating to BNG and LNRS
- Assessing proposed site allocations that may be included in the Local Plan
- Assisting planning officers in assessing individual planning applications

### 1.4 Report

This report fulfils the brief as outlined above. It explains the rationale and methodology used in formulating this mapping dataset and outlines some of its limitations. It identifies and describes a number of Nature Recovery Priority Areas with associated targets where habitat creation and enhancement from BNG could be directed within a future Swale LNRS. It will conclude by providing recommendations about how the mapping dataset and identified Nature Recovery Priority Areas strategies can be used to support the following:

- Developing a Swale LNRS to guide the delivery of BNG across the Borough
- Undertaking site selection and devising site specific policy for SBC's Strategic Housing Land Availability Assessment (SHLAA)

- Formulating policy and developing mechanisms for delivering offsite BNG within a Swale LNRS
- Key questions relating to LNRS and BNG that that apply in the case of individual planning applications

## 2. POLICY AND LEGISLATIVE RATIONALE

### 2.1 The 25 Year Environment Plan

2.1.1 This report follows from the Government’s policy commitments to enhance biodiversity within its 25 Year Environment Plan (HM Government 2018), which will be formalised in forthcoming legislation in the Environment Bill. The content and maps contained in this report are framed in terms of the objectives of this policy and legislation where they relate to the planning system, as well as relevant methodologies specified to meet these objectives.

2.1.2 The Government’s Environment 25 Year Plan has committed to:

*“Creating or restoring 500,000 hectares of wildlife-rich habitat outside the protected site network, focusing on priority habitats as part of a wider set of land management changes providing extensive benefits”.*

The plan expands on this, stating

*“Through changes in the way we manage our land, we will develop a Nature Recovery Network providing 500,000 hectares of additional wildlife habitat, more effectively linking existing protected sites and landscapes, as well as urban green and blue infrastructure.*

The 25 year plan further commits to making the planning system a key vehicle for delivering this commitment. It states:

*“We will explore the ways in which new data, tools and strategies can support development that brings wider environmental improvement, including linking with fresh initiatives, such as the Nature Recovery Network into the planning system”*

As well as:

*“Making sure that existing requirements for net gain for biodiversity in national planning policy are strengthened, including consulting on whether they should be mandated alongside any exemptions that may be necessary”.*

2.1.3 The Government seeks to formalise these commitments in legislation through the forthcoming Environment Bill, which sets out the framework for mandating BNG and LNRS. Below are set out the relevant aspects of BNG and LNRS for the purposes of undertaking this report:

### 2.2 Biodiversity Net Gain

2.2.1 The Environment Bill mandates that all development, with limited exceptions for small applications and some brownfield sites, will be required to provide a measurable minimum of

10% BNG. This should be accommodated within the rules of the existing mitigation hierarchy<sup>1</sup>, and offsite compensation should only be considered as a last resort.

2.2.2 Developers will be required under legislation to provide a BNG plan with supporting calculations using the Defra Biodiversity Metric 2.0 (Crosher et al 2019) (henceforth referred to as the Metric) to demonstrate how BNG requirements will be met for each development. This Metric scores biodiversity, using habitats as a proxy, according to the following criteria:

- Distinctiveness – habitats are scored on a scale from very low to very high according to relative biodiversity value. Very low and low scored habitats (scored 0 and 2 respectively) represent areas under intensive human use such as buildings and infrastructure, amenity greenspace and intensive agriculture. High and very high scored habitats (scored 6 and 8 respectively) represent priority habitats scheduled under s.41 of the NERC Act (2006). Medium scores represent habitats intermediate between these two groups.
- Condition – habitats are scored between 1 and 3 for condition judged against assessment criteria set out in the Metric Technical Supplement (Crosher et al 2019).
- Connectivity – an additional multiplier of up to 1.15 can be applied to high and very high distinctiveness habitats that have wider landscape scale connectivity benefits
- Strategic significance - an additional multiplier of up to 1.15 can be applied to habitats that meet locally defined targets for conserving and enhancing biodiversity, which can be formulated and specified by local authorities

2.2.3 An overall biodiversity unit total for any given habitat is produced by multiplying the area of habitat by the scores under each of the above criteria. This calculation forms a baseline on which further calculations can take place to assess and demonstrate that BNG will be achieved post development according to a BNG plan.

2.2.4 As part of this legislation the baseline value of an area of habitat is determined at the date of application, unless any prior activity has taken place that lowers the biodiversity value of the land and is not pursuant to a grant of planning or other statutory consent. In this case the estimated biodiversity value of the area of habitat prior to this activity is considered the baseline. This is in order to prevent the practice of “site trashing” where developers deliberately destroy habitat in order to reduce the need to provide compensation for loss of habitat. Therefore a further benefit of this report and associated maps is to provide a baseline record of habitats in order to assist in appropriately enforcing this requirement.

2.2.5 Parts one and two of the mapping exercise concentrate on mapping the whole Borough according to the first criteria of habitat distinctiveness. Part one involves identifying and classifying individual habitats in types that are compatible with the Metric. Part two classifies groups of habitats by low, medium and high distinctiveness scores in order to identify where the greatest concentrations of high distinctiveness habitat occur. Other components of the metric, notably condition and strategic significance, will be referenced further in Chapter 5.

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<sup>1</sup> The mitigation hierarchy, set out in paragraph 175 of the National Planning Policy Framework, requires that developers first avoid, then mitigate, and as a last resort compensate for loss of biodiversity



## 2.3 Local Nature Recovery Strategies

2.3.1 Local authorities will be required to produce a LNRS, which should be integrated within a National Nature Recovery Network. LNRS are required to include a biodiversity statement and map, which should:

- Describe, identify and map biodiversity features within the Local Authority Boundary, including nationally designated sites, other nature reserves and wider areas of importance for biodiversity
- Describe, identify and map priorities and opportunities for promoting nature recovery and enhancement

2.3.2 The Environment Bill does not explicitly link LNRSs and BNG, however it is implied in the 25 Year Environment Plan that BNG should be used to contribute to meeting the objectives of the National Nature Recovery network and therefore also LNRS. The connection between LNRSs and BNG will be established in Part 3 of the mapping exercise, which will identify the main Nature Recovery Priority Areas for biodiversity within the Borough and opportunities to enhance biodiversity at a landscape scale in terms that are compatible with BNG and the Metric. This map will form the basis for recommendations about integrating BNG and LNRS into local planning policy and practice in Chapter 5.

### 3. COMPILING HABITAT MAPS – METHODOLOGY AND LIMITATIONS

#### 3.1 Part 1 – Baseline Assessment of Habitats

3.1.1 A desktop baseline habitat assessment was carried out in order to classify current habitats across the Borough according to the UK Habitat Classification System, which is the method of habitat classification used in the Metric. This was undertaken as a purely desktop exercise, and no ground surveys were undertaken. The following mapping resources were used and cross referenced against other non-mapping data where relevant:

3.1.2 Kent Habitat Survey (2012)(KHS): this data set represents the most comprehensive available record of habitat data available in Kent and was used as the base mapping layer for this exercise. However it has a number of limitations for the purposes of this report: a) data is from 2012, and therefore it does not always reflect current habitat cover; b) it is not directly compatible with UK Habitat Classification System and its habitat classifications require some effort to translate; c) it does not easily or reliably classify certain types of habitat in terms of relative ecological importance and distinctiveness, particularly in the case of grasslands and woodlands. Consequently it required cross referencing with other data sources to ensure results were as accurate and up to date as possible

3.1.3 The Priority Habitat Inventory (PHI): This is a publicly available data set produced by Natural England identifying priority habitats scheduled under s.41 of the NERC Act (2006). The PHI was used to cross reference the findings of the KHS in relation to the most important habitats found across the Borough, and was particularly useful in distinguishing higher and lower value woodland and grassland habitats. It does have limitations in terms of out of date and inaccurate data, and therefore required checking against satellite imagery and documentary data.

3.1.4 Google Earth: Google Earth, providing up to date satellite imagery, was used to cross check data found in the KHS and PHI in order to identify and record recent land use changes and check that habitat classifications from other sources were accurate. Using professional judgement it is generally possible to verify the presence of broad habitat types using satellite imagery with some degree of accuracy. This activity was concentrated in priority areas with the most relevance for the purposes of this report, either where there are high concentrations of priority habitats or around settlements where there are highest concentrations of proposed developments. In other lower priority parts of the Borough a more rapid assessment approach was adopted.

3.1.5 Other documentary sources and local knowledge: Where necessary and available to verify habitat classification in priority areas, data from other documentary sources and local knowledge were used. This included Local Wildlife Site citations, local records and consultation with internal KWT colleagues and local external contacts. Given the time limitations on preparing this report, this method was only applied in specific areas where high biodiversity value and potential development pressure closely coincide.

3.1.6 The map attached as Figure 1 shows the results of this exercise, dividing the Borough into discrete habitat parcels derived from the KHS that correspond to UK Habitat Classification System. Data for built areas, private gardens and transport infrastructure was removed in order to reduce the size of the data set for the purposes of producing a more manageable data set, and because these areas have limited relevance for the purposes of this report. Given the scope of this report, which relies on existing publicly accessible data and does not allow for ground surveys, the map presented is subject to the following qualifications and limitations:

- Mixed habitats – many of the polygons used in the KHS contain more than one habitat type. This primarily relates to grassland and arable habitats which contain scrub and woodland features. In the case of grasslands and croplands with low habitat distinctiveness these polygons are referred to by their primary habitat types (“modified grassland” and “cropland”), but the presence of higher habitat distinctiveness such as trees and areas of scrub is reflected in an intermediate habitat distinctiveness score (see below for further details). Separate categories of “other neutral grassland with other habitats” and “other woodland/scrub” are included to reflect composite areas of medium distinctiveness habitat occurring within a single polygon.
- Linear habitats – linear habitats such as hedge rows and tree lines are poorly reflected in the KHS, and are therefore not included in this map. Linear water features such as rivers, streams and ditches are better reflected and have been included. While linear habitats are included in the Metric, the mapping and recommendations have been confined primarily to area blocks of habitat rather than linear habitats.
- Differentiation between grassland habitat types – the Metric allows for three bands of grasslands of low, medium and high habitat distinctiveness, divided into types depending on neutral, acid and calcareous soil. The KHS is not always reliable in making distinctions between the biodiversity values of these habitat types. In the case of higher distinctiveness grasslands this issue can often be solved by cross-referencing with the PHI and satellite imagery, there is a higher level of confidence that areas ascribed to higher distinctiveness classifications are accurate. However the distinction between low and medium distinctiveness grassland is less reliable, and has often had to rely on reference to satellite imagery alone. Therefore any attributions of low and medium distinctiveness grassland would need to be confirmed by ground survey.
- Differentiation between woodland and scrub habitat types – a similar situation to grasslands occurs with woodlands and scrub. Attribution of higher distinctiveness woodland habit types is more reliable by cross referencing with the PHI, Ancient Woodland Inventory, satellite imagery and documentary evidence. However given the limited data available it is not always possible to make a reliable distinction between medium distinctiveness woodland and scrub habitats. As both of these habitats are ascribed the same distinctiveness and this is not a priority distinction for the purposes of this report, they are presented as a composite “other woodland/scrub” category.

- Classification of low value habitat types – the most common habitat types recorded are low distinctiveness modified grasslands and croplands. No attempt has been made to distinguish different types of croplands therefore this category will include arable fields as well as intensive horticulture and orchards. The KHS records the distinction between croplands and modified grassland as of 2012, and there has been significant interchange between these categories in the past eight years. While every endeavour has been made to identify and record these changes between intensive agricultural uses, given the limited time and resources and the lower priority of recording lower distinctiveness habitat types, it is likely that some inaccuracies will remain.
- Habitat condition – it is beyond the scope of this study to make judgements on the relative condition of different habitats. This would require more detailed ground study, and therefore habitat condition has been excluded from this report even though it constitutes a significant component of Defra Metric calculations.

3.1.7 This map will be made available to SBC as a GIS shapefile layer, with guidance on use set out in Chapter 5.

## **3.2 Part 2 – Classification of high, medium and low habitat value**

3.2.1 Once habitat types were identified in part one of the mapping exercise, the process of classification according to relative importance was a relatively simple one of recording respective habitat distinctiveness categories according to the pre-specified criteria of the Metric for each habitat in the data set. This was undertaken subject to the following qualifications:

- An intermediate category of Low+ was created for areas primarily composed of low distinctiveness habitat but where medium distinctiveness features were present. As stated above, this was mostly applied to intensively managed agricultural lands where some woodland or scrub features were found to be present.
- An intermediate category of Medium+ was applied to a limited number of areas primarily composed of medium distinctiveness habitat but where high distinctiveness features were also present. This applied for instance to medium distinctiveness ditch habitats where high distinctiveness features such as reed beds were also present (Low+ and Medium+ are our own classifications and are not included in the Metric).
- Very high distinctiveness habitat is confined to a few very small parcels of lowland meadow and acid grassland habitat. Given that the extent of very high distinctiveness habitat is negligible on the scale of the whole Borough, this distinctiveness classification was not included and relevant habitat parcels were recorded as high distinctiveness habitat.

3.2.2 Figure 2 illustrates habitats across the Borough classified according to Low, Low+, Medium, Medium+ and High distinctiveness habitats. Deriving from this, Figure 3 illustrates

the distribution and concentrations of high distinctiveness habitat alone, which will form the basis of Nature Recovery Priority Area mapping undertaken in part three of the mapping exercise.

3.2.3 This map will be made available to SBC as a GIS shapefile layer, with guidance on use set out in Chapter 5.

### 3.3 Part 3 – Identifying Nature Recovery Priority Areas

3.3.1 The purpose of part 3 of the mapping exercise is to identify the areas of the Borough that should be considered as Nature Recovery Priority Areas within a future Swale LNRS, and therefore be target areas for offsite BNG. The identified areas are those that are most suitable for targeting habitat restoration and creation from BNG in order to contribute to the goals of the LNRS, and where development should be avoided or carefully planned in a way that is integrated with the LNRS.

3.3.2 In identifying and mapping these areas the Lawton Principles have been followed. The Lawton Report (Lawton et al 2010) highlights that statutory protected areas are not enough to arrest biodiversity decline, and that they need to be supported by coherent and resilient ecological networks at a landscape scale. The principles call for more wildlife sites, that existing sites need to be bigger, they need to be better managed and need to be joined up through new habitat creation. These principles underpin much of the Government's 25 year plan where it relates to biodiversity as well as the content of paragraphs 170 d and 174 of the National Planning Policy Framework (Ministry of Housing, Communities and Local Government 2019).

3.3.3 Drawing from these principles, this part of the mapping exercise focused on identifying the most suitable locations for targeting BNG to achieve the greatest impact in terms of enhancing ecological networks. It prioritised parts of the Borough where there are existing concentrations of related high distinctiveness habitat with the aim of:

- Restoring existing areas of high distinctiveness habitat where condition can be improved through better management
- Creating or restoring habitat on areas of land adjoining existing areas of high distinctiveness habitat to expand habitat extent
- Creating or restoring habitat on areas of land suitable to join up one or more existing areas of high distinctiveness habitat

3.3.4 The Nature Recovery Priority Areas identified in this report therefore have two components:

- A core zone, comprising identified blocks of existing high distinctiveness habitats, within which the focus is on habitat enhancement to improve the habitat condition through better management

- A buffer zone, drawn at an appropriate distance from the core zone, where the focus is on restoration and creation to expand the extent and connectivity of existing high distinctiveness habitat. A distance of 250 meters has been chosen for indicative purposes though this does not preclude habitat restoration and creation taking place beyond this buffer (see below for further explanation).

3.3.5 In defining these Nature Recovery Priority Areas the following were also considered:

- The location of existing statutory protected areas – in the case of Swale this primarily relates to the Swale SSSI, SPA and Ramsar site but also includes parts of the Blean SSSI/SAC, and Queendown Warren SSSI/SAC. Statutory designated sites are excluded as suitable sites for restoration using BNG funding, but priority should be given to restoring habitat adjacent to SSSI boundaries.
- The Local Wildlife Site (LWS) network – there are 32 non-statutory designated LWSs in the Borough, concentrated primarily in the North Downs, on the edge of the Swale SSSI and in the Blean. The extent of identified Nature Recovery Priority Areas should prioritise restoring LWSs where there is scope for improving condition and enhancing habitat networks between them (subject to securing consent from private landowners where appropriate).
- Kent Biodiversity Opportunity Areas (BOAs) – BOAs identify parts of the Kent where the greatest opportunities exist to enhance ecological networks through habitat enhancement, restoration and creation at a county scale. Four BOAs are located partially within Swale and are illustrated in Figure 4: the North Kent Marshes, the Blean, the Mid Kent Downs Woods and Scarp and a small section of the Medway Gap and North Kent Downs. These have been used as a guide to identifying Nature Recovery Priority Areas within the Borough and defining the targets and priorities for habitat restoration and creation in these Nature Recovery Priority Areas. Note that BOAs are likely to be superseded once the Kent Nature Partnership has adopted a new countywide Nature Recovery Network, which is currently in development. Maps and statements relating to individual BOAs can be found at <http://kentnature.org.uk/boas.html>
- The Kent Biodiversity Strategy – this document was approved by the Kent Nature Partnership in February 2020 and outlines the main priorities for restoring habitats and protecting key species throughout Kent. These priorities will be highlighted in the case of each Nature Recovery Priority Area where appropriate in order to indicate where BNG has potential to contribute to the targets of the Kent Biodiversity Strategy.

3.3.6 Based on these considerations the following criteria were used to define the boundaries of the core and buffer zones of the Nature Recovery Priority Areas:

- The definition of Nature Recovery Priority Areas uses the BOA network as a foundation, but adapts and expands BOA boundaries according to further criteria listed below.

- Nature Recovery Priority Areas are focused around a core zone of easily identified blocks of contiguous or closely located high distinctiveness habitats that are characteristic of particular geological, soil, topographic and hydrological conditions. This core zone also includes easily identifiable smaller areas of high distinctive habitats that have potential to act as “stepping stones” between larger blocks.
- Outlying smaller fragments of high distinctiveness habitats that do not qualify as “stepping stones” are not included in the core zone in order to avoid over extending the buffer zone, however they can be included within the Nature Recovery Priority Area as a component within or straddling the edge of the buffer zone.
- Nature Recovery Priority Areas are extended to include all statutory and non-statutory designated areas in the Borough unless particular sites are too isolated from other blocks of high distinctiveness habitats for this to be meaningful.
- The buffer zone of Nature Recovery Priority Areas are drawn at 250m distance around the core zone of high distinctiveness habitat, subject to modifications outlined in criterion six below, where habitat creation and restoration should be prioritised into order to expand and connect existing blocks of high priority habitat. 250m has been chosen as the most appropriate distance for incorporating fields adjacent to the core zone without extending into areas too remote from the core where habitat creation and enhancement would be less desirable or achievable. This buffer should be considered an indicative guide only, and its boundary does not preclude habitat creation extending beyond the 250m buffer if appropriate.
- The 250m buffer zone does not apply to existing built up areas, and boundaries are drawn to the edge of built up areas if they extend to within 250m of the core zone. Boundaries of the buffer zone are extended beyond the 250m from the core zone if this is justified with reference to other existing strategies (for instance BOAs or opportunities identified in strategies defined by conservation organisations).

3.3.7 The results of this exercise are illustrated in Figure 5. This shows the core and buffer zones for three Nature Recovery Priority Areas focused on the Swale, North Downs and the Blean. Further details on these Nature Recovery Priority Areas are outlined in the following Chapter.

3.3.8 This map will be made available to SBC as a GIS shapefile layer, with guidance on use set out in Chapter 5. It is anticipated that these maps will be compatible for use in SBCs interactive planning mapping tool and be accessible to the public

## 4. NATURE RECOVERY PRIORITY AREAS

### 4.1 Priority Areas

4.1.1 Using criteria set out above the following three areas have been identified that could form the basis of a Swale LNRS, provide opportunities for delivering onsite and offsite BNG and guide planning policy in Swale where it relates to biodiversity. Separate consideration has also been given to Traditional Orchard priority habitat, which is found widely dispersed throughout the Borough and therefore does not easily fit within the ecological network approach applied to other habitats.

4.1.2 Specific targets have not been included for each of these priority areas as this is beyond the scope of this report. It is recommended that further work is undertaken to devise appropriate Borough specific targets for a Swale LNRS, using the Kent Biodiversity Strategy as a guide (Kent Nature Partnership 2020).

### 4.2 Swale Nature Recovery Priority Area

4.2.1 This Nature Recovery Priority Area focuses around the internationally important wetlands and intertidal habitats of the Swale SPA/Ramsar/SSSI. It is illustrated in figures 6 and 7, showing the presence of high distinctiveness habitats and designated areas within the buffer zone. The coastal and intertidal habitats of the North Sheppey Coast from Minster to Leysdown have not been included for the purposes of this report given that they are under limited development pressure and contain limited opportunities for habitat restoration under BNG, however it may be appropriate to include this area within any future LNRS. It should be noted that much of this area is covered by statutory designations and therefore falls outside the scope of BNG, including all intertidal habitats. The specific habitat restoration priorities for this Nature Recovery Priority Area can be summarised as follows:

4.2.2 Floodplain Wetland Mosaic (FWM) – FWM is a composite habitat in the UK Habitat Classification system, which is included because of its importance for providing habitat to aquatic birds and other animal species. It is also referred to as Coastal and Floodplain Grazing Marsh in other classification systems and in the PHI. FWM incorporates a range of wetland habitat types including neutral grassland, reedbed, ditches and standing open water (these individual habitats are also presented separately in Figure 1 where they do not fall within an area classified as FWM). Priority should be given to enhancing, restoring and creating FWM habitat along the SPA/Ramsar/SSSI boundary in South Sheppey and between Sittingbourne and Faversham. FWM (referred to in the document as Coastal and Floodplain Grazing Marsh) is identified as a priority in the Kent Biodiversity Strategy.

4.2.3 Neutral Grassland – many areas adjoining the Swale SSSI are not suitable for restoration to FWM owing to the lack of suitable hydrology to create and enhance wetland features. Nevertheless these areas should not be excluded from consideration for BNG. Restoring these areas to Species-Rich Neutral Grassland would not create priority habitat, but would provide a valuable transitional buffer for wetland areas closer to the coast and provide



additional habitat, particularly for bird species that are characteristic of the North Kent Marshes.

4.2.4 Former Industrial Land: the area surrounding the Swale has a long industrial history and contains a large number of sites with habitats associated with previous industrial use. This includes the priority habitat type Open Mosaic Habitat on Previously Developed Land, which is particularly important for rare invertebrates. This also includes open water in former quarries, and associate wet woodlands found in sites such as the Oare Gunpowder Works. Priority should be given to safeguarding, restoring and enhancing these sites. There are often opportunities to do this as part of onsite habitat compensation and GBI. Brownfield habitats are identified as a priority in the Kent Biodiversity Strategy.

4.2.5 Multifunctional Green Space as part of Green and Blue Infrastructure (GBI) – this Nature Recovery Priority Area borders the three main settlements in the Borough: Sittingbourne, Faversham and Sheerness. Therefore priority should be given to creating GBI that incorporates a variety of habitats, including those mentioned above but also including lowland deciduous and wet woodland habitat where appropriate, and also combines habitat creation with recreational facilities. In this way BNG has potential to contribute to the objectives of SBC’s GBI strategy.

### 4.3 North Downs Nature Recovery Priority Area

4.3.1 This Nature Recovery Priority Area is centred on the dry valleys of the dip slope of the North Downs. It is illustrated in figures 8 and 9, showing the presence of high distinctiveness habitats and designated areas within the buffer zone. The area consists of four linear concentrations of woodland and grassland high distinctiveness habitats that run from the southern boundary of the Borough towards Borden, Ospringe, Painter’s Forstal and Selling respectively and also includes a small disconnected area around Queendown Warren in the far south west corner of the Borough. In the absence of statutory protected sites (other than a small section of Queendown Warren SSSI/SAC), a network of Local Wildlife Sites forms the spine of this Nature Recovery Priority Area. The priorities for this area are:

4.3.2 Woodlands – this Nature Recovery Priority Area contains large concentrations of Lowland Deciduous Woodland priority habitat and smaller sections of Lowland Beech and Yew Woodland priority habitat. Opportunities exist to enhance this woodland through improved management, and expanding the extent and improving connectivity through creation of new woodland. There is also potential to buffer existing areas of woodland with complementary areas of species-rich grassland, wood pasture and parkland and scrub. Any woodland restoration plan should be considered in the context of the wider mosaic of woodland and grassland that exists in this area, and woodland creation should be avoided in areas where creation or restoration of Lowland Calcareous Grassland priority habitat would be more appropriate. Both these types of woodland are identified as priorities in the Kent Biodiversity Strategy, and woodland creation has potential to contribute towards SBCs climate change strategy.

4.3.3 Grasslands – this Nature Recovery Priority Area contains smaller fragments of species-rich calcareous and neutral grassland, particularly on the steep sides of dry valleys. Opportunities exist to enhance existing areas medium distinctiveness neutral and calcareous grassland to priority habitat condition, and create new medium and high distinctiveness grassland habitat on existing arable and modified grassland fields, particularly focusing on creation of Lowland Calcareous Grassland Priority Habitat. Lowland Calcareous Grassland is identified as a priority in the Kent Biodiversity Strategy.

#### **4.4 The Blean Nature Recovery Priority Area**

4.4.1 The majority of the Blean woodland complex is located within the boundaries of Canterbury, with significant sections also found on the eastern edge of Swale. The section within Swale includes the eastern extremity of the Blean SSSI and SAC (this site is excluded for the purposes of BNG). This area is illustrated in figures 10 and 11, showing the presence of high distinctiveness habitats and designated areas within the buffer zone. This Nature Recovery Priority Area is focused around a cluster of SSSI or LWS designated woodlands, composed mainly of lowland deciduous ancient woodland and conifer plantation habitat types. The Blean is distinguished from the woods of the North Downs owing to the prevalence of acid rather than calcareous soils, and as a result fragments of Lowland Heathland and Lowland Acid Grassland are also found in small pockets. The priorities for this area are:

4.4.2 Woodlands – the majority of this Nature Recovery Priority Area is composed of woodland. There are opportunities to improve management of existing Lowland Deciduous Woodland Priority Habitat, restore existing areas of low distinctiveness conifer plantation to high distinctiveness Lowland Deciduous Woodland, and create new woodland on existing agricultural land adjoining woodland areas. As stated above, Lowland Deciduous Woodland is identified as a priority in the Kent Biodiversity Strategy.

4.4.3 Grasslands and heaths – the Blean is suitable for creating mosaics of woodland combined with (depending on soil conditions) Lowland Heathland priority habitat, Lowland Acid Grassland priority habitat and Neutral Grassland (either as priority Lowland Meadow or medium distinctiveness Neutral Grassland habitats). This could be combined with restoration of existing conifer plantations. Both Lowland Heathland and Lowland Acid Grassland are identified as priorities in the Kent Biodiversity Strategy.

#### **4.5 Borough Wide Priority – Traditional Orchards**

4.5.1 Swale, and particularly the area between Sittingbourne and Faversham, is noted for its long-standing tradition of fruit growing. The remaining relict traditional orchards can be found scattered throughout the Borough and form an important part of the both it's natural and historic heritage. The distribution of traditional orchards is illustrated in Figure 13, which shows that this priority habitat type does not easily fit within any of the other priority habitat networks found in the Borough. As a result, a separate Borough-wide strategy is required to safeguard and enhance existing traditional orchards and create new traditional orchard habitat.

4.5.2 The Kent Biodiversity Strategy identifies Traditional Orchards as a priority, highlighting how development can be an appropriate mechanism for restoring or creating this habitat as an integral part of GBI within development footprints. Priorities in this respect should be to avoid any loss of Traditional Orchard as a result of development, and where appropriate incorporating new or existing traditional orchards into development master plans. As a caveat, “community orchards” are often incorporated into development in circumstances when other habitats would be more suitable for a particular location. Therefore, any plans to create new traditional orchard habitat should be reviewed to ensure that this habitat type would be in keeping with the character and ecological features appropriate to the particular location.

## 5. APPLICATION AND RECOMMENDATIONS

### 5.1 Local Nature Recovery Strategy

5.1.1 While LNRSs are not yet legally mandated, any policy for BNG should be underpinned by a strategy that anticipates the form and content of a likely future LNRS. The mapping exercise undertaken as part of this report, and the identification of four strategic priority areas outlined in Chapter 4 above, provides all the components that would be required for a legally mandated LNRS in terms of:

- Describing the key biodiversity features of the Borough
- Identifying priorities and opportunities within the Borough for promoting nature's recovery, and developing specific targets towards this end
- Identifying specific measures that could be taken to meet the targets of this strategy
- Providing a local nature recovery map to illustrate all of the above

5.1.2 It is recommended that the maps, priorities and targets specified in this report are used as the basis for a provisional LNRS, subject to future work. This would have the following benefits for Swale Borough Council:

- It would put SBC in a good position to meet legislative obligations relating LNRS with less expenditure of resources once the Environment Bill becomes Law
- It would provide a coherent Borough-wide guide to all aspects of BNG in order to maximise benefits to biodiversity at a landscape scale
- It would provide a framework for integrating BNG policy with other relevant policy areas such as climate change and BGI
- Once made law, it would provide legislative underpinning to future BNG policy and strategy.

### 5.2 Policy Relating to Strategic Land Use

5.2.1 The latest version of the Strategic Housing Land Availability Assessment (SHLAA) has been provided for the purposes of this report, which is under preparation for the forthcoming SBC Local Plan. The allocations set out in the SHLAA have compared this with the three Nature Recovery Priority Areas and the distribution of Traditional Orchard Priority Habitat, which is illustrated in Figure 13. A review has then been undertaken of all the sites in the SHLAA which are likely to impact on Nature Recovery Priority Areas, the findings of which are set out in Appendix N.

5.2.2 In the first instance it should be stated that the coincidence of an allocation proposal within a Nature Recovery Priority Area should not be considered a reason to preclude such an allocation from consideration for inclusion in the Local Plan. KWT are currently undertaking work at the site "Land East of Iwade" (SHLAA ref. 18/219), which represents a good example of how, with carefully considered master planning to maximise opportunities, a development on the edge of an identified Nature Recovery Priority Area can provide

substantial benefits for biodiversity. On the basis of this example, assessment of allocations in the Nature Recovery Priority Areas should be considered a question of balancing opportunities and threats to biodiversity specific to each case. The following recommendations can be made about how to treat proposed allocations where they coincide with Nature Recovery Priority Areas:

- Loss of priority habitat identified as part of the Nature Recovery Priority Area core zone should be avoided if possible. Where a proposed allocation area is made up entirely or predominantly by land identified as a Nature Recovery Priority Area core zone priority habitat then achieving BNG would be likely to prove difficult, both technically and financially, therefore in these cases it is advised that careful consideration is given of alternative sites for purposes of the SHLAA. Only a small number of sites in the SHLAA that would fall into this category (see Appendix N).
- Where a development is located entirely or predominantly in the Nature Recovery Priority Area buffer zone, particularly in areas suitable as sites of offsite BNG provision, it is recommended that this fact be given material weight in deciding whether the site should be accepted in the Local Plan compared to alternatives in less environmentally sensitive locations.
- In the case of sites located entirely or predominantly in the Nature Recovery Priority Area buffer zone, acceptance in the Local Plan should be subject to conditions requiring that development maximise potential opportunities to meet the targets of specific Nature Recovery Priority Areas. This should be specified in terms of: a) areas within the development footprint that are of the highest strategic significance and should therefore not be built on; b) the type of habitat required for onsite habitat compensation and BNG; c) specific opportunities for habitat enhancement within the development footprint that should be included as part of a BNG strategy; d) specific areas of the site where onsite habitat compensation and BNG should take place in order to expand and connect the extent of existing priority habitats.
- Where allocation sites are situated close to or adjacent to each other, policy should specify how habitat compensation and BNG should be coordinated to achieve maximum benefit in terms of enhancing wider habitat networks.
- Consideration should be given to avoiding not only direct loss of habitat, but also potential indirect impacts from disturbance, disruption to local hydrology and pollution (including light and noise). This particularly applies to impacts on protected animal species. It is beyond the scope of this report to go into detail about these issues as they are largely site specific. However it is recommended as a minimum that general conditions relating to these issues should be included in site specific policy (subject to further studies at the application stage) with site specific conditions included in the case of sites including or adjacent to known designated sites (including LWSs).

- For allocation sites that contain areas of Traditional Orchard priority habitat it is recommended that: a) there is no loss of Traditional Orchard priority habitat; b) that any areas of Traditional Orchard priority habitat within the development footprint are incorporated into landscape master planning at an early stage with provision of on-going management and enhancement; c) where an allocation site is composed wholly or predominantly of Traditional Orchard then consideration should be given to alternative sites on the same grounds set out in 5.2.2 bullet point 1 above.

5.2.3 In relation to these points, more specific recommendations are given for each applicable site in the SHLAA in Appendix N.

### 5.3 Delivering Offsite BNG

5.3.1 The principle recommendation of this report in relation to BNG is that the delivery of all offsite BNG should, where possible, contribute to enhancing a Swale LNRS, the components of which are outlined in this document. It is recommended that further work is undertaken to formalise this work in the Local Plan, including formulating more detailed habitat creation and enhancement targets, in order to ensure that SBC is prepared for the requirements of the Environment Bill. The LNRS should be set out explicitly in a BNG policy in the Local plan and detailed in an appended BNG Supplementary Planning Document.

5.3.2 It is beyond the scope of this document to detail all relevant aspects of creating a mechanism to deliver BNG. The Kent Nature Partnership is currently developing a countywide framework detailing all aspects of BNG, and SBC should refer to this work on the following issues:

- The form of any BNG Policy and Supplementary Planning Document for BNG
- The development of large-scale strategic conservation projects funded by pooled BNG contributions
- The governance of BNG at county and district/borough levels
- The viability of policy requiring a level of BNG in excess of the mandatory minimum of 20%
- Details relating to monitoring, reporting and accreditation

Kent Wildlife Trust and Kent Wildlife Trust Consultancy will be happy to advise and liaise with the Kent Nature Partnership on any of these issues.

5.3.3 With specific reference to the mapping exercise undertaken as part of this report, following areas can be highlighted where the maps have wider application or point towards future activities:

- The successful operation of BNG depends on securing a reliable supply of sites where habitat creation and enhancement can take place. Further investigations should be made about developing a register for receptor sites that are suitable for providing BNG in order

to meet the targets of a Swale LNRS (see paragraphs 4.1.2 and 5.3.1 regarding developing specific LNRS targets) and where landowners have expressed an interest in providing BNG on their land. This should include an audit of land owned by SBC and partner organisations (such as KWT) to identify possible cost effective and flexible BNG options that do not require resort to 3<sup>rd</sup> parties or land purchase.

- In order to secure the buy in of landowners, and any other potential investors, it will be necessary to estimate the likely demand for BNG credits. Kent Wildlife Trust Consultancy will be happy to advise on how this work might be undertaken.
- In paragraph 2.2.4 above it was stated that, in order to discourage the practice of “site trashing”, the Environment Bill will specify that in circumstances where landowners have undertaken activities that lower the value of habitats, then the baseline should be considered an estimate of habitat value prior to these activities taking place. Subject to the limitations outlined in paragraph 3.1.6 above, the habitat map illustrated in Figure 1 should be used to flag where potential “site trashing” may have taken place and where further investigations may be necessary.
- The maps contained in this report can be used to identify where BNG can be combined with other aspects of policy, particularly relating to Climate Change and GBI. BNG represents a significant opportunity to meet targets relating to tree planting and carbon sequestration, and this mapping exercise can be used to identify specific areas where woodland creation would be most suitable through BNG. Reference has been made in paragraph 4.1.4, relating to the Swale Nature Recovery Priority Area, about how the BNG could also provide multifunctional greenspace within the SBC GBI strategy. It may be appropriate to undertake further work at a finer grain of scale to identify smaller scale urban BNG opportunities, and scope exists for urban habitat enhancement being added as a 5th Nature Recovery Priority Area. Alternatively it may be appropriate to develop town based LNRSs that link in with a Borough-wide LNRS through Neighbourhood Plans.
- Paragraph 2.2.2 above refers to the Strategic Significance multiplier in the Metric. It is recommended that SBC state explicitly that the high Strategic Significance multiplier can only be used for actions that meet the targets set out in this report in order to incentivise developer compliance.
- As stated in paragraph 3.1.6 it is beyond the scope of this report to deal with linear habitats and therefore this report only covers area habitat blocks. It is recommended that further work is undertaken to identify priority linear habitats throughout the Borough.

## 5.4 Guidance for planning officers dealing with individual planning applications

5.4.1 In assessing individual planning application, particularly those impacting on Nature Recovery Priority Areas, it is recommended that the same principles for assessing proposed allocations for the SHLAA are adopted, as set out in paragraph 5.2.2. In order to assist planning officers in doing this, the following checklist of questions that should be asked where an individual development is located within or close to a Nature Recovery Priority Area, and where the development gives rise to a BNG requirement:

5.4.2 Does the development lead to the loss of any habitat identified within a Nature Recovery Priority Area core zone? If this is the case, then careful attention should be given to whether the mitigation hierarchy has been followed and if this loss could have been avoided through revised master planning.

5.4.3 In the case of developments wholly or partially in the Nature Recovery Priority Area buffer zone, what opportunities exist on site to create or enhance habitat in ways that increase the extent and connectivity of the Nature Recovery Priority Area core zone? Attention should be given to whether the applicant has properly reflected and incorporated these opportunities into their landscape masterplan. Where this is not the case then the masterplan should be revised to better reflect the opportunities present on site.

5.4.4 Do BNG habitat creation and enhancement proposals include habitat types that reflect appropriate targets for particular Nature Recovery Priority Areas? Taken in isolation, the Metric calculation can be manipulated to achieve nominally higher biodiversity gains for habitats that are not the most appropriate for the specific location. Care should be taken that proposed habitat creation and enhancement is tailored to the priorities of the LNRS, not just for maximising scores returned by the Metric.

5.4.5 Do surveys submitted with the application correspond with habitats recorded in the baseline map (Figure 1)? If this is not the case then further investigation is required to establish if a) the site has been subject to “site trashing”, therefore the applicable baseline will be an estimate of conditions existing prior to any activities that reduce the value of habitats taking place rather than the application date (see paragraph 2.2.4); b) the applicant has incorrectly applied a lower distinctiveness habitat type in order to reduce the Metric baseline score; c) one of the limitations of the baseline study outlined in paragraph 3.1.6 above applies.

5.4.6 Have condition, connectivity and strategic significance score been recorded accurately? Developers often underrepresent these scores to achieve a lower baseline, therefore these scores should be independently verified. BNG plans should be formulated in response to an accurate assessment of the site baseline, rather than manipulated to reach a predefined unit score that fits a pre-prepared BNG/compensation strategy.

5.4.7 Are offsite and onsite BNG habitat creation and enhancement plans feasible given existing site conditions relating to soil, hydrology, public use and timescales? Developers



sometimes introduce BNG plans that unrealistically inflate what can be achieved in order to achieve higher biodiversity unit scores. Where an applicant states that they will create a particular habitat in a particular location to a particular condition, advice should be sought about whether this is feasible given prevailing conditions of the site. The risks of this taking place are minimised by undertaking BNG in a Nature Recovery Priority Area, where it can be demonstrated that local conditions are suitable for particular priority habitats.

5.4.8 Does the offsite BNG plan contribute to the LNRS? Based on the recommendations of this report, all BNG requirements should meet targets relating to the Nature Recovery Priority Area as outlined in Chapter 4. If this is not the case, then the applicant should be required to provide a strong justification why this is not the case. If the applicant has not identified a site to undertake BNG, then they should be referred to any existing register of possible BNG sites that have potential to meet LNRS targets outlined in Chapter 4 and requested to seek advice from a recognised local providers of BNG.

## 6. REFERENCES

Ian Crosher A, Susannah Gold B, Max Heaven D, Matt Heydon A, Lauren Moore D, Stephen Panks A, Sarah Scott C, Dave Stone A & Nick White A (2019). *The Biodiversity Metric 2.0: auditing and accounting for biodiversity value: User guide (Beta Version, July 2019)*.

*Natural England*

Ian Crosher A, Susannah Gold B, Max Heaven D, Matt Heydon A, Lauren Moore D, Stephen Panks A, Sarah Scott C, Dave Stone A & Nick White A. (2019). *The Biodiversity Metric 2.0: Auditing and accounting for biodiversity value: technical supplement (Beta version, July 2019)*.

*Natural England*

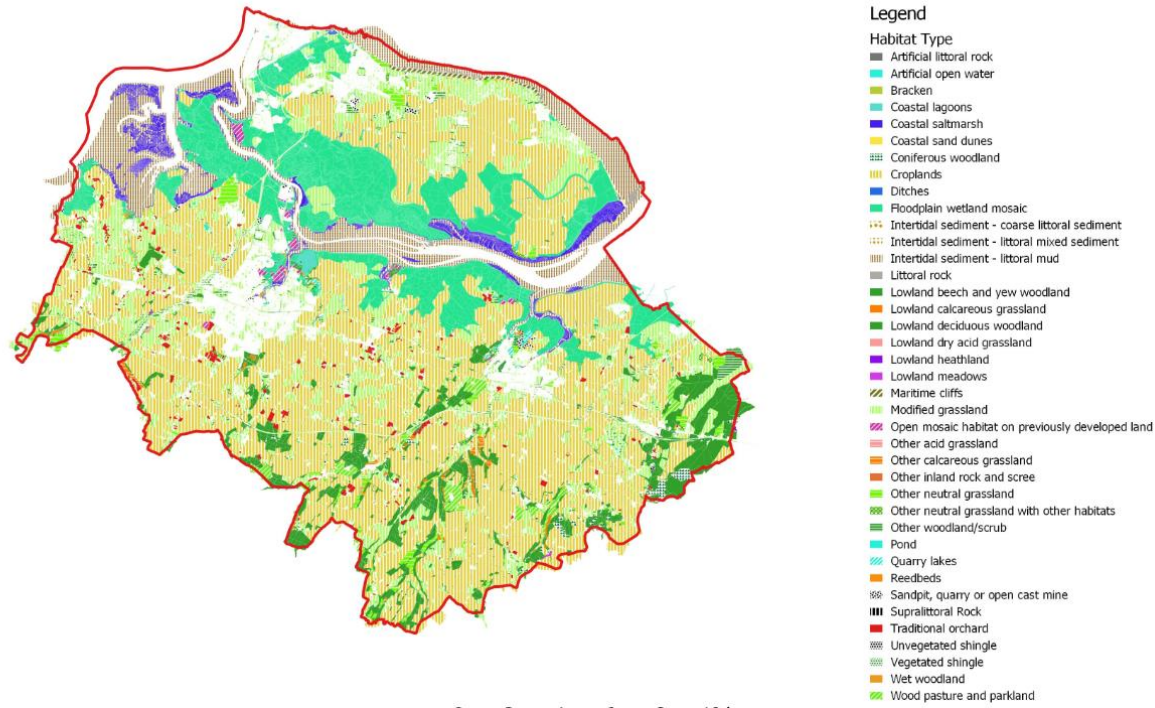
HM Government (2018). *A Green Future: Our 25 Year Plan to Improve the Environment*

Ministry of Housing, Communities and Local Government (2019). *National Planning Policy Framework*

Lawton, J.H., Brotherton, P.N.M., Brown, V.K., Elphick, C., Fitter, A.H., Forshaw, J., Haddow, R.W., Hilborner, S., Leafe, R.N., Mace, G.M., Southgate, M.P., Sutherland, W.J., Tew, T.E., Varley, J. & Wynne, G.R. (2010). *Making Space for Nature: a review of England's wildlife sites and ecological networks*. Report to Defra

Kent Nature Partnership (2020). *Biodiversity Strategy – 2018 to 2044*

## Appendix A – Figure 1 Habitat Types



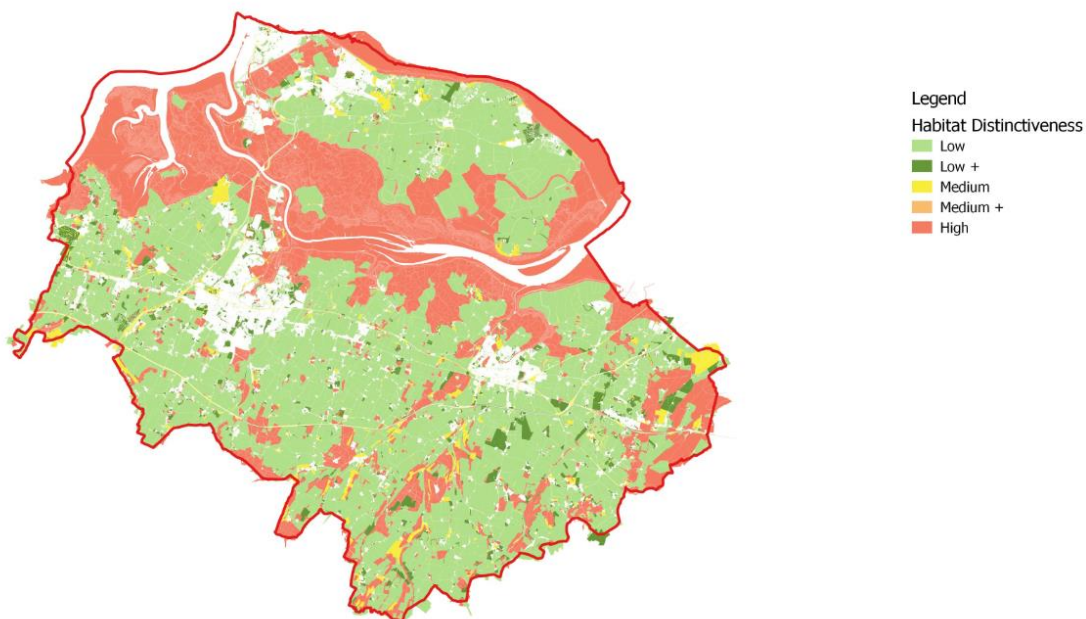
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Figure 1  
 UK Habitat Classifications



**Consultancy  
 Services**

## Appendix B – Figure 2 Habitat Distinctiveness



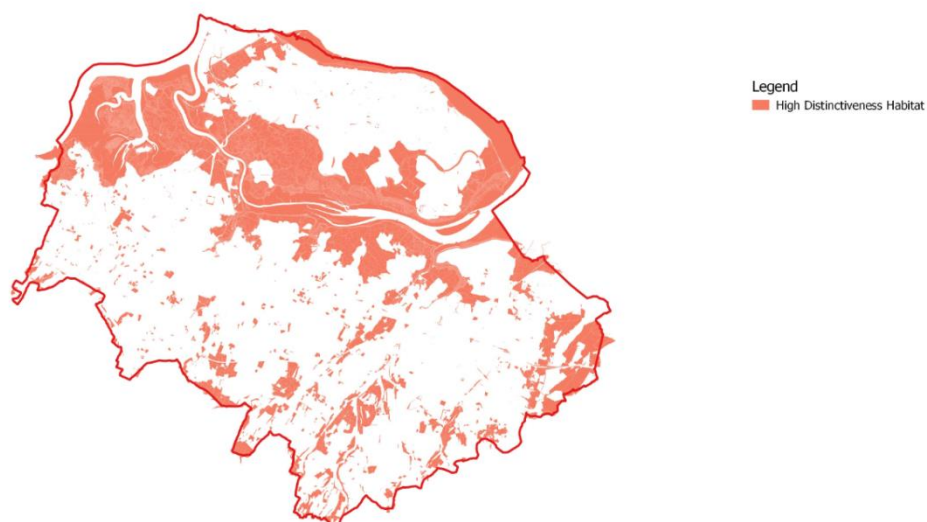
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Figure 2  
Habitat Distinctiveness



## Appendix C. Figure 3 High Distinctiveness Habitat



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Figure 3  
High Distinctiveness Habitat



### Appendix D. Figure 4 Biodiversity Opportunity Areas

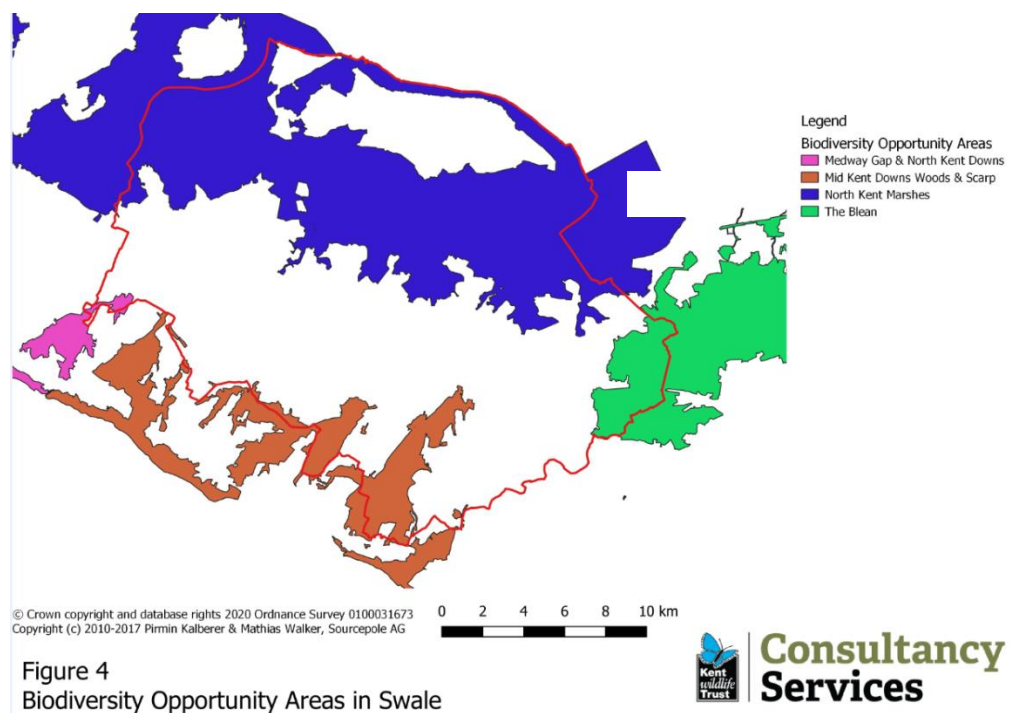


Figure 4  
Biodiversity Opportunity Areas in Swale

### Appendix E. Figure 5 Nature Recovery Priority Areas

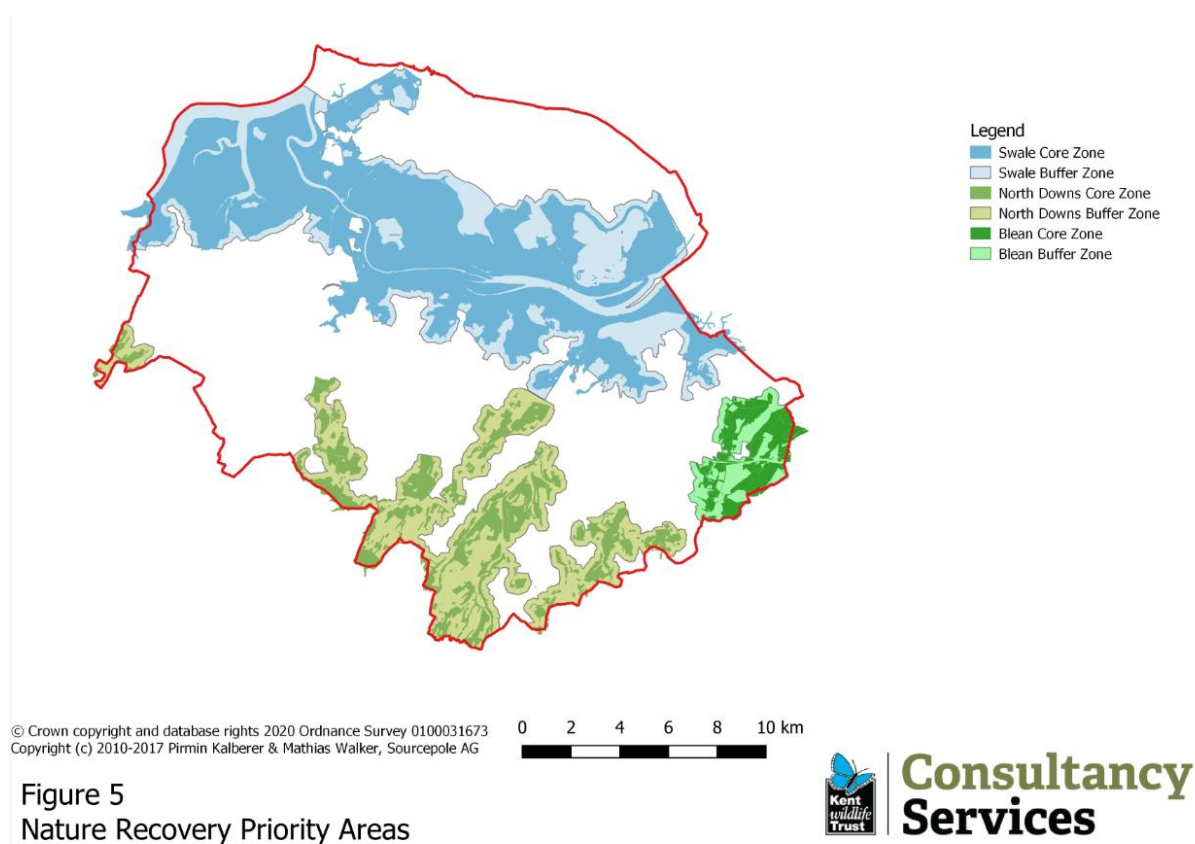


Figure 5  
Nature Recovery Priority Areas

### Appendix F. Figure 6 Swale Priority Area Habitats

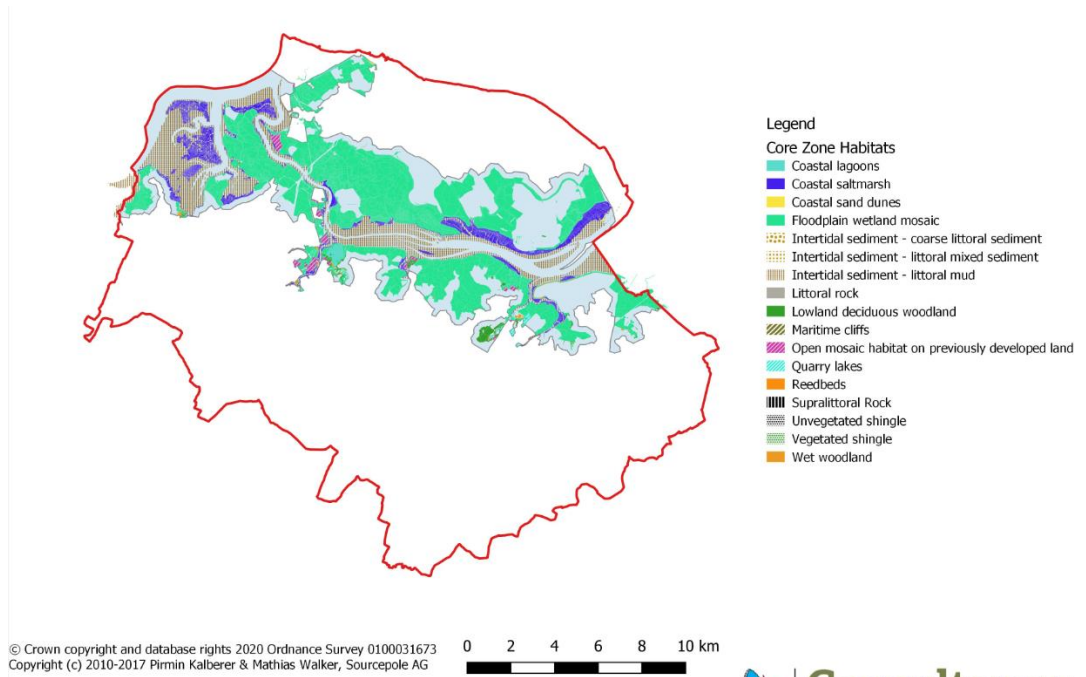


Figure 6  
 Swale Nature Recovery Priority Area - Habitats



### Appendix G. Figure 7 Swale Nature Recovery Priority Area Habitat

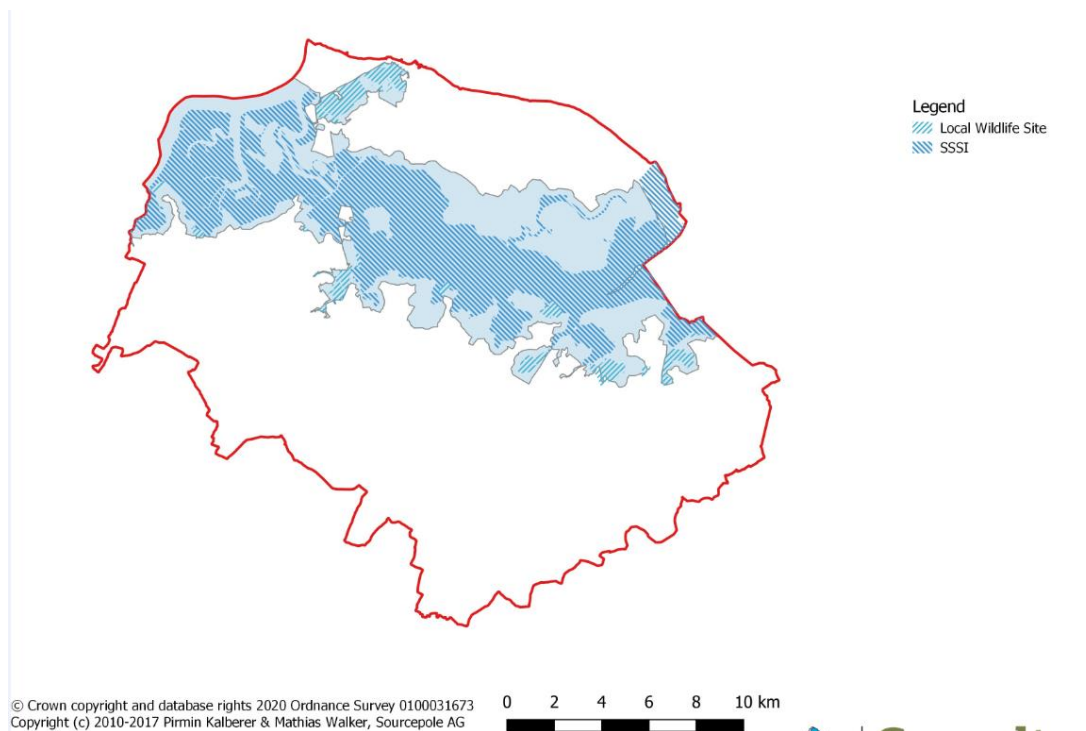
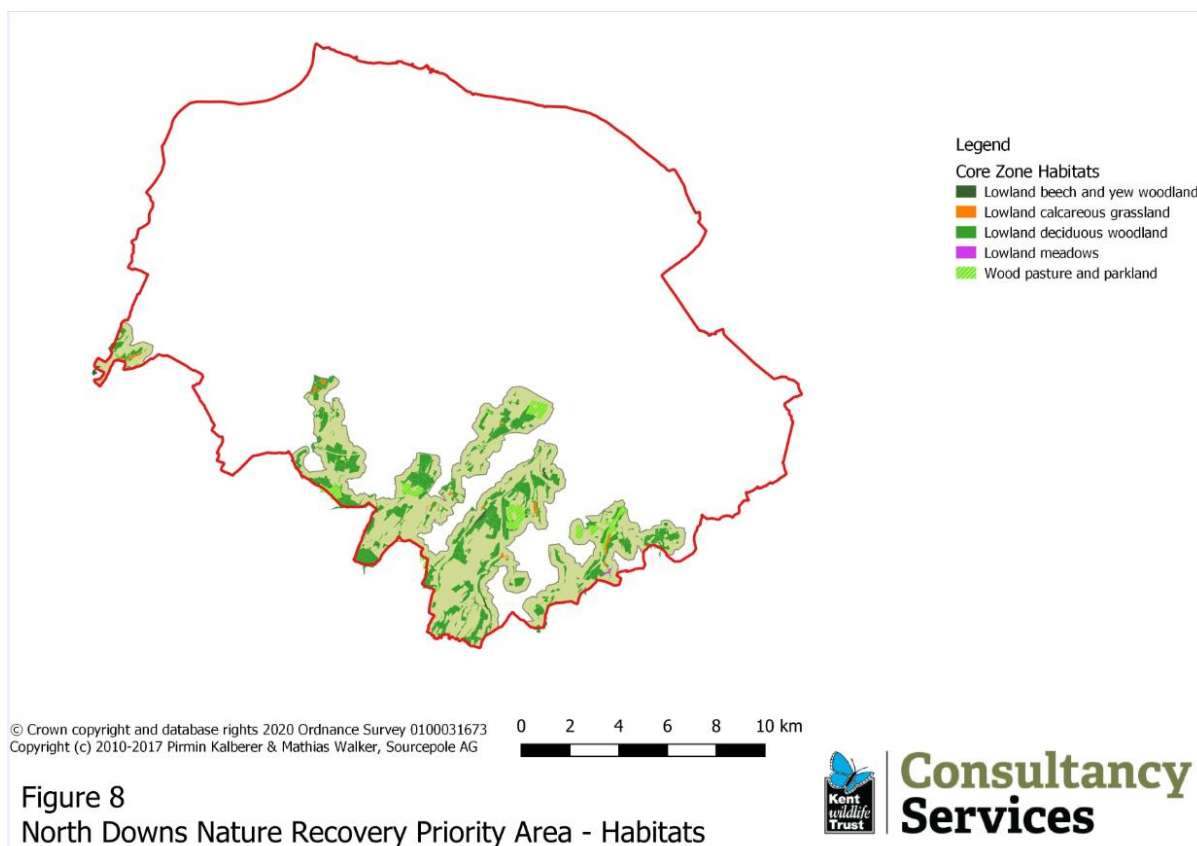


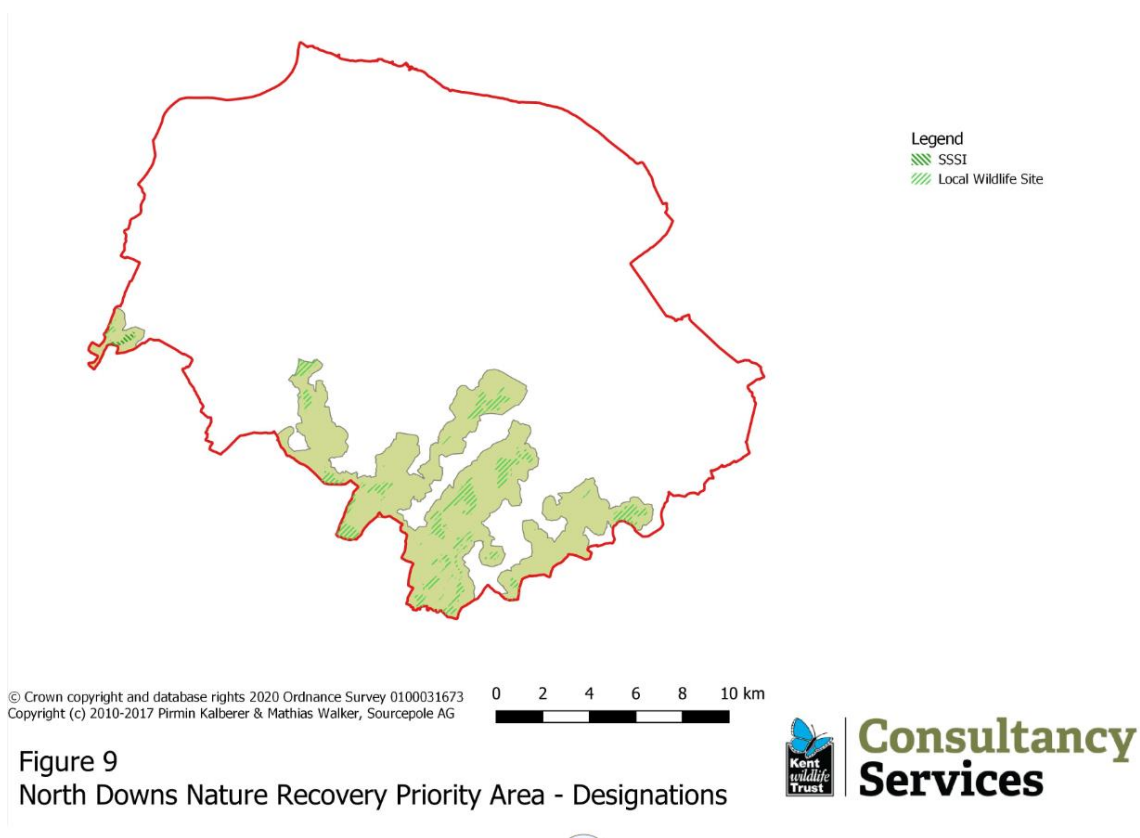
Figure 7  
 Swale Nature Recovery Priority Area - Designations



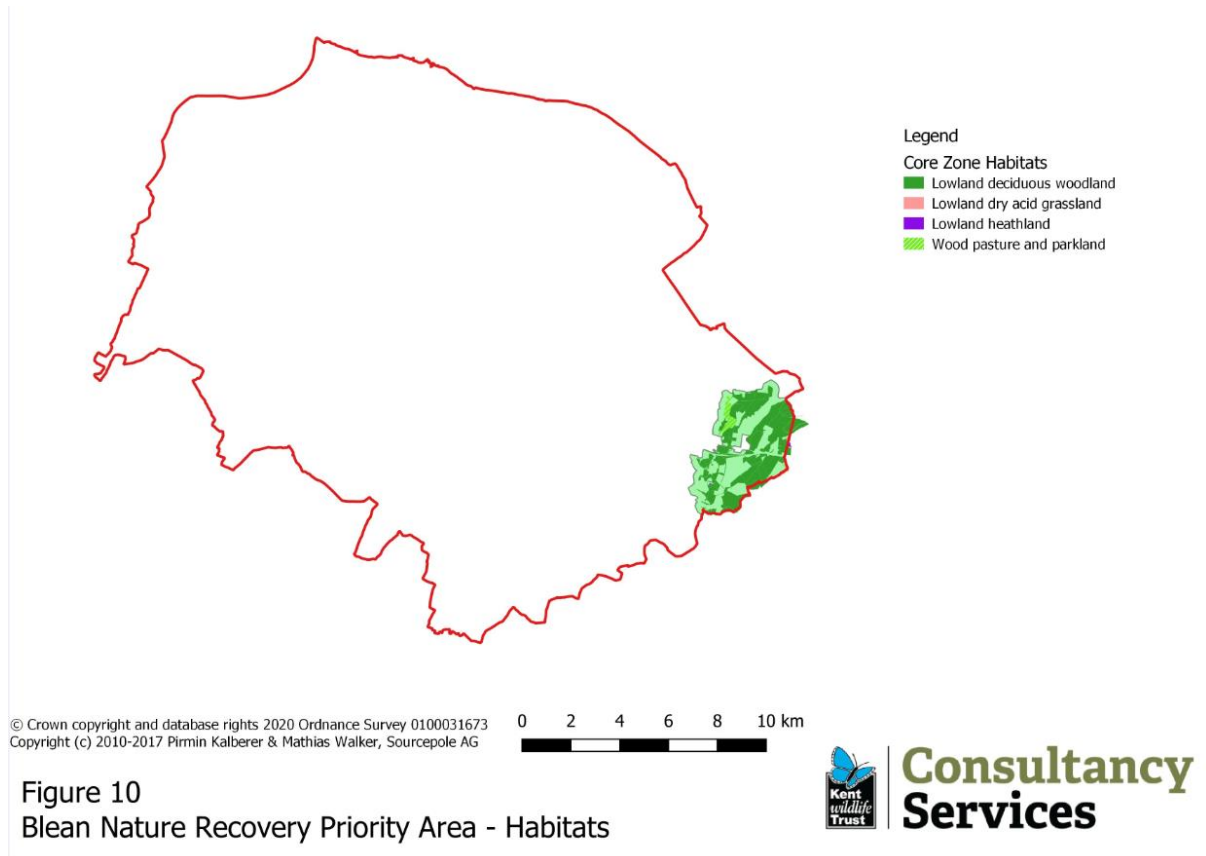
## Appendix H. Figure 8 North Downs Nature Recovery Priority Area Habitat



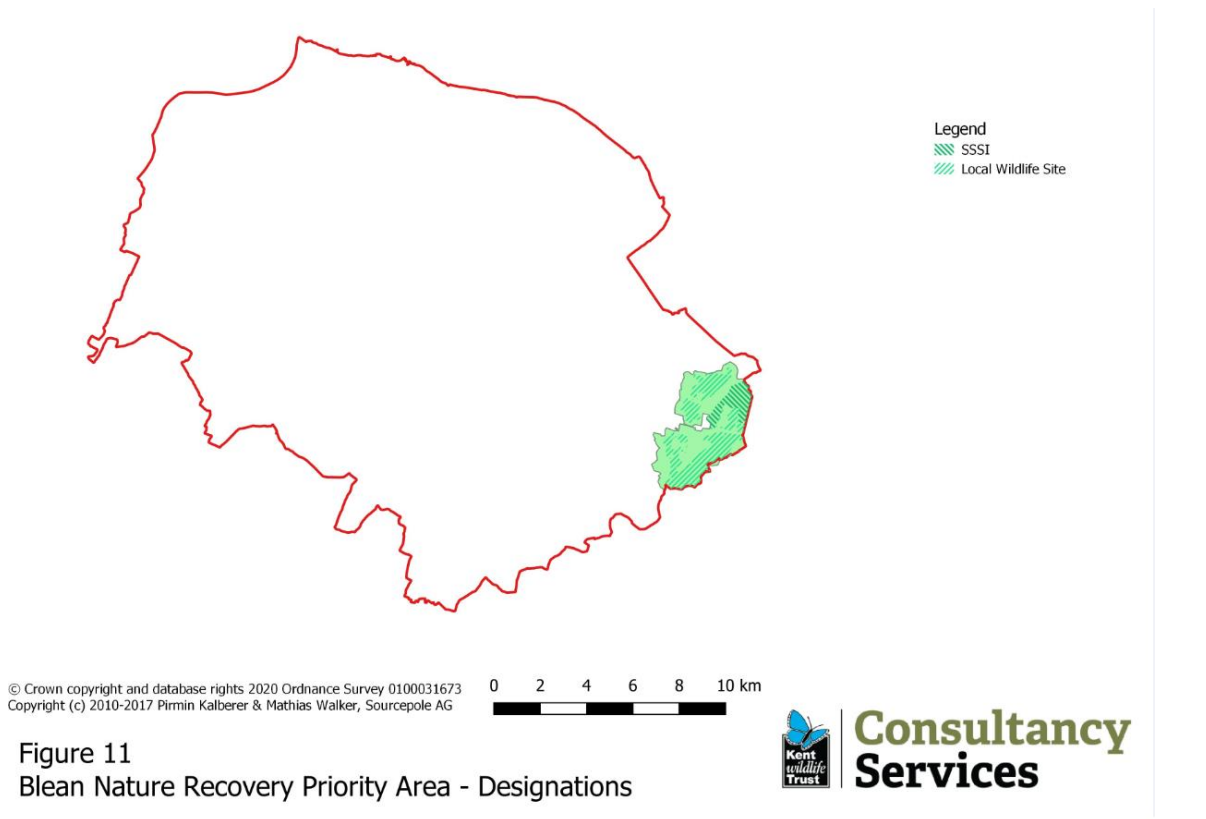
## Appendix I. Figure 9 North Downs Priority Area Designations



### Appendix J. Figure 10 Blean Nature Recovery Priority Area Designations



### Appendix K. Figure 11 Blean Nature Recovery Priority Area Designations





## Appendix L. Figure 12 Distribution of Traditional Orchard Habitat

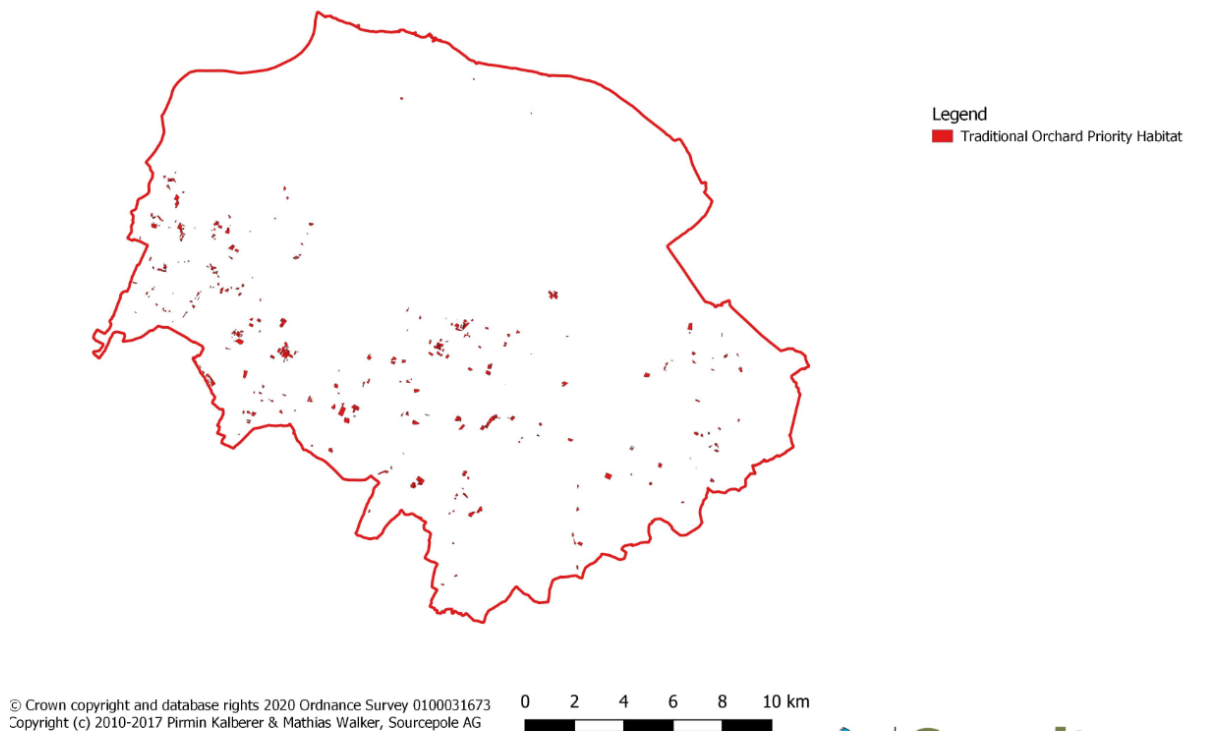


Figure 12  
Distribution of Traditional Orchard Priority Habitat



## Appendix M. Figure 13 SHLAA

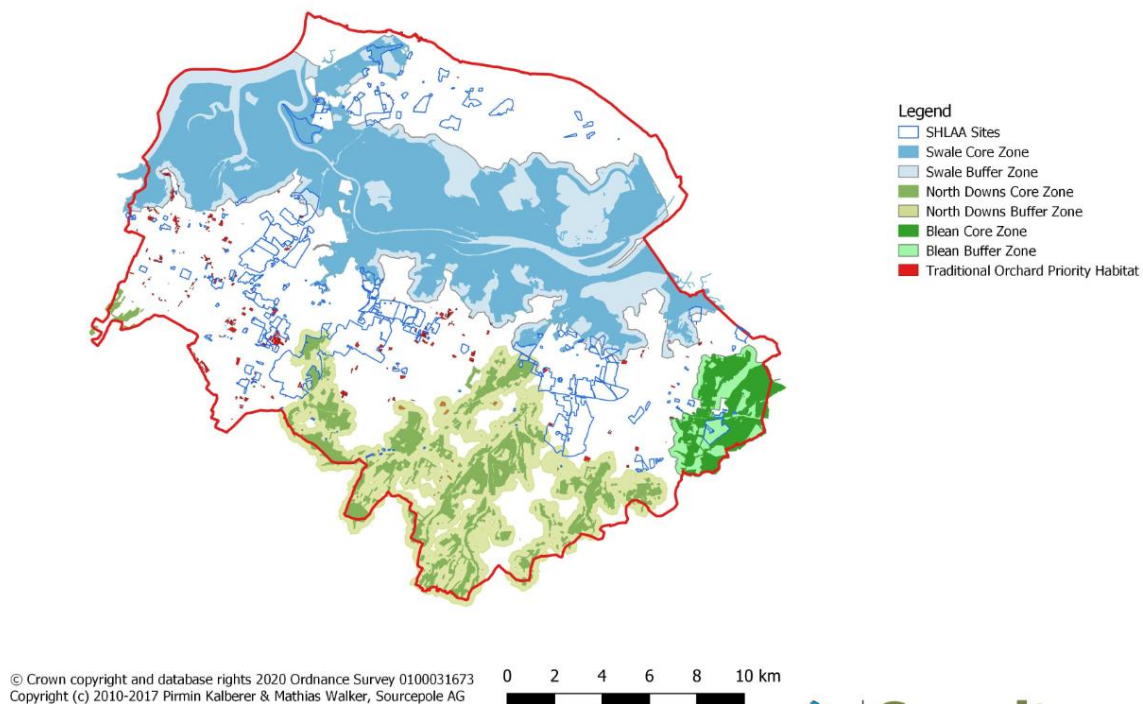


Figure 13  
SHLAA Mapped on to Nature Recovery Priority Areas



## Appendix N. Site Specific Recommendations for SHLAA Sites

The following tables set out recommendations about how to treat proposed allocations in the SHLAA where they coincide with Nature Recovery Priority Areas. Recommendations are in line with those set out in section 5.2.2 of the report.

Table 1: Risks and opportunities for sites which fall within the Swale, Blean and North Downs Nature Recovery Priority Areas, excluding impacts to solely traditional orchard sites

Site ref number	Address	Parish	SBC initial assessment	Risks and opportunities
SLA18/011	Land Rear of 66 Scrapsgate Road	Minster	Unsuitable	This entire site falls within the Swale Nature Recovery Priority Area. The entirety of this site is classified as Floodplain Wetland Mosaic priority habitat, and as such, it will provide technically and financially challenging to deliver BNG for this proposed development. This site may be more appropriate as a receptor for BNG, with opportunities to enhance Floodplain Wetland Mosaic priority habitat within a coherent ecological network within the Swale Nature Recovery Priority Area.
SLA18/014	Danley Farm, Drove Road	Minster	Unsuitable	The vast majority of this site falls within the Swale Nature Recovery Priority Area. Almost the entirety of this site is classified as Floodplain Wetland Mosaic priority habitat and as such, it will provide technically and financially challenging to deliver BNG for this proposed development. This site may be more appropriate as a receptor for BNG, with opportunities to enhance Floodplain Wetland Mosaic priority habitat within a coherent ecological network within the Swale Nature Recovery Priority Area.
SLA18/019	Syndale Park, London Road	Ospringe	Unsuitable	The majority of this site falls within the North Downs Nature Recovery Priority Area and is directly adjacent to a large area of wood pasture and parkland priority habitat. Onsite BNG provision and landscaping should seek to increase the extent of key priority habitats, working with nearby development sites (e.g. 152, 81, 167 and 30) to create a joined up ecological network in this area to support a LNRS.

SLA18/020	Monkshill Farm, Monkshill Road	Hernhill	Unsuitable	The northern section of this site falls within the Swale Nature Recovery Priority Area and includes areas Floodplain Wetland Mosaic priority habitat. The extent of this priority habitat should be extended and enhanced as part of the development.
SLA18/030	Land at Lion Field, London Road	Faversham	Suitable	The majority of this site falls within the North Downs Nature Recovery Priority Area and is directly adjacent to a large area of wood pasture and parkland priority habitat. Onsite BNG provision and landscaping should seek to increase the extent of key priority habitats, working with nearby development sites (e.g. 152, 81, 167 and 19) to create a joined up ecological network in this area to support a LNRS.
SLA18/060	Land at Wallend, Lower Road	Minster	Unsuitable	The southern section of this site falls within the Swale Nature Recovery Priority Area and is directly adjacent to Floodplain Wetland Mosaic priority habitat to the south. Development on this site should ensure that the extent of adjacent priority habitat is increased and suitably buffered to support a functional ecological network.
SLA18/061	Land at Queenborough Road	Queenborough	Unsuitable	This entire site is classified as Floodplain Wetland Mosaic priority habitat. As such, it will provide technically and financially challenging to deliver BNG through development, and it is recommended that alternative sites are considered. This site would be very suitable as a BNG receptor site, enhancement of which would support the strategic goals of the Swale Nature Recovery Priority Area and provide a key functional link to The Medway Estuary SSSI, SPA, and Ramsar to the south.
SLA18/062	39 Abbey Fields	Faversham	Suitable	Part of this site falls within the Swale Nature Recovery Priority Area. On and/or offsite BNG provision should seek to contribute to the network of habitats for which this priority area has been identified.

SLA18/ 065	Land East of Abbey Farm	Faversham	Suitable	Part of this site falls within the Swale Nature Recovery Priority Area with Floodplain Wetland Mosaic priority habitat both onsite and directly adjacent to the site. It will be financially and technically difficult to achieve BNG on this site if these priority habitats are lost to development. To increase the feasibility of this site and to protect and enhance these areas of priority habitat we recommend that the eastern extent of the site be safeguarded from development and incorporated into onsite landscaping. It is likely that this will require over one third of the site being protected from development. BNG provision onsite should seek to increase the extent of these habitats.
SLA18/ 70			Unsuitable	Not included within SHLAA PDF. Located within the North Downs Nature Recovery Priority Area . Development should not result in the loss of any priority habitat and BNG provision should increase its extent.
SLA18/ 71			Unsuitable	Not included within SHLAA PDF. Located within the North Downs Nature Recovery Priority Area. Development should not result in the loss of any priority habitat and BNG provision should increase its extent.
SLA18/ 072	Former Doddington Primary School, The Street	Doddington	Unsuitable	Partially in the North Downs Nature Recovery Priority Area. BNG provision should contribute to increasing the extent and condition of relevant priority habitats.
SLA18/ 080	Land at Halfway Road, Halfway Houses	Sheerness	Unsuitable	This site falls within the Swale Nature Recovery Priority Area and is located directly adjacent to areas of Floodplain Wetland Mosaic priority habitat. Development on this site should ensure that priority habitat is not negatively affected and ensure that BNG increases the extent of key priority habitats within the Swale Nature Recovery Priority Area .

SLA18/081	Land at London Road and Western Link	Faversham	Suitable	The majority of this site falls within the North Downs Nature Recovery Priority Area and is directly adjacent to a large area of wood pasture and parkland priority habitat. Onsite BNG provision and landscaping should seek to increase the extent of key priority habitats, working with nearby development sites (e.g. 152, 30, 167 and 19) to create a joined up ecological network in this area to support a LNRS.
SLA18/086	Churchmans Farm, Stalisfield Road	Ospringe	Unsuitable	In the North Downs Nature Recovery Priority Area. BNG provision should contribute to increasing the extent and condition of relevant priority habitats.
SLA18/089	Land at Home Farm, The Street	Doddington	Unsuitable	In the North Downs Nature Recovery Priority Area. BNG provision should contribute to increasing the extent and condition of relevant priority habitats.
SLA18/090	Land at Former Gas Yard, The Street	Doddington	Unsuitable	The site falls within the North Downs Nature Recovery Priority Area and the majority of the site comprises deciduous woodland habitat. The site is directly adjacent to wood pasture and parkland priority habitat. Development should not result in the loss of any priority habitat and BNG provision should increase the extent of priority habitat in this Nature Recovery Priority Area.
SLA18/102	Milstead Manor Farm, Manor Road	Milstead	Unsuitable	Partially in the North Downs Nature Recovery Priority Area. BNG provision should contribute to increasing the extent and condition of relevant priority habitats.
SLA18/108	Land at Brett House, Bysing Wood Road	Faversham	Suitable	This site falls within the Swale Nature Recovery Priority Area and BNG provision should focus on contributing to increasing the condition and extent of locally important habitats.
SLA18/112	Land at Sittingbourne Golf Centre, Church Road	Tonge	Unsuitable	The majority of this site falls within the Swale Nature Recovery Priority Area. Landscaping and onsite BNG provision should seek to increase the extent of key priority habitats identified for this Nature Recovery Priority Area. Habitat provision should be encouraged within the priority area identified to create a functional ecological network.

SLA18/113	Land at The Port of Sheerness, Rushdenden Road	Queenborough	Unsuitable	This entire site falls within the Swale Nature Recovery Priority Area. A large portion of the site is classified as Open Mosaic Habitat on Previously Developed Land, Floodplain Wetland Mosaic and coastal saltmarsh priority habitats. The portion of the site not classified as priority habitat is of high strategic significance for connecting areas of priority habitat and should be prioritised for habitat restoration through BNG projects. Due to the large proportion of high distinctiveness habitats on site it will be technically and financially challenging to deliver BNG for this proposed development and therefore alternative sites should be considered.
SLA18/152	Land south of A2 London Road/West of Water Lane	Ospringe	Suitable	The majority of this site falls within the North Downs Nature Recovery Priority Area and is directly adjacent to a large area of wood pasture and parkland priority habitat. Onsite BNG provision and landscaping should seek to increase the extent of key priority habitats, working with nearby development sites (e.g. 30, 81, 167 and 19) to create a joined up ecological network in this area to support a LNRS.
SLA18/155	Land off Canterbury Road	Dunkirk	Unsuitable	This site falls entirely within the Blean Nature Recovery Priority Area and is directly adjacent to lowland deciduous woodland. This site should be targeted for habitat creation to increase the extent of priority habitat and ensure that suitable buffers are included from the outside to prevent negative impacts.
SLA18/156	Foresters Lodge Farm	Dunkirk	Unsuitable	This site falls entirely within the Blean Nature Recovery Priority Area and is an extremely sensitive site in terms of impacts to priority habitats. Consequently, this also means that this site provides great opportunities to create and restore habitats to support a nature recovery network in this area. It is advised that this site is considered as a potential site for offsite BNG delivery as part of the creation of a LNRS, rather than for development.

SLA18/ 162	Bossenden Farm Frontage Land	Dunkirk	Unsuitable	This site falls entirely within the Blean Nature Recovery Priority Area and is directly adjacent to lowland deciduous ancient woodland that forms part of Church Woods SSSI. This site should be targeted for habitat creation to increase the extent of priority habitat and ensure that suitable buffers are included from the outside to prevent negative impacts.
SLA18/ 163	Oakside Park, London Road	Dunkirk	Unsuitable	This site falls entirely within the Blean Nature Recovery Priority Area and is directly adjacent to lowland deciduous woodland. This site should be targeted for habitat creation through BNG provision to join up existing areas of priority habitat to the east and west.
SLA18/ 167	Land West of Western Link	Faversham	Suitable	This site is located within both the Swale and North Downs Nature Recovery Priority Areas and thus represents a key link between downland and wetland habitat areas in the Borough. It also includes a large area of open mosaic habitat on previously developed land, which a key habitat type within the Swale Nature Recovery Priority Area, as well as includes an area of ancient woodland. If this site is selected for inclusion in the Local Plan careful consideration should be given how onsite BNG provision will enhance rather than detract from its strategic location, and it should be ensured that all priority habitats on site are protected, buffered and enhanced. It is recommended that alternatively this site could function as a key receptor site for delivering offsite BNG projects in order to develop a strategic network of habitats connecting these two priority areas.
SLA18/ 173	Former Funton Brickworks	Lower Halstow	Unsuitable	This site falls within the Swale Nature Recovery Priority Area. BNG provision should seek to increase the extent and quality of priority habitats in this area.

SLA18/ 180	Nil Desperandum Rushenden Hill	Queenborough	Suitable	This site is directly adjacent to the Swale Nature Recovery Priority Area and directly adjacent to the Medway Estuary and Marshes SSSI, SPA and Ramsar. The site is also located adjacent to a small area of deciduous woodland priority habitat. A suitable buffer is recommended between development and areas of priority habitat to the north and west, prioritising habitat creation which supports the network of habitats within the Swale Nature Recovery Priority Area.
SLA18/ 199	West Street, Queenborough	Queenborough	Suitable	This site is directly adjacent to the Swale Nature Recovery Priority Area and directly adjacent to the Medway Estuary and Marshes SSSI, SPA and Ramsar. We would advise that the site does not extend beyond the existing hard standing areas and that landscaping is designed to extend the adjacent mudflat habitat.
SLA18/ 207	South of Queenborough Creek	Queenborough	Suitable	The majority of this site falls within the Swale Nature Recovery Priority Area. The northern section of this site includes areas of Floodplain Wetland Mosaic priority habitat and is directly adjacent to mudflat priority habitat. These priority habitats should be protected and enhanced and opportunities to promote their inclusion within a coherent ecological network should be sought. We recommend that the footprint of any future development does not increase the amount of existing hardstanding on site. Floodplain Wetland Mosaic habitat on site should be incorporated into the landscaping strategy, which should seek to expand and connect these areas of priority habitat within the Nature Recovery Priority Area.
SLA18/ 215				Not listed in the SHLAA PDF. Directly adjacent to the Swale Nature Recovery Priority Area and to mud flat and saltmarsh habitats. Landscaping and BNG provision should seek to increase the extent of these habitats and provide suitable buffers.



SLA18/218	North East Sittingbourne	Sittingbourne	Suitable	The northern section of this site falls within the Swale Nature Recovery Priority Area and includes areas of broadleaved woodland. Landscaping and onsite BNG provision should seek to increase the extent of adjacent key priority habitats including reedbeds and Floodplain Wetland Mosaic. Habitat provision should be encouraged within the priority area identified to create a functional ecological network.
SLA18/219	Land East of Iwade	Iwade	Suitable	Part of this site falls within the Swale Nature Recovery Priority Area and is direct adjacent to areas of Floodplain Wetland Mosaic priority habitat. Development on this site should seek to increase the extent of the priority habitat with Floodplain Wetland Mosaic prioritised through onsite BNG provision. Traditional orchard should be retained and enhanced, being incorporated into the landscaping strategy from the outset.
SLA18/223	Land at Ashford Road, North Street, Sheldwich	Sheldwich, Faversham, Ospringe & Selling	Unsuitable	A small portion of this site is located within the North Downs Nature Recovery Priority Area with areas of traditional orchard and deciduous woodland in the centre of the site and additional areas of deciduous woodland to the west of the site. Onsite BNG provision should seek to increase the extent of deciduous woodland and other key habitats within this priority area.
SLA18/225	South East Sittingbourne	Bapchild, Tonge, Rodmersham, Tunstall, Teynham, Milstead & Bredgar	Suitable	A section of this site falls within the North Downs Nature Recovery Priority Area, including areas of broadleaved ancient woodland, open mosaic habitat on previously developed land and traditional orchard. Priority should be given to creating and enhancing habitat across this site in line with the biodiversity area. On site BNG provision should seek to connect Highsted Wood and Cromers Wood. Traditional orchard should be retained and enhanced, being incorporated into the landscaping strategy from the outset.

**Table 2:** Risks and opportunities for sites which fall within the traditional orchard priority area

Site ref number	Address	Parish	SBC initial assessment	Risks and opportunities
SLA18/010	Land at Cellar Hill	Teynham	Suitable	Proposed developments should include appropriate mechanisms for restoring or creating traditional orchard habitat as an integral part of GBI within development footprints. Loss of Traditional Orchard should be avoided as a result of development and, where appropriate, incorporating new or existing traditional orchards into development master plans
SLA18/022	Land at Hearts Delight Road	Tunstall	Unsuitable	
SLA18/028	Land at Queen Court Farm, Faversham	Ospringe	Suitable	
SLA18/034	Land West of The Street	Lynsted with Kingsdown	Unsuitable	
SLA18/124	Land at The Tracies	Newington	Suitable	
SLA18/140	Callum Park	Lower Halstow	Unsuitable	
SLA18/153	Land south of Dover Castle Inn, A2 London Road/Cellarhill	Teynham	Suitable	
SLA18/177	Land at Cowstead Farm, Lower Road	Minster	Suitable	
SLA18/190	Land East of Station Road	Teynham	Suitable	
SLA18/222	Land at Manor Farm, Key Street	Borden	Suitable	
SLA18/232	Land at Stickfast Lane	Bobbing	Unsuitable	