

Environmental Services and Climate Change Committee	
Meeting Date	12 November 2025
Report Title	Barton's Point - considering future options for management of biodiversity
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods
Head of Service	Martyn Cassell, Head of Environment and Leisure
Lead Officer	Graeme Tuff, Greenspaces Manager
Classification	Open
Recommendations	1. Members to discuss the considerations and give a steer on what options they want officers to pursue. 2. To recommend to Policy and Resources committee to remove the mains drainage project from the capital programme. 3. To write to the Sea Cadets informing them of the Ecology report.

1 Purpose of Report and Executive Summary

- 1.1 This report provides an update on recent ecological surveys conducted at Barton's Point Coastal Park and considers the future implications and actions required.
- 1.2 Members are given a range of considerations and asked to consider recommendations on how the site is managed moving forwards.

2 Background

- 2.1 Following the coalition's ambitions to explore opportunities to improve the offering at Barton's Point Coastal Park and generate more commercial income, the Council sought Expressions of Interest (EOI) in May 2022 to manage the various elements of the site. This included the Boathouse, Toilet and Shower Block, Boating Lake, Former Pitch and Putt Course, seasonal camping ground and car park to combine to make an overall improved leisure offer.
- 2.2 The EOI process generated considerable interest and having reviewed the submissions and undertaken commercial negotiations, a preferred operator was identified, with ambitious plans for the site, including use of the lake for an inflatable adventure course, improved café offering and accommodation pods. Given the nature of these plans, involving considerable capital investment, any lease agreement would be subject to securing planning permission. Following

selection, the preferred bidder developed their plans over some time, with the support of external planning consultants.

- 2.3 A key risk in securing planning permission was the ecology and biodiversity on the site and the ability to mitigate any concerns that might be raised, in the event of a changing and more intensive use of Bartons Point for leisure. At a similar time, the onset of Biodiversity Net Gain as part of national planning reforms, was a relevant consideration by the time the plans were implemented.
- 2.4 Consequently, a specialist company, Bakewell, were instructed to undertake a year-long suite of ecological surveys to fully understand both the ecological value of Barton's Point and the potential to mitigate against harm, and ultimately to secure a planning permission for more intensive use. These surveys were completed in April 2025, with the final full report (appendix I) received in early summer.

Survey Findings

- 2.5 Bakewell's surveys revealed the park's exceptional biodiversity, emphasising the complex and fragile relationships among species, particularly invertebrates and nesting birds, around the brackish lake and adjacent grasslands. The lake's brackish nature resulting from a mix of freshwater and saline influences from its proximity to the Thames and Medway estuaries, creates a rare habitat supporting specialised species. Key findings include:
- **High Species Diversity:** The surveys identified a rich array of invertebrates and nesting birds, with the lake and grasslands forming a delicate ecosystem reliant on stable environmental conditions.
 - **Fragile Ecosystem:** The interdependent relationships between species are highly sensitive to disturbances, such as increased human activity or habitat alteration.
 - **Brackish Lake Significance:** The lake's unique salinity supports rare aquatic and semi-aquatic species, making it a critical ecological feature.

Planning Legislation and Considerations

- 2.6 Under UK planning law, developments impacting ecologically sensitive areas must comply with the National Planning Policy Framework (NPPF), which emphasises biodiversity protection and the need for a Biodiversity Net Gain (BNG) of at least 10% for new developments (effective since February 2024 for major developments under the Environment Act 2021).
- 2.7 The surveys indicate that the proposed inflatable waterpark and accommodation would increase site usage to the point at which it would potentially disrupt the fragile ecosystem. Key legislative and regulatory considerations include:

- Wildlife and Countryside Act 1981 (as amended): Protects species identified in the surveys, such as nesting birds and potentially great crested newts, requiring mitigation measures for any development.
- Natural England and Kent Wildlife Trust: As statutory consultees, both organisations are likely to object to the waterpark proposal due to its potential to harm protected species and habitats. Kent Wildlife Trust, managing over 9,500 acres across 90+ sites, prioritizes conservation and has significant influence in planning decisions.
- Local Planning Policy: Swale Borough Council's Local Plan emphasises sustainable development and habitat protection, aligning with objections to developments that threaten biodiversity.
- Environment Act 2021: Mandates BNG, requiring developers to enhance biodiversity through measurable improvements.

Bakewell's Recommendations

2.8 Bakewell's conclusions highlighted the challenges of securing planning consent for the waterpark or any other intensification of use (such as the camping or accommodation pods), due to the site's ecological importance. They noted the following:

- Statutory Objections: Natural England and Kent Wildlife Trust are likely to oppose the application, citing impacts on protected species and the brackish lake's ecosystem.
- Alternative Uses: The park's unique biodiversity supports educational and environmental initiatives, such as interpretive trails or research programs.
- Biodiversity Net Gain Opportunities: Enhancing grassland species diversity could generate BNG credits, providing an economic incentive for conservation-focused management while meeting legislative requirements.

2.9 The ecological surveys underscore Barton's Point Coastal Park as a critical biodiversity asset, particularly due to its brackish lake and diverse species. Due to the park's ecological significance, the Council has been advised that planning consent for future uses on the park will need to carefully consider the park's sensitive and unique ecosystem. Any planning application for intensification of use faces significant hurdles in obtaining consent due to potential ecological impacts and likely objections from Natural England and Kent Wildlife Trust. The Queenborough Lines, the channel of water running from Barton's point across the top of the of the Island is also a scheduled ancient monument and therefore any major impacts on that would require support of Historic England as well.

2.10 This presents a very substantial challenge for efforts to diversify and intensify use of the site for commercial operators and has led the preferred bidder to reconsider its position.

- 2.11 As a result, the Economy and Property committee, who took the original decision to approve the lease of the site to a new operator, met on 8 October 2025 to reverse that decision, and have referred future direction to this committee. They have requested an update paper on property related matters in January 2026, following this committee's discussions, to avoid a lengthy decision process for future options.

Considerations for the Future

- 2.12 This committee is therefore presented with a number of considerations and implications as detailed below. It may be that the Committee sets certain directions for the officers to go away and investigate, in order to return to a future committee with final recommendations/options for consideration. Appendix II shows current and previous uses to help Members understand the implications better.
- 2.13 **Grounds maintenance of the site** - officers will need to analyse the ecological report and understand how the Council might need to adapt its current maintenance of the site in the short term. Our grounds maintenance contractors will need to be sensitive to the findings, and a revised regime may need to be agreed. If this requires specialist works, it may increase costs for the management of the site. Our current perspective is that the regime hasn't changed considerably in the last 20 years, and we still have the unique ecology, so the regime may well be satisfactory.
- 2.14 **Habitat Bank** – the Planning Policy team are currently working on a pilot study to look at sites that may be suitable for use as BNG habitat banks. Broadly speaking this is a site where developers, who are unable to meet BNG requirements on their own site, can buy credits on another site. They can currently do this anywhere across the country but obviously it would be better for Swale if it was local. This may generate financial receipts that can be used to enhance the ecology at Bartons Point and we are now investigating options for Barton's Point as part of the pilot.
- 2.15 **Café** –whilst awaiting the bigger project plan, property services took on an interim café operator. This has worked well with operation across the peak seasons and bringing in some concession income. We invested £13k in the boathouse to bring it up to a better standard before they started, using UK Shared Prosperity funding. The Council's medium term financial plan originally set income at £28k per annum for 25/26 from the new leisure operator, however this was corrected in 25/26 final budget setting, knowing it wouldn't come forward this year. Members will need to consider that future use is highly unlikely to generate the same level of income, given the limited commercial potential. However as is shown across many country parks in the region, a high-quality café offering is a crucial part of the operation and therefore the future intention would be to secure a long-term operator for the site. Members will need to discuss whether they want the existing offering to stay in place until the overall management of the site is confirmed.

- 2.16 **Previous/current uses/lake management** – the removal of the old café operator, means that the informal camping offer that had operated for many years at the site is no longer available. This never had formal planning permission and whilst the report does say that camping in some locations may still be possible, this would need to be carefully managed and the costs of mitigating will likely be prohibitive. The café also operated water sports (kayaks/canoes/pedalos), which also have not operated since the switch. Given that much of the report talks about the unique elements of salt and fresh water in the lake, it is unlikely that this will be possible in future, however we will be assessing this. Individual members of the public do continue to use their own equipment on the lake, and it is unlikely we could police this if a complete ban was made. We must however consider improved signage and clear locations of where people can and can't launch.
- 2.17 **Toilets** – the toilet block was replaced under the coalition's first Corporate Plan. They are a great facility but unfortunately are subject to regular vandalism and are expensive to operate (circa £48k per annum). On top of this there is no mains drainage and the cesspool costs approx. £11.5k per annum to empty. Had the main leisure operator project gone ahead, then the intention was to transfer the toilets to the concession, who could operate them alongside their operation, saving the Council the annual costs. Again, depending upon Member's wishes the toilets may be integrated into the new operator or remain with the Council.
- 2.18 **Drainage** - a capital project was set aside to research connecting the site to the mains drainage along with the Sea Cadet centre on the site. Engineers drew up a scheme, which was complicated by the very long run to the main road and the fact it is uphill, therefore needing a pumped solution. The estimated cost of the project was vastly over the allocated capital budget and the pumped solution would require annual service contracts to be in place that would likely match the cesspool emptying cost. Therefore, the project has not progressed. The remaining capital could be used to investigate options for improving the cesspit and maybe make it more efficient, lowering annual costs. It is therefore recommended not to proceed with the mains drainage project anymore.
- 2.19 **Events** – part of the site is set aside as the 'events field'. The grass has always been cut short, and it is further away from the lake, but still in close proximity to ditches where ecology has been recorded. It hosts an annual fairground and circus and generates approximately £4k income per annum. As this practice has continued throughout the survey period, it is felt that we do not need to change this practice at the current time, although we will need to review this alongside the ecology report. Historically, events have taken place in and around the lake, including the historic 'Sheppey Pirates' event. It is considered that this type of event would not be possible in future.
- 2.20 **Other Site users** – there are two further regular users of the site who have agreements with the Council and the privately owned neighbouring Sea Cadets Centre. The model engineering club operate a miniature railway on a sectioned-off part of the site behind the car park and have a license until January 2029, with a rolling option beyond that and a rental cost of £150 per annum. There is a 6

month notice period. It is not suggested that this impacts the ecology of the site, but members should consider whether the current agreement suits the Council. Economy and Property committee may wish to discuss the current property arrangements.

The Model airplane club have had an annual license of a grassed area over the opposite side of the park since Sept 2012 at an annual cost of £500 with 6 months' notice period. There was an unfortunate grass fire caused by an event in recent years which affected a large part of the site. Decisions will need to be made if these activities can continue.

The Sea Cadets were granted their land from the Ministry of Defence at the same time the Council (or its predecessor) were granted our land. Despite assuming that there were covenants requiring access for the sea cadets to use the lake, no such evidence has yet been found. There has never been reason to formalise the arrangement, despite some previous tension on lake usage. They use the lake for training and education and again this activity has continued throughout the survey period. We therefore do not feel that this should be changed/restricted at the current time, but any major escalation in usage by the Cadets would need to be formally assessed. It is recommended that the Council writes to the Sea cadets formally making them aware of the ecology report and asking them to be mindful when planning their activities. These matters would need to be considered in any sort of management plan.

Potential Options for the Future

- 2.21 Members are asked to consider how they would like officers to proceed for the long term. Clearly there are many more options than those below and some of the below will be interchangeable rather than exclusive.
- a) Continue to manage in-house with existing income generation from leisure activities, but with a management plan to preserve the habitat.
 - b) Retain the land, limit leisure usage and focus on the use of the site for ecological benefit/habitat bank. Explore potential ecological enhancements through biodiversity credits.
 - c) Explore external management opportunities with conservation organisations to run as an ecology education centre.
 - d) Transfer the asset to a local organisation.

3 Proposals

- 3.1 Members to discuss the considerations and give a steer on what options they want officer to pursue.

3.2 To recommend to Policy and Resources committee to remove the mains drainage project from the capital programme.

3.3 To write to the Sea Cadets informing them of the Ecology report.

4 Alternative Options Considered and Rejected

4.1 No options have been dismissed at the current time.

5 Consultation Undertaken or Proposed

5.1 The matter has been discussed at recent Sheppey Area committees and will remain an item on future agendas.

5.2 Minster Parish Council will be a key consultee in future options.

6 Implications

Issue	Implications
Corporate Plan	With the change in direction from maximising income from the asset to ecological protection, this moves from the Economy to Environment theme of the Plan.
Financial, Resource and Property	It is hoped that any change of grounds maintenance regime will be able to be absorbed within current budgets, but any specialist requirements will need additional funding. Decisions will be bought forward at a later date if this is the case. Any reduction in leisure usage e.g. other site users and events would see a budget income pressure of about £8,000 per annum. There is already a growth bid in budget proposals for 2026-27 for increased cesspool costs of £3,500. The habitat bank option could provide an opportunity for additional income generation. If we were to move beyond the pilot project, we would need to ascertain that contributions cover the whole life maintenance costs of adding more planting etc. If management were kept in-house, then any project to provide classroom/education facilities would need to be costed and considered against other priorities.
Legal, Statutory and Procurement	The main report covers the relevant legislation in relation to biodiversity considerations.

	Any future external management considerations would need to follow the Council's financial standing orders and Property Asset Strategy.
Crime and Disorder	The facilities on-site do suffer from vandalism, made more difficult by the remote nature of the site.
Environment and Climate/Ecological Emergency	This is the most relevant implication of the report. Clearly, future decisions need to ensure we continue to be an exemplar environmental steward. Using the site for habitat improvements will enable us to off-set our carbon emissions and support other developments in the Borough to do the same. There are two specific actions in the Councils CEE action plan namely 1. To investigate a pilot study for a Swale habitat bank 2. To investigate the leasing of council owned woodlands to educational institutions for management.
Health and Wellbeing	The provision of high quality, local open spaces and parklands is vital to supporting community health and well-being. A further developed habitat bank would also assist in air quality and wider health and well-being.
Safeguarding of Children, Young People and Vulnerable Adults	Not applicable.
Risk Management and Health and Safety	There is financial and operational risk within options discussed in this report. The site is currently managed by the Council and inspected on a regular basis. However, reduced on-site presence does impact what can be achieved.
Equality and Diversity	No decisions in this report are thought to negatively impact any of the protected characteristics.
Privacy and Data Protection	No implications.

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

- Appendix I: Full Ecological Survey Report
- Appendix II: Barton's Point Map of Current/Previous uses

8 Background Papers

[Link to Economy and Property Decision – 8 October 2025](#)