

Appendix 2: Sites of Importance for Nature Conservation (SINC) partial review paper

Consultation document

Local Plan Regulation 18 stage submitted
sites

March 2021

1. Purpose of this consultation

- 1.1. This is a consultation document relating to proposed changes to the sites of importance to nature conservation (SINC) land-use designation in Bexley. The Council invites comments from interested parties on the survey data, approach to surveys, recommendations and conclusions contained within the independent ecological review of some of Bexley's designated SINC (Appendix 1); and the Council's subsequent schedule of proposed changes and maps setting out boundary changes (Section 4). This is a partial SINC review; not all designated SINC are included.
- 1.2. This consultation is targeted at those who have interest in the land and others who have an interest or expertise in nature conservation; however, comments are welcomed from anyone who has an interest. **The closing date of this consultation is Friday 7 May 2021.**

2. Introduction

- 2.1. As part of the review of its Local Plan, the Council held a public 'call for sites' exercise, which was conducted in mid-2017. Residents, landowners and other interested parties were asked to submit details of sites that they wanted to be assessed for future development potential or change of land use designation, including potential SINC land use.
- 2.2. All sites submitted were assessed by the Council for their suitability to accommodate the use proposed as part of Bexley's local plan preparation. The site assessments and Council's recommendations for land use were included within the local plan Regulation 18 stage consultation paper '[Preferred approaches to planning policies and land-use designations](#)' which was publicly consulted upon in early 2019.
- 2.3. The consultation also provided an opportunity for land-owners and interested parties to provide comments on existing SINC shown within the adopted [SINC Report 2016](#) and submit requests to amend SINC boundaries.
- 2.4. Ultimately, 14 sites were identified from the process to be considered for SINC designation changes or for boundary amendments. Land Use Consultants (LUC) were appointed to undertake an independent ecological assessment of the 14 sites, assessing each site against the standard SINC criteria. The purpose of this assessment was to determine whether the sites had the potential to be afforded a SINC land-use designation.
- 2.5. It is equally important that this assessment should benefit from additional consideration by individuals and organisations with knowledge of the sites and of nature and as such it is now being made available for public consultation. LUC's partial review of SINC within Bexley can be found at Appendix 1 to this report (published separately).
- 2.6. The findings of the partial review of SINC have been summarised in **Table 1**, which also includes the Council's consideration of the findings and proposals for the 14 sites. Ten of the 14 sites are proposed to be updated, either incorporating boundary changes or the designation of new SINC. These updates are proposed by the Council as changes to the SINC land-use designation on the Local Plan policies map, subject to consideration of responses to this consultation, and findings of any additional evidence underpinning the local plan.

3. Frequently asked questions

What are Sites of Importance for Nature Conservation?

- 3.1 In planning, a Site of Importance for Nature Conservation (SINC) is a land use planning designation conferred through the Council's development Plan. It is also another name for a Local Wildlife Site.
- 3.2 SINC's are areas of land chosen to represent the best wildlife habitats in London, the borough and areas of land where people can experience nature close to where they live and work. They are areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery. Sites are classified into Sites of Metropolitan, Borough and Local Importance depending on their relative value.

What protection is given to ecology if a site is not designated as a SINC?

- 3.3 All protected and priority habitats and the species receive a protection associated with their significant value through legislation, planning policies and guidance.
- 3.4 Ecological value on any site must be taken into account during the planning decision process. If a development is being proposed, information on any biodiversity impacts and opportunities should have informed site selection and design, pre-application consultation and the application itself. Reference should be made to Bexley's Development Plan policies.

What does a SINC land-use designation mean for a site?

- 3.5 The SINC land-use designation is an additional consideration in planning decisions. The Council's Development Plan, formed of the Mayor's London Plan and Bexley's Local Plan, have planning policies relating to SINC's, including Policy G6 from the new London Plan on biodiversity and access to nature is of importance. These policies and associated guidance will be considered by the planning authority when considering planning applications. The purpose of these policies is 'not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks' and are supported by national policy and guidance.

What does the Council consider when determining the future land-use of a site?

- 3.6 The Council must consider wider planning considerations including some competing needs and requirements to reach a balanced decision on designating sites as SINC.

Housing and employment requirements

- 3.7 The Council is required to meet London Plan targets set for Bexley for housing and employment growth when allocating land-uses within its Local Plan, which is currently in production. This includes allocating enough land in the borough for new homes and jobs. The Council has considered available and developable sites within the first five years and developable sites within the final 10 years of the Local Plan period (2021 – 2036).
- 3.8 The Council considers a sequential approach to allocating sites for land use designations. Sites considered to have the highest ecological value are protected from development through a SINC designation, where possible.
- 3.9 This sequential plan-led approach for locating development at a strategic level aligns with the avoidance step of the mitigation hierarchy set out in planning policy, by considering whether

significant harm to wildlife can be avoided by locating on an alternative site with less harmful impacts.

Existing planning consents

- 3.10 Some sites assessed already have planning permission for development. The ecological value of a site would have been considered by the Council when reaching a decision at the time planning consent was granted. However, the findings of this partial SINC survey will inform the Council's decisions when considering information provided by the applicant, including when discharging any ecology conditions on those applications.
- 3.11 The Council is proposing to afford a SINC land-use designation on a small number of sites where the principle of development has already been accepted through an active planning consent. This recognises the biodiversity value of the site, and should the active planning consent not be implemented, it also ensures due consideration is given to subsequent development proposals that may impact upon the SINC.

4. The Council's response to the partial SINC review

- 4.1 A summary of the ecological assessment of the 14 sites and the Council's response to the review's findings and recommendations, are set out in Table 1 below. The full review can be found at Appendix 1 (published alongside this report). Table 1 includes the Council's schedule of proposed amendments to Bexley's SINC and new SINC. This represents the SINC land-use designation changes the Council proposes to make, subject to consideration of responses to this consultation, and findings of any additional Local Plan evidence.
- 4.2 Figures 1 to 20, which follow on from Table 1, contain a site map and aerial image for each site where a new or updated boundary has been proposed by the Council in Table 1. The site maps contain the survey site ID and name in the figure title, and visually display the type of change proposed by the Council. The aerial images contain the proposed SINC number and name in the figure title, and visually displays the proposed SINC boundary.

Table 1: Summary of Partial SINC Review and the Council's response and proposed actions

Site ID	Site name	Related SINC number and name	Partial SINC Review - Summary Findings	Partial SINC Review - Recommendations	Council response to Partial SINC Review findings and recommendations	Council's proposed action	Change to SINC designation?	Change to SINC citation?	SINC boundary changes?	SINC number and/or name changes?
1	Land at Former Borax Works	Adjacent to M041 Erith Marshes	The centre of the site is considered a notable example of open mosaic on previously developed land within the borough, which is a habitat of principle importance. The site is used by a wide range of species, many of which are of notable status in London. Habitats within the centre of the site are of Borough Grade II SINC quality.	SINC extension	<p>Agree. The principle of development on the site has been accepted through an approved outline planning consent, which determined that with appropriate mitigation and enhancements the benefits of the proposal and other material considerations outweigh the impacts on existing biodiversity. The reserved matters application 15/02926/OUTM02, approved in June 2020, considered the implications for biodiversity, securing measures to mitigate and enhance biodiversity on site.</p> <p>The designation of the site as a SINC will not affect the status of this current planning consent. However, should the planning consent not be implemented, any future development proposals will need to demonstrate compliance with development plan policies, including biodiversity policies.</p>	Designate as a new SINC	Borough Grade II	New	New	BxBII34 Borax Fields
1	Land at Former Borax Works	Within M041 Erith Marshes	The ditches that bound the site are of Metropolitan SINC quality and should remain within the designation. These habitats provide connectivity within the wider Erith Marshes Metropolitan SINC and the Crossness Nature Reserve, and likely contribute towards the favourable status of these sites.	SINC retention	Agree. The reserved matters application 15/02926/OUTM02, approved in June 2020, and conditions attached to the outline planning consent, have secured the protection, enhancement and long-term management of this ditch habitat and an ecological buffer zone.	Retain the SINC	No change	Update	No change	No change
2	Veridion Park Industrial Estate	Within M041 Erith Marshes	Reedbed habitats within the site are in favourable condition and should remain part of the Erith Marshes Metropolitan SINC. Reed bed habitats are of value to a number of notable species, and the section which bisects the site is a notable example of this habitat within the borough.	SINC retention	Agree.	Retain the SINC	No change	Update	No change	No change

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2	Veridion Park Industrial Estate	Adjacent to M041 Erith Marshes	Grassland habitats to the west are in good condition and similar to habitats found within the adjacent Erith Marshes Metropolitan SINC. These habitats support the function of the current designation and are of high ecological value.	SINC extension	Agree. The Council recognises the significant ecological value of this site. However, the principle of development on the site has been accepted through approved active outline planning consent 10/00063/OUTEA. The current employment land designation on this site has also been assessed, following London Plan policy and using local evidence. It is considered that it provides a necessary contribution to London's industrial land. Nonetheless, detailed Ecological Impact Assessments will be needed to guide the design. Development proposals will need to demonstrate compliance with biodiversity policies, including adherence to the mitigation hierarchy, and demonstration of measurable net gains for biodiversity.	Extend the SINC	Metropolitan	Update	Update	M041 Erith Marshes
2	Veridion Park Industrial Estate	Adjacent to M041 Erith Marshes	Grassland to the east was noted as rank, of lower quality and not a notable example within the borough and therefore is not suited for inclusion into the Erith Marshes Metropolitan SINC.	No Change	Agree.	Do not extend the SINC	N/A	N/A	N/A	N/A
3	Greenfield land adjacent to Crayford Rough	Adjacent to M123 Crayford Rough	Habitats on site are similar to those of the adjacent Crayford Rough Metropolitan SINC and likely contribute towards the functionality and favourable status of this site, making it suitable for inclusion. Essentially the site forms an ecological continuation of the SINC and habitats on site are likely to support populations of notable plant species, birds and reptiles.	SINC extension	Agree.	Extend the SINC	Metropolitan	Update	Update	M123 Crayford Rough
4	Stoneham Park, Medway Road	Adjacent to BxBII28 Perry Street Farm	Supports common and widespread habitats. However, it is recognised that the site holds some value for local residents in the close vicinity of the site. Inclusion of the site with the adjoining Perry Street Farm SINC would not benefit the status of the adjoining SINC, which supports a richer assemblage of habitats and species.	No Change	Agree.	Do not extend the SINC	N/A	N/A	N/A	N/A

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5a	Land at Tile Kiln Lane	None	It is recognised the site is valued by local residents for its aesthetic appeal. However, despite being notable in size, the site is of limited ecological value to the wider borough and comprises highly disturbed agricultural habitats.	No Change	Agree.	Do not designate as SINC	N/A	N/A	N/A	N/A
5b	Land at Dartford Road	Adjacent to BxBII27 Norman's Wood and Tile Kiln Lane	The site is a good example of pond habitat which is scarce within the borough, and includes marginal reedbed, a habitat of principle importance. Despite its recent creation, habitats on site are of notable ecological value which will likely increase as the habitats mature, and therefore suitable for inclusion into the adjoining Normans' Wood and Tile Kiln Lane SINC. The site also provides amenity and recreational facilities, although it should be noted that these are restricted due to ticketed entry.	SINC extension	Agree.	Extend the SINC	Borough Grade II	Update	Update	Rename to BxBII27 Norman's Wood, Tile Kiln Lane and Cypry Angel Pool, Dartford Road
5b	Land at Dartford Road	Adjacent to BxBII27 Norman's Wood and Tile Kiln Lane	Habitat to the east of the site is species poor tall ruderal and scattered/dense scrub. This habitat is widespread and common within the borough and is of relatively lower value than the wetland habitat to the west and therefore does not merit inclusion into the SINC designation in its current condition.	No Change	Agree.	Do not extend the SINC	N/A	N/A	N/A	N/A
5c	Land between Dartford Road and Tile Kiln Lane	None	The site comprises entirely of poor-semi improved grassland adjacent to woodland and wetland habitats. Grassland habitats were noted as species poor and did not represent a good example within the borough. The site is aesthetically pleasing however has limited access and is currently managed by the land owner for private use.	No Change	Agree.	Do not designate as SINC	N/A	N/A	N/A	N/A
5d	Land South of Vicarage Road and Tile Kiln Lane	None	The site is intensively grazed, is of low ecological value and supports a limited range of habitats and species. However, it is accepted the site provides a large area of open space and attractive views across the borough, which are likely valued highly by users.	No Change	Agree.	Do not designate as SINC	N/A	N/A	N/A	N/A

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6	Belvedere Gas Holders / Southern Gas Network	None	Woodland to the south of the site was noted as species rich, suitable to support a wide assemblage of breeding birds, is a notable example within the borough, and meets the criteria for SINC designation. The site is separated from the nearby Erith Marshes Metropolitan SINC by a major road, which presents an ecological barrier, and is not considered suitable for inclusion into the Erith Marshes Metropolitan SINC. However, given the value provided to the adjacent green corridor of Belvedere rail corridor it should be considered separately as a new Borough Grade II SINC. Habitat to the north of the site, noted for its botanical richness, does not comprise a notable example of open mosaic on formerly developed land by itself due to its small size and limited carrying capacity.	New SINC	<p>Agree. The current employment land designation on this site has been assessed, following London Plan policy and using local evidence. It is considered that it is surplus to requirements and has been assessed for its suitability as a housing site allocation in the local plan. The ecological value of the southern part of this site, and its contribution to the strategic green wildlife corridor, has also been recognised.</p> <p>Should the Local Plan allocate this site for delivery of a proportion of the boroughs housing need, as proposed in the local plan regulation 18 consultation document, development proposals will need to secure the best outcome for biodiversity, demonstrating compliance with development plan policies, including biodiversity policies. Detailed Arboricultural and Ecological Impact Assessments will be needed to guide the design of this site and secure the long-term protection and enhancement of the proposed SINC.</p>	Designate as a new SINC	Borough Grade II	New	New	BxBII33 Gas Holders Woodland, Belvedere
7	Land to the North of the River Cray	Adjacent to M106 River Cray	Habitats on site were of low ecological value, common and widespread and are not considered suitable for inclusion into the adjacent River Cray SINC to the south.	No Change	Agree. The site is also subject to an approved planning consent 19/00941/FULM. The Ecological Management Plan secured through the consent includes provisions to maximise the ecological value of retained and created habitats in the long-term.	Do not extend the SINC	N/A	N/A	N/A	N/A
8	Land at Jubilee Way	Within BxBII23 Sidcup Rail sides	The assessment found the site to support high value habitats that are of Borough Grade II SINC quality, contributing to the provision and maintenance of ecological connectivity across the borough through the dark corridor of the rail side. The width of the site is considered to provide a notable contribution towards the ecological functionality of the designation, which if significantly impacted cannot be recreated offsite and would present a permanent loss of habitat connectivity. The site was also noted for its attractive views to rail users and screening provision.	SINC retention	Agree.	Retain the SINC	No Change	Update	No change	No change

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9	Erith Quarry	Within BxBI04 Erith Quarry and Fraser Road	The site supports a rich mosaic of habitats, therefore an additional 'buffer zone' of tall ruderal habitat, grassland and bare ground habitats should also be included within the recommended designation boundary change, to preserve the habitat richness of the site. Species rich semi-improved neutral grasslands and woodland periphery habitat are suitable to support a rich assemblage of species. The examples on site are notable examples within the borough. These habitats are difficult to recreate, are of a notable size and are of Borough Grade I SINC quality. The majority of the site however comprises a new housing development (in various stages of construction). The construction footprint does not support habitats of notable value and is not of SINC quality.	Partial SINC de-designation; and, Partial SINC retention	Agree. The site is subject to an approved planning consent 14/02155/OUTM. The Ecological Mitigation and Management Plan secured through condition includes provisions to maximise the ecological value of retained and created habitats in the long-term.	Retain part of the SINC, and remove part of the SINC	No change	Update	Update	No change
10a	Urban Open Space at Whitehall Lane	BxBII15 Slade Green Recreation Ground	Grassland to the east likely continues to support a notable population of common lizard and is in favourable condition, of Borough Grade II SINC quality, despite being subject to recreational pressures. This grassland offers open views for residents of notable aesthetic value. Hedgerow along the south boundary is also notable and a habitat of principle importance. Grassland to the west was heavily mown amenity grassland and was not suitable to support populations of common lizard for which the east of the site is noted for. It therefore is not suitable for SINC status.	Partial SINC de-designation; and, partial SINC retention	Agree.	Retain part of the SINC, and remove part of the SINC	No change	Update	Update	BxBII15 Rename to Whitehall Lane Open Space
10b	Urban Open Space at Howbury Lane	None	Habitats on site are common, widespread and are not suitable for SINC selection.	No Change	Agree.	Do not designate as SINC	N/A	N/A	N/A	N/A
10c	Urban Open Space at Lincoln Close	None	Habitats on site are common, widespread and are not suitable for SINC selection.	No Change	Agree.	Do not designate as SINC	N/A	N/A	N/A	N/A

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11	Former Allotments at Howbury Lane	Within BxBII14 Rail sides from Bexleyheath to Slade Green Triangle	The Rail sides from Bexleyheath to Slade Green Triangle SINC is designated for its mosaic of dense scrub, rough grassland and scattered trees. The site visit found similar habitat on site and supported a rich mosaic of habitats suitable to support a wide assemblage of invertebrates, breeding birds, reptiles and badger. The site was situated within an important commuting corridor for wildlife and contributes towards the functionality of the SINC and its favourable status.	SINC retention	Agree.	Retain the SINC	No change	Update	No change	No change
12	Edendale Road (Cheviot Close and Venners Close), Barnehurst	BxL11 Edendale Road, Bexleyheath	None of the habitats were notable within the borough. However, woodland is of local importance to a wide assemblage of common and widespread species (including badger, breeding birds, invertebrates and bats). Mature oak trees within the woodland were of a notable age and provided additional habitat and species richness to the woodland. The woodland is hard to recreate, as planted woodland would take a considerable amount of time to mature and develop the species and structural diversity required to provide equivalent value to the mature woodland found on site. Habitat adjacent to Venners Close is considered suitable for SINC designation through extension of the existing SINC. Tall ruderal and scattered scrub habitats to the south were of local importance to invertebrates and breeding birds and support the function of the current SINC. Grassland habitats to the north of the site are common, widespread and species poor and are not suitable for SINC status. However, it is recognised that these habitats have educational value to the local scout group.	Partial SINC de-designation; partial SINC retention; and, SINC extension	Agree.	Retain part of the SINC and extend it, and remove part of the SINC	No change	Update	Update	BxL11 Edendale Road, Bexleyheath

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13	Our Lady of the Angels Church Woodland	None	The site is comprised entirely of woodland that, despite its small size, is considered a notable example, of meeting the criteria for SINC quality. Dominated by oak, with a species diverse scrub layer and dynamic structure, the site likely supports a diverse range of common and widespread species. The site is functionally linked with the nearby Erith Quarry SINC and is suitable to support breeding populations of Red List species including house sparrow and song thrush, which are potentially present within the nearby Erith Quarry SINC.	New SINC	Agree.	Designate as a new SINC	Borough Grade II	New	New	BxBII31 Our Lady of the Angels Woodland
14	Rail Corridor and Sandbank between Fraser/Bexley Rd, Bronze Age Way and Sandcliffe Rd	None	The woodland habitat on site forms a notable area of rail side habitat, meeting the criteria for SINC quality. This habitat was noted as species rich and structurally diverse and hard to recreate. The position of the site along the railway cutting provides added value of connectivity, which is site specific and cannot be recreated. Linear treelines and dense scrub to the north and south of the central woodland are comparatively species poor in composition and in places comprise non-native species such as leylandii and are therefore not suitable for SINC selection.	New SINC	Agree.	Designate as a new SINC	Borough Grade II	New	New	BxBII32 Parish's Pit Woodland

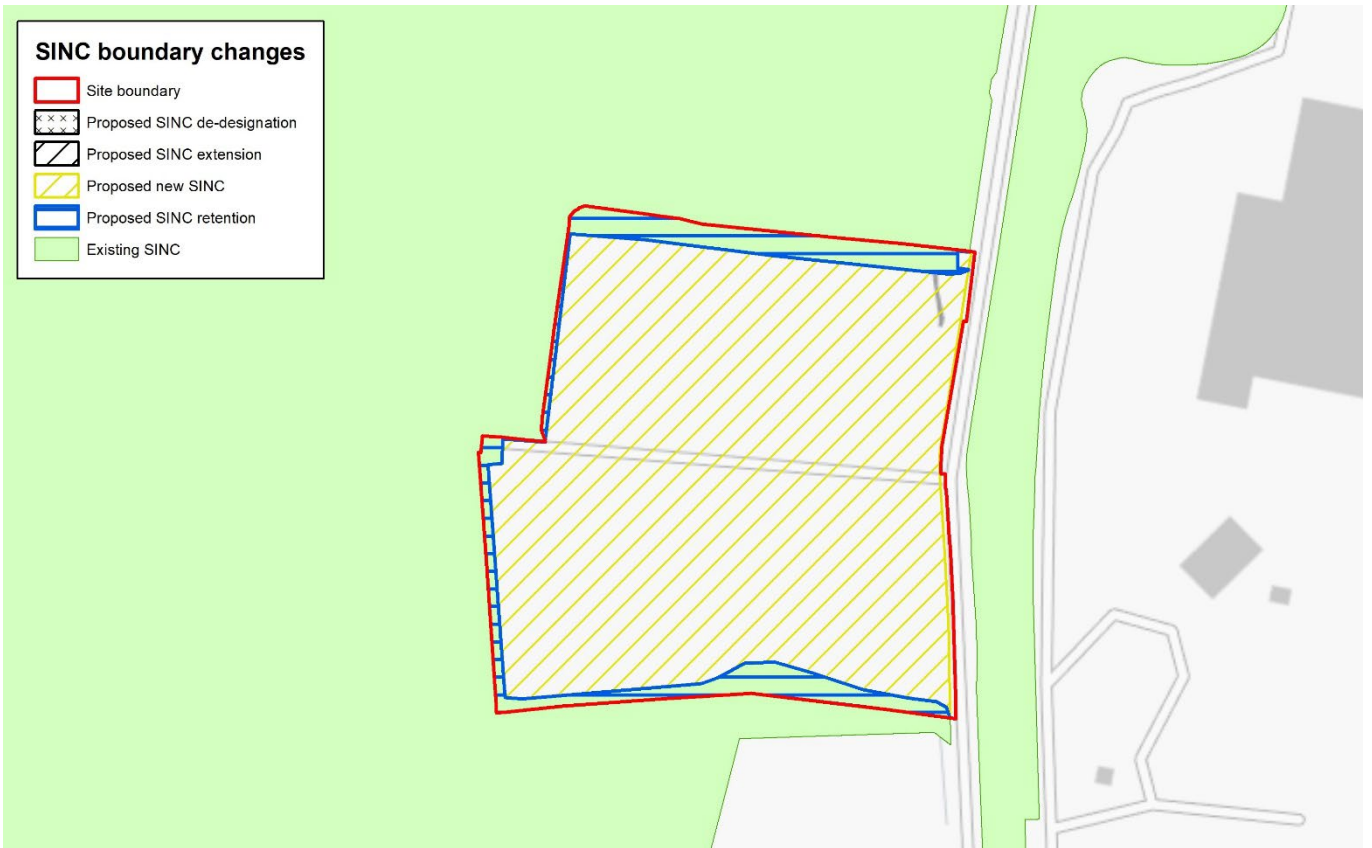


Figure 1: Survey site 1 – Land at Borax Works



Figure 2: BxII134 Borax Fields SINC - proposed new designation boundary

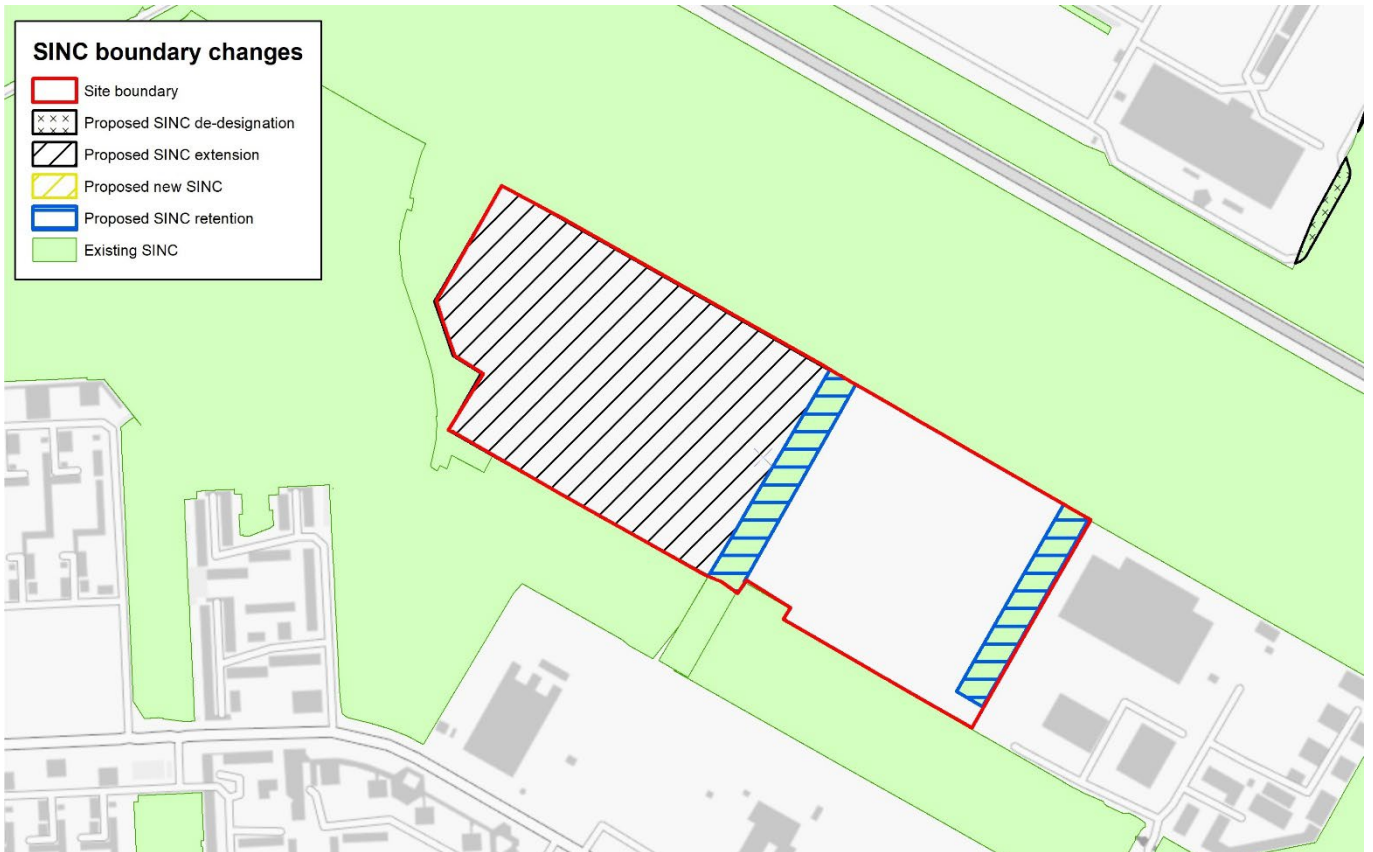


Figure 3: Survey site 2 - Veridion Park Industrial Estate



Figure 4: M041 Erith Marshes SINC showing amended boundary



Figure 5: Survey site 3 - Greenfield land at Crayford Rough showing proposed extension to adjacent SINC



Figure 6: M123 Crayford Rough SINC showing amended boundary



Figure 7: Survey site 5b - Land at Dartford Road showing proposed extension to adjacent SINC



Figure 8: BxBII27 Norman's Wood, Tile Kiln Lane with Cypry Angel Pool, Dartford Road SINC showing amended boundary

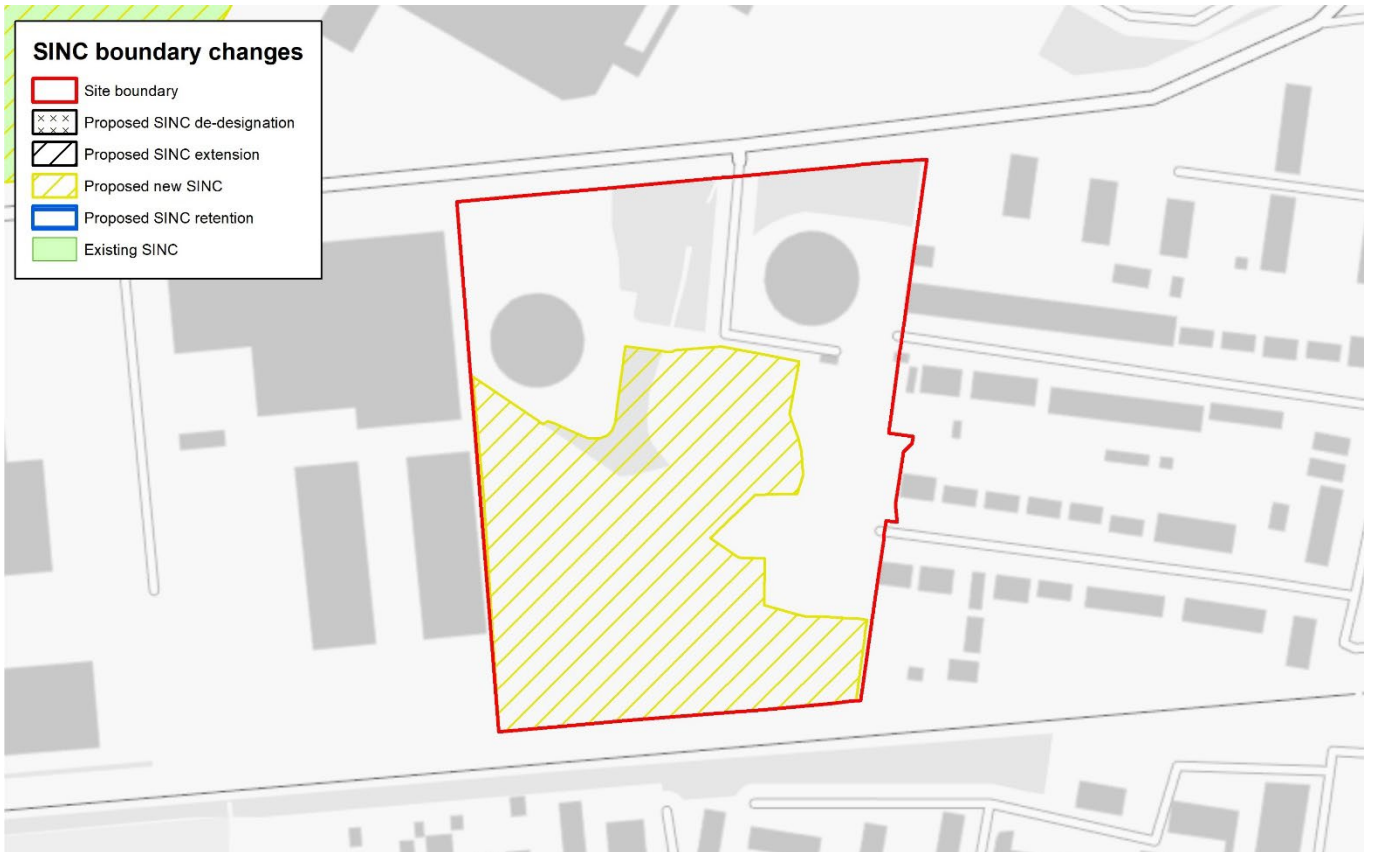


Figure 9: Survey site 6 – Southern Gas Network / Belvedere Gas Holders



Figure 10: BxII33 Gas Holder Woodland, Belvedere SINC - proposed new designation



Figure 11: Survey site 9 - Erith Quarry SINC showing proposed boundary changes



Figure 12: BxBI04 Erith Quarry and Fraser Road SINC showing amended boundary



Figure 13: Survey site 10a – (renamed) Whitehall Lane Open Space SINC showing proposed boundary changes



Figure 14: BxBII15 (renamed) Whitehall Lane Open Space SINC showing amended boundary

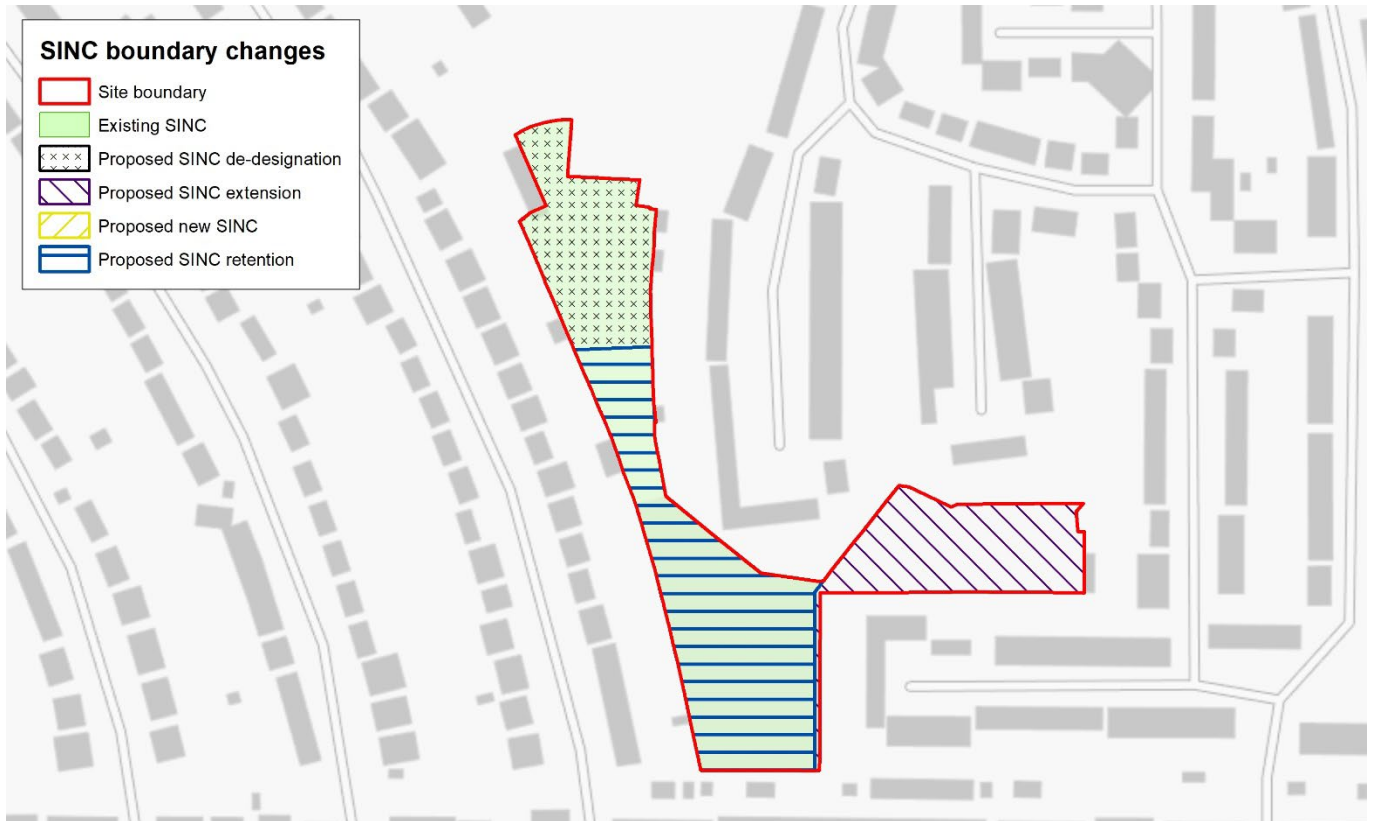


Figure 15: Survey site 12 - Edendale Road (Cheviot Close and Venners Close) showing proposed boundary changes



Figure 16: BxL11 Edendale Road SINC showing revised boundary



Figure 17: Survey site 13 - Our Lady of the Angels Church Woodland



Figure 18: BxII31 Our Lady of the Angels Woodland SINC – proposed new designation



Figure 19: Survey site 14 - Rail corridor and sandbank between Fraser Rd/Bexley Rd, Bronze Age Way and Sandcliffe Rd



Figure 20: BxII32 Parish's Pit Woodland SINC - proposed new designation

5. Next steps

- 5.1. Comments received to this consultation will be considered by the Council before a final decision is made to amend SINC boundaries or add or remove SINC designations. The final schedule of amendments to Bexley's SINC land use designation will be submitted to the London Wildlife Sites Board, and the [SINC Report 2016](#) will be updated.
- 5.2. New SINC boundaries and the site survey information will be sent to the ecological record centre for London, known as Greenspace Information for Greater London (GiGL). Ecologists will request ecological information from GiGL, when producing ecological reports to be submitted with planning applications. Ecological information should be taken into consideration when development proposals that may impact on biodiversity are being prepared.
- 5.3. A new Local Plan Policies Map will include all planning land-use designations within the borough, including SINC. Work is underway to prepare a new local plan for London Borough of Bexley. All information on the Plan, including its content, timetable, and how to get involved can be found on the [Local Plan review](#) pages of the Council website.

6. Appendix 1: Partial review of SINC within Bexley

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