

Royal Borough of Greenwich Sites of Importance for Nature Conservation Review 2024



Client

Royal Borough of Greenwich

Date

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Essex County Council

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Address: County Hall, Market Road, Chelmsford, Essex, CM1 1QH

Contact no: 0333 013 6840

Email: ecology.placeservices@essex.gov.uk

Website: www.placeservices.gov.uk

VAT number: GB 104 2528 13

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Client representative		Harini Boteju, Policy Planner, Royal Borough of Greenwich	
Report prepared by		Neil Harvey BSc (Hons)MCIEEM, Natural Environment Manager	

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This report has been compiled in accordance with BS 42020:2013 Biodiversity – Code of practice for planning and development, as has the survey work to which it relates.

The information, data, advice and opinions which have been prepared and provided are true, and have been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional *bona fide* opinions.

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1. Introduction

- 1.1. The National Planning Policy Framework (NPPF) (2024) includes at Paragraph 192 reference to the need for development plans to identify locally designated sites for biodiversity and geodiversity as part of measures to safeguard wildlife-rich habitats and wider local ecological networks. It goes on to say that plans should also promote the conservation, restoration and enhancement of such ecological networks.
- 1.2. The ecological network is taken to include sites with statutory protection at an international and national level, but also those that are considered to be important at a local level. Nationally, sites important for biodiversity and geological conservation at a local level are described as Local Sites, and guidance was historically provided by Defra on their identification and selection¹.
- 1.3. The London Plan also recommends the identification and protection of sites in order to protect biodiversity and to provide opportunities for local communities to have access to nature. The Mayor of London's London Environmental Strategy² sets out the criteria and procedures by which sites should be identified within Local Plans.
- 1.4. Within the Boroughs of London, sites identified as having nature conservation value are known as Sites of Importance for Nature Conservation (SINCs). Although not receiving any statutory protection, it is expected that SINCs will be protected from significant harm within the planning system. Many SINCs are designated on the basis of the Priority Habitats that they contain, and so additional weight should be given to the need for their protection as a key contribution to the maintenance of biodiversity in England.
- 1.5. The Defra guidance states that the Local Sites network should be an inclusive one, meaning that any site that objectively satisfies the published selection criteria should be selected as a SINC and afforded appropriate consideration, whether or not formal designation has been completed.
- 1.6. With the advent of Local Nature Recovery Strategies, as a requirement of the Environment Act 2021, SINCs and the ecological networks of which they are a part serve a more proactive and positive role within the conservation of biodiversity. Such locally designated sites of nature conservation value are considered to be Areas of Particular Importance for Biodiversity (APIB) and form part of the core of the Nature Recovery Network, providing the focus for action to restore, enhance and recreate natural habitats throughout the landscape and available to all local communities. This should include measures to:
 - Improve the quality of SINCs, by improving their management, for nature conservation outcomes
 - Increase the area of existing SINCs, by creating new habitats to buffer them and improve their resilience
 - Better connect SINCs in the landscape, to facilitate the movement of species and so improve their ability to respond to environmental change (including climate change)
 - Create new high-quality habitats in the right locations so that they rapidly achieve the condition needed to be designated as SINCs

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<https://webarchive.nationalarchives.gov.uk/20130402204735/http://archive.defra.gov.uk/rural/documents/protected/localsites.pdf>

² [London Environment Strategy | London City Hall](#)

- 1.7. The current SINC selection process for the London Boroughs³ has been developed by the London Wildlife Sites Board (LWSB), although it is not obligatory for it to be followed, provided that an equivalent process conforming to regional and national policies can be demonstrated. The LWSB is chaired by the Greater London Authority and is made up of representatives from the London Boroughs Biodiversity Forum, Greenspace Information for Greater London, London Wildlife Trust and London Geodiversity Partnership.
- 1.8. The process sets out that it is the responsibility of the London Boroughs to maintain up to date data on all land of importance for nature conservation within their administrative boundaries. It suggests that suitably qualified ecologists be engaged to survey sites and assess them against the criteria.
- 1.9. This report has been prepared by Place Services on behalf of Royal Borough of Greenwich as part of their work to prepare a new development plan. It details the methodology followed during a review of all of the LoWS within the Borough, carried out during 2024, which updates the evidence base required to support Local Plan review and future development management decisions.
- 1.10. Identification of land as a SINC within this report does not confer any right of public access to the Site, above and beyond any Public Rights of Way that may exist. Many SINC are in private ownership, and this should be respected at all times. Guidance on accessibility is provided within each SINC description.
- 1.11. Whilst reasonable effort has been made to ensure accurate mapping of the site boundaries, the accompanying SINC maps should be considered as being illustrative only and, if necessary, they should be interpreted on site by a suitably qualified ecologist with reference to the selection criteria.

³ It should be noted that the process is currently under review, but no information on the revised approach has yet been released.

2. Methodology

- 2.1. Sites of Importance for Nature Conservation were first identified in Greenwich in a report by the London Ecology Unit published in 1989. The most recent review took place in 2016 as part of a green infrastructure study⁴, but it is understood that the recommendations in that review were never implemented.
- 2.2. This review has considered all of the Borough and Local SINCS considered in the 2016 review, bearing in mind both the original citations presented in the published study (from an unspecified date) together with the updated information from that review. This included two new sites recommended for selection for the first time, which have not subsequently been designated by a recognised process. Each Site was visited by a suitably qualified ecologist and information was collected on the habitats present, and their condition. The sites were then assessed against the current SINC selection document.
- 2.3. Metropolitan SINCS were not included within the scope of this review on the assumption that responsibility for their amendment sat with the London Wildlife Sites Board, although it has subsequently been clarified that this is not correct. Consideration of the status of Metropolitan SINCS is included here, but without the benefit of site visits.
- 2.4. Any existing SINC considered to not satisfactorily meet the published criteria are recommended for deletion from the register. Boundaries have been remapped where parts of SINCS no longer meet criteria, or where additional qualifying habitat has been identified. Site descriptions have been reviewed and adjusted as necessary to reflect any changes within the SINCS and to provide as full a description of the habitats present as possible. New sites considered to meet the criteria are proposed for inclusion in the register.
- 2.5. The grading of SINCS has also been reviewed in order to ensure that there is a consistent approach to the identified levels of importance – Metropolitan, Borough (at two levels) and Local. The published definitions of the different grades can be summarised as follows:
 - Sites of Metropolitan Importance for Nature Conservation are those sites which contain the best examples of London's habitats, sites which contain particularly rare species, rare assemblages of species or important populations of species, or sites which are of particular significance within otherwise heavily built-up areas of London
 - These are sites which are important on a borough perspective in the same way as the Metropolitan sites are important to the whole of London. Although sites of similar quality may be found elsewhere in London, damage to these sites would mean a significant loss to the borough
 - A Site of Local Importance is one which is, or may be, of particular value to people nearby (such as residents or schools). These sites may already be used for nature study or be run by management committees mainly composed of local people
- 2.6. Although there is no published definition separating the two grades of Borough SINCS, the approach taken here is to distinguish those sites that support Priority habitat and equivalent as Grade I and to use Grade II for sites that do not support Priority habitat, but that nonetheless are considered to be of strategic importance for biodiversity at a Borough level. A rationale has been provided within each site description to justify the reasons for the selection and grading of the site.

⁴ https://www.royalgreenwich.gov.uk/downloads/download/790/towards_a_greener_royal_greenwich

- 2.7. All site boundaries have been re-mapped using current OS mapping at a minimum scale of 1:500 to provide an appropriate level of detail for most GIS projects. Where practical built-up elements, particularly impermeably surfaced areas, have been removed to provide more accurate area figures for SINC. Boundary mapping aims to reflect ecological units, so for example, if the quality of grassland habitat varies across one field, the whole field is included as being part of the same ecological unit. This is particularly important where there is potential for sites to be enhanced through better management practices.
- 2.8. The condition of the habitats on each SINC have been assessed using professional judgement, in the absence of sufficient time to carry out any more systematic or quantitative assessment. The results of the condition assessment are presented as one of 'good', 'moderate' or 'poor'. An additional descriptor relating to any observable trend in condition has been added, subject to the surveyor's professional judgement: 'stable', 'improving', or 'declining'.
- 2.9. Where sites show a decline in condition, either in the past or ongoing, the potential for restoration has been considered in both their selection and their grading. In many cases, it remains a better ecological option to protect and restore habitats that have had proven biodiversity value in the past than to attempt to create habitat from scratch.
- 2.10. The Site descriptions also highlight any management issues that were identified during the site visits, either as a result of current inappropriate management methods, lack of management, or through the use of the Sites for activities other than delivering nature conservation outcomes.
- 2.11. For consistency and clarity, all site codes have been retained from the previous SINC reviews, which means that any new sites, or existing SINC the grades of which are proposed to be changed, have a previously unused code. As a result, there are gaps in the numbering where sites have been deleted or merged.
- 2.12. This review is intended to be considered by a Local Site Selection Panel in order to evaluate the approach taken and validate the recommendations for changes to existing designations.

3. Results

Summary

3.1. As a result of this review, the following changes are proposed:

- Two new SINC's have been identified
- Three existing SINC's are recommended for deletion from the network
- Two Potential SINC's have been identified for future consideration
- 18 SINC's have been reduced in size by a total of 47.4 hectares
- 16 SINC's have been increased in size by a total of 17.3 hectares
- One SINC has been split into two
- One Borough I site has been demoted to Borough II
- Five Borough II sites have been demoted to Local
- Four Borough II sites have been promoted to Borough I
- One Local site has been promoted to Borough I
- Two Local sites have been promoted to Borough II

3.2. Overall, following this review, there are now the following numbers and area of SINC's (excluding Metropolitan sites, many of which cross Borough boundaries):

Table 1 – SINC numbers and area

Grade	Number	Area (ha)
Borough I	20	322.7
Borough II	12	82.1
Local	16	52.9

3.3. Full descriptions of the reviewed SINC's, with maps, have been included in a register for the first time, which accompanies, and should be read in conjunction with, this report.

Changes to existing SINC's

3.4. The following table of previously designated SINC's includes a brief summary of the proposed changes, if any, applied as a result of the current assessment.

Table 2. Changes to existing LoWS at this review

Site code	Site Name	Change	Change in area (ha)
GrBI01	Plumstead Common (Winn's Common, Bleak Hill and the Slade)	Remapped boundaries, minor changes	-0.4
GrBI02	Tump 53 Nature Park	Minor boundary amendment, slight increase	+0.1
GrBI03	Gravel Pit Lane and the Nature Study Centre	Majority of golf course removed, wooded habitat along lane retained	0.0
GrBI04	Eltham Palace Fields	Removed formal gardens and Palace; remove amenity grass in SW corner; minor boundary changes	-6.1
GrBI05	Maryon Park, Gilbert's Pit and Maryon Wilson Park	Removed surfaced sports facilities and animal park	-1.0

Site code	Site Name	Change	Change in area (ha)
GrBI06	Shrewsbury Park, Shooters Hill Golf Course, Dothill Allotments & Woodlands Farm	Removed golf course and farm buildings and other formal areas	-6.4
GrBI07	Greenwich Cemetery	Added adjacent King George's Field	+1.8
GrBI10	Sidcup Road Grassland and Harmony Wood	No change	-0.1
GrBI11	Twin Tumps and Thamesmere	Expanded to take in adjacent habitat	+3.2
GrBI12	Woolwich Common	Removed car parks and other surfaced areas	+0.7
GrBI13	Greenwich Ecology Park and Southern Park	Removed most of southern park and developed area to east	-2.2
GrBI14	Charlton House Lawn	No change	0.0
GrBI15	Birchmere	Remapped boundaries	+0.2
GrBI16	Oxleas Meadow	Remapped boundaries	-0.3
GrBI17	Thamesmead Historic Area and Wetlands	No change	0.0
GrBI18	Charlton Cemetery and Charlton Park	Split into two SINCs, added Charlton Park to cemetery and upgraded to BI	+1.8
GrBI19	Plumstead Cemetery	No boundary change; upgraded to BI	0.0
GrBI20	Woolwich Cemeteries & Rockliffe Gardens	Removed car park and other more formal areas; upgraded to BI	-0.5
GrBI21	Sutcliffe Park Flood Alleviation Scheme	Extended to include additional area managed favourably for biodiversity; upgraded to BI	+5.4
GrBI22	St John the Baptist Churchyard, Eltham	Church removed; remainder of churchyard added; upgraded to BI	+0.3
GrBII01	Repository Wood	Charlton Cemetery separated; woodland area unchanged	0.0
GrBII06	Ridgeway in Greenwich	Remapped boundaries	+0.8
GrBII07	Eastmoor Street Park	Developed areas removed	-0.2
GrBII08	Belmarsh Ditches	Remapped to remove areas lost to development	-0.8
GrBII09	Deansfield	Remapped to include roadside bank	+0.3
GrBII10	Eltham Park North	No change	0.0
GrBII12	Quaggy River at Blackheath Park	Remapped; add flood storage area	+0.7
GrBII13	Royal Blackheath Golf Course South	No change	0.0
GrBII14	Hawksmoor Park	Remapped boundaries; name change from Gallions Reach Park	+0.1
GrBII22	Avery Hill Fields	Removed sports pitches; added sown grassland habitat in Avery Hill Park; downgraded from BI	-17.1

Site code	Site Name	Change	Change in area (ha)
GrBII23	Westcombe Woodlands	Extended to include all connected woodland habitat; upgraded from L	+0.5
GrBII24	Eaglesfield Wood	Boundaries re-mapped; upgraded from L	-0.1
GrL03	The Oaks, Plumstead	Remapped to remove developed land	-0.1
GrL05	Southwood Recreation Ground, New Eltham	Extended to include additional wooded habitat	+0.3
GrL09	The Tarn	No change	0.0
GrL19	Academy Place Orchard	Additional woodland habitat added to the north; amenity grassland at southern end removed	+0.4
GrL20	Mycenae House Gardens	No change	0.0
GrL21	Plumstead Common Nature Reserve	Added additional semi-natural habitat to the east	+0.7
GrL22	East Wickham Open Space (Greenwich section)	No change	0.0
GrL23	Well Hall Pleasaunce	Formal garden areas removed	-2.4
GrL24	Twinkle Park	No change	0.0
GrL27	Plumstead Railway Cutting	Downgrade from BII. Removed railway line	-0.7
GrL28	Westcombe Park Railsides	Downgrade from BII. Removed railway lines and developed areas	-2.0
GrL29	Blackheath to Falconwood Railsides	Downgrade from BII. Removed railway lines, added extra section; remapped boundaries	-3.8
GrL30	Mottingham and New Eltham Railsides	Downgrade from BII. Removed railway lines	-3.2
GrL31	River Ravensbourne in Greenwich	Downgrade from BII. Remapped to administrative boundary	-0.02

- 3.5. Four cemetery or churchyard sites have been upgraded to Borough I grade in recognition of the acid grassland habitat that they support, which should be considered as Priority Habitat, even though the character of the grassland is shaped by their primary function. In a similar way, two mature woodland sites have been upgraded to Borough II, although the woodland community is not an entirely natural one.
- 3.6. The four existing railsides have all been remapped to remove the unvegetated track sections, as these distort the apparent extent of SINC habitat. These sites have also been downgraded to Local from Borough II as the biodiversity value of the habitat is constrained by its narrow linear form and by the regular passage of trains. The sites are also operational, with management decisions made entirely on that basis.

Deleted Sites

- 3.7. The following LoWS are recommended for deletion as part of this review.

Table 3. LoWS to be deleted at this review

Site code	Site Name	Reason for deletion
GrBII05	St Nicholas Churchyard, Deptford	The citation for this site describes it as one of the best sites for ferns in the Borough, but no significant fern species or populations are now present, which was also noted in 2016.
GrL16	Anglesea Road Open Space & School Wildlife Garden	This is a very small group of mature and semi-mature trees straddling a public open space and a school site. There is a lack of substantive ecological value and is considered to be no more important than many other small groups of trees in built up areas around the Borough.
GrL18	St Mary Magdalene Churchyard, Woolwich	The citation of this site referenced two locally scarce fern species that are no longer present, which was also noted in 2016. It is also stated that the grassland supported good quantities of wildflowers, but this is no longer the case, with all grassland areas mown frequently for amenity purposes.

- 3.8. These losses all appear to relate to over-zealous management affecting the populations of fern species, which can be vulnerable to environmental change. The scarcer ferns tend to grow on brickwork and other built infrastructure, from which they can be removed in the mistaken belief that they will cause damage.

New Local Wildlife Sites

- 3.9. The following new sites were identified during this review as meeting the current selection criteria and are proposed for inclusion in the SINC network.

Table 4. SINC to be added at this review

Site code	Site name	Area (ha)	Summary description
GrL25	Cator Park	5.0	This is a largely new collection of habitats forming strategic green infrastructure as part of a regeneration scheme. Some more mature trees have been retained, which combine with new water features to create semi-natural habitats that already show biodiversity value.
GrL26	Gallions Reach Park	8.1	This site similarly consists of new green infrastructure following regeneration and features expansive grassland and scrub in a strategic location adjacent to the River Thames.

- 3.10. Both of these sites support relatively new habitats, and it might be expected that their biodiversity value will increase over time, which may lead to upgrading as more important species populations are recorded.

Potential SINC

- 3.11. Potential SINC are sites that could not be shown to meet the site selection criteria during this review, but that may either be close to that threshold and capable of meeting it in the near future or are lacking in the necessary survey data to evidence selection. Thus, the main routes to full SINC status are either additional survey work aimed at demonstrating their value, or management actions that result in an enhancement of the site to the point that one or more criterion is met. Following this review, there are now two Potential SINC.

Table 5. Potential SINCs

Site code	Site name	Area (ha)	Notes
GrP01	Eltham Warren Golf Course	16.0	This site was part of GrBI02, selected for the acid grassland habitat between its fairways. Although access was not possible, there is no evidence of any substantial remaining acid grassland, with belts of trees between the fairways instead.
GrP02	Thamesmead	40.5	Post-industrial site that appears to include habitats likely to support significant biodiversity value, but access is not possible and there is a lack of survey data.

- 3.12. A more detailed survey of the golf course site might reveal persisting patches of acid grassland habitat, or the persistence of populations of key indicator species, at which point, the site could be reinstated. It is also possible that a shift in management could restore the extent of open grassland.
- 3.13. The area of Thamesmead will be subject to future development, and it is hoped that part of that process will include the surveys needed to establish the significance of the green infrastructure that will be retained. A long-term management strategy that is focused on habitat creation and enhancement for nature conservation outcomes would almost certainly lead to the selection of some or all of this site.

Place Services

Essex County Council
County Hall, Chelmsford, Essex CM1 1QH

T: +44 (0)333 013 6840

E: enquiries@placeservices.co.uk

www.placeservices.co.uk

[@PlaceServices](https://twitter.com/PlaceServices)

