

TECHNICAL ADVICE NOTE

TITLE: Ecological Justification for Application of Biodiversity Metric Trading Rule 4. Planning Reference: 25/1502/FH AUTHOR: Tom Beasley FUNCTION: Technical Engineering & Asset Management	EAN NO: M/EF/DNA/EAN/0003/26 DATE: 12/08/2026 SITE: Dungeness A Site - Boilers Down Project
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1 BACKGROUND

The Dungeness A Boilers and Ancillary Plant Removal Project (Boilers Down) will result in the loss of 0.24ha of Coastal Vegetated Shingle habitat and requires the delivery of 1.74 biodiversity units, including the mandatory 10% Biodiversity Net Gain (BNG) uplift. Nuclear Restoration Services (NRS) has collaborated with private ecological consultants, Natural England, Kent County Council Ecology (KCC Ecology) and Folkstone and Hythe District Council (the LPA), to identify the most appropriate BNG solution for the Project.

The initial preferred approach was the creation of a Strategic Habitat Enhancement Area within land owned by the Nuclear Decommissioning Authority (NDA) and managed by NRS (see the 'Biodiversity Position Statement' (DNA/PS/23305/RPT/7504) in original planning submission for more details). The proposal would have enhanced existing areas of Coastal Vegetated Shingle within the Dungeness, Romney Marsh and Rye Bay SSSI, generating biodiversity units for both the Boilers Down Project and future decommissioning activities whilst delivering long-term ecological improvements within the Dungeness landscape.

However, Natural England reviewed the proposal and concluded that, because Coastal Vegetated Shingle is itself a notified feature of the SSSI, enhancement of that habitat for BNG purposes would be contrary to current BNG guidance (see DAS/A019666). The practical consequence of this situation is that statutory biodiversity credits remain the only fully compliant option available.

Statutory credits are intended as a mechanism of last resort in BNG and provide no certainty that biodiversity enhancements will be delivered within Kent, the Romney Marsh National Character Area, or habitats connected to the wider Dungeness ecological network. By contrast, local habitat banks have identified opportunities to deliver high and very high distinctiveness habitats within the Romney Marsh landscape, directly contributing to landscape-scale nature recovery and the objectives of the Kent and Medway Local Nature Recovery Strategy. It is this combination of circumstances that underpins the request to apply Rule 4 of the Biodiversity Metric

2 INTRODUCTION

This statement has been prepared to support the proposed application of Rule 4 of the Statutory Biodiversity Metric User Guide (June 2026) in relation to the loss of 1.58 habitat units of Sparsely Vegetated Land - Coastal Vegetated Shingle arising from the Dungeness A Boilers Down Project.

Rule 4 states “In exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant decision maker”. This document sets out the requirement for this work to take place, and the ecological justification for deviation from the biodiversity metric methodology.

The circumstances of this development differ materially from those typically associated with commercial, residential, industrial or infrastructure development. Dungeness A is an existing nuclear licensed site occupying its geographic location because of historic national energy infrastructure decisions. Unlike conventional developers, NRS cannot relocate the site, select an alternative location with fewer environmental constraints, or avoid the need for decommissioning works through redesign. The site must be decommissioned where it exists and within the environmental context in which it was established.

The proposed works are not discretionary development undertaken to facilitate growth, expansion or redevelopment. The Boilers Down Project forms part of a statutory programme of nuclear decommissioning and hazard reduction required under the Energy Act 2004 and delivered on behalf of the NDA. The works are necessary to progress Dungeness A towards its approved decommissioning end state and fulfil the NDA's statutory responsibilities.

The Project also accords with the NDA Group Strategy (March 2026), which identifies Site Decommissioning and Remediation as a core strategic objective and seeks the safe dismantling of redundant nuclear facilities, reduction of hazards and progressive site remediation. The Boilers Down Project is a key component of this nationally significant programme.

Unlike conventional development, which generally seeks to establish a permanent land use, the proposed works form part of a transitional programme of infrastructure removal and environmental remediation. The development is therefore not creating a new long-term use of land but facilitating the decommissioning of a legacy nuclear facility in accordance with statutory and strategic obligations.

Collectively, these factors create a distinct set of circumstances associated with the decommissioning of legacy nuclear licensed sites. The statutory requirement for the works, the fixed location of the site, the overriding public interest in continuing nuclear decommissioning, and the significant operational, regulatory and ecological constraints affecting habitat compensation opportunities distinguish this proposal from conventional development schemes. When considered alongside the absence of available like-for-like biodiversity units (i.e., Coastal Vegetated Shingle), these factors give rise to the exceptional circumstances that justify consideration of using Rule 4 of the Statutory Biodiversity Metric.

NRS recognises that Biodiversity Net Gain delivery is dynamic. Habitat availability, ecological opportunities and the biodiversity unit market will evolve over time, and future opportunities may arise through new habitat banks, habitats more closely aligned with Coastal Vegetated Shingle, or habitat creation projects delivered directly by NRS or its partners. Accordingly, the application of Rule 4 in this case should not be regarded as establishing a general precedent for development within the Dungeness area, nor as a permanent requirement for future NRS projects. Rather, it reflects the specific statutory, operational, ecological and market circumstances that exist at the time of determination. Future proposals should continue to be assessed on their own merits against the evidence and opportunities available at that time.

The development will result in the loss of 0.24Ha of coastal vegetated shingle habitat located within the operational site land. Whilst the habitat qualifies as a UK Priority Habitat and is assigned a high distinctiveness value within the Statutory Biodiversity Metric, the affected habitat is located outside the Dungeness, Romney Marsh and Rye Bay SSSI boundary and does not form part of the notified SSSI interest features.

The Statutory Biodiversity Metric identifies a requirement to compensate for:

- 1.58 habitat units of Coastal Vegetated Shingle (A4 habitat tier); and
- 0.16 habitat units to achieve the mandatory 10% Biodiversity Net Gain requirement.

This results in a total requirement of 1.74 habitat units. The biodiversity unit requirements have been confirmed through the submitted Statutory Biodiversity Metric and associated ecological assessment documentation (see RT-MME-181303).

3 EXCEPTIONAL CIRCUMSTANCES

It is recognised that the biodiversity trading hierarchy seeks replacement through habitat types of the same broad habitat category and distinctiveness wherever possible.

However, this case presents exceptional circumstances.

3.1 Absence of On-site Opportunities

NRS has explored various opportunities for habitat retention, enhancement and creation within the site boundary and land under its ownership and control (see the 'Biodiversity Position Statement' (DNA/PS/23305/RPT/7504) in original planning submission for more details). Suitable areas of land have already been used as compensatory habitat to satisfy previous planning requirements.

Opportunities for on-site compensation are severely constrained by:

- the operational requirements associated with decommissioning works;
- nuclear licensed site restrictions;
- the presence of nationally and internationally designated ecological sites surrounding the development area; and
- Natural England's position regarding ecological enhancement works within designated features of Dungeness (see DAS/A019666).

As a result, no ecologically meaningful or deliverable on-site habitat compensation solution exists at this time.

3.2 Absence of Like-for-Like Off-site Units

A review of available habitat banks and biodiversity unit providers nationally has not identified any registered and available habitat units for Coastal Vegetated Shingle.

The applicant has therefore exhausted the preferred options within the biodiversity metric hierarchy and faces a choice between:

1. purchase of Statutory Biodiversity Credits; or
2. application of Rule 4 to secure alternative habitat units delivering equivalent or greater ecological benefit.

4 WHY STATUTORY CREDITS WOULD DELIVER LESS PREFERRED ECOLOGICAL OUTCOMES

The statutory credit scheme is intentionally designed as a mechanism of last resort.

Whilst statutory credits would satisfy the technical requirements of the legislation, they provide no certainty that biodiversity enhancement would:

- occur within Folkestone & Hythe District;
- occur within the Romney Marsh National Character Area (NCA);
- support the ecological networks associated with Dungeness;
- contribute to the objectives of the Kent and Medway Local Nature Recovery Strategy (LNRS); or
- benefit the species assemblages affected by the development.

Consequently, strict reliance upon statutory credits could result in biodiversity investment being directed away from Kent entirely, delivering limited ecological relevance to the area in which the impact occurs.

NRS considers that the primary objective of Biodiversity Net Gain should be to deliver genuine biodiversity recovery at a landscape-scale. In the circumstances of this application, this objective would be better served through strategically located habitat bank units within Kent and the wider Romney Marsh ecological network than through purchase of statutory credits.

5 ECOLOGICAL BASIS FOR RULE 4 APPLICATION

The following sections present the ecological justification for the application of Rule 4 of the Biodiversity Metric trading rules. They describe the proposed compensation habitats and evaluate their ecological characteristics against those of the affected Coastal Vegetated Shingle habitat, including consideration of habitat structure, ecological function, species assemblages and biodiversity value. The assessment also considers alignment with local nature recovery objectives, the ecological character of the Romney Marsh landscape and the wider Dungeness environment.

The sections then set out how the proposed habitat enhancements will be delivered through a registered habitat bank to provide a compliant and locally relevant means of satisfying the Biodiversity Net Gain requirements associated with the development.

5.1 Benefits for Biodiversity Delivered Locally

The affected habitat is classified as Coastal Vegetated Shingle; however, the principal ecological value of Dungeness shingle habitats arises not solely from their plant communities but from the specialist ecological conditions they provide. This assessment focusses on ecological function rather than strict botanical similarity.

The habitat supports assemblages associated with:

- sparsely vegetated substrates;
- early successional habitats;
- abundant bare ground;
- warm micro-climates;
- nectar-rich flowering resources;
- invertebrate-rich habitat mosaics;
- lichen communities;
- scrub-shingle transitions; and
- structurally diverse open habitats.

Dungeness is recognised internationally for these ecological characteristics and supports nationally important assemblages of invertebrates, specialist moths, solitary bees, wasps, beetles and spiders. The Special Area of Conservation citation specifically identifies the exceptional extent and diversity of stable vegetated shingle communities and associated scrub-shingle mosaics.

Accordingly, ecological equivalence should be assessed in relation to the ability of a compensatory habitat to support similar ecological functions and species assemblages, rather than on botanical similarity alone.

5.2 Available Appropriate Alternative Habitat Types

In the absence of available Coastal Vegetated Shingle units, there are Biodiversity Units available with local habitat banks which share some ecological overlap. Quotes were obtained from:

- Two habitat banks within the local area (via Gaia, see **Appendix 1**, and Adonis Blue, see **Appendix 2**), and;
- A third registered habitat bank was discussed with Folkstone & Hythe District Council but discounted because the units are not publicly available.

No other suitable habitat banks were available at the time of preparing this report (suitability primarily being based on habitat units available and proximity).

Both the Gaia and Adonis Blue habitat banks are able to provide units of Lowland Meadow. Gaia is able to provide a mosaic of units of Lowland Meadow (1BU), Wet Woodland (0.584BU), and Mixed Scrub (0.1584BU). They are also able to provide 1.74BU of Grazing Marsh as an alternative proposal (more information is included in **Appendix 1**).

The mixed habitat compensation delivers a mosaic supporting a broad range of priority species and ecological functions identified by the Kent & Medway LNRS. The mosaic includes species-rich grassland supporting pollinators and invertebrates, scrub habitats representing a component of the natural successional habitat sequence characteristic of Dungeness (these habitats aim to mimic some of the ecological characteristics and species assemblages), and wet woodland (this habitat is ecologically rich and supports biodiversity restoration in line with the character of the landscape and local plans), contributing to landscape-scale biodiversity recovery within the Romney Marsh area. A mosaic generally supports more species than a single habitat. This is NRS' preferred strategic option.

Information on the suggested compensatory habitats is presented below. It details the ecological benefits and how they relate to those of the Vegetated Shingle. It also considers their alignment with the landscape and local plans and strategies.

Lowland Meadow (g3a)

Lowland Meadow is a UK Priority Habitat of high distinctiveness and represents one of the most species-rich grassland habitat types available through the biodiversity unit market. Although it does not replicate the physical structure of coastal vegetated shingle, it delivers substantial ecological value through the provision of diverse flowering plant communities, abundant nectar and pollen resources, and structurally varied grassland habitat.

This provides the greatest overlap with some of the ecological functions of vegetated shingle. It supports a variety of species and meets LNRS objectives. Many of these species groups are important components of the Dungeness ecosystem. It is ecologically similar in some respects but not structurally similar (it would not replace bare substrate or early successional conditions, for example).

Lowland meadow supports:

- pollinating insects;

- solitary bees and bumblebees;
- hoverflies;
- butterflies and moths;
- predatory invertebrates;
- farmland and grassland bird assemblages.

Alignment with the Romney Marshes NCA:

- Contributes to the restoration and enhancement of species-rich grassland habitats within the wider Romney Marsh landscape.
- Increases habitat diversity within an area historically characterised by a mosaic of grassland, grazing marsh and coastal habitats.
- Provides ecological connectivity between existing semi-natural habitats and strengthens landscape-scale habitat networks.

Alignment with the Kent & Medway LNRS (GL3):

- Supports creation and restoration of species-rich grasslands and the recovery of priority species.
- Directly contributes to objectives for pollinator recovery, habitat connectivity and resilient ecological networks.
- Provides a habitat type that is recognised as being of high biodiversity value and capable of supporting a wide range of declining species.
- Delivers nature recovery outcomes within the same National Character Area as the impact.

Relationship to the Dungeness Landscape:

- While not a direct analogue of coastal vegetated shingle, lowland meadow supports many of the same ecological functions associated with flower-rich open habitats.
- Provides abundant nectar and pollen resources for invertebrate communities, which are a key component of the biodiversity importance of the wider Dungeness landscape. It has the potential to support a greater abundance and diversity of pollinating insects and flower-dependent invertebrates, contributing directly to species recovery objectives identified within LNRS.
- Maintains the open character of habitats within the Romney Marsh landscape and supports species that utilise open ground and grassland mosaics.

The habitat therefore contributes directly to species recovery objectives identified within the LNRS, particularly those relating to pollinator recovery, ecological connectivity and the enhancement of species-rich habitat networks.

Furthermore, where lowland meadow creation forms part of a wider habitat mosaic incorporating areas of open ground, field margins, scrub edges and other semi-natural habitats, it can provide significant functional support to many of the invertebrate groups associated with open coastal habitats.

Wet woodland (w1d)

Wet woodland is also a high distinctiveness UK Priority Habitat. Whilst this habitat is not ecologically or structurally similar to coastal vegetated shingle, as part of the mosaic of habitats suggested it can deliver additional biodiversity functions not provided by shingle. Wet woodland and marsh habitats provide an inland transition from the coastal shingle habitats.

Wet woodland supports:

- saproxylic invertebrates;
- woodland-edge species;
- wetland faunal communities.

Alignment with the Romney Marshes NCA

- Wet woodland is a characteristic habitat associated with the wetland, ditch and floodplain systems that occur throughout Romney Marsh and its surrounding landscapes.
- Contributes to habitat diversity within a landscape otherwise dominated by open marsh and agricultural habitats.
- Supports ecological connectivity between grazing marsh, wetland and woodland habitats.

Alignment with the Kent & Medway LNRS (WTH6)

- Supports LNRS priorities for the recovery and enhancement of freshwater and wetland habitats.
- Contributes to the creation of resilient ecological networks by increasing habitat diversity and connectivity.
- Provides habitat for a wide range of wetland-associated species, including invertebrates, birds, amphibians and mammals.
- Delivers additional ecosystem services including natural flood management, water retention and climate resilience.

Relationship to the Dungeness Landscape

- Dungeness is not solely important for its shingle habitat; the designated landscape also includes freshwater pits, ditches, wetlands and fen systems that support nationally important biodiversity.
- Wet woodland contributes to the wider wetland habitat network associated with the Romney Marsh and Dungeness landscape.
- Although it has limited direct similarity to coastal vegetated shingle, it supports ecological connectivity with other habitats that form part of the designated landscape.

Mixed scrub (h3)

Dungeness is internationally important for its scrub-on-shingle communities, particularly prostrate broom and blackthorn scrub. Although mixed scrub is not the same habitat, it does partially replicate one component of the natural Dungeness successional sequence. Mixed scrub is categorised as a medium distinctiveness habitat.

Mixed scrub provides structural and functional habitat resources that are largely absent from coastal vegetated shingle (though scrub is present within shingle habitats when not in a 'good' condition). Scrub provides nesting habitat for birds, shelter for invertebrates and year-round food resources. The habitat therefore contributes positively to landscape-scale biodiversity resilience and ecological connectivity.

Mixed scrub supports:

- nectar resources;
- berry production;
- scrub-edge invertebrates;
- breeding birds.

Aligns to the Romney Marshes NCA:

- Contributes to the habitat mosaic characteristic of the wider Romney Marsh landscape.
- Enhances ecological connectivity between grassland, wetland and woodland habitats.

Alignment with the Kent & Medway LNRS (SH2)

- Supports LNRS objectives for species recovery, ecological connectivity and habitat mosaics.

- Increases structural diversity within the landscape, creating a more resilient ecological network.
- Benefits pollinators, invertebrates, birds and small mammals through provision of nectar, shelter and food resources.

Relationship to the Dungeness Landscape

- Scrub is a recognised component of the natural successional stages found within the Dungeness ecosystem.
- The Dungeness SAC citation specifically identifies its internationally important scrub-on-shingle communities, including blackthorn and broom scrub.
- Although not a direct replacement for coastal vegetated shingle, mixed scrub reflects part of the natural ecological progression associated with stable shingle systems.

5.3 Note on other suitable habitats not currently available on the local market

Open Mosaic Habitat, Open Habitats with Ephemeral/Short Perennial Vegetation, and Lowland Calcareous Grassland are also capable of supporting many of the ecological functions, invertebrate communities, pollinator resources and species recovery objectives associated with the wider Dungeness landscape. Whilst none constitute a direct replacement for Coastal Vegetated Shingle, they represent ecologically appropriate and deliverable alternatives. Where units of these habitat types become available in the future (either through commercial habitat banks, or where the site can develop its own habitat bank), they should also be considered as alternative habitats under Rule 4 which can provide substantially greater local biodiversity benefit than reliance on statutory biodiversity credits.

6 PLANNING BALANCE AND PROFESSIONAL JUDGEMENT

Rule 4 exists to allow professional judgement to be exercised where strict application of the biodiversity metric trading hierarchy would not deliver the most appropriate ecological outcome.

In this case, NRS is not seeking flexibility due to viability, commercial preference or land ownership constraints. The development is required to fulfil statutory obligations placed upon the NDA and NRS under the Energy Act 2004 and to deliver the objectives of the NDA Group Strategy (March 2026). Furthermore, the works must be undertaken at the location of an existing nuclear licensed site and cannot reasonably be relocated to avoid the ecological constraints present.

The exceptional circumstances identified in this report arise from the combination of statutory necessity, overriding public interest, locational inflexibility and the absence of suitable like-for-like compensation opportunities. These factors are not commonly associated with conventional development proposals and should therefore carry significant weight in determining whether a departure from the biodiversity metric trading hierarchy is justified.

In this instance:

- the development is required to progress the statutory decommissioning of Dungeness A;
- the project supports the objectives of the NDA Group Strategy (March 2026);
- the development must be undertaken at a fixed, existing nuclear licensed site;
- no ecologically meaningful on-site compensation opportunity exists;
- no like-for-like Coastal Vegetated Shingle units are currently available;
- statutory biodiversity credits may not deliver biodiversity benefits within Kent or the wider Dungeness landscape;
- suitable habitat bank units can be secured within the Romney Marsh landscape;
- the proposed habitat mosaic supports biodiversity recovery and ecological resilience;
- and
- the approach aligns with the Kent and Medway Local Nature Recovery Strategy.

Consequently, NRS considers that this case represents the type of exceptional circumstance for which Rule 4 was intended. Application of Rule 4 would secure a locally relevant and ecologically meaningful compensation outcome that is preferable to reliance on statutory biodiversity credits.

7 CONCLUSION

In assessing the application of Rule 4, it is important to recognise that this proposal arises from the statutory decommissioning of a legacy nuclear licensed site rather than discretionary development. The works are required to fulfil obligations placed upon the NDA and NRS under the Energy Act 2004 and support delivery of the NDA Group Strategy (March 2026). Unlike conventional developers, NRS cannot relocate the site, select an alternative location or avoid the requirement to undertake decommissioning works.

There is a compelling public interest and operational justification for the nuclear decommissioning activities at Dungeness A to proceed. NRS has demonstrated that no ecologically meaningful on-site compensation opportunity exists and that no like-for-like Coastal Vegetated Shingle habitat units are currently available nationally. NRS considers that this represents an exceptional ecological circumstance for the purposes of Rule 4. Application of Rule 4 would allow biodiversity compensation to be secured through strategically located habitat bank units delivering habitats of the closest available ecological analogue to the affected vegetated shingle habitat. They offer the greatest opportunity to support similar invertebrate assemblages, ecological processes and nature recovery objectives within the same area.

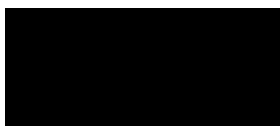
NRS considers that the combination of statutory necessity, overriding public interest, locational inflexibility and the absence of suitable like-for-like compensation opportunities constitutes the exceptional circumstances envisaged by Rule 4. The proposed approach would deliver a more locally relevant, strategically aligned and ecologically beneficial outcome than the purchase of statutory biodiversity credits.

NRS does not suggest that application of Rule 4 in this instance should establish a general precedent for development within the Dungeness area. Biodiversity Net Gain delivery is inherently dynamic, and future opportunities may arise through additional habitat banks, the availability of more appropriate habitat units, or habitat creation projects delivered directly by NRS. Future proposals should therefore continue to be assessed on their own merits against the ecological evidence and compensation opportunities available at the time.

Accordingly, the applicant respectfully requests that Folkestone & Hythe District Council exercise its professional judgement and agree the application of Rule 4 in this case.

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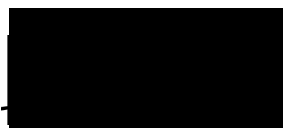
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APPENDIX 1 – Detail of the Kensham Habitat Bank (BGS-110225001)

The Kensham Nature Reserve Biodiversity Gain Site comprises approximately 69 acres of land and is registered on the Natural England Biodiversity Gain Sites Register. The site is generating approximately 170 Biodiversity Units, which are available for immediate allocation and purchase. Importantly, the habitat bank is located approximately 25km to the northwest of site in Rolvenden, within the Romney Marshes National Character Area (NCA) and just in the Ashford Local Planning Authority (LPA) area bordering the Folkestone and Hythe LPA.

The habitat bank is administered by Gaia, which was provided with details of the biodiversity unit requirements arising from the Dungeness A Boilers Down Project. In response, Gaia prepared a range of habitat unit options based on the habitats available within the registered habitat bank. These options have been developed to enable Nuclear Restoration Services (NRS) and the Local Planning Authority to assess which habitat combination would deliver the greatest biodiversity benefit, best support local nature recovery objectives, and provide the most appropriate ecological compensation for the loss of coastal vegetated shingle habitat.

The following mix of habitat units is proposed:

- 'Lowland Meadow' – 1BU.
- 'Wet Woodland' - 0.584BU.
- 'Mixed Scrub' - 0.1584BU.

The habitat bank performs a Science Programme on their land to supplement the statutory biodiversity net gain requirements with enhanced Measurement, Reporting and Verification of species, soils, and consideration of Natural Capital Benefits achieved.

Alternative Option Information

This alternative habitat option was presented for discussion with the Local Planning Authority, but will not be considered at this time.

Grazing Marsh (g3c)

1.74BU 'Grazing Marsh'.

Note – Due to the cost of developing Grazing Marsh, the habitat bank requires this allocation to comprise solely of this habitat type. This option has the best alignment with landscape-scale conservation, but is not as well aligned ecologically.

This habitat has the strongest relationship with the wider Dungeness and Romney Marsh landscape, but is the least similar habitat to vegetated shingle. The Dungeness, Romney Marsh and Rye Bay SSSI is designated partly because of its extensive grazing marsh systems and associated wetland ecology. The overlap in species assemblages is relatively limited due to the wet versus dry nature of the habitats.

It would support:

- wetland invertebrates;
- dragonflies;
- water beetles;
- aquatic bugs;
- breeding waders;
- amphibians;
- ecological connectivity with Romney Marsh habitats.

Alignment with the Romney Marshes NCA

- Grazing marsh is one of the defining habitats of the Romney Marsh landscape and forms a fundamental component of the area's ecological character.

- Supports the restoration and enhancement of habitats that are intrinsically linked to the natural and cultural identity of the area.
- Strengthens ecological connectivity between existing marshland, ditch networks, wetlands and coastal habitats.
- Contributes to landscape-scale habitat recovery within the same National Character Area as the development impact.

Alignment with the Kent & Medway LNRS (GL2)

- Supports LNRS priorities relating to the restoration, enhancement and connectivity of wetland and freshwater habitats.
- Contributes towards species recovery objectives through the creation and long-term management of habitats that support a wide range of priority and declining species.
- Enhances ecological resilience by increasing the extent and connectivity of high-value marshland habitats within Kent.
- Delivers biodiversity investment directly within a landscape identified as a strategic priority for nature recovery.

Relationship to the Dungeness Landscape

- Grazing marsh is a notified habitat feature of the wider Dungeness, Romney Marsh and Rye Bay SSSI and contributes significantly to the ecological importance of the designated landscape.
- Supports ecological processes and species populations associated with the wider Dungeness and Romney Marsh habitat complex.
- Provides strong landscape-scale ecological linkage to habitats already present within the wider area surrounding Dungeness.
- Although fundamentally different in structure and environmental conditions from coastal vegetated shingle, it forms part of the wider network of habitats that underpin the biodiversity value of the area.

APPENDIX 2 – Detail of the Adonis Blue Habitat Banks

Adonis Blue have provided a quote for all units to be supplied as Lowland Meadow habitat (1.74BU). They have identified two prospective habitat banks, but neither have units registered and available for immediate allocation. These are:

- 'Pond Wood' in the neighbouring Ashford LPA/NCA (approximately 10km away from site).
- 'Haffenden Farm' in the neighbouring LPA/NCA (approximately 20km away from site).

The Pond Wood habitat bank may be a suitable habitat bank for consideration in the future once units are available for allocation. The management of this site uses some traditional practices and has some additional natural capital benefits.