

BIRCHINGTON PARISH COUNCIL

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Thanet District Council,
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June 30 2026

Dear Adrian,

Draft consultation response from Birchington Parish Council on Thanet District Council's Draft Biodiversity Strategy

Birchington Parish Council welcomes the opportunity to comment on Thanet District Council's Draft Biodiversity Strategy.

The Parish Council supports the overall ambition of the strategy to protect, enhance and restore biodiversity across Thanet. We particularly welcome the recognition of Thanet's distinctive natural assets and support the strategy's emphasis on Biodiversity Net Gain, habitat connectivity, sustainable land management, community engagement and long-term monitoring.

However, the Parish Council considers that the final strategy should be strengthened to provide clearer assurance that the protection, restoration and natural functioning of existing habitats and ecosystems will be prioritised and that the strategy should place sustainability at its core.

The Parish Council therefore asks Thanet District Council to adopt a clear "nature first" principle, supported by a wider sustainability principle, and to embed both as material considerations in relevant decision making and as core requirements within development, planning, land management, procurement, asset management and operational policies and practices.

1. A clear "nature-first" principle should be added as a material consideration

The strategy should include an explicit commitment that existing natural habitats, ecological networks and ecosystem processes will be protected as the priority, and that the "nature first" principle will be treated as a material consideration in all relevant Council decisions and operations.

The Parish Council recommends that the strategy includes the following principle:

Thanet District Council will prioritise the protection, restoration and natural functioning of existing habitats and ecosystems in decision making and operations ahead of engineered, artificial or offset-based solutions. This "nature first" principle should be treated as a material consideration in all relevant Council decision making and embedded in development, planning,

land management, asset management, procurement and operational policies and practices.

Manmade interventions, including green infrastructure, sustainable drainage systems, habitat banks, biodiversity units and engineered coastal or flood management measures, should only be used where they support, enhance or are demonstrably less damaging to natural biodiversity, and must not be used as a substitute for avoidable habitat loss or degradation.

This would provide a clear policy test for future decisions and help ensure that biodiversity protection is embedded in practice, not only in aspiration.

2. Embed sustainability across environmental, social and economic policy

The Parish Council recommends that the strategy includes a clear sustainability principle:

Thanet District Council will apply the principle of sustainability across the Biodiversity Strategy and related decision making, ensuring that current development, land use, resource management and operational decisions do not compromise the ability of future generations to benefit from healthy ecosystems, resilient communities and a sustainable local economy. Environmental, social and economic policy should be considered together, with biodiversity and natural ecosystem function recognised as essential foundations for long-term wellbeing and prosperity.

A genuinely sustainable biodiversity strategy should ensure that environmental, social and economic objectives are mutually reinforcing rather than treated as competing priorities. Short-term economic or operational convenience should not be allowed to undermine long-term ecological resilience, public wellbeing or the interests of future generations.

3. The mitigation hierarchy should be made explicit

The Parish Council asks that the strategy clearly embeds and applies the mitigation hierarchy across all planning, land management and infrastructure decisions:

- a. Avoid harm to existing habitats and species.
- b. Minimise unavoidable harm.
- c. Restore affected habitats on site.
- d. Compensate or offset only as a last resort.

Biodiversity Net Gain and habitat banking can be useful tools, but they must not become a justification for the avoidable loss of existing natural habitats.

The strategy should state clearly that offsetting is not equivalent to protecting established habitats, particularly where habitats are mature, complex, irreplaceable, difficult to recreate, or important for protected or priority species.

4. Existing habitats should be valued above newly created artificial substitutes

The Parish Council is concerned that some biodiversity approaches can overvalue newly created or engineered habitats while undervaluing existing natural systems.

The strategy should therefore make clear that:

- mature trees, hedgerows, wetlands, chalk grassland, coastal habitats, ponds, ditches, scrub, brownfield mosaic habitats and species-rich grassland should be retained wherever possible
- artificial or engineered measures such as green roofs, planters, attenuation basins, ornamental landscaping or off-site credits should not be treated as equivalent replacements for functioning natural habitats
- the age, condition, connectivity, species value and natural function of existing habitats should be fully considered before any loss is accepted.

They should not be accepted as like-for-like replacements for existing functioning habitats unless robust ecological evidence supports this.

5. Stronger safeguards are needed for habitat banking and offsetting

The Parish Council supports the principle of local habitat banks where they deliver genuine, additional, long-term biodiversity gains. However, the strategy should include stronger safeguards to ensure that habitat banking does not weaken protection for existing biodiversity.

The Parish Council recommends that the strategy should require:

- clear evidence that on-site avoidance and retention have been fully considered before off-site offsetting is accepted
- local offsetting to be prioritised within Thanet wherever possible
- habitat banks to support Local Nature Recovery Strategy priorities
- transparent reporting on biodiversity units, habitat condition, delivery progress and long-term management
- independent ecological review of habitat bank proposals
- legal protection and funded management for at least 30 years
- enforcement mechanisms where promised outcomes are not delivered.

6. The strategy should include measurable baselines and targets

The Parish Council welcomes the commitment to monitoring and reporting. However, the strategy should include a clearer baseline so that progress can be tested objectively.

We recommend that the final strategy includes measurable indicators for:

- habitat extent and condition
- tree canopy cover
- hedgerow length and quality
- wetland extent and water quality
- chalk grassland condition
- coastal and intertidal habitat condition
- farmland margins and pesticide reduction
- priority species presence and abundance
- ecological connectivity
- urban green infrastructure
- Biodiversity Net Gain delivery and compliance.

Each indicator should have a baseline, target, timescale, monitoring method, responsible body and reporting frequency.

7. Prioritise natural flood management and coastal processes

The Parish Council supports the strategy's recognition of wetlands, coastal habitats and natural processes. We ask that this be strengthened so that natural flood management, wetland restoration, saltmarsh, dunes, grassland, hedgerows, ponds, riparian buffers and natural drainage are considered before hard-engineered alternatives.

Engineered solutions may sometimes be necessary, but they should be designed to work with natural systems and should be subject to biodiversity impact assessment, long-term monitoring and community scrutiny.

8. Stronger governance and independent assurance are required

The Parish Council welcomes the commitment to monitoring and reporting. This

should include:

- a named senior responsible officer
- member-level oversight
- annual public reporting
- independent ecological audit at regular intervals
- transparent publication of monitoring data
- clear enforcement arrangements for failed BNG or habitat management commitments
- parish and community involvement in local delivery and review.

Parish councils should be treated as key local partners, especially where projects affect parish land, rural corridors, public rights of way, watercourses, farmland, village edges or locally valued habitats.

9. Community knowledge should be built into the evidence base

Local communities often hold detailed knowledge of wildlife sites, seasonal flooding, hedgerow loss, informal green corridors, nesting areas and locally important habitats. The final strategy should include a mechanism for parish councils, residents, farmers, landowners and local wildlife groups to contribute evidence to biodiversity mapping, monitoring and project selection.

This would help ensure that decisions are informed not only by strategic mapping but also by local ecological knowledge.

Conclusion

Birchington Parish Council supports the aims of the Draft Biodiversity Strategy and welcomes its ambition to restore nature across Thanet. However, the final strategy should be strengthened to provide clear assurance that the protection and restoration of existing natural biodiversity will come before engineered, artificial or offset-based solutions.

The Parish Council therefore asks Thanet District Council to incorporate clear principles to deliver 'nature-first' and sustainability principle. Furthermore, it should embed an explicit mitigation hierarchy, improve safeguards around offsetting and habitat banking, introduce measurable baselines and targets, and provide stronger governance, monitoring and independent assurance.

With these amendments, the strategy would provide a stronger, more sustainable and more credible framework for protecting Thanet's natural environment and securing lasting biodiversity recovery for future generations.

Yours sincerely,



Cllr. Nick Blankley
Chairman, Birchington Parish Council