



ECOLOGICAL ADVICE SERVICE

TO: Amanda Grout
FROM: Emma England
DATE: 12 July 2023
SUBJECT: 20230448 / Land At Former Northfleet Cement Works

The following is provided by Kent County Council's Ecological Advice Service (EAS) for Local Planning Authorities. It is independent, professional advice and is not a comment/position on the application from the county council. It is intended to advise the relevant planning officer(s) on the potential ecological impacts of the planning application and if sufficient/appropriate ecological information has been provided.

Any additional information, queries or comments on this advice that the applicant or other interested parties may have must be directed in every instance to the planning officer, who will seek input from the EAS where appropriate and necessary.

CONDITION DISCHARGE – ADDITIONAL INFORMATION REQUIRED

We have reviewed the submitted documents in relation to condition 12 (wording in Appendix 1) and advise that additional information is needed before a discharge can be recommended.

Planting

Condition 12 states that the “soft landscaping scheme shall accord with details illustrated and annotated on the approved drawings, but notwithstanding reference to planting mixes shown on drawing no. 10986-LD-PLN-161 Rev P02 (Phase 1C - Detailed Illustrative Soft Landscape Plan), it shall adopt a planting approach which is not reliant on large areas of planting mixes.” We have compared drawing no. 10986-LD-PLN-161 Rev P02 with drawing no. 2956-PH1B-PP-10 Rev P1 and note the following differences:

1. Trees

- Drawing no. 10986-LD-PLN-161 Rev P02 includes six trees: four large (1 *Acer platanoides* ‘Globusum’, 2 *Sorbus aria* and 1 *Sorbus torminalis*) and two small (1 *Crataegus laevigata* ‘Paul’s Scarlet’ and 1 *Crataegus persimilis* ‘Prunifolia splendens’). Three of these trees are native species.

- Drawing no. 2956-PH1B-PP-10 Rev P1 includes four trees: two large (1 *Sorbus intermedia* 'Brouwers' and 1 *Tilia cordata* 'Rancho'), and two small (2 *Crataegus persimilis* 'Prunifolia'). One of these trees is a native cultivar.

The reduction in number of trees proposed and change to the tree species/varieties proposed is considered to result in a reduction in the ecological value of the proposed trees. Native trees are generally better for nature than non-native trees, although cultivars with double flowers generally have poor biodiversity value.

We would recommend that the number of trees be increased to at least match those on drawing no. 10986-LD-PLN-161 Rev P02. Ideally the trees should be native species of wildlife value.

2. Hedging

- The AAe Environmental Consultants report (February 2022) indicates that *Carpinus betulus* (native) hedging will be included in landscaping plans although, no hedging is indicated on drawing no. 10986-LD-PLN-161 Rev P02.

Native hedges can provide good wildlife value if they are at least 1.8m high x 1.8m wide, which may or may not be possible within the red line boundary. If it is possible, then native hedging should be included on plans as far as this is consistent with previous approvals.

3. Bed planting

- Drawing no. 10986-LD-PLN-161 Rev P02 includes planting of 'Street Type Three Mix' and 'Street Type Four Mix'. It is not clear from the drawing what plants these mixes include (and so the biodiversity value unclear), but it is noted that one of the planting areas as per drawing no. 10986-LD-PLN-161 Rev P02 has been changed to amenity grassland in drawing no. 2956-PH1B-PP-10 Rev P1. Amenity grassland has very low ecological value. Some of the plants proposed on drawing no. 2956-PH1B-PP-10 Rev P1 do have some ecological value (e.g., *Lavandula angustifolia* 'Hidcote', *Rosmarinus officinalis*, *Jasminum officinale*).

It is unclear how submitted bed planting compares in terms of ecological value to drawing no. 10986-LD-PLN-161 Rev P02. However, it will no longer be possible to include a log pile in the area that now contains amenity grassland. The log pile could be included elsewhere on the site, or shrub planting reinstated in this area.

Habitat Features

Condition 12 states that "*The scheme shall include details of the ecological enhancement measures shown in Figure 1 of the Ecological Mitigation and Enhancement Strategy by AA Environmental Limited dated February 2022.*"

We have reviewed Figure 1 of the Strategy and note that the two building integrated bat boxes and two building integrated bird boxes, as well as the two log piles have not been included on plans. Plans therefore need to be updated to include these features in appropriate locations, of appropriate makes/models and construction.

Tree Protection

Drawing no. 2956-PH1B-LA-10 Rev P1 includes hard landscaping details. However, measures for the protection of retained trees is not clearly referred to in any of the submitted documents. It may be helpful to update this drawing to include those measures, or at least reference to those measures shown on the “*Tree Protection Plan attached as Appendix 3 of the Arboricultural Implications Report prepared by SJA Trees dated February 2022 (Ref. SJA TPP 22070-041)*”. Failure to include clear links to the relevant Tree Protection Plan could result in mitigation measures failing to be implemented.

If you have any queries regarding our comments, please do not hesitate to get in touch.

Emma England **Biodiversity Officer**

This response was submitted following consideration of the following documents:

AAe Environmental Consultants (February 2022) Erection of 3 Dwellings Ecological Mitigation and Enhancement Strategy. Harbour Village at Ebbsfleet Garden City.

Allen Pyke (April 2023) Planting Plans 1 of 2. Harbour Village Phase 1B 3 Units Scheme. 2956-PH1B-PP-10 Rev P1.

Allen Pyke (April 2023) Planting Plans 2 of 2. Harbour Village Phase 1B 3 Units Scheme. 2956-PH1B-PP-11 Rev P1.

Allen Pyke (April 2023) Landscape General Arrangements Surface Finishes. Harbour Village Phase 1B 3 Units Scheme. 2956-PH1B-LA-10 Rev P1.

LUC London (July 2022) Phase 1C Detailed Illustrative Soft Landscape Plan. Harbour Village at Ebbsfleet Garden City. 10986-LD-PLN-161 Issue P02.

Savills (April 2023) Letter: Land at Former Northfleet Cement Works, Gravesend, Kent Application for the Discharge of Condition 12 (Soft Landscaping) attached to Planning Permission Ref: 20220078.

SJA Trees (February 2022) Arboricultural Implications Report. Proposed re-development at Northfleet Embankment West. Phase 1c Reserved Matters. Harbour Village (Three Additional Units) Kent.

Appendix 1: Condition Wording

12. Prior to the first occupation of any dwelling hereby approved a detailed soft landscaping scheme shall be submitted to and approved in writing by the Local Planning Authority Gravesham Borough Council and shall include the type and species of planting to be carried out, to include their quantity and size. The soft landscaping scheme shall accord with details illustrated and annotated on the approved drawings, but notwithstanding reference to planting mixes shown on drawing no. 10986-LD-PLN-161 Rev P02 (Phase 1C - Detailed Illustrative Soft Landscape Plan), it shall adopt a planting approach which is not reliant on large areas of planting mixes.

The scheme shall include details of the ecological enhancement measures shown in Figure 1 of the Ecological Mitigation and Enhancement Strategy by AA Environmental Limited dated February 2022 shall be installed in accordance with details of their form and siting which have first been submitted to and approved in writing by the local planning authority, and thereafter retained at all times.

The development shall incorporate measures to ensure protection of the retained trees as identified in the Tree Protection Plan attached as Appendix 3 of the Arboricultural Implications Report prepared by SJA Trees dated February 2022 (Ref. SJA TPP 22070-041).

The approved soft landscaping scheme, including ecological enhancement measures, shall be carried out in full during the first available planting season following first occupation of any dwelling hereby approved and maintained in accordance with the details shown on drawing no 10986-LD-PLN-161 Rev P02 (Phase 1C - Detailed Illustrative Soft Landscape Plan). Any trees, plants or grass that die, are damaged, removed or become diseased shall be replaced with a species of a similar size and species during the next available planting season.

Reason: In order to ensure an acceptable and functional standard of development upon completion and accord with the terms of the application by ensuring ecological enhancement measures are incorporated and retained as part of the development and to ensure the continued well-being of the trees in the interests of the amenity and environmental quality of the locality, in accordance with adopted Gravesham Local Plan Core Strategy Policies CS12 and CS19 and National Planning Policy Framework paragraphs 130 and 180.