

Date: 26<sup>th</sup> March 2024

Ref: 20221064

Site address: Land Surrounding Ebbsfleet United Football Club,  
Stonebridge Road, Northfleet, Gravesend, Kent

Katherine Parkin

Gravesham Borough Council

By email only [planning.reps@gravesham.gov.uk](mailto:planning.reps@gravesham.gov.uk)



**Kent**  
Wildlife Trust

Dear Katherine,

**RE: Outline planning application with all matters reserved, except for the primary means of access and road layout, for a phased mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation / remediation works, and the development of residential units (Use Class C3), Class E uses including floorspace for retail Class E(a)), food/beverage and drinking establishments (Use Class E(b)), local services (Use Class E(c)), indoor sport/recreation/fitness (use Class E(d)), healthcare space (Use Class E(e)), creche/nursery uses (Use Class E(f)), office floorspace (Use Class E(g)(i)), a new multi-use stadium with associated business and leisure facilities (sui generis), hotel (Use Class C1), community uses floorspace (Use Class F2). The phased redevelopment will include other sui generis uses, delivery of open space and significant realignment of the road network including the A226 Galley Hill Road / Stonebridge Road / Lower Road with hard / soft landscaping, car and cycle parking provisions, infrastructure works, ancillary and associated works.**

## SUMMARY

Kent Wildlife Trust (KWT) have provided previous comments on the application in December 2022 and September 2023. Whilst some of our concerns outlined within these consultation responses have been addressed, such as further measures to reduce the impacts of cat predation and recreational pressures within Swanscombe Peninsula Site of Special Scientific Interest (SSSI), we are still concerned that a development of this scale will have significant negative effects on Swanscombe Peninsula SSSI, Thames Estuary and Marshes Special Protection Area (SPA) and Ramsar, Botany Marsh Local Wildlife Site (LWS) and the several priority habitats surrounding the site. As the proposed development still poses a substantial threat to biodiversity, KWT **object** to the current proposals, as a development of this scale at this location cannot have an overarching positive impact to wildlife and biodiversity. As stated within our previous response (September 2023), we are confused as to why our December 2022 response letter cannot be found within the documents along with other consultee responses, and that our concerns were not addressed within the applicant's Biodiversity and Ecology Response letter.

## IMPACTS TO BIODIVERSITY

KWT still have concerns regarding impacts to the surrounding designated sites such as Swanscombe Peninsula SSSI, Thames Estuary Marine Conservation Zone (MCZ), Botany Marsh LWS, Ebbsfleet Marshes LWS, Alkerden Pit Site of Nature Conservation Interest (SNCI) and River Thames Site of Importance for Nature Conservation (SINC). This also includes Robin's Creek, which is adjacent to the site's north-eastern corner and home to breeding Cetti's warbler, a Schedule 1 species, and five Priority Habitats - coastal saltmarsh, mudflats, coastal and floodplain grazing marsh, deciduous woodland, and open mosaic habitat, which are all adjacent to the site and support an abundance of species such as the nationally scarce tentacled lagoon worm and breeding ringed plover, which is a qualifying species for the Thames Estuary Marshes SPA and Ramsar.

We note that additional information such as the 'Design Code addendum – ecology' has been provided which illustrates buffers between the development and Swanscombe Peninsula SSSI and proposed locations of cat-

proof fencing and signposts for restricted access, however we share Natural England's and KCC Ecology's concerns that the mitigation hierarchy has not been followed and that impacts have been inadequately assessed and not appropriately mitigated. We note that the applicant has stated *"a number of mitigation measures will be secured through various management plans, to be conditioned to the granting of planning permission for the Proposed Development."* However, due to the number of nationally and internationally protected conservation sites which surround the application site, it is extremely inappropriate to not provide a detailed assessment of all ecological impacts to the designated sites and their features, so that detailed, bespoke mitigation can be devised to avoid, reduce and as a last resort, compensate against these negative effects. We urge that this needs to be undertaken at the Outline Planning Application stage. Impacts to consider should include direct and indirect impacts to the breeding bird, invertebrate and vascular plant assemblages within all designated wildlife and conservation sites, such as Swanscombe Peninsula SSSI, Botany Marsh LWS, Ebbsfleet Marshes LWS, Alkerden Pit SNCI and Robins Creek. Impacts to birds (breeding and wintering) and marine wildlife should also be assessed within Thames Estuary Marshes SPA and Ramsar, Thames Estuary MCZ and River Thames SINC. Impacts to consider should include increases in noise, dust, overshadowing, vibrations, artificial light, recreational disturbances, cat predation, changes in air and water quality and what the cumulative impacts of these factors will have on the designated sites and their features.

As mentioned within our previous responses, the designated sites and priority habitats are protected under Section 15 of the National Planning Policy Framework (NPPF, 2023), which sets out the Government's current planning policy in relation to conserving and enhancing the natural environment. Nationally and Locally Protected Sites are also protected under Policy CS12 of Gravesham's Local Plan, which states: *"Sites designated for their biodiversity will be protected, with the highest level of protection given to internationally designated SPAs, SAC and Ramsar sites, followed by nationally designated SSSIs, followed by LWS and then by other areas of more local importance of biodiversity."* We also consider the current proposals do not commit to supporting the Government's 25 Year Plan for the Environment due to the negative impacts the development will have on the adjacent designated sites and priority habitats which support protected and priority species.

### **BIODIVERSITY NET GAIN**

We note from reviewing Annex 2: Biodiversity Net Gain Assessment Report that the applicant has proposed a 352% net gain in habitat units and 75% net gain in hedgerows. Currently the biodiversity net gain (BNG) metric has not been included within the planning application, despite its request from KCC Ecology in November 2023. We strongly urge that the metric is uploaded so that it can adequately be reviewed to conclude whether this proposed BNG is achievable. From reviewing Table 3 – Post Construction Assessment within the BNG Assessment Report, we note that the buildings and roads don't appear to have been included and therefore we are concerned that these are also absent within the metric, and therefore the 352% net gain is wildly overestimated. We also note that the applicant has proposed to create lowland meadow in 'moderate' condition. There are no plans to show where this lowland meadow is proposed, but due to the urbanisation of the area and the significant increase in recreational pressures, we are not convinced that this habitat, nor its condition is achievable.

Despite additional information being provided within the planning application, KWT cannot see how the applicant can adequately mitigate against the negative impacts the development will have on the surrounding biodiversity rich habitats and that the development poses a significant risk to the integrity of Swanscombe Peninsula SSSI and Botany Marsh LWS. We stand by our previous comments that the development should be reduced to a size where effective mitigation can be designed and delivered to proactively protect the habitats and species within the surrounding environment. At this stage, the development should not be granted planning permission as it does not align with NPPF, The Government's 25 Year Plan, nor with Gravesham local policies.

If you require any further clarification regarding this response, please do not hesitate to contact me.

Yours sincerely,

**Emma Waller**

Planning and Policy Officer

Kent Wildlife Trust

[emma.waller@kentwildlife.org.uk](mailto:emma.waller@kentwildlife.org.uk)

