



## ECOLOGICAL ADVICE SERVICE

**TO:** Genna Henry  
**FROM:** Helen Forster  
**DATE:** 26 August 2022  
**SUBJECT:** 20220852 Land Surrounding Ebbsfleet United Football Club, Northfleet

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*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 whether sufficient and appropriate ecological information has been provided to assist in its determination.*

*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.*

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We have reviewed the submitted scoping report and we have the following comments:

The submitted information has detailed that a preliminary ecological report has been carried out on site and as a result the following is proposed to be carried out:

- Assessment of impacts the proposal will have on the adjacent Swanscombe Peninsula SSSI
- Assessment of impacts to the LWS adjacent and within 2km of the site
- Assessment of impacts to the SSSI, SPA, Ramsar and NNR within 10km of the site.
- Assessment of impact
- Breeding bird survey
- Wintering bird survey
- Assessment of the quality of the Mud flats.

The submitted information has confirmed that the assessment will assess impacts from construction and operational phase of the proposed development.

We have reviewed the above and advise that we are largely satisfied with the proposal however we highlight that there may be a need for invertebrate surveys following the Mud Flat assessment.

### **Mitigation/Compensation**

We recommend that the proposed development follows the 'mitigation hierarchy' when designing the proposed development. It is described in British Standard BS 42020:2013, and involves the following step-wise process:

- Avoidance – avoiding adverse effects through good design;
- Mitigation – where it is unavoidable, mitigation measures should be employed to minimise adverse effects;
- Compensation – where residual effects remain after mitigation it may be necessary to provide compensation to offset any harm;
- Enhancement – planning decisions often present the opportunity to deliver benefits for biodiversity, which can also be explored alongside the above measures to resolve potential adverse effects.

The measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development (BS 42020:2013, section 5.5).

We advise that where habitat creation/enhancement is required as mitigation and/or compensation is required to avoid impacts on species, habitats or the designated sites there will be a need for parameter plans to be submitted with the planning application demonstrating that it will and can be implemented within in the proposed development.

It's not sufficient to only have the proposed mitigation and compensation to be demonstrated within indicative landscaping plans as these can be changed with subsequent reserve matter applications (if granted).

### **Lighting**

Artificial lighting can have a negative impact on species (particularly nocturnal species) and therefore there is a need to ensure that consideration is given to minimising light spill from artificial lighting within areas which might be utilised by species. We recommend that with any planning application a dark lighting plan is submitted indicating which areas will receive minimal light spill.

### **Enhancements**

The ecological report submitted with the scoping opinion has made recommendations for enhancements and we recommend that a plan or details are submitted setting out the minimum number of green roofs and enhancement features to be incorporated into the site. We advise that the enhancement features must be incorporated into the buildings and located within the landscaping.

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

**Helen Forster MCIEEM**  
**Biodiversity Officer**

This response was submitted following consideration of the following documents:  
*EIA Scoping Opinion Requests; Trium Environmental consulting; July 2022*

Gravesham Borough Council