



ECOLOGICAL ADVICE SERVICE

TO: Amanda Grout
FROM: Emma England
DATE: 04 May 2023
SUBJECT: 20230044 / Three Gables, Gravesend

The following is provided by Kent County Council's Ecological Advice Service (KCC 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.

SUMMARY - SUFFICIENT INFORMATION PROVIDED

We have reviewed the information submitted by the applicant and advise that sufficient information has been provided. The implementation of the recommendations provided by the arboricultural consultant should be secured as appropriate if planning permission is granted.

Biodiversity and Enhancements

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 174 and 180 of the National Planning Policy Framework (NPPF) 2021, biodiversity should be maintained and enhanced through the planning system. Enhancement measures could include provision for nesting birds such as barn swallows if present in the local area. If planning permission is granted, we advise the following condition is attached:

Prior to completion, a detailed plan showing how the development will enhance biodiversity will be submitted to, and approved in writing by, the local planning authority. This will include details of the measures proposed and basic management measures to achieve the proposed habitat targets. The approved measures will be implemented and retained thereafter.

Appendix 1 provides some generic (non-exhaustive) information regarding the most common enhancements we see proposed. With regards to condition discharge, to provide a view regarding the potential ecological benefits or risks of any project, in line with relevant legislation and planning policy, we require sufficient detail to be submitted. Without sufficient detail we are unable to provide an opinion regarding the suitability of any proposed measures. Suitable detail may include the provision of information such as:

- The proposed target species;
- Make and model of any boxes;
- Location information such as height, aspect, surrounding habitat;
- Detailed planting schedules; and
- Relevant management necessary to ensure the habitat is suitable for the target species.

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:

Sylvanarb (April 2023) Tree Survey Plan. TG/TSP/2122-01.

Sylvanarb (April 2023) Tree Protection Plan. TG/TSP/2122-02.

Sylvanarb (April 2023) Arboricultural Report. Three Gables, Walnut Hill Road, Instead Rise, Kent, DA13 9HL.

Ward and Associates (January 2023) Proposed redevelopment, Three Gables, Walnut Hill Road, Instead Rise, Gravesend, Kent, DA13 9HL. 2224.WD.01A.

Ward and Associates (January 2023) Proposed redevelopment, Three Gables, Walnut Hill Road, Instead Rise, Gravesend, Kent, DA13 9HL. 2224.WD.06.

Appendix 1: Ecological Enhancement Measures

Possible Biodiversity Enhancements	Details
Provision of ready-made bird boxes	Suitability: All development. Location: Semi-mature/mature trees, buildings To provide a long-term ecological benefit for the site, boxes will need to be correctly sited: be away from windows and doors, be at the appropriate height for the target species, be sheltered, and sited on a northern or eastern facing aspect. The boxes should be away from artificial light sources. Material: Wall or tree-mounted woodcrete or building integrated boxes are generally recommended for development projects over wooden boxes. Wooden boxes are only likely to last 5-10 years before needing to be replaced to continue to provide a wildlife benefit. A woodcrete box has a much longer lifespan of 20-25 years before needing to be replaced. We would always recommend durable materials be selected for installation to minimise maintenance in the long-term and to provide a longer-term assurance of biodiversity net gain in line with the NPPF 2021. Erection: Follow the manufacturer guidelines. Maintenance: Many bird boxes need clearing out at the end of the nesting season. The manufacturer can provide relevant information as well as the Royal Society for the Protection of Birds (RSPB)¹ and British Trust for Ornithology (BTO)².
Provision of barn swallow nesting space	Suitability: Generally limited to suitable rural locations. Location: Outbuildings <i>See the following link for more information:</i> Attracting Swallows to Nest Sites in Outbuildings - The RSPB

¹ [How To Clean a Bird Nesting Box - The RSPB](#)

² [Putting up a nest box | BTO - British Trust for Ornithology](#)

Provision of bat boxes/bricks/tubes/tiles or bat roosting spaces within the new buildings	Suitability: Most development. Location: Semi-mature/mature trees, buildings To provide a long-term ecological benefit for the site, boxes will need to be correctly sited: be away from windows and doors, be at the appropriate height (ideally 4-5m high), be sheltered, and sited on a southerly facing aspect. The boxes and a flight path to the box should be unlit. A clear flight path to the box is needed, so vegetation should not clutter the space around the box. Material: Wall or tree-mounted woodcrete or building integrated boxes are generally recommended for development projects over wooden boxes. Wooden boxes are only likely to last 5-10 years before needing to be replaced to continue to provide a wildlife benefit. A woodcrete box has a much longer lifespan of 20-25 years before needing to be replaced. We would always recommend durable materials be selected for installation to minimise maintenance in the long-term and to provide a longer-term assurance of biodiversity net gain in line with the NPPF 2021. Erection: Follow the manufacturer guidelines. Maintenance: Bat boxes should only be checked by a suitably licensed individual to avoid breaches of legislation.
Provision of space for solitary bees	Suitability: Most development. Location: Building integrated or wall-mounted Bricks or boxes for solitary bees need to be correctly sited in a warm, sunny spot. The box should be near vegetation, but vegetation should not clutter the entrances. Place at least 1m from ground level. The box should not sway in the wind or easily become dislodged. Avoid where possible using single large hotels. Instead use lots of smaller ones spaced around the site. Material: Woodcrete boxes and building integrated boxes are generally recommended for development projects over wooden/other boxes. Although, as some sources recommend regular maintenance of solitary bee hotels, provided there is a commitment to regular maintenance, less durable boxes can be acceptable. Erection: Follow the manufacturer guidelines.

	Maintenance: See www.bumblebeeconservation.org/bee-nest-boxes/. And here.
Provision of native/ wildlife-friendly planting	Suitability: Most development. Native Species: An RHS study found that the best way to support invertebrates in gardens and promote a healthy ecosystem, is to choose plantings biased towards British native plants, and encourage dense vegetation, although leaving some areas of bare soil³. https://www.rhs.org.uk/advice/profile?pid=848 or https://www.britishflora.co.uk Hedgerows: As far as possible, hedgerows should be connected to high-quality habitats to improve species movement. To maximise any potential wildlife benefit long-term, species-rich⁴ native hedgerows should be prioritised and be managed sympathetically for wildlife, with a target height and width of at least 1.8m by 1.8m. Establish climbing plants on walls and other vertical structures: Where space is limited, climbing plants can provide increased wildlife benefit within the space available. Climbing Plants & Wall Shrubs - The RSPB

³ [Plants for Bugs - RHS science projects / RHS Gardening](#)

⁴ Containing a minimum of five different native species.