



ECOLOGICAL ADVICE SERVICE

TO: Kelly Joyce
FROM: Clair Thackray
DATE: 22 June 2023
SUBJECT: 20230465 Helen Allison School

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.

SUMMARY – SUFFICIENT INFORMATION

We have reviewed the ecological information submitted by the applicant and advise that sufficient ecological information has been provided. We have taken this view due to an Ecological Assessment letter report (Hone Ecology, March 2023) and plan of ecological enhancements (Ryder, March 2023) having been submitted.

If planning permission is granted, we advise that the informative and conditions below are included.

A timber-framed storage shed with timber-cladding walls and a low-pitched roof is located in the south-east of the site. While no evidence of nesting was recorded during the ecological assessment, we advise that any works to remove the structure are undertaken in accordance with the following informative:

BREEDING BIRD INFORMATIVE

The applicant is reminded that, under the Wildlife and Countryside Act 1981 (as amended), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or being built. Planning consent for a development does not provide a defence against prosecution under this Act.

Habitats are present on and around the site that provide opportunities for breeding birds. Any work to vegetation/structures that may provide suitable nesting habitats should be carried out outside of the bird breeding season¹ (1st March to 31st August inclusive) to avoid destroying or damaging bird nests in use or being built. If vegetation/structures need to be removed during the breeding season, mitigation measures need to be implemented. This includes examination by a suitably qualified and experienced ecologist immediately prior to starting work. If any nesting birds are found, works must cease until after the birds have finished nesting.

PRECAUTIONARY AVOIDANCE MEASURES

While the proposals are understood to be limited to minor excavation and import of surfacing materials, there remains a low risk of the capture of reptiles, amphibians and hedgehog within the works area we advise that a condition for the implementation of a precautionary approach to working is attached to any planning permission. Suggested wording:

For the duration of the pre-works period and the construction phase of the development, the following precautionary measures for the protection of retained habitats and protected species will be implemented:

- *The grassland habitat within and bordering the site will be maintained in a short grazed or mown condition until commencement of works;*
- *The duration of groundworks will be kept as short as possible;*
- *Backfilling of any trenches and other excavations will be undertaken before nightfall, or a ramp will be left to allow any animals to easily exit;*
- *All excavations and trenches will be checked each morning throughout the construction period and prior to infilling;*
- *All temporarily stored building materials (that might act as temporary resting places) will be isolated from areas of tall/dense vegetation and raised off the ground where possible, e.g. on pallets;*
- *Should protected species be discovered within the site, all works will stop immediately while a suitably qualified ecologist is contacted for advice.*

TEMPORARY ACCESS ROUTE

A temporary access route has been proposed to the south of the school grounds, for occasional use by larger vehicles. This area has not been included within the ecological report but is shown on a submitted plan. The route extends along the northern edge of an arable field, from Wrotham Road to an existing school field access. From reviewing aerial photographs (dated November 2022) it would appear that existing gaps within the line of trees along Wrotham Road are narrower than required for larger vehicles (a width of 4m is proposed), and that a degree of vegetation clearance may be required if this route is used. Should clearance be required, we advise that the tree denoted in the photograph at the end of this letter is retained, as a compression fork feature which may be suitable for roosting bats is visible (as circled). The mature pollard tree should also be retained for

¹ It should be noted that some birds are capable of nesting outside of these times, especially where weather conditions are favourable. Birds such as feral pigeon, wood pigeon and barn owl have been recorded nesting in every month of the year. Care when removing bird nesting habitat may therefore be required at all times of year, with attention paid to the nesting habits of the species that could make use of the site and weather conditions at the time of clearance.

both bat roost potential and biodiversity value. Should either tree require removal then further ecological assessment would be required prior to clearance works being undertaken. We advise that a condition is attached in this regard, suggested wording:

No removal of trees with suitable features for roosting bats will be carried out until a preliminary ground level roost assessment has been completed by a suitably qualified CIEEM registered ecologist, followed by further surveys and implementation of mitigation as required. The results of any additional surveys and details of mitigation/licensing will be submitted to the LPA. Written approval from the LPA will not be required on receipt.

We have included this condition to ensure that Gravesham Borough Council receive the survey and mitigation information.

The smaller trees closer to the northern boundary fence of the field may require removal, these works should be carried out in accordance with the breeding bird informative as detailed above.

ECOLOGICAL ENHANCEMENT

The submitted Landscape General Management / Ecological Interventions Plan (Ryder, March 2023) includes a reasonable range of proposals to enhance the site for biodiversity. If planning permission is approved, we advise that implementation of the Plan is secured by condition. Suggested wording:

Prior to completion, the ecological enhancement measures detailed in the Landscape General Management / Ecological Interventions Plan (Ryder, March 2023) will be implemented. Appropriate management and maintenance measures will be undertaken to ensure enhancement in the long term.

LIGHTING AND BIODIVERSITY

No artificial lighting is currently proposed for the operation phase. Given the presence of ecologically valuable habitats in the vicinity, we advise that a condition is attached regarding the potential installation of lighting at a future date. Suggested wording:

Prior to installation of any artificial lighting, a lighting design plan for biodiversity will be submitted to, and approved in writing by, the local planning authority. The plan will show the type and locations of all lighting, as well as the expected vertical and horizontal light spill in lux levels, to demonstrate that areas to be lit will not adversely impact biodiversity. Any external lighting installed will be fitted with PIR sensors and will accord with the Bat Conservation Trust's 'Guidance Note 08/18: Bats and Artificial Lighting 08/18' (or subsequent updates). All lighting will be installed in accordance with the specifications and locations set out in the plan and will be maintained thereafter. No additional lighting will be installed without prior written approval from the Local Planning Authority.

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

Clair Thackray
Biodiversity Officer

Photograph of temporary site access at Wrotham Road (November 2022)



This advice is based on a review of the following submitted plans and documents:
Ecological Assessment. Hone Ecology. March 2023.
Landscape General Management / Ecological Interventions Plan. Ryder, March 2023.
Supplementary Drawings and Information.