



ECOLOGICAL ADVICE SERVICE

TO: Peter Price

FROM: Phillip Lomax

DATE: 13 May 2022

SUBJECT: 20220432 Former Police Station, Gravesend

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 Provided

We have reviewed the ecological information submitted in support of this planning application and advise that sufficient information has been provided.

If planning permission is granted, we advise that a condition securing the implementation of ecological enhancements is attached.

Developer Contributions will need to be provided due to the increase in dwellings within the zone of influence of a Special Protection Area.

Thames Estuary and Marshes SPA and Ramsar

The development includes proposals for new dwellings within the zone of influence (6km) of The Thames Estuary and Marshes Special Protection Area (SPA) and Wetland of International Importance under the Ramsar Convention (Ramsar Site). Gravesham Borough Council will need to ensure that the proposals fully adhere to the agreed approach within the North Kent Strategic Access Management and Monitoring Strategy (SAMMS) to mitigate for additional recreational impacts on the designated sites and to ensure that adequate means are in place to secure the mitigation before first occupation.

A recent decision from the Court of Justice of the European Union has detailed that mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a full 'appropriate assessment' is needed under the Habitats Directive. Therefore, we advise that due to the need for the application to contribute to the North Kent SAMMS there is a need for an appropriate assessment to be carried out as part of this application.

Biodiversity Net Gain

The submitted Preliminary Ecological Appraisal (PEA) has assessed that the current demolition site has negligible biodiversity value. It includes an assessment of the predicted increase in biodiversity value if the submitted landscape scheme is implemented. We therefore advise that a suitably worded condition should be required to ensure the satisfactory delivery of that landscape scheme. Suggested condition wording is set out below:

Landscape and Ecological Management Plan

A Landscape and Ecological Management Plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior to the completion of site access works of the development. The content of the LEMP shall include the following.

- a) Description and evaluation of features to be managed;*
- b) Ecological trends and constraints on site that might influence management;*
- c) Aims and objectives of management;*
- d) Appropriate management options for achieving aims and objectives;*
- e) Prescriptions for management actions, together with a plan of management compartments;*
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period);*
- g) Details of the body or organisation responsible for implementation of the plan;*
- h) Appropriate success criteria, thresholds, triggers and targets against which the effectiveness of the various conservation measures being monitored can be judged.*

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

Reason

Biological communities are constantly changing and require positive management to maintain their conservation value. The implementation of a LEMP will ensure the long term management of habitats, species and other biodiversity features.

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

Phillip Lomax
Biodiversity Officer

This advice is based on a review of the following submitted plans and documents:

1. *Preliminary Ecological Appraisal Police Station, 133 Windmill Street, Gravesend, Kent. 13th April 2022. Tyler Grange.*
2. *Landscape Strategy. March 2022. James Blake Associates.*

Gravesend Borough Council