



ECOLOGICAL ADVICE SERVICE

TO: Amanda Grout
FROM: Clair Thackray
DATE: 18 October 2023
SUBJECT: 20230977 / Swift Farm, Harvel

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 by the applicant and advise that sufficient ecological information has been provided at this time. We have taken this view due to a Preliminary Ecological Assessment (Arbtech, August 2023) having been completed which shows limited potential for impacts on protected or priority species within the proposed construction area. In addition, the habitat management proposals outlined within the Design and Access Statement (Marshall, August 2023) provide information regarding potentially beneficial management of the adjacent Local Wildlife Site which lies within the site ownership/management. While we acknowledge that considerable detail has been provided, we advise that the submitted information is enlarged upon and provided as a separate Habitat Management Plan (HMP), to be secured by condition. Further botanical information is required to inform the HMP, as detailed within the ecological report; these surveys can also be secured by planning condition.

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

HABITAT MANAGEMENT PLAN FOR LOCAL WILDLIFE SITE AREA LYING WITHIN SITE OWNERSHIP/MANAGEMENT

The proposals include provision of stables for a horse and pony, which will access the field to the north for grazing. As detailed in our previous response, the field lies within Strawberry Hill, Pasture & Woodland Local Wildlife Site (LWS, Ref. GR6), designated for

unimproved chalk grassland and chalk scrub, ancient woodland and diverse communities of associated butterflies, snails and birds. The location of the LWS relative to the proposed construction site is shown on the map at the end of this letter.

LWS are important for the conservation of wildlife at the county level. These are non-statutory designations which are generally recognised by local authorities and given weight and protection by inclusion in development plan policies. The site also lies within the Medway Gap and North Kent Downs Biodiversity Opportunity Area and includes calcareous grassland, listed as a priority habitat (or Habitat of Principal Importance) under Section 41 of the NERC Act 2006.

In accordance with Policy CS12 of Gravesham Borough Council's Local Plan Core Strategy (2014), the proposals have potential to restore and enhance habitats within the LWS, subject to appropriate grazing management. Outline management proposals have been included within the D&A Statement. We advise that these are detailed further within a Habitat Management Plan, which will include clear, annotated site plans, and a five-year management schedule. The botanical survey recommended within the PEA will provide baseline information for the Plan and should be used to assess management outcomes and any requirement for an alteration in the grazing regime. A copy of the citation for the LWS should be referred to, this will need to be obtained from Kent Wildlife Trust¹. We advise that the HMP is secured by condition attached to any approved planning permission. Suggested wording:

Within six months of commencement, a Habitat Management Plan (HMP) will be submitted to, and approved in writing by, the local planning authority. The content of the HMP will be based on the information included within Section 9 of the Design and Access Statement, Tracey Marshall, August 2023, and include the following:

- *Description and evaluation of all habitats to be managed within the owned/managed area of the Local Wildlife Site, informed by a botanical survey undertaken by a suitably qualified ecologist during the optimum survey season as detailed within the Preliminary Ecological Appraisal (Arbtech, August 2023);*
- *Aims and objectives of habitat management;*
- *Constraints that might influence management;*
- *Map of all habitat management areas;*
- *Detailed management proposals for the grassland, scrub and woodland habitats;*
- *Details of any precautionary measures required for protected species during habitat management, including breeding birds, reptiles and hazel dormouse;*
- *Preparation of a management schedule (including an annual work plan capable of being rolled forward over a five-year period);*
- *Details of the persons, body or organisation responsible for implementation of the plan, and*
- *A schedule for annual monitoring by the site owner/manager and details of potential remedial measures to be implemented (including amendment of the grazing schedule) where required.*

¹ [Local Wildlife Sites | Kent Wildlife Trust](#)

The Plan will include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured. The approved plan will be implemented in accordance with the approved details. Suggested condition wording will be provided.

BIODIVERSITY METHOD STATEMENT

The PEA and D&A Statement include appropriate precautionary mitigation recommendations to be implemented during site clearance and construction for breeding birds, amphibians, reptiles, hedgehog and hazel dormouse. We advise that additional measures are required for the protection of the adjacent Local Wildlife Site and Roman Snail, as this species occurs within chalk grassland habitat and could potentially hibernate within the bare ground areas of the site. We advise that all measures are detailed within a Biodiversity Method Statement, to be secured by a condition attached to any planning permission. Suggested wording:

BIODIVERSITY METHOD STATEMENT

No development works shall take place (including any site clearance), until a biodiversity method statement has been submitted to, and approved by, the local planning authority. The content of the method statement will be based on the recommendations within the Preliminary Ecological Appraisal report, Arbtech, August 2023, and will include:

- *Proposed precautionary mitigation works to protect the adjacent Local Wildlife Site and avoid/mitigate potential impacts on reptiles, amphibians, hazel dormouse, breeding birds, hedgehog and Roman snail;*
- *Working method(s) necessary to achieve stated mitigation;*
- *Contingency plans should a protected species be encountered;*
- *The extent and location of proposed construction and mitigation works shown on appropriate scale maps and/or plans; and*
- *Details of persons responsible for implementing mitigation works.*

Reason: To protect habitats and species identified in the ecological surveys from adverse impacts during construction.

LIGHTING AND BIODIVERSITY

Details of a limited degree of external lighting have been included within the D&A Statement. We advise that implementation is secured by condition. Suggested wording:

Low temperature (<3000K), downward facing, LED lighting will be installed within the stable block as detailed within the Design and Access Statement, Tracey Marshall, August 2023. Lighting will be switch operated and limited to c. 1 hour during the morning and evening; no lights will remain switched on overnight. No additional external lighting, whether temporary or permanent, shall be placed or erected within the site unless details are submitted to and approved in writing by the local planning authority.

BIODIVERSITY ENHANCEMENTS

Prior to completion, the ecological enhancement measures detailed in Section 9 of the Design and Access Statement, Tracey Marshall, August 2023, will be implemented and maintained thereafter.

ADDITIONAL COMMENTS

We wish to highlight the following within the PEA report. Paragraph 3.1 states: “Details of any statutory designated sites within 2km radius of the site, including their reasons for

notification, are provided in Table 2 below. Non-statutory sites could be present in the vicinity but can't be confirmed within biological data.

The locations of non-statutory sites in Kent are publicly available on K-LIS. We advise that the consultant makes themselves familiar with this resource for future applications (for other sites) in order that a fully informed ecological impact assessment can be carried out.

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

Clair Thackray
Biodiversity Officer

This response was submitted following consideration of the following documents:

Site Location and Proposal Plans. No date.

Proposed Stable Block and Associated Grazing – Land Registry Maps. No date.

Design and Access Statement. Tracey Marshall. No date.

