



## ECOLOGICAL ADVICE SERVICE

**TO:** Katherine Parkin  
**FROM:** Emma England  
**DATE:** 19 October 2022  
**SUBJECT:** 20220915 / Former Gravesend and North Kent Hospital (M Block)

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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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### **Summary - Sufficient Information Provided**

We have reviewed the ecological information submitted by the applicant and advise that sufficient ecological information has been provided.

If planning permission is granted, we advise that a condition securing the implementation of ecological enhancements is attached. A breeding bird informative should also be included with any granted planning permission.

It should be ensured that developer contributions for an increase in dwellings within the zone of influence of relevant designated sites are accurate.

### **Breeding Birds**

The buildings on site may support breeding birds, as such an informative is recommended should planning permission be granted to avoid breaches of wildlife legislation.

#### Breeding birds – suggested informative wording

*The applicant is reminded that, under the Wildlife and Countryside Act 1981 (as amended) (section 1), 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. Breeding bird habitat is present on the application site and between*

*1st March and 31st August (the main nesting bird season) in particular<sup>1</sup>, could contain active nests, unless a survey carried out immediately prior to the clearance of suitable nesting habitat has been undertaken by a competent ecologist and has shown that nesting birds are not present. Therefore, the clearance of suitable nesting habitat should take place outside the main nesting bird season, or only be carried out following a nesting bird check immediately prior to clearance, that shows that the nesting habitats are not in active use by nesting birds.*

### **Ecological Enhancements**

One of the principles of the National Planning Policy Framework is that “opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity”. There are opportunities within the designs to incorporate habitats and features to provide ecological enhancements to the site. The submitted ecology report provides useful recommendations regarding this and these recommendations should be considered.

We advise that measures to enhance biodiversity are secured as a condition of any granted planning application. Suggested wording is provided below:

#### Ecological Enhancements – suggested condition wording:

*Prior to first occupation and in tandem with Condition 19 (soft landscaping) of the granted permission for application 20190504, details of a scheme for the protection and enhancements of biodiversity, including bat and bird boxes, use of native species in landscaping and incorporation of features beneficial to wildlife wherever possible within and around the perimeter of the site, together with details of the timing/phasing of the respective elements forming the scheme and proposed management arrangements, shall be submitted to and approved in writing by the LPA. The approved scheme shall be fully implemented prior to the occupation of the final dwelling and thereafter maintained.*

### **North Kent Sites**

The development is within the zone of influence (6km) of The Swale Special Protection Area (SPA) and Wetland of International Importance under the Ramsar Convention (Ramsar Site) and the North Kent Strategic Access Management and Monitoring Strategy (SAMMS) enables developments to strategically 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.

It is our understanding that the number of dwellings/ units proposed is slightly different from application 20190504. Therefore, it is our view that the appropriate assessment should be updated to reflect these changes

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<sup>1</sup> It should also be noted that certain species such as feral pigeon can nest all year round and that these species are protected whilst nesting at any time of year. In instances where all year-round nesters could be present, it would be sensible to undertake a nesting bird check prior to clearance at any time of year. An ecologist can advise further.

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:

*Corylus Ecology (August 2022) Update Preliminary Ecological Appraisal. M Block Gravesend Hospital, Gravesend.*

*Gravesham Borough Council (17 February 2022) Notification of Grant of Permission to Develop Land. Application: 20190504.*

*Newsteer (August 2022) S.73 Planning Statement. Former Gravesend and North Kent Hospital (M Block), Clifton Road, Gravesend, Kent.*

*RM\_A (August 2022) Site Location Plan, Existing and Consented Site Block Plan with S73 Block M. Former Gravesend and North Kent Hospital (M Block), Bath Street, Gravesend, DA11 0DG.*