

Katherine Parkin
Gravesham Borough Council
Sent via email

Our ref: KT/2024/131593/01-L01
Your ref: 20240312
Date: 10 May 2024

Dear Katherine Parkin

Improvements and enhancements to nature reserve, including restoration of wetland grazing marsh and reedbed by creating hydrological features to enhance wetland habitat by creating pools, scrapes and rills.

Land at RSPB Shorne Marshes, Queens Farm Road, Shorne, Gravesend, Kent

Thank you for consulting us on the above application. We have **no objections** to the proposal, subject to the following **planning condition** and **informative** being applied to any planning permission granted.

Fisheries, Biodiversity and Geomorphology

We have reviewed the submitted documents with particular reference to the Construction Environmental Management Plan, the Ecological Site Assessment and the Design and Access Statement.

Within section 3.22-3 conflicting habitat requirements, (page 18 of the Design and access statement) it states that “we have utilised the extant topography and the scope of peak surface water with the creation of banks within high water level areas. The new hydrological regime will ensure ditches do not dry out (as they do currently), therefore increasing water vole habitat.” The proposal proposes to additionally abstract from pre wetted ditch networks to the greater wetland. Therefore, it is essential that levels within the ditch networks are managed and monitored to prevent “dry out”.

We consider that planning permission could be granted to the proposed development as submitted if the following planning condition is included as set out below. Without this condition, the proposed development on this site could pose an unacceptable risk to the environment and we would object to the application.

Condition 1

No development shall take place until a water level management and monitoring programme has been submitted to and agreed by the local planning authority.

Reason

To ensure that the abstraction regime does not 'dry out' any ditches with Water Vole and Great Crested Newt populations. This is supported by national planning policy set out in paragraph 180 of the National Planning Policy Framework

Informative 1

The Site falls within a Site of Special Scientific Interest and Ramsar designation and therefore Natural England will need to be contacted for assent and Habitats Regulations Assessment purposes.

Flood Risk

We have reviewed the documents associated with the enhancement work to the RSPB Shorne Marshes. We do not oppose the improvements and enhancement works detailed but would advise the applicant to apply for a flood risk activity permit for any hardstanding, permanent or ancillary work within 8 metres of fluvial statutory main river and within 16 metres of a tidal flood defence.

Informative 2 Environmental Flood Risk Activity Permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metre of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk

Please do not hesitate to contact us should you require any further information.

Yours sincerely

Ms Laura Edwards

Planning Advisor

Direct email KSLPLANNING@environment-agency.gov.uk