



ECOLOGICAL ADVICE SERVICE

TO: Katherine Parkin

FROM: Emma England

DATE: 19 July 2023

SUBJECT: 20230678 / Land South Of Two Gates Hill, Higham

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 if sufficient/appropriate ecological information has been provided.

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.

NO INFORMATION – NO FURTHER INFORMATION REQUIRED

No ecological information has been submitted with this application. As a result of reviewing the data we have available to us, and the information submitted with the planning application, we advise that the proposed development has limited potential to result in ecological impacts. As such, we are satisfied that there is no requirement for an ecological survey to be carried out at this time¹.

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

If planning permission is granted, we advise that the conditions below are attached.

North Kent Sites

The development includes proposals for accommodation (albeit seasonal) within the zone of influence (6km) of the Thames Estuary and Marshes Special Protection Area, Medway Estuary and Marshes Special Protection Area and the respective/associated Wetland(s) of

¹ We consider we have taken a proportionate approach to ensure that the provision of information within the planning application is appropriate to the environmental risk associated with the development and its location in line with Clause 4.1.2 of BS42020 (BSI, 2013).

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). Where workers are expected to be present within the caravans between October and March, mitigation will be required for additional recreational impacts on the designated sites and adequate means must be in place to secure the mitigation before first occupation.

A 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 still a need for an appropriate assessment to be carried out as part of this application.

Biodiversity Net Gain

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 174 and 180 of the National Planning Policy Framework (NPPF) 2021, biodiversity should be maintained and enhanced through the planning system. If planning permission is granted, we advise the following condition is attached:

Prior to completion, details of how the development will enhance biodiversity will be submitted to, and approved in writing by, the local planning authority. This will include native species planting (e.g., hedgerow planting). The approved measures will be implemented and retained thereafter.

Lighting and Biodiversity

Artificial lighting has been proven to significantly impact on the behaviour of insects, birds, bats, and other nocturnal mammals. This is relevant to both retained and created/enhanced areas of vegetation. If planning permission is approved, we advise the avoidance of increased artificial lighting impacts on retained or planted vegetation. This can be secured if relevant through an appropriately worded condition if planning permission is granted. Suggested wording:

No 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. Any details to be submitted shall be in accordance with the Institute of Lighting Engineers Guidance Notes for the Reduction of Obtrusive Lighting, GN01, dated 2005 (and any subsequent revisions), and shall include a layout plan with beam orientation and a schedule of light equipment proposed (luminaire type; mounting height; aiming angles and luminaire profiles). Any details to be submitted shall also follow the recommendations within the Bat Conservation Trust and Institution of Lighting Professionals 'Guidance Note 8: Bats and Artificial Lighting 08/18' (or subsequent updates) Bats and artificial lighting in the UK document produced by the. The development shall thereafter be carried out in accordance with the subsequently approved details and maintained as such thereafter.

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:

GSP (May 2023) Proposed Block Plan. Little Mockbeggar, Land south of two gates road.

GSP (May 2023) Existing Block Plan. Little Mockbeggar, Land south of two gates road.