



ECOLOGICAL ADVICE SERVICE

TO: *Lisa Fisher*

FROM: *Jonathan Lynch*

DATE: *09 August 2024*

SUBJECT: *20240199 / Dalefield Industrial Park, Dalefield Way, Gravesend*

The following is provided by Kent County Council's Ecological Advice Service (KCC 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.

SUMMARY – NO FURTHER INFORMATION REQUESTED

KCC's Ecological Advice Service previously commented on this proposal in our advice note dated **3rd May 2024**. The proposed amendments are unlikely to have significantly different effects on biodiversity when compared to the original proposal. Therefore, the advice provided in our previous response applies equally to this amendment. As such, we advise that our previous comments remain valid.

SOUTH THAMES ESTUARY AND MARSHES SSSI

Our previous comments highlighted that the proposed development is located adjacent to South Thames Estuary and Marshes SSSI. As such, Gravesham Borough Council are required to consult Natural England on this planning application under Schedule 4(w) of the Town and Country Planning (Development Management Procedure) Order 2015 which states that Natural England must be consulted on "*development in or likely to affect a Site of special Scientific Interest*" and under Section 28I of the Wildlife and Countryside Act, 1981 (as amended). Natural England have been consulted and, in their letter dated 10th

June 2024, raised no objection to the proposals, stating: *“Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.”*

As such, no further action regarding the adjacent SSSI is recommended beyond our suggestion that the below conditions are attached to any notice of planning permission.

SUGGESTED CONDITIONS

1. *No development shall take place until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by Gravesham Borough Council. The CEMP shall accord with the measures outlined in section 5 of the Ecological Mitigation Statement associated with this application (Lloydbore, February 2024) and include details of the following:*
 - *a sensitive lighting scheme to avoid light spill into the adjacent SSSI;*
 - *risk assessment of potentially damaging construction activities;*
 - *details of any construction exclusion ‘buffer’ zones to be implemented on site;*
 - *practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements);*
 - *the location and timing of sensitive works to avoid harm to the adjacent SSSI;*
 - *responsible persons and lines of communication; and*
 - *details of any protective fences, exclusion barriers or warning signs to be utilised.*

The approved CEMP shall be implemented and adhered to throughout the construction period in accordance with the approved details.

Reason: To ensure that any adverse environmental impacts of development activities on the adjacent SSSI and on the site are mitigated in line with the NPPF 2023, paragraph 186.

2. *Prior to the use of the first building, details of a sensitive lighting scheme to avoid impacts to the adjacent South Thames Estuary and Marshes SSSI and prevention of light pollution shall be submitted to and approved in writing by Gravesham Borough Council. These measures will thereafter be implemented and maintained in accordance with the approved details unless otherwise agreed in writing by Gravesham Borough Council.*

Reason: To limit the impact of light pollution from artificial light on the nature conservation site in accordance with the NPPF 2023, paragraph 191c.

3. *Within three months of the completion of the development hereby approved, photographic evidence of the incorporation of the below enhancement measures for biodiversity, as outlined in the Ecological Mitigation Plan (Lloydbore, February 2024) associated with this application, shall be submitted to Gravesham Borough Council:*
 - *provision of artificial bird boxes integrated into or installed external to the workshop building present within the wider site; and*
 - *soft landscaping in the form of a garden area consisting of grassland, trees, mixed shrubs, perennials, herbs and bulbs.*

The approved plan will be implemented in accordance with the approved details and retained for the lifetime of the development.

Reason: to minimise impacts on and provide net gains for biodiversity in line with the NPPF 2023 180(d).

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

Jonathan Lynch
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Natural England Consultation (June 2024)
- Existing Block Plan (LeachRhodesWalker, July 2024)
- Proposed Block Plan (LeachRhodesWalker, July 2024)