



ECOLOGICAL ADVICE SERVICE

TO: Katherine Parkin
FROM: Helen Forster
DATE: 05 July 2022
SUBJECT: 20220575 Higham Marshes, 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 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.

We advise that additional information is required prior to determination of the planning application.

The planning application is within South Thames Estuary and Marshes SSSI and the Thames Estuary and Marshes SPA and Ramsar and the submitted information has detailed that the proposed of the proposed development is to address the following issues within the site:

- *Surface pools dry out, depriving wader chicks of food and habitat for other species. Existing hydrological systems are inefficient and do not provide the volume of water required to maintain wet features throughout the spring and summer, this is getting worse through climate change;*
- *The lack of infrastructure to support grazing regimes which create the optimal grass sward structure that breeding waders need;*
- *Lack of nesting habitat for waders;*

We agree with the principle of the proposed development however the submitted information has not clearly demonstrated how the works will be carried out to avoid a breach of wildlife legislation and ensure that the habitat regulations have been fully considered.

The submitted information has primarily focused on the enhancing the site for the birds associated with the designated sites. But the SSSI and the Ramsar site have also been designated for their invertebrate and plant interest and therefore there is a need to ensure that the works to create the scrapes and ditches will not negatively impact /damage or destroy these features.

Species not associated with the designated sites are present within the site (including reptiles and water voles) and there is a need to ensure that the works will not result in a negative impact on these species.

We advise that there is a need for an Ecological Impact Assessment to be submitted as part of the current planning application. An EcIA is a process of identifying, quantifying and evaluating the potential effects of development on habitats, species and ecosystems, so providing all ecological survey information alongside any necessary avoidance, mitigation and compensation proposals within one document. The EcIA will enable GBC to fully assess the ecological impact of the proposed development and consider if the proposed works are appropriate.

As the works are within /adjacent to the Thames Estuary and Marshes SPA and Ramsar and **if** the works have not been agreed within the management plan for the SPA and Ramsar there will be a need for a shadow HRA to be submitted with the planning application.

We advise that Gravesham BC is the competent authority under the Conservation of Habitats and Species Regulations 2018 (the 'Habitat Regulations'), and should have regard to the habitat regulation assessment (HRA) process set out in regulation 61 of the Habitat Regulations in the determination of any planning application. Should a likely significant effect on a European/internationally/ designated site be identified, Gravesham BC may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process. Therefore, if the proposals may result in a likely significant effect upon the designated sites, then sufficient information will need to be submitted with any planning application to allow Gravesham BC to undertake an Appropriate Assessment.

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

Helen Forster MCIEEM
Biodiversity Officer

This response was submitted following consideration of the following documents:
Various ecology documents