



ECOLOGICAL ADVICE SERVICE

TO: Amanda Cue
FROM: Emma England
DATE: 15 May 2024
SUBJECT: 20240355 / Mid Kent Golf Club, 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.

CONDITION DISCHARGE – TEXTUAL CHANGES REQUIRED

We have reviewed the submitted document in relation to condition 3 and advise that the reptile precautionary mitigation measures be updated before a discharge can be recommended. We have taken this view following review of the methodology proposed for sensitive habitat clearance for reptiles at the site.

British reptiles are protected species under the Wildlife and Countryside Act (WCA) 1981 (as amended) and it is an offence to intentionally kill, injure or take any wild animal. There is suitable habitat on-site for reptiles.

Condition 3 states: “No development shall take place (including any ground works or vegetation clearance) until a precautionary method statement for protected species (e.g., reptiles and nesting birds) has been submitted to, and approved in writing by, the Local Planning Authority. The content of the method statement shall be produced by a suitably qualified and experienced ecologist and through liaison with the construction.

Reason: In accordance with Policies CS12 and CS19 of the Gravesham Local Plan Core Strategy (September 2014)”.

The submitted method statement is unclear regarding when the second grass cut should take place, and has a first cut to c.250mm and a second cut to a maximum of 150mm. We would recommend changing the reptile habitat manipulation in paragraphs 2 and 3 under the heading 'Reptile Precautionary Mitigation Measures' to state the following:

- *Any required clearance of tall grassland (>150mm high) with potential to support reptiles will be undertaken in two stages, with a first cut to 150mm¹;*
- *48 hours later, following a fingertip search by an ecologist, the arisings will be carefully removed using hand tools, looking for the presence of any reptiles within the vegetation as it is removed. Any reptiles found will be caught by a suitably qualified and experienced ecologist, and moved to suitable habitat;*
- *Once the arisings have been removed from the cut area, the vegetation can be cut to ground level. This will happen shortly after the removal of arisings to prevent the grass regrowing and again becoming suitable for reptiles;*
- *Vegetation clearance will only be carried out during the period March to October in suitable weather conditions for reptiles to be active (temperatures above 9°C, dry conditions, low wind);*
- *Vegetation clearance will be carried out using handheld equipment;*
- *Vegetation will be cut so as not to leave islands of vegetation where reptiles can get trapped, so cutting in a way that allows reptiles to move into adjacent areas of long vegetation without having to break cover²;*
- *Where ground works are required, any holes or fissures discovered following grass clearance, or the removal of any scrub/tree roots, will be undertaken carefully under Ecological Clerk of Works supervision using an excavator with a toothed bucket or a handheld spade (depending on the area of habitat requiring a destructive search). Firstly, the top few centimetres of the ground should be removed, to expose reptiles sheltering in crevices just below the surface. Following this, larger and deeper excavations can be made, concentrating on areas which afford shelter to reptiles, such as tree stumps and buried rubble. Particular care needs to be taken when emptying the bucket in case any reptiles are dug up in the spoil. Any reptiles found will be caught by a suitably qualified and experienced ecologist, and moved to suitable habitat³;*
- *Once vegetation has been cut to ground level, it will be kept short (<100mm) for the duration of construction to prevent reptiles returning to the area;*
- *A suitably qualified and experienced ecologist will be contacted for advice if any reptiles are discovered during works.*
- *Construction materials will be kept on raised pallets for the duration of construction to avoid reptiles using them for basking/sheltering.*

Once the submitted ecology document has been updated, sufficient information will be available to discharge the condition.

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

¹ Edgar, P., Foster, J., and Baker, J. (2010) *Reptile Habitat Management Handbook*. Amphibian and Reptile Conservation, Bournemouth.

² [Grassland management for reptiles | Suffolk Wildlife Trust](#)

³ [file \(arguk.org\)](http://file.arguk.org)

Emma England
Biodiversity Officer

This response was submitted following consideration of the following documents:

Kent Sussex Ecology Ltd (February 2024) Condition Discharge Document for Gravesham Borough Council application 20231115.