



ECOLOGICAL ADVICE SERVICE

TO: *Genna Henry*

FROM: *Helen Forster*

DATE: *07 December 2022*

SUBJECT: *Land Surrounding Ebbsfleet United Football Club, Northfleet 20221064*

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 have reviewed the ecological information submitted with this application and advise that additional information is required prior to determination.

We require the following documents to be submitted:

- Phase 1 map of the site – the map in the Environmental Statement document is difficult to review
- Illustrative plan of the proposed development - the map in the Biodiversity Net Gain Assessment is difficult to review
- BNG excel metric to assess if we agree with the conclusion the proposal will result in a 352% BNG habitats and 75% BNG of hedgerows.
- Detailed assessment of the impact the proposal will have on the adjacent SSSI and LWS
- Clarification on why the application are satisfied the breeding bird surveys are accurate.
- Results of the current wintering bird surveys

Swanscombe Peninsula SSSI and Botany Marshes Local Wildlife Site

The proposed development is directly adjacent to the Swanscombe Peninsula SSSI and Botany Marshes Local Wildlife Site. We advise that the information is insufficient to assess the impact

the proposal will have on the designated sites and the species associated with the designated sites.

The Parameter plan and the illustrative plan indicates that there will be buildings and infrastructure directly adjacent to the designated sites which are likely to result in a negative impact on the designated sites. The submitted information refers to the mitigation hierarchy and the first point is avoidance. To demonstrate that the application is following the mitigation hierarchy we recommend that areas of open space/planting is carried out within the area adjacent to the designated sites and it is not developed with housing/buildings. The increase in planting/open space would reduce the direct impact on the designated sites.

The information submitted with the planning application is not sufficient to fully understand the impacts from noise, lighting, overshadow and recreational pressure from the proposed development.

We advise that additional information assessing the impact the proposal will have on the designated sites. We recommend that the ecological information submitted for the (now withdrawn) DCO London Resort application is utilised to support the assessment.

Birds

Wintering birds

The submitted information has detailed that a wintering bird survey will be carried out in 2022 and therefore we presume it is on going. We advise that the results of the wintering bird survey are submitted to ensure that the impact on wintering birds is fully understood. We highlight that the results of the wintering birds survey may require amendments to proposed layout.

The (now withdrawn) DCO London Resort application detailed that the Swanscombe Peninsula provided functionally linked land for birds associated with the Thames Estuary & Marshes SPA and Ramsar. Therefore we highlight there is a need to consider if the mudflats support species associated with the designated sites.

We will provide further information on whether a shadow habitat regulations assessment is required once we have reviewed the wintering bird surveys.

Breeding Birds

The breeding bird surveys were only carried out in July this year. Typically breeding bird surveys are carried out in April, May and June and therefore it is possible that larger number of birds utilise the site than were recorded during the breeding bird survey. We advise that we require clarification on why the applicants are satisfied that the surveys are sufficient.

Additional Documents

The phase 1 map and the illustrative landscape master plan have only been provided as inserts in the Biodiversity Net Gain Assessment and difficult to review. Therefore we advise that we require readable versions of these documents.

We will be able to provide more detailed comments (if required) on whether additional information on other species (not discussed within this letter) or other matters are required once we have received larger versions of those plans

We require the BNG excel metric to be submitted to enable us to consider if we agree with the conclusions of an anticipated BNG of 352% habitats and 75% of hedgerows. We understand that the site is largely hard standing but considering the high levels of anticipated recreational use we do query how that can be achieved.

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:

ES CH14 Ecology and Biodiversity; Trium

ES Appendix Ecology and Biodiversity; Trium