



## ECOLOGICAL ADVICE SERVICE

**TO:** *Katherine Parkin*

**FROM:** *Helen Forster*

**DATE:** *01 November 2023*

**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:

- 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.
- Updated parameter plan demonstrating that a buffer can be created between the proposal and the designated sites.
- Clarification on why the application are satisfied the breeding bird and wintering bird surveys are accurate.
- Additional information regarding the submitted HRA.

### **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.

We note that the submitted information details that a new buffer zone along the boundary of the Proposed Development will be introduced, to provide separation between the SSSI and proposed residential dwellings. In addition the additional information highlights that it should be noted that the Proposed Development will not result in buildings being located closer to the SSSI than is the current baseline. However this is not reflected within the submitted parameter plans 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 we highlight that the first point is avoidance and we highlight that the mitigation hierarchy has not been followed as the parameter plans have not been updated and continue to demonstrate that residential development will be adjacent to the SSSI and LWS.

To demonstrate that the application is following the mitigation hierarchy we recommend that an updated parameter plan is submitted demonstrating that a buffer will be created between the designated site and the proposed development. Information must also be provided detailing how the buffer area will be created.

The submitted information has detailed that Impacts from noise and lighting would be managed through sensitive design and location of new lighting to minimise impacts on wildlife. However as the submitted parameter plans demonstrate that the residential area will be directly adjacent to the designated sites boundaries we question how these impacts can be avoided.

We advise that the additional information is not sufficient to fully understand what impact the proposal will have on the designated sites.

## **Birds**

### *Wintering birds*

A wintering bird survey has been submitted and it has made the following conclusion: *Due to the low numbers of overwintering waterfowl using the habitats next to the Proposed Development it is thought that neighbouring habitats do not provide functionally linked overwintering habitats to the SSSI or SPA of any significant value*

However the wintering bird surveys were only carried out in December and January and no information has been provided detailing why surveys were not carried out from October to March to fully understand how wintering birds were using the site and adjacent habitat. We advise that this point needs to be addressed within the submitted report.

We due to the lack of surveys the wintering bird surveys may not provide an accurate understanding of how wintering birds use the site and therefore the conclusions may not be valid.

### *Breeding Birds*

The breeding bird surveys were only carried out in July 2022. The updated breeding bird surveys methodology details that 6 surveys should be carried between March and July 2023 and any deviation in the number of surveys must be supported with detailed and robust justification.

As only 1 survey visit was carried out we highlight that it is possible that larger number of birds utilise the site than were recorded during the breeding bird survey.

Our original comments were provided in November 2022 and therefore updated breeding bird surveys could have been completed in the 2023 survey season.

#### Habitat Regulations Assessment

The HRA has screened out every impact except recreational pressure. However as detailed above we are concerned that full breeding and wintering bird surveys were not carried out and therefore it may not have fully assessed the impact the proposal will have on any birds associated with the designated sites. We can provide further advice on this point once we have received the additional information requested above.

The report has concluded that the proposal will not result in an adverse impact on the SPA/Ramsar sites due to contributing to the SAMMS scheme. The HRA states the following regarding payment:

Gravesham Borough Council state that *“Developers are requested to pay the full tariff of £314.05 for every new dwelling or non-C3 residential use, provided within 6 km of the Ramsar site and SPA larger housing developments beyond 6 km from them.”*

The report then concludes that it will only be certain phases within the 6km that will have to contribute to the proposed development. As the information from GBC states that it will include larger housing developments beyond 6km we are of the opinion that all dwellings within the proposal must contribute to the SAMMS scheme.

#### **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. The submitted information details that these plans have been provided but we are only able to locate the phase 1 map. We advise that the illustrative landscape master plan must be submitted to ensure that we can consider the submitted information fully.

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. This document has not been provided and therefore our previous comments are still valid.

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