



ECOLOGICAL ADVICE SERVICE

TO: *Hannah Gunner*

FROM: *Luke Wallace*

DATE: *09 May 2023*

SUBJECT: *MC/23/0187 / Land at East Hill, Chatham*

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 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.

We highlight several concerns with the current proposals/lack of information. This includes:

- No ecological survey information appears to have been submitted. We have looked at the reports as part of the previous MC/19/0765 and they are considered out-of-date in alignment with current CIEEM guidance.
- Some of these surveys found evidence of legally protected/priority species within the site (or within the boundary). Examples include Skylark, dormouse and badgers. It is unclear what mitigation and/or compensation will be implemented for protected/priority species regarding construction and the operational development.
- It is unclear if some of the development (notably the southern-most part) will be outside the 15m boundary for ancient woodland (as per standing advice from Natural England/the Forestry Commission). This habitat is specifically protected from deterioration under paragraph 180 of the NPPF.
- Furthermore, we have concerns about the impact of lighting on this sensitive habitat – it is not clear how this impact will be mitigated for.
- The planting schedule is extremely poor from biodiversity perspective. A large proportion of the planting schedule is non-native; therefore, it will have little to no biodiversity value, does not help to safeguard the ancient woodland ecosystem and is not in keeping with the Kent countryside.

We advise that an updated ecology report is submitted which addresses all ecological considerations, including the issues highlighted above, and that includes an appropriate mitigation/compensation plan.

We also advise that the planting schedule is revised to feature predominately native species-only. This should be accompanied by a Landscape and Ecological Management Plan (LEMP) to demonstrate that elements of the landscaping, such as the proposed 'species rich grass', will be established and managed properly into the future.

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

Luke Wallace
Biodiversity Officer