



ECOLOGICAL ADVICE SERVICE

TO: *Ross McCardle*

FROM: *Helen Forster*

DATE: *29 April 2022*

SUBJECT: *21/1631/FH Land Adjoining 39 Victoria Rd West, Littlestone*

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 updated block plan and we advise that the comments are largely similar to those we provided in September 2021

We have reviewed the information submitted with the planning application and discussed the application with the ecologist and have the following comments to make:

The submitted landscaping plan provides no details about area to the south of the site and instead it states that for details refer to the Ecological Management Plan. This document has not been submitted as part of the application or referred to within the design and access statement. As detailed within our comments for application Y18/0768 this area is required for designated sites mitigation (as per the Habitat Regulations Assessment) and protected species mitigation – therefore we recommend that the plans are updated to demonstrate that these areas will be created as proposed within the original application.

We note that the landscaping plan details that slow worm habitat will be created within the NE of the site and highlight that as this area will have limited habitat connectivity we have concerns that it is not suitable to be used as the reptile mitigation within that area. We understand that a detailed mitigation strategy will be submitted as part of condition 7 (Y18/0768/FH) and therefore, as there is space within the wider site, we are happy for the

mitigation area to be confirmed as part of that submission. We highlight that while the area of Tussocky grassland may not be suitable to be used as a receptor site we highlight that it can still provide ecological benefits

We recommend that the area is not used as the receptor site but if the receptor site shown on the landscaping plan is proposed to be used we expect information to be submitted (as part of C7) demonstrating that the connectivity will be retained to the wider area. With regard to connectivity we highlight the following and advise that it must be considered/addressed within the reptile mitigation strategy.

- As the applicant will have no control over how residents manage the gardens this can not be used to demonstrate connectivity.
- There is a ditch running between the receptor site and the wider area but Information must be provided by the SuDS engineers demonstrating that the ditch will have regular dry period to ensure there are periods of terrestrial connectivity

The landscaping plan confirms that there will be a line of scrub along the southern boundary to reduce impacts from the development on the ecology area. The landscaping plan has been updated to confirm the hedgerow along the southern boundary will be continuous and there will be no gaps within the scrub to minimise the risk of residents entering into the ecology area. The maintenance of the scrub must be included within the ecological management plan.

The landscaping plan suggests that there will be a path running from the development site behind the houses directly to the east of the development. We understand that the path will be located within the area of the SPA mitigation area (we understand the details of the SPA mitigation area are the Ecological Management Plan) and therefore the use of that path by residents is likely to cause disturbance to any birds using the mitigation area. We would prefer for the path to be removed but if that is not possible there will be a need for fencing and a hedgerow to be created to avoid disturbance on the SPA mitigation area. We recommend that the landscaping plan is updated to demonstrate what approach will be implemented.

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:

Preliminary Ecological Appraisal. KB Ecology. Nov16.

Herpetological Surveys. KB Ecology. Jan18.

Bat night time surveys. KB Ecology. Jan18.

Wintering bird Surveys; KB Ecology;

Botanical Survey; Lesley Mason

Information To Inform A Habitat Regulation Assessment Of The Potential Impacts On The European Designated Sites; FPCR; February 2020

Landscaping Plan – uploaded on to portal 14th April 2022