



ECOLOGICAL ADVICE SERVICE

TO: *Mark Davies*

FROM: *Helen Forster*

DATE: *06 July 2020*

SUBJECT: *Land btw Woodchurch Road etc, Tenterden 19/01788/AS*

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 advise that we have the following comments to make on the biodiversity net gain metric

This is a hybrid application which consists of a full application for the country park and sports pitches and outline for the residential aspect of the site. With outline applications we understand that the layout is not fixed therefore there may be some changes made to the finalised layout (if planning permission is granted). To try and address concerns that the built footprint of any reserve matters application will erode into the areas of habitat within the proposed development a *proposed habitats* plan and an *illustrative ecological framework* plan has been submitted. The *proposed habitats* plan shows the areas of habitat which will be retained, enhanced and or created as a result of the proposed development. However we highlight that there is some contradictions between the *proposed habitats* plan and an *illustrative ecological framework* plan as the framework plan indicates that shrubs /trees will be planted in the grassland areas.

We have reviewed the *Tree protection Plan West* (SJA; September 19) and it also highlights that planting is proposed within the grassland areas (as per the *illustrative ecological framework*) therefore we are concerned that, if granted, there will be a significant increase of planting within the site when we would expect the habitat fingers going through the site to be primarily grassland and retained hedgerows with minimal (ideally no) non native planting within these areas)

To address this point we recommend a plan is submitted clearly demonstrating the habitats which will be retained/created/enhanced within the outline application area. We acknowledge that the areas identified as Semi Natural Greens space within the *illustrative ecological framework* – details that there will be limited new tree shrub planting but *limited* is open to interpretation. Any new planting should be enhancing the existing hedgerows not resulting in a reducing of the grassland area.

The report has detailed that the proposal will result in biodiversity net gain and the submitted net gain metric has demonstrate that there is a small anticipated net gain proposed for habitats. The biodiversity net gain metric is based on the proposed site layout within the *proposed habitats plan* and therefore we are concerned that the conclusions within the metric is unlikely to be correct as the area of grassland to be retained/created/enhanced, is likely to be reduced due to tree/shrub/scrub planting. Our main area of concern is primarily the residential area but the submitted plans also indicate that there will larger areas of tree planting within the country park – over and above what we would expect within a parkland.

The country park aspect of the planning application is for full planning permission and therefore we would expect the plans to clearly demonstrate what planting is proposed and therefore understood if the proposed tree planting could have a negative impact on the grassland - potential impacts include direct loss from the tree planting and shading. As the number of trees increase the impacts from shading also increase and if the area of tree planting is to dense the grassland is likely to cease to exist. We spoke to the applicant about this point and we understand that the intention is to only plant the occasional tree within the park land area however this point is not supported by the plans.

We do understand that the application for the residential area is an outline planning application and therefore it's unlikely that, if planning permission is granted, any reserve matters application will look exactly like the proposed illustrative masterplan. However we would expect the biodiversity net gain metric to take this in to account and calculate the minimum area of grassland retained/enhancement/created within the proposed development which is likely to be achievable.

The metric does consider the quality of the grassland and the metric submitted with the planning application details that on completion of the development the quality of the grassland will increase from moderate to good. The proposed development is for up to 250 dwellings and therefore there will be in increase in recreational pressure within this area which can degrade the quality and conditions of habitats – particularly grassland.

We do agree that if an area is managed appropriately the quality of the habitat can increase and from discussions with the applicant we understand that they are of the opinion that the appropriate management can be carried out. However we are concerned that it will be difficult to manage some areas within the site to retain or improve the quality of the grassland such as small areas of habitat, areas will be high recreational pressure or areas where there may be other management requirements – areas include the habitat fingers, the play trail area within the country park, grassland surrounding the sports pitches.

Therefore we would suggest that there is a need for information to be provided demonstrating why the applicant is satisfied that the quality of the grassland can improve

through proposed management – if that is not possible we suggest that there is a need for the metric to be amended to reflect the quality of the habitat within the whole of the site.

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:

Ecological Management Plan; EPR; December 2019

Ecological Impact Assessment; EPR; December 2019