



ECOLOGICAL ADVICE SERVICE

TO: *Richard Timms*

FROM: *Emma England*

DATE: *31 May 2023*

SUBJECT: *23/500899/OUT / Land North Of The A20, Hollingbourne*

The following is provided by Kent County Council's Ecological Advice Service (KCC 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.

SUMMARY – ADDITIONAL INFORMATION REQUIRED

We have reviewed the additional ecological information submitted in support of this application and advise that further information is sought from the applicant prior to determination of the planning application.

Lighting

In our previous letter, dated 20th April 2023, the following information was requested:

“Lighting contour plans reviewed by a suitably qualified ecologist to demonstrate that there will be no additional illumination of hedgerows at the site boundaries on the horizontal or vertical planes. These lighting contour plans should be produced in a manner that means they can be easily understood by non-lighting professionals. Guidance regarding the information that would need to be presented, is provided in the 2018 Institute of Lighting Professionals (ILP) Guidance Note 8: Bats and Artificial Lighting¹.”

We also stated: *“The submitted Ecological Impact Assessment (EclA) is based on a draft lighting report and therefore the conclusions made with regards to ecological impacts may be incorrect.”*

¹ [Guidance Note 8 Bats and artificial lighting | Institution of Lighting Professionals \(theilp.org.uk\)](https://www.theilp.org.uk/guidance-note-8-bats-and-artificial-lighting/)

KCC EAS has since been asked to review an email response to our previous letter sent 19th May 2023. This email response does not evidence a review of the submitted lighting plans by an ecologist as requested. This includes input by an ecologist that only taking proposed vertical illuminance calculations at 10m high is fully appropriate for this site and the potential species of concern (e.g., dormice/all the various bat species that may use the site).

The submitted baseline lighting report indicates that the highest lux levels on site currently, are 2.11 lux along the southern boundary (vertical illuminance at 1.5m height). The submitted external lighting assessment also states that: *“Observations taken during the [baseline] survey indicate that the application site is intrinsically dark, with minimal street lighting and floodlighting present in the immediate vicinity.”* On reviewing proposed lighting calculations, tables show maximum lux levels along the boundaries of up to 4.7 lux (northern site boundary, vertical illuminance at 10m height). This appears to be an increase on existing lighting levels.

The submitted EclA reports states the following: *“The levels of new lighting at the site, as per the draft lighting report, would increase in the central areas of the site, however, there is no additional illumination of existing hedgerows at the site boundaries. Should the lighting levels be increased resulting in potential light spill onto existing hedgerow and scrub then additional measures will be required to prevent this such as changes in the design of lighting units, new perimeter fencing and additional planting.”*

As such, further input and assessment by an ecologist is required with regards to the proposed lighting plans for the site.

The previous concerns raised by KCC EAS have not been addressed and our previous concerns with our response dated 20th April 2023 remain valid.

Biodiversity Net Gain

Following our previous letter, dated 20th April 2023, further information has been provided with regards to off-site compensation land for biodiversity net gain. The site proposed looks promising, although the information provided is incomplete. For example, **existing constraints on the proposed compensation site (e.g., protected species/soil type) that may affect the targeted habitats do not appear to have been fully addressed. This information would be needed to ensure that the proposed compensation site is a viable option.**

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 174 and 180 of the National Planning Policy Framework (NPPF) 2021, biodiversity should be maintained and enhanced through the planning system.

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

Emma England
Biodiversity Officer

This response was submitted following consideration of the following documents:

Avison Young (May 2023) Email: RE: 23/500899/OUT - Land North Of The A20, Hollingbourne, Ecology Lighting Response, dated 19th May 2023.

DFL (January 2023) Lux Survey Report: Wates Ashford Road, Maidstone.

SLR (February 2023) Land North of Ashford Road (A20): Biodiversity Gain Plan. (Including review of biodiversity metric excel spreadsheet supplied separately)

SLR (January 2023) Ecological Impact Assessment: Land North of Ashford Road (A20).

Ramboll (February 2023) Ashford Road, Maidstone: External Lighting Assessment.