

From: Jonathan Moore-Lambe [jonathan.moorelambe@btinternet.com]
Sent: 17 November 2016 13:51
To: Howson, Paul; Planning
Subject: Little Densole Farm Eco Holiday Park - Y16/0623/SH
Attachments: Pure Ecology KWT response 14Nov2016.pdf

Categories: Red Category

Dear Paul,

further to the Kent Wildlife Trust Consultation Response of 26th October 2016, please find attached letter from Pure Ecology of 14th November which demonstrates that the scheme and its Ecological Enhancements are deliverable and that if required any further elements can be the subject of an Appropriate Condition.

I also refer to the Kent County Council Ecological Advice Service response of 17th November which advises that :-

"Sufficient information has been provided to determine the planning application" and

"We have reviewed the submitted Lighting Plan, and we are satisfied that they are in line with recommendations provided by Bat Conservation Trust" and

"The applicant has demonstrated that there will be no detrimental impact to the ancient woodland through increases in lighting." and

"We have reviewed the Proposed Management Plan and advise that if implemented will provide exceptional ecological benefits".

I also refer to our previous telephone discussions, and your discussions with the Applicant when you advised that you had to follow the advice of the Statutory Consultees. We therefore hope that the above and the positive responses received help towards you making your Recommendation.

We would be grateful if this email correspondence and the attached letter could please be published on the LPA's Track and Trace System as they are material considerations to the Application.

regards,

Jonathan

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By Email: Jonathan Moore-Lambe, Lambe Planning & Design Ltd

14th November 2016

Dear Mr. Moore-Lambe

Re: Kent Wildlife Trust Comments on the LEMS for Little Densole Farm

Thank you for sending me a copy of the comments received from the Kent Wildlife Trust (KWT) (their ref: SH05/KN) on the Landscape Ecology Management Strategy (LEMS) (October, 2016) that was submitted in support of planning application 16/0623 for the proposed holiday lodges and tourism facilities at Little Densole Farm, Canterbury Road. The KWT have raised concerns on the level of detail the LEMS provides on the proposed enhancement measures, but it is our recommendation that these should be addressed by way of a planning condition for a comprehensive Landscape Ecology Management Plan.

The LEMS provides clear aims and objectives to deliver wildlife habitats and biodiversity gain within the new landscape that reflect the rural qualities and ecological context of the site, and wider local area. We recognise that further details on management prescriptions for habitat enhancement measures will be required, but our understanding is that the LEMS includes habitats that are readily achievable given the current site conditions and proposed development. In order to prepare a detailed ecological management plan we will need to review options for establishing and maintaining wildlife habitats, with consideration to the differing costs, labour inputs and, most notably, the effectiveness of the management proposal.

Mr. Nicholson of the KWT makes particular reference to the success of establishing species-rich grasslands in areas of improved grassland. We accept that species-rich grassland cannot be achieved simply by casting wildflower seeds on the improved grassland bed and that management options such as altering the cutting regime, harrow and re-seeding (or slot-seeding), or even soil stripping and reseeded will need to be considered.

However, because such management options need to be developed with consideration to budget, the proposed development programme and timescales for establishing new habitats, we believe providing this level of detail prior to planning permission is unadvisable because it would unnecessarily limit options for the applicant at the project implementation phase of development. The implemented solution may differ from a management plan favoured at the planning stage depending on the available resources of the applicant. A decision to adopt more intensive ecological management plan options may be implemented to deliver rapid results. Alternatively, the development programme may allow less costly/labour-

intensive options with more intensive options being implemented only if subsequent monitoring shows that desired conservation objectives are not being met.

Concerns on the impact of lighting would also be addressed through appropriate monitoring, which can be prescribed in a detailed management plan. The current lighting plan by Kingfisher Lighting Ltd. (drawing D28982/PY/A) advocates low level lighting and provides a suitable design against which environmental controls can be adopted if remedial measures are required.

In conclusion, we acknowledge the KWT concerns and believe these should be addressed once the planning decision is granted. The LEMS provides specific and achievable objects against which the management requirements and scope a detailed ecological management plan can be imposed by a condition of the planning notice.

I trust this clarifies our approach and the rationale for a strategy in preference to a detailed ecology management plan for submission with the planning application.

Yours sincerely

Anton Kattan



Director