



ECOLOGICAL ADVICE SERVICE

TO: *Danielle Wilkins*

FROM: *Helen Forster*

DATE: *16 May 2022*

SUBJECT: *21/2504/FH 88 St Leonards Road Hythe*

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.

When we previously commented we advised that the 2018 ecological survey may no longer be valid. CIEEM have produced an advice note titled *On The Lifespan Of Ecological Reports & Surveys* which provides details about when ecological survey data can be considered valid. With surveys that are over 3 years old the advice note states: *The report is unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated.*

To address our previous concern the applicant has provided current pictures of the site and it indicates that the site has not been regularly managed since the 2018 surveys were carried out. We advise that they demonstrate that there is suitable habitat for reptiles within the site and therefore reptiles may be present.

Due to the size of the site and because the habitat has only established in the last 4 years and the site is small we advise that we accept that a reptile survey is not required but advise that, if planning permission is granted an ecological mitigation strategy is submitted detailing how the works will be carried out to avoid impacting reptiles. Suggested wording at the end of the report.

From speaking to the residents we understand the following:

- That bats forage/commute within the site and therefore we recommend that the lighting plan is designed to minimise impacts on bats. We recommend that any lighting condition requires the lighting plan to follow the recommendations within the Bats and artificial lighting in the UK document produced by the Bat Conservation Trust and Institution of Lighting Professionals. <https://cdn.bats.org.uk/pdf/Resources/ilp-guidance-note-8-bats-and-artificial-lighting-compressed.pdf?mtime=20181113114229>
- Ecological enhancements have been carried out by the residents on the access road to the site which will benefit biodiversity. It's our understanding that they will not be lost by the proposed development and we would encourage the applicant to retain them within the development 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:
Phase 1 Ecological Scoping Report; Hone Ecology; May 2018

Condition Recommendations

Reptiles

Prior to works commencing on site an ecological mitigation strategy is submitted to the LPA for written approval. The mitigation strategy must demonstrate how works will avoid impacting protected/notable species. The strategy must be implemented as approved.

Lighting

We recommend that any lighting condition requires the lighting plan to follow the recommendations within the Bats and artificial lighting in the UK document produced by the Bat Conservation Trust and Institution of Lighting Professionals.
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