

Project: 5921 - Littlestone Beach Huts
Our Ref: 5921-LLB-CO-Ec-0002

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15th March 2024

Dear Alex,

RE: 22/2100/FH Coast Drive Car Park, Greatstone – Habitats Regulations Assessment (HRA)

We are writing in response to comments provided by Kent County Council's (KCC) Ecological Advice Service (Helen Forster 23/1/24) on the shadow HRA report (Lloydbore 2023) for Coast Drive Car Park, Greatstone (planning ref: 22/2100/FH). The concerns in KCC's consultation response relate to the following sources of potential impact to the nearby internationally-designated sites:

- lighting; and
- increased human activity.

The following information seeks to address these and may be used as an addendum to the HRA report.

Lighting

The absence of a lighting plan was identified as a point of concern by KCC's ecologist. The need for this is to evidence claims that proposed lighting will not cause significant illuminance of the nearby designated sites.

A lighting plan has now been prepared by the Applicant's lighting designers (DesignPlan Lighting 2024), and an adapted version of that is shown below in Appendix 1 and 2 of this letter. Appendix 1 shows that, for the main lighting, there is no illuminance ('light-spill') into the designations, and in fact, very little light even escapes beyond the boundary of the proposed development site, which is set back from the designations. Appendix 2 shows the same thing for the emergency lighting on the south side of the proposed building, which is activated rarely and for very short periods during an emergency when the fire alarms are activated. Again, there is no light-spill into the designations.

For these reasons, no significant effect on the designated sites relating to lighting disturbance of qualifying features is likely, and therefore this effect can be screened out.

Increased human activity

KCC's letter states that no information has been provided clarifying the current use of the site. Whereas in fact, the shadow HRA report (Lloydbore 2023) describes the current use of the site in paragraphs 1.7, 1.9, 4.32, 4.64, 4.69, and 5.50.

KCC's letter also states that that no information has been provided clarifying whether it is anticipated that there will be an increase in water sports users. Whereas in fact, the shadow HRA report (Lloydbore 2023) accepts the potential for increased use of the site in paragraphs 4.65-4.66 and paragraphs 5.44-5.45.

KCC's letter also states that the latest shadow HRA report (Lloydbore 2023) has not detailed that winter water sports on this site would be restricted. Whereas in fact, Paragraph 5.48 of the shadow HRA report referred to here describes restrictions on site use in November-February inclusive. However, the report does state that the exact nature of the restrictions on water sports operating from the Proposed Development will need to be discussed and agreed with Natural England and in consultation with the operator. Paragraphs 5.49-5.50 are also relevant to this.

Therefore, it is clear that the latest HRA report (Lloydbore 2023) has considered these matters in its assessment of effects and in reaching its conclusions.

In terms of the ability of Folkestone and Hythe's SARMS to offer sufficient and effective mitigation for identified likely significant effects of increased human activity, I believe this is something that is being discussed internally within your authority in relation to this development proposal, and the outcome of those discussions will inform your HRA. The shadow HRA report stated:

"The mitigation measures for the likely significant operation phase effects [i.e. increased human activity] require the further development of the District's SARMS Actions for the Romney and Lade Foreshore sub-area to a level that robustly demonstrates, to Natural England's satisfaction, its expected effectiveness, followed by its successful implementation in relation to the Proposed Development site prior to its use/occupation."

Hopefully this letter helps to clarify and address some of the concerns raised by KCC's ecologist and provides a useful addendum to the shadow HRA report.

Yours sincerely,

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Associate Ecologist



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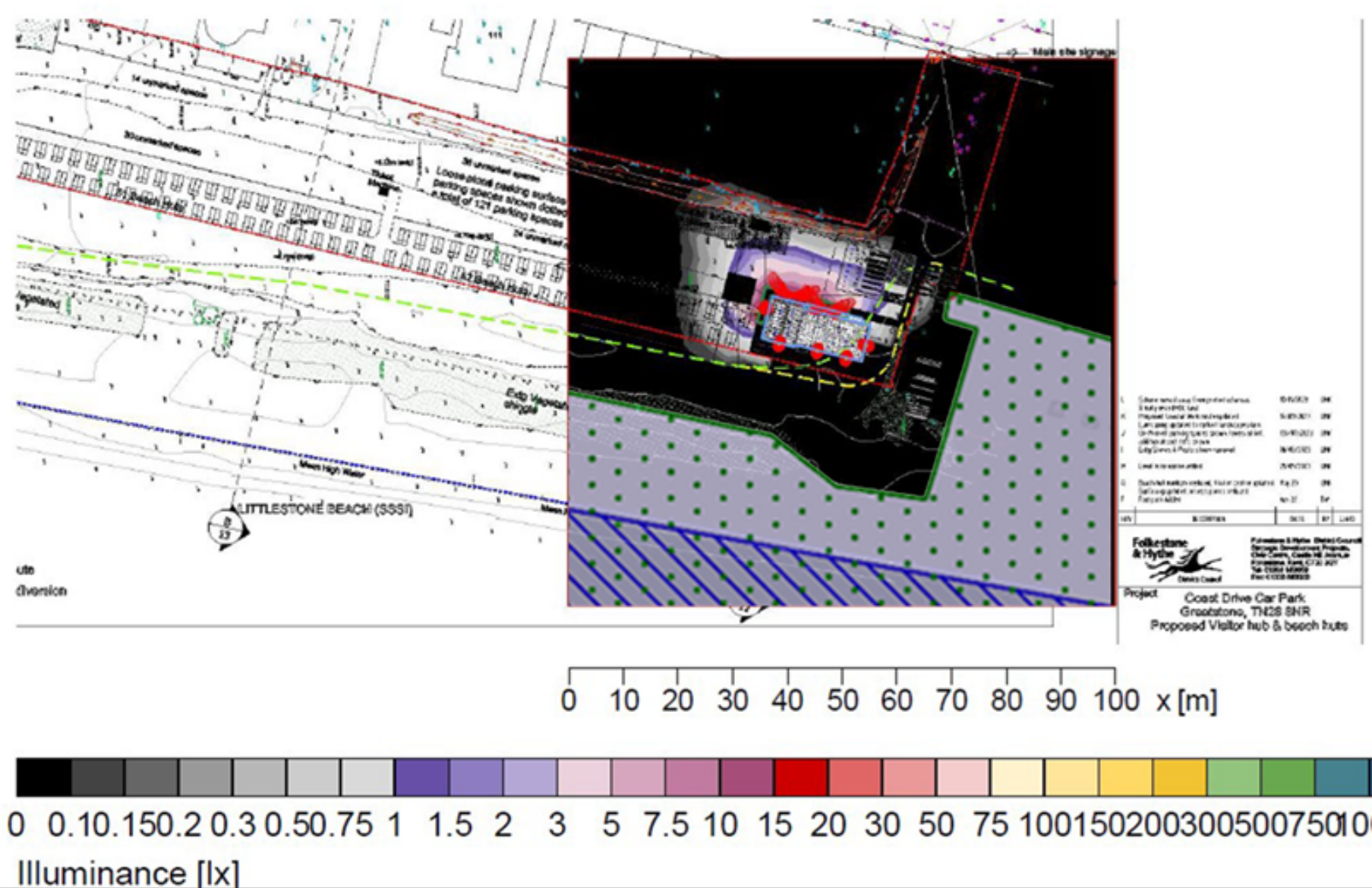


as recognised by



SAFETY
SCHEMES IN
PROCUREMENT

Appendix 1 – Main lighting plan (the nearest designated site is shown by the green-bordered area of green dots on white background)



ute diversion

Littlestone Beach (SSSI)

Project: Coast Drive Car Park
Greatstone, TN28 3HR
Proposed Visitor hub & beach huts

