



ECOLOGICAL ADVICE SERVICE

TO: David Campbell
FROM: Emma England
DATE: 02 October 2024
SUBJECT: 24/0700/FH/CON / Maude Memorial Hall, New Romney

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 if sufficient/appropriate ecological information has been provided.

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.

CONDITION DISCHARGE – ADDITIONAL INFORMATION REQUIRED

We have reviewed the submitted documents in relation to condition 10 and advise that additional information is needed before a discharge can be recommended.

Condition 10 states: *“Development shall be carried out in accordance with the recommendations specified in sections 6.1 and 6.2 of the Bat Survey (Greenspace Ecological Solutions – August 2023), unless additional/alternative measures are agreed in writing by the Local Planning Authority.*

Reason: To protect bats on site.”

Condition 10 has secured compensation for the loss of the bat roost on-site. This is in line with the National Planning Policy Framework 2023. Paragraph 180 states: *“Planning policies and decisions should contribute to and enhance the natural and local environment by:... d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;...”*

Policy CSD4 Green Infrastructure of Natural Networks, Open Spaces and Recreation of the Folkestone and Hythe District Council Core Strategy Review (March 2022) states:

“...The council will require development proposals over their lifetime: i. To provide net gains in biodiversity at least to comply with statutory and/or national policy requirements (assuming no residual loss);...”

We are pleased to see confirmation that a Natural England bat mitigation licence was in place prior to works starting on-site. We are pleased that a toolbox talk was provided to workers, and a bat box erected on a tree. These measures form part of the recommendations in sections 6.1 and 6.2 of the bat survey report and required by Condition 10.

Additional information has been provided by the applicant in response to our advice note dated 29th May 2024 (but is not currently showing on the public register for application 24/0700/FH/CON). However, it is still unclear what type of roofing (and roofing membrane, if needed) will be used for the new buildings on the site. It would be beneficial for this to be clarified.

The additional information indicates that an integrated bat box is proposed at about 3m from ground level on the pavilion's eastern elevation (Kent Structures drawing dated 28th August 2024, Revision C4 KS5606-3005, Pavilion Detail Elevations, Maude Pavilion and Nursery). The location and position of the bat box shown is considered acceptable (when lighting is not considered – see below). The make and model of the box should be provided to confirm that it is suitable.

With regards to lighting, we note that the applicant has stated that *“the bat roost on the eastern elevation of the pavilion will not be lit. There is a wall mounted luminaire adjacent to it but it is down-facing and has a “path diffuser” which directs all light towards the ground.”*

It would also be helpful for the location of the bat box on the tree to be clarified and for it to be stated whether this box will be lit.

We note a lux level contour plan has been provided (but is not currently showing on the public register for application 24/0700/FH/CON) with a maintenance factor of 0.9 and lighting of 2700K. The lux levels provided are assumed to be at ground level on the horizontal plane although we cannot see that this is clearly stated anywhere. This plan (Lux Works E53272/PJ/A dated 22nd July 2024 for Maude Pavilion and Nursery Romney) indicates that lighting around the roost (assumed at ground level) will be between 13 and 18 lux, with the likely (lit) flight path(s) between 0.2 lux and 22 lux. Lighting levels at day 1 of operation are expected to be higher, and current guidance indicates that lighting plans that need to take into consideration bats, should provide lux level contour plans using a maintenance factor of 1¹.

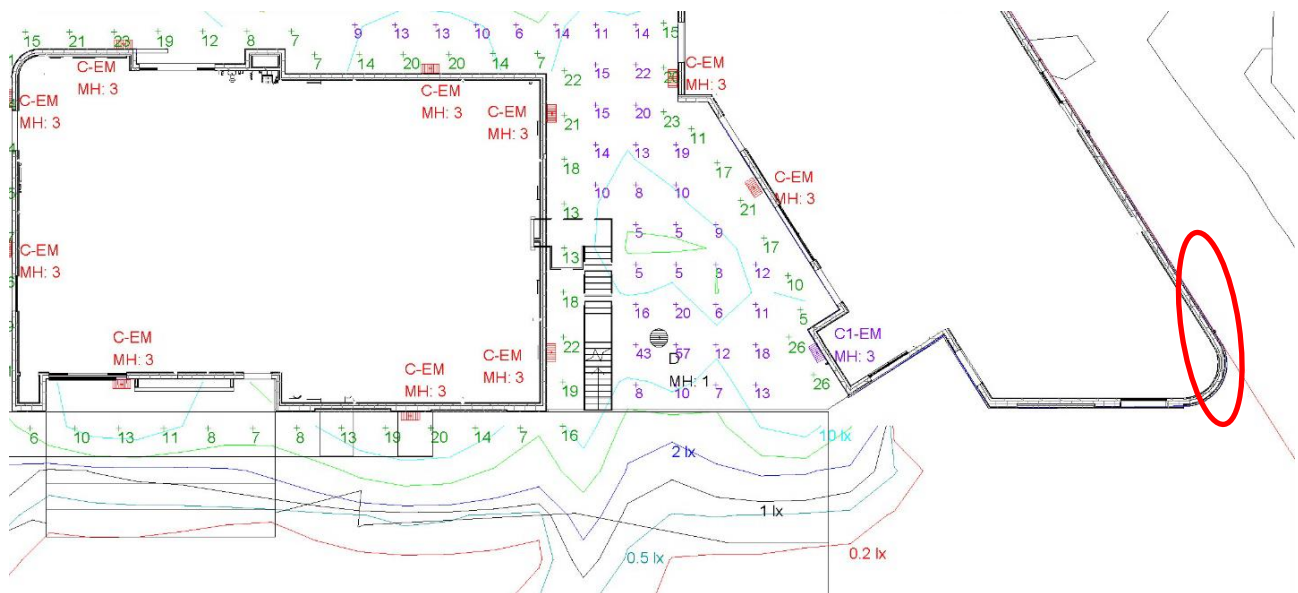
The bat that was previously recorded as roosting on-site was a soprano pipistrelle bat. Soprano pipistrelle bats generally fly approximately 2-10m above ground level². Lighting levels at 2m+ have not been provided. Light levels around the bat box itself have not been provided. Relevant light levels for the bat box would likely be those levels on the vertical plane at and around the bat box entrance.

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

² [Soprano pipistrelle - UK Bats - Bat Conservation Trust](https://www.batconservationtrust.org.uk/soprano-pipistrelle/)

Illuminating a bat roost can cause disturbance and this can result in bats deserting (or never using) the roost and delay emergence, reducing foraging time available. The flight path to and from the roost is important, although soprano pipistrelle bats are recorded as less sensitive to lighting of their flight paths than they are to the lighting of their roosts³. Soprano pipistrelle bats are less vulnerable to the negative impacts of lighting than some other species of British bat. Soprano pipistrelle bats may be able to cope with lighting levels up to 5 lux⁴ along foraging routes.

Current available information (although limited) indicates that the proposed location of the bat box, when lighting is taken into consideration, means that it is unlikely to be used. The simplest solution may be to move the proposed bat box to a more suitable location, or provide an additional bat box in an alternative location. We would recommend that an integrated bat box is provided on the south/ south-east facing elevation of the nursery building, as far away from windows as possible and to a height of over 3m from ground level (ideally 4-5m from ground level). Suggested location(s) shown below by the red circle:



The make and model of the bat box should be confirmed to ensure that it is suitable.

Condition 10 indicates that there should be the incorporation of a wildlife-friendly planting into the scheme. It is not clear whether planting forms part of proposals and this should be clarified.

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

Emma England
Biodiversity Officer

³ [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/)

⁴ [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/)

This response has been provided following consideration of the following documents:

Folkestone and Hythe District Council (September 2024) Email sent by David Campbell at 16:34 on 9th September 2024.

Greenspace Ecological Solutions (August 2023) Bat Survey Report. Maude Pavilion and Associated Land, New Romney.

Kent County Council (August 2024) Email chain sent by Emma England RE: 24/0700/FH/CON – Maude Pavilion and Nursery: External Lighting. Sent 11:59 on 21st August 2024.

Kent Structures (August 2024) Site Plan. Maude Pavilion and Nursery. KS5606-1000-C1.

Lux Works (July 2024) E53272/PJ/A. Maude Pavilion and Nursery Romney.