



ECOLOGICAL ADVICE SERVICE

TO: Katherine Parkin

FROM: Helen Forster

DATE: 18 December 2023

SUBJECT: Land To the East Of Brookers Farm, Luddesdown 20231116

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.

This application is retrospective and therefore we have reviewed the google earth photos to consider if we would have recommended that an ecological survey was carried out as part of this application.

We advise that it is unlikely that we would have recommended that an ecological survey was required as part of this application if the application had been submitted prior to works commencing as the majority of the works were carried out within an arable field. However as the satellite photos indicate that there were some areas of suitable habitat (particular around the storage area) we would have recommended that a precautionary mitigation approach was implemented prior to works commencing. This would have ensured that, if present, the risk of impacting protected/notable species would have been minimised.

Under section 40 of the NERC Act 2006 and paragraphs 174 and 180 of the NPPF 2023, biodiversity should be maintained and enhanced through the planning system. The planning statement has detailed that the following enhancements will be implemented within the site:

A 130-metre-long mixed native species hedgerow will be planted across the site which in a few years will screen off the truck unloading area. The new hedge will be in effect a continuation of the hedgerow east of the site which connects with the SSSI woodland,

increasing connectivity. The hedgerow will be interspersed with native tree planting. This new feature will be composed of native mixed species hedgerow with broadleaf tree standards (8-14cm girth) probably planted 4-5 meters apart. The trees are likely to be Field Maples as they are found in the vicinity.

The chalk used to construct the composting bays was locally sourced and will be left to naturally colonised by local plant species. This will increase visual screening when viewed from the track access.

Native tree planting along the track boundaries and between Luddesdown Road and the track to limit visibility.

Hedgerow gapping up of the existing hedgerow on Luddesdown Road The surrounding hedgerows will be cut on a three-year rotation and gapped up where necessary.

Locally sourced seeds will be used for creating a species rich grassland and managed through grazing.

The above measures are all detailed within the Biodiversity Enhancement Plan and we are supportive of them. However we advise that if the chalk bund must be seeded with a chalk grassland mix if it hasn't started to establish within 12months of planning permission being granted.

We advise that the planning officer must be satisfied that the proposed measures will be implemented. From looking at the satellite photos it appears that the site is currently planted with vines – if this conclusion is correct we are concerned the measures detailed above will not be carried out.

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

Helen Forster MCIEEM
Biodiversity Officer