

ECOLOGY & LIGHTING RESPONSE

Application Ref: 20260160

Site: Land East of Dean Lane, Harvel (Clanna)

Re: Discharge of Conditions 14 (Ecology) & 15 (Lighting)

Dear Sir/Madam,

We write in response to the consultation from Kent County Council Ecological Advice Service dated 15 April 2026 in respect of the above application.

This submission provides a consolidated and updated response addressing all matters raised and is intended to supersede previous ecological and lighting submissions unless otherwise stated.

1. Structure of Submission

In response to the request for clarity, all ecological, landscaping and lighting information has now been consolidated into a single coordinated submission comprising:

- Updated Ecological Enhancement & Landscape Plan
- Lighting Strategy and Lux Contour Plan
- This supporting response

This approach ensures consistency across all documentation and provides a clear basis for assessment.

2. Maintenance Period

All ecological and landscape measures have been updated to confirm that they will be:

Implemented in the first planting season following completion of development and thereafter maintained for the lifetime of the development.

This ensures full compliance with Condition 14.

3. Hedgerow Reinforcement Planting

The updated plan now clearly identifies the locations of hedgerow reinforcement planting along site boundaries.

Planting will be undertaken as a double staggered row at a density of **5 plants per linear metre**, comprising the following native species mix:

- Hawthorn (*Crataegus monogyna*) – 40%
- Blackthorn (*Prunus spinosa*) – 20%
- Field Maple (*Acer campestre*) – 10%
- Hazel (*Corylus avellana*) – 10%
- Dog Rose (*Rosa canina*) – 10%
- Guelder Rose (*Viburnum opulus*) – 5%
- Spindle (*Euonymus europaeus*) – 5%

This provides a structurally and ecologically robust native hedgerow consistent with local character.

4. Hedgerow Management

Hedgerow management prescriptions have been updated to provide clear long-term management, including:

- Cutting outside the bird nesting season
- Management on a rotational 2–3 year cycle across different sections
- Maintenance to achieve a minimum height of 1.8m and width of 1.5m

This approach will maximise biodiversity value and structural diversity.

5. Ecological Buffer Zone and Grazing Management

The ecological buffer zone has been revised to ensure it functions effectively as a protected habitat area.

A **physical separation** between the paddock and the ecological buffer will be implemented through appropriate fencing, ensuring that:

- The buffer zone is excluded from routine horse grazing
- Habitat establishment is not compromised
- Ecological functionality is maintained

This addresses concerns regarding grazing pressure and habitat viability.

6. Access and Buffer Interface

The relationship between the site access and ecological buffer has been reviewed.

The buffer has been locally adjusted at the access point to reflect the practical requirements for access while maintaining the integrity of the buffer elsewhere across the site.

This ensures that the ecological buffer remains effective and deliverable.

7. Structures Within Buffer Zone

The ecological buffer has been reviewed in relation to the presence of structures.

The updated plan ensures that:

No built development is located within the ecological buffer zone.

Where necessary, the buffer has been realigned to maintain consistency with this principle.

8. Habitat Specification Within Buffer Zone

The ecological buffer zone has now been clearly defined to include a mosaic of habitats comprising:

- Species-rich wildflower meadow
- Native grassland
- Scattered scrub and edge habitat

This will provide structural diversity and enhanced ecological value.

9. Wildflower Meadow Specification

The wildflower meadow will be established using a suitable native seed mix, such as:

Emorsgate EM3 Meadow Mix

This ensures the establishment of a species-rich and locally appropriate habitat.

10. Bird and Bat Boxes

Further detail has been provided in respect of bird and bat box installation.

Bird boxes will:

- Be installed at 3–5m height
- Face north or east
- Target species such as house sparrow and starling
- Be constructed from woodcrete (e.g. Schwegler 1B or equivalent)

Bat boxes will:

- Be installed at 3–5m height
- Face south
- Be located on suitable structures or pole-mounted where necessary
- Be constructed from woodcrete (e.g. Schwegler 2F or equivalent)

All boxes will be positioned to maintain clear flight paths along boundary vegetation.

11. Hedgehog Connectivity

Hedgehog passage gaps (minimum 130mm x 130mm) have been updated to ensure connectivity across the site.

These are now provided on the northern, eastern and southern boundaries, maximising permeability and access to surrounding habitat.

12. Lighting Strategy and Lux Contour Plan

A detailed lighting strategy and lux contour plan have now been submitted in support of Condition 15.

Lighting has been designed to:

- Use low-level, downward-facing luminaires
- Be limited to warm white (<3000K)
- Incorporate PIR sensors to minimise duration
- Avoid upward light spill
- Maintain dark corridors along boundaries and ecological features

The submitted lux contour plan demonstrates that light levels fall to 0.5 lux or below at ecological buffer zones and boundary vegetation, ensuring no adverse impact on bats or other nocturnal species, in accordance with Bat Conservation Trust Guidance Note 8.

13. Luminaire Specification

All lighting will comprise:

- Low-output LED luminaires (approx. 10W)
- Fully hooded or directional fittings
- Maximum mounting height of approximately 2–2.2m
- PIR activated controls

Final product selection will comply with these parameters.

14. Conclusion

The matters raised by the Ecological Advice Service have been fully addressed through the updated plans and supporting information.

The revised scheme now provides:

- Clear and deliverable ecological enhancement measures
- Robust habitat creation and management proposals
- Effective protection of ecological buffer zones
- A compliant lighting strategy with demonstrated control of light spill

The submission therefore provides sufficient information to enable Conditions 14 and 15 to be discharged.

We respectfully request that the holding objection is removed and that the conditions are formally discharged.