

Date: 09 July 2020

By email only: planning.comments@sevenoaks.gov.uk



Dear Claire Sheering,

RE: 19/05000/HYB | Hybrid application comprising, in outline: development of business space (use classes B1a/b/c) of up to 27,773 sqm GEA; works within the X enclave relating to energetic testing operations, including fencing, access, car parking; development of up to 635 residential dwellings; development of a mixed use village centre (use classes A1/A3/A4/A5/B1a/D1/D2); land safeguarded for a primary school; change of use of Fort Area and bunkers to Historic Interpretation Centre (use class D1) with workshop space and; associated landscaping, works and infrastructure. In detail: demolition of existing buildings; change of use and works including extension and associated alterations to buildings Q13 and Q14 including landscaping and public realm, and primary and secondary accesses to the site. | DSTL Fort Halstead Crow Drive Halstead Sevenoaks KENT TN14 7BU

Many thanks for your consultation on the above application.

Summary

Kent Wildlife Trust supports the position of the Woodland Trust with regard to impacts to ancient woodland. It does not seem that concerns raised by the Woodland Trust on 18th November 2019 have been addressed and the proposed buffer continues to be inadequate. We also support concerns raised by KCC Ecology with regards to the impacts of humans, pets, invasive species and external lighting.

Kent Wildlife Trust **object** to this application unless the following is provided:

- A suitable ancient woodland buffer zone in line with standing advice. The minimum buffer zone of 15m is not considered to be suitable.
- Details of suitable mitigation measures to sufficiently reduce impacts of increased recreational pressure, the impact of pets and encroachment of invasive species on ancient woodland.
- A detailed external lighting strategy which demonstrates how impacts to ancient woodland habitat, and other sensitive ecological receptors, will be avoided.

More detailed comments on the consultation documents are set out below.

Ancient Woodland

Direct and indirect impacts to ancient woodland should be taken into account when determining the suitability of this proposal. Paragraph 175(c) of the National Planning Policy Framework states that “*development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists*”. As a result of the proposed housing layout in what was previously referred to as block 5, lack of detail within the lighting strategy and proposed pedestrian access, we are not confident that the proposals effectively avoid impacts to ancient woodland.

The applicant has included a 15m buffer within their plans, representing the minimum buffer required in line with Natural England and the Forestry Commissions standing advice. The advice states that “*you should have a buffer zone of at least 15 metres to avoid root damage. Where assessment shows other impacts are likely to extend beyond this distance, you’re likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic.*” We would advise that dust, noise and



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lighting during the construction phase, and noise and lighting during the operational phase, are likely to negatively impact on the ancient woodland. We would also consider that external lighting and noise from residential gardens, which are unlikely to be under the control of the applicant, should be accounted for in the assessment of potential impacts to ancient woodland. On the basis of the above, we believe that a 15m buffer is unlikely to be sufficient to mitigate impacts. Please note that increases in the ancient woodland buffer should not include private gardens, for reasons stated above.

A functional ancient woodland buffer should be in place before the commencement of development and should remain in place, without recreational use, throughout construction and beyond. Buffer zones should be planted with local and appropriate native species or managed through a scheme of natural regeneration. In addition, a suitable lighting strategy, which avoids light spill into ancient woodland should be secured via a suitable condition. Please see below for further comments relating to a lighting strategy.

Another concern relating to ancient woodland arises from impacts of increased recreational pressure and pets. Recreation should not be encouraged within ancient woodland or its buffer areas. Where this is unavoidable, due to pre-existing access points, the applicant should provide signage and paths which protect the most sensitive areas of habitat. The applicant should provide details on mitigation to reduce the impacts of pets on the ecology of the ancient woodland habitat.

Lighting strategy

At present, the Technical Lighting Report does not appear to take account of ecological receptors. A suitable lighting strategy, which avoids light spill into ancient woodland and other sensitive receptors should be secured via a suitable condition. The lighting scheme should avoid areas where biodiversity enhancements are to be implemented, e.g. locations of bat boxes erected within the site.

Local Wildlife Sites (LWS)

The application site is in close proximity to Chevening Estate LWS and Woodlands west of Shoreham LWS. These woodland sites are accessible via a number of public rights of way. We refer you to our advice on mitigating impacts from recreational pressure, pets and invasive species on ancient woodland as this advice also applies to these Local Wildlife Sites.

Biodiversity mitigation, enhancements

We recommend that details for the long-term management of green infrastructure and biodiversity enhancement are provided and be secured via a suitable condition. A management plan should include details of how this will be funded and monitored in perpetuity.

Biodiversity net gain calculation

There is not enough information to determine if the applicant has satisfied the requirements of the NPPF paragraph 170 by providing net gains for biodiversity. We would advise that, in line with the upcoming Environment Bill that Biodiversity Net Gain be assessed using a suitable metric. The upcoming Bill states that at least 10% BNG should be delivered. We hope to be able to encourage developments to seek ambitious BNG schemes in line with the "*Kent Biodiversity Net Gain Strategy – Statement of Principles*" being prepared by The Kent Nature Partnership. The document states that this strategy should deliver a statutory net gain of 20% as a minimum across Kent, and aim to achieve more wherever possible.

We hope that the above comments are useful and would be happy to provide further input if desired.

Yours sincerely,

Nicky Britton-Williams

Wilder Towns Officer

Kent Wildlife Trust

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