Response for deadline 7 – "Lighting at the Hoverport"

Planning Inspectorate ref: EN020026 [redacted]

Introduction

During questioning at ISH3 Agenda item 13.3 the Applicant "confirmed that there will be no lighting at the Hoverport (see REP6-108 13.3 Daubenton's bats in Pegwell Bay).

In response to this statement, I referred to TDC REP4-160 para 1.1.11 which stated that should permission be granted, they would want a commitment for all entry and exit points to the intertidal area to incorporate wheel wash facilities. I said that I couldn't envisage a situation where there wouldn't be lighting for wheel washing as the vehicles are potentially coming in and out twenty-four hours a day. If there is lighting on the hoverport to ensure that the vehicles are properly washed both in and out, then the lighting will have an effect on the Daubenton's Bat colonies.

REP6-108 gives the Applicant's summary of their oral case given at ISH3 and regarding the Daubenton's Bats said that:

"*Daubenton's bats primarily forage over water, further reducing the potential for impact*".

Regarding wheel-washing on the Hoverport site:

"*The Applicant advised that any wheel washing activity would be very short-term and undertaken during the summer period. The need for lighting would be dependent on tidal conditions and timing of movements on and off the site, and lighting would not necessarily be required during daylight hours"*.

This gave rise to Action Point 85 "*Confirm any lighting requirements at the hoverport, for example for wheel washing*".

In REP6-110 the Applicant responds:

"*The specification and layout for any lighting that may be required to facilitate access to the mudflats via the hoverport have not yet been defined, may not be required, and will be subject to the Main Works Contractor's detailed method engineering.*
To mitigate any risk to Schedule 5 invertebrates, including disturbance during use of places of shelter or protection, a REAC commitment has been secured at Deadline 6. This commits to avoiding any incidental or direct lighting of vegetated areas by locating any temporary task lighting, where required, as close as practicable to the seawards edge of the hoverport and/or as close as practicable to Sandwich Road".

Analysis of the responses by the Applicant

1) The Applicant indicates that Daubenton's Bats forage primarily over water. Daubenton's Bats are slow moving and thus avoid lit areas to reduce the risk of predation. As a result, Daubenton's Bats thrive on the dark, undisturbed habitat of the Hoverport and can fly freely from their roosts over the dark apron to the intertidal area. ANY lighting on the apron will have a significant effect on the Daubenton's Bats.
2) The Applicant states that any wheel-washing will be in the summer months suggesting that work on the intertidal HDD pits will occur in the summer months. Is the timing of this work restricted by the breeding season? There appears to be no mention of it in the oLEMP, CEMP or REAC.
3) Vehicles will obviously have to stop working on the HDD pits and move to the Hoverport site as high tide approaches and will only be able to return as the tide recedes.

4) Although the actual timing will be determined by Health and Safety considerations, I will assume that vehicles will move an hour before high tide and return an hour after high tide.
5) The Applicant states that the need for lighting will be dependent on tidal conditions and I presume they are describing a condition where high tide occurs during the nighttime period when lights will be necessary for wheel-washing.
6) Lighting is likely to be needed for wheel-washing between 30 minutes and 1 hour after sunset and up to between 30 minutes and an hour before sunrise but I will use one hour for both.
7) The longest day / shortest night in the UK usually falls on the 21st June and studying a six-week period (1st June to 21st July 2026) will give an indication of the minimum time required for lighting.
8) Using sunrise and sunset data (see appendix) and using an hour after sunset and an hour before sunrise it is possible to estimate the period of time that lighting for the wheel-wash is likely to be required for this six-week period.
9) Using tide data for this same six-week (see appendix) and comparing it with the need for lighting explained in 8) above, it is possible to estimate the number of nights that lighting will be required.
10) Using this crude method gives an estimate of 23 out of a possible 42 days that lighting will be required for wheel-washing for the period between June 1st and July 21st 2026. Details are shown in the appendix with the relevant days shown within red boxes.
11) Although it is not possible to be certain of the actual number of days because there are so many variables, it is possible to say with certainty that lighting will be required for a significant number of days during this six-week period. It should be noted that I deliberately selected a period when the nights are at their shortest. Other months will be worse assuming the Applicant does work both day and night.
12) The Applicant is referring to REP6-135 (REAC) B76 when stating that they will position lighting at the Hoverport as close to the seaward edge as possible. However, Thanet District Council (TDC) in REP4-160 1.1.11 stipulate that the Applicant must: "*Limit vehicle movements to designated structurally sound pathways within the apron, avoiding proximity to the bay edge by at least 5 meters unless bridged*".
13) With this limitation the positioning of the wheel-washing facility with its associated lighting will be relatively close to the vegetated areas and disturbance of Daubenton's Bats is highly likely. See point 1) above.
14) In REP6-135 the Applicant suggests that wheel-washing may be as close as practicable to the Sandwich Road.
15) Such a wheel-wash may be applicable to prevent excessive dust or mud getting onto the highway (GG17) or to prevent non-invasive species transferring to the Hoverport site (B04) but is not applicable to prevent possible contamination from the Hoverport site being transferred to and from the intertidal area (REP4-160 1.1.9).
16) The Applicant has made no mention of the lights on the vehicles being used but I assume they will have them to travel safely in the dark. These lights will also disturb the Daubenton's bats.

I appreciate that the Ex A have asked for additional information from the Applicant in PD-025 para 11.2 "*Access to Pegwell Bay*" to be submitted by Deadline 7 but I felt it necessary to itemise my concerns and hopefully provide the Ex A with information they might find useful.

David Stevens.

Appendix

a) June 2026

June 2026 — Sun in Ramsgate

‹ May | June | July ›

Month: June Year: 2026 Go

2026	Sunrise/Sunset		Daylength		Astronomical Twilight		Nautical Twilight		Civil Twilight	
Jun	Sunrise	Sunset	Length	Diff.	Start	End	Start	End	Start	End
1	04:43	21:01	16:17:24	+1:53	Rest of night		02:52	22:53	03:58	21:46
2	04:43	21:02	16:19:13	+1:49	Rest of night		02:51	22:55	03:57	21:47
3	04:42	21:03	16:20:57	+1:44	Rest of night		02:49	22:56	03:56	21:48
4	04:41	21:04	16:22:37	+1:39	Rest of night		02:48	22:58	03:55	21:50
5	04:41	21:05	16:24:11	+1:33	Rest of night		02:46	23:00	03:55	21:51
6	04:40	21:06	16:25:39	+1:28	Rest of night		02:45	23:01	03:54	21:52
7	04:39	21:06	16:27:03	+1:23	Rest of night		02:44	23:03	03:53	21:53
8	04:39	21:07	16:28:21	+1:17	Rest of night		02:43	23:04	03:53	21:54
9	04:39	21:08	16:29:33	+1:12	Rest of night		02:42	23:06	03:52	21:55
10	04:38	21:09	16:30:40	+1:06	Rest of night		02:41	23:07	03:52	21:56
11	04:38	21:10	16:31:41	+1:01	Rest of night		02:40	23:08	03:51	21:56
12	04:38	21:10	16:32:37	+0:55	Rest of night		02:39	23:09	03:51	21:57
13	04:37	21:11	16:33:26	+0:49	Rest of night		02:38	23:10	03:50	21:58
14	04:37	21:11	16:34:10	+0:43	Rest of night		02:38	23:11	03:50	21:59
15	04:37	21:12	16:34:48	+0:38	Rest of night		02:37	23:12	03:50	21:59
16	04:37	21:12	16:35:20	+0:32	Rest of night		02:37	23:13	03:50	22:00
17	04:37	21:13	16:35:47	+0:26	Rest of night		02:37	23:13	03:50	22:00
18	04:37	21:13	16:36:07	+0:20	Rest of night		02:36	23:14	03:50	22:01
19	04:37	21:13	16:36:21	+0:14	Rest of night		02:36	23:14	03:50	22:01
20	04:37	21:14	16:36:29	+0:08	Rest of night		02:36	23:15	03:50	22:01
21	04:37	21:14	16:36:31	+0:02	Rest of night		02:37	23:15	03:50	22:01
22	04:38	21:14	16:36:27	−0:03	Rest of night		02:37	23:15	03:50	22:02
23	04:38	21:14	16:36:17	−0:09	Rest of night		02:37	23:15	03:51	22:02
24	04:38	21:14	16:36:01	−0:15	Rest of night		02:38	23:15	03:51	22:02
25	04:39	21:14	16:35:39	−0:21	Rest of night		02:38	23:15	03:51	22:02
26	04:39	21:14	16:35:11	−0:27	Rest of night		02:39	23:14	03:52	22:02
27	04:40	21:14	16:34:37	−0:33	Rest of night		02:40	23:14	03:52	22:01
28	04:40	21:14	16:33:58	−0:39	Rest of night		02:40	23:13	03:53	22:01
29	04:41	21:14	16:33:12	−0:45	Rest of night		02:41	23:13	03:54	22:01
30	04:41	21:14	16:32:21	−0:51	Rest of night		02:42	23:12	03:54	22:00

JUNE	RAMSGATE DATE	GMT TIME	BST MTRS	ADD TIME	1 Hr MTRS	HIGH TIME	TIDE MTRS	LOW TIME	TIDE MTRS
Mon.	01/06/2026	06:29	0.96	12:10	4.81	18:52	0.95		
Tue.	02/06/2026	00:27	4.67	07:00	1.00	12:42	4.81	19:25	0.97
Wed.	03/06/2026	01:00	4.66	07:33	1.02	13:13	4.80	19:57	0.94
Thu.	04/06/2026	01:34	4.65	08:05	1.03	13:45	4.78	20:30	0.90
Fri.	05/06/2026	02:11	4.62	08:40	1.06	14:20	4.72	21:05	0.86
Sat.	06/06/2026	02:50	4.53	09:17	1.14	14:59	4.63	21:44	0.87
Sun.	07/06/2026	03:35	4.39	09:59	1.25	15:44	4.51	22:31	0.92
Mon.	08/06/2026	04:28	4.24	10:52	1.37	16:38	4.39	23:31	0.98
Tue.	09/06/2026	05:31	4.14	11:57	1.44	17:42	4.33		
Wed.	10/06/2026	00:39	1.00	06:38	4.16	13:08	1.41	18:51	4.39
Thu.	11/06/2026	01:46	0.95	07:41	4.31	14:14	1.29	19:54	4.56
Fri.	12/06/2026	02:48	0.86	08:38	4.53	15:16	1.12	20:53	4.77
Sat.	13/06/2026	03:50	0.78	09:30	4.75	16:19	0.95	21:48	4.94
Sun.	14/06/2026	04:53	0.72	10:22	4.91	17:24	0.79	22:43	5.04
Mon.	15/06/2026	05:56	0.68	11:14	5.00	18:25	0.64	23:39	5.09
Tue.	16/06/2026	06:54	0.67	12:06	5.03	19:20	0.50		
Wed.	17/06/2026	00:35	5.08	07:48	0.68	12:57	5.02	20:11	0.38
Thu.	18/06/2026	01:30	5.04	08:38	0.72	13:46	4.98	21:00	0.31
Fri.	19/06/2026	02:22	4.95	09:24	0.78	14:35	4.92	21:46	0.29
Sat.	20/06/2026	03:14	4.82	10:08	0.86	15:24	4.82	22:32	0.34
Sun.	21/06/2026	04:07	4.64	10:53	0.95	16:17	4.69	23:21	0.45
Mon.	22/06/2026	05:04	4.44	11:42	1.05	17:17	4.55		
Tue.	23/06/2026	00:15	0.62	06:05	4.27	12:36	1.14	18:22	4.42
Wed.	24/06/2026	01:11	0.80	07:08	4.19	13:35	1.19	19:29	4.36
Thu.	25/06/2026	02:11	0.95	08:10	4.21	14:37	1.20	20:32	4.35
Fri.	26/06/2026	03:10	1.05	09:07	4.31	15:38	1.16	21:29	4.39
Sat.	27/06/2026	04:04	1.10	09:57	4.44	16:33	1.10	22:19	4.44
Sun.	28/06/2026	04:51	1.12	10:41	4.58	17:19	1.04	23:01	4.50
Mon.	29/06/2026	05:32	1.10	11:19	4.69	17:59	0.98	23:39	4.57
Tue.	30/06/2026	06:09	1.05	11:54	4.77	18:36	0.91		

b) July 2026

July 2026 — Sun in Ramsgate

‹ June | July | August ›

Month: July Year: 2026 Go

2026	Sunrise/Sunset		Daylength		Astronomical Twilight		Nautical Twilight		Civil Twilight	
Jul	Sunrise	Sunset	Length	Diff.	Start	End	Start	End	Start	End
1	04:42	21:13	16:31:24	−0:56	Rest of night		02:43	23:11	03:55	22:00
2	04:43	21:13	16:30:21	−1:02	Rest of night		02:45	23:10	03:56	22:00
3	04:43	21:13	16:29:13	−1:08	Rest of night		02:46	23:09	03:57	21:59
4	04:44	21:12	16:27:59	−1:13	Rest of night		02:47	23:08	03:58	21:58
5	04:45	21:12	16:26:40	−1:19	Rest of night		02:49	23:07	03:59	21:58
6	04:46	21:11	16:25:16	−1:24	Rest of night		02:50	23:06	04:00	21:57
7	04:47	21:10	16:23:46	−1:29	Rest of night		02:52	23:05	04:01	21:56
8	04:48	21:10	16:22:11	−1:34	Rest of night		02:54	23:03	04:02	21:55
9	04:49	21:09	16:20:31	−1:39	Rest of night		02:55	23:02	04:03	21:55
10	04:50	21:08	16:18:46	−1:44	Rest of night		02:57	23:00	04:04	21:54
11	04:51	21:08	16:16:57	−1:49	Rest of night		02:59	22:59	04:05	21:53
12	04:52	21:07	16:15:02	−1:54	Rest of night		03:01	22:57	04:07	21:52
13	04:53	21:06	16:13:03	−1:59	Rest of night		03:03	22:55	04:08	21:50
14	04:54	21:05	16:10:59	−2:03	Rest of night		03:05	22:53	04:09	21:49
15	04:55	21:04	16:08:51	−2:08	Rest of night		03:07	22:52	04:11	21:48
16	04:56	21:03	16:06:38	−2:12	Rest of night		03:09	22:50	04:12	21:47
17	04:57	21:02	16:04:22	−2:16	Rest of night		03:11	22:48	04:13	21:46
18	04:59	21:01	16:02:01	−2:20	Rest of night		03:13	22:46	04:15	21:44
19	05:00	21:00	15:59:36	−2:24	Rest of night		03:15	22:44	04:16	21:43
20	05:01	20:58	15:57:08	−2:28	Rest of night		03:17	22:42	04:18	21:41
21	05:03	20:57	15:54:35	−2:32	- 01:22	00:39 -	03:19	22:40	04:20	21:40
22	05:04	20:56	15:51:59	−2:35	- 01:33	00:28 -	03:21	22:38	04:21	21:39
23	05:05	20:55	15:49:20	−2:39	- 01:41	00:20 -	03:23	22:36	04:23	21:37
24	05:07	20:53	15:46:37	−2:42	- 01:48	00:13 -	03:26	22:33	04:24	21:35
25	05:08	20:52	15:43:51	−2:45	- 01:54	00:07 -	03:28	22:31	04:26	21:34
26	05:09	20:50	15:41:02	−2:49	- 02:00	00:01 - 23:56	03:30	22:29	04:28	21:32
27	05:11	20:49	15:38:10	−2:52	02:05	23:51	03:32	22:27	04:29	21:30
28	05:12	20:48	15:35:15	−2:55	02:10	23:46	03:35	22:25	04:31	21:29
29	05:14	20:46	15:32:17	−2:57	02:15	23:42	03:37	22:22	04:33	21:27
30	05:15	20:44	15:29:16	−3:00	02:20	23:37	03:39	22:20	04:34	21:25
31	05:17	20:43	15:26:13	−3:03	02:24	23:33	03:41	22:18	04:36	21:23

JULY	RAMSGATE DATE	GMT TIME	BST MTRS	ADD TIME	1 Hr MTRS	HIGH TIME	TIDE MTRS	LOW TIME	TIDE MTRS
Wed.	01/07/2026	00:14	4.65	06:46	0.97	12:26	4.83	19:12	0.81
Thu.	02/07/2026	00:48	4.72	07:23	0.90	12:58	4.86	19:48	0.72
Fri.	03/07/2026	01:21	4.76	08:00	0.87	13:28	4.87	20:23	0.64
Sat.	04/07/2026	01:54	4.76	08:35	0.88	13:59	4.86	20:57	0.60
Sun.	05/07/2026	02:28	4.70	09:08	0.95	14:34	4.84	21:32	0.62
Mon.	06/07/2026	03:07	4.59	09:43	1.05	15:14	4.78	22:11	0.69
Tue.	07/07/2026	03:51	4.44	10:25	1.17	16:01	4.67	22:59	0.79
Wed.	08/07/2026	04:45	4.28	11:18	1.29	16:58	4.53	23:56	0.91
Thu.	09/07/2026	05:50	4.18	12:22	1.38	18:07	4.43		
Fri.	10/07/2026	01:01	1.01	07:02	4.20	13:33	1.39	19:22	4.42
Sat.	11/07/2026	02:13	1.05	08:13	4.34	14:51	1.30	20:35	4.52
Sun.	12/07/2026	03:31	1.03	09:19	4.54	16:11	1.09	21:43	4.68
Mon.	13/07/2026	04:49	0.91	10:18	4.74	17:24	0.81	22:44	4.84
Tue.	14/07/2026	05:57	0.78	11:12	4.89	18:25	0.53	23:41	4.97
Wed.	15/07/2026	06:54	0.65	12:02	5.00	19:18	0.29		
Thu.	16/07/2026	00:33	5.05	07:44	0.56	12:48	5.08	20:06	0.11
Fri.	17/07/2026	01:21	5.08	08:28	0.51	13:32	5.13	20:48	0.02
Sat.	18/07/2026	02:05	5.04	09:07	0.52	14:15	5.14	21:28	0.02
Sun.	19/07/2026	02:49	4.94	09:43	0.57	14:58	5.10	22:06	0.13
Mon.	20/07/2026	03:33	4.77	10:18	0.69	15:45	4.95	22:45	0.35
Tue.	21/07/2026	04:21	4.54	10:57	0.87	16:36	4.71	23:27	0.66
Wed.	22/07/2026	05:14	4.28	11:43	1.10	17:34	4.41		
Thu.	23/07/2026	00:16	1.01	06:16	4.06	12:38	1.34	18:43	4.14
Fri.	24/07/2026	01:12	1.31	07:26	3.97	13:43	1.50	19:57	4.02
Sat.	25/07/2026	02:18	1.50	08:35	4.04	14:59	1.50	21:06	4.07
Sun.	26/07/2026	03:27	1.50	09:33	4.23	16:06	1.35	21:59	4.22
Mon.	27/07/2026	04:24	1.38	10:19	4.45	16:57	1.15	22:42	4.42
Tue.	28/07/2026	05:11	1.19	10:58	4.65	17:40	0.94	23:20	4.62
Wed.	29/07/2026	05:53	0.99	11:32	4.79	18:19	0.74	23:55	4.78
Thu.	30/07/2026	06:34	0.82	12:05	4.89	18:58	0.59		
Fri.	31/07/2026	00:27	4.89	07:13	0.70	12:34	4.95	19:35	0.49

N.B. The tide times are in GMT but that has been taken into account.