



ECOLOGICAL ADVICE SERVICE

TO: *Katy Claw*

FROM: *Helen Forster*

DATE: *08 January 2020*

SUBJECT: *Uplands, Crete Road East Y18/1009/FH*

The following is provided by Kent County Council's Ecological Advice Service (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 whether sufficient and appropriate ecological information has been provided to assist in its determination. 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.

We have reviewed the ecological information submitted as part of this planning application and we advise that sufficient information has been provided to determine the application.

Reptiles

The reptile survey confirmed that 3 species of reptiles (slow worm, adder and common lizard) are present within the site and the proposed development will result in a loss of suitable reptile habitat. A reptile mitigation strategy has been submitted and it has confirmed that there is sufficient capacity within the north of the site (following enhancement works) to support the reptile population.

This area is within the applicants ownership and we are satisfied that it is appropriate mitigation area. When we previously commented we highlighted that the following information was required due to the high ecological interest of the site:

- *Minimum number of trapping days*
- *Months that the trapping can be carried out during*
- *A4 size maps showing the following;*
 - *Area of scrub to be cleared during the initial enhancement works*
 - *Management compartments so it's clear which areas will be cut in which years.*

We advise that the updated report has addressed the above points and we are satisfied that sufficient information has been provided to determine the planning application.

We advise that if planning permission is granted the following conditions are included:

Prior to works commencing the reptile mitigation and habitat enhancements detailed within the Reptile Mitigation Strategy (Martin Newcombe, December 2019) must be implemented. No construction works can commence until the reptile mitigation has been completed and the site released by the ecologist.

And

Following the completion of the reptile mitigation the receptor site must be managed as detailed within the Reptile Mitigation Strategy (Martin Newcombe, December 2019) for the lifetime of the development.

Bats

We accept the conclusions of the bat assessment on the building that there is limited potential for bats to be roosting within the building and therefore we are satisfied that there is no requirement for bat emergence surveys to be carried out. However we would have preferred the results section of the report to have been more detailed to clearly set out why the ecologist reached the conclusion that there was limited potential for bats to be roosting within the building.

It is likely that bats will be foraging/commuting within the site and therefore we advise that any lighting scheme is designed to have minimal impact on bats. Due to the size of the development we do not require a specific bat lighting condition to be included (if planning permission is granted) but instead recommend that any lighting condition includes a requirement to be designed to be sensitive to bats.

Ecological Enhancements

One of the principles of the National Planning Policy Framework is that “opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity”. In addition to securing any necessary mitigation measures, we advise that Folkestone & Hythe District Council should seek to ensure that ecological enhancement measures are incorporated into the landscaping proposals. We recommend that if planning permission is granted the following condition is included:

Within 3 months of works commencing on site an ecological enhancement plan must be submitted to the LPA for written approval. The plan must be implemented as approved.

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

Helen Forster MCIEEM
Biodiversity Officer

This response was submitted following consideration of the following documents:

Ecological Scoping Survey; Martin Newcombe; November 2018
Reptile Survey; Martin Newcombe; June 2016