



ECOLOGICAL ADVICE SERVICE

TO: *Katy Claw*

FROM: *Helen Forster*

DATE: *01 April 2019*

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 additional information is required prior to the determination of the planning application.

Reptiles

The reptile survey confirmed that 3 species of reptiles are present within the site and the proposed development will result in a loss of suitable reptile habitat and therefore prior to determination there is a need for FHDC understand how the impact on the reptile population will be mitigated.

We advise that this information is required prior to determination of the planning application as the presence of 3 species of reptiles within the site make it capable of being designated as a Local Wildlife site and therefore the site could be of county importance for nature conservation. Therefore due to the interest of the site it is important that the applicant can demonstrate that the impact can be appropriately mitigated.

Prior to determination we advise that there is a need for an reptile mitigation strategy to be submitted clearly demonstrating where the reptile receptor site will be located, suitability to support the population, details of any enhancements and how the translocation will be carried out.

The red line boundary shown within the ecological report is larger than the red line boundary submitted detailed in the site location plan. If the applicants own the grassland to the north of the site it will likely be possible to retain reptile population within land in the applicants ownership. However if the applicants do not own the land to the north we would expect details of an off site receptor site to be submitted with confirmation from the landowner that the reptile translocation can be carried out. Due to the presence of adders within the site there is a need to ensure that the applicant can demonstrate that suitable adder receptor site can be found within the surrounding area as adders have specific habitat requirements.

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 details of ecological enhancements to be incorporated in to the site (over and above any necessary mitigation) are submitted as part of this planning application.

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