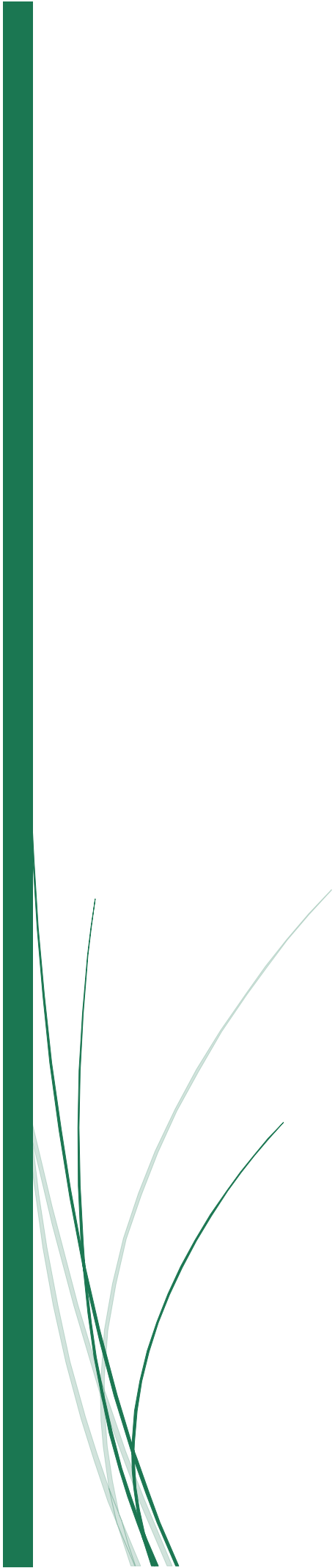




Land adjacent to Hillside House, Cliff Road, Hythe

Preliminary Ecological Appraisal

A Report for Hollaway Studio

November 2025



**Greenspace
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www.greenspace-ecology.co.uk

info@greenspace-ecology.co.uk

Land adjacent to Hillside House, Cliff Road, Hythe, Kent, CT21 5XL

Preliminary Ecological Appraisal

Client:	Hollaway Studio	
Project Ref:	Land adjacent to Hillside House	
Report Ref:	J24-021683_P5	
Author:	Technical Review:	Approval:
Ryan Richardson BSc (Hons) MSc, Assistant Ecologist	Lottie Gibbons BSc (Hons) MSc QCIEEM, Ecologist	Guy Newman BSc (Hons), MCIEEM. Director
Revision Ref:	Status/ Comment:	Date of Issue:
-	Final	28 th November 2025
Disclosure:		
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1 PROJECT OVERVIEW

Client: Holloway Studio

Site Address: Land adjacent to Hillside House, Cliff Road, Hythe, Kent CT21 5XL

Attending Ecologists: Lottie Gibbons BSc (Hons) MRes QCIEEM, Ecologist

Survey Date(s): 28th November 2024

Site Proposals: The construction of a residential dwelling with associated landscaping and access.

Associated Planning Reference Number: Not yet submitted.

Source of Relevant Documents:

Document:	Source:
Application Boundary:	Location Plan (Hollaway Studio, 2024. Drawing Ref: 23.0109 01 P1)
Site Location Plan:	Google Earth Pro
Desk Study:	Magic Map (Magic.defra.gov.uk)
Proposed Development:	Proposed Masterplan (Roof Version) (Hollaway Studio, 2024. Drawing Ref: 23.0109 07 P1) Proposed Masterplan (Ground Version) (Hollaway Studio, 2024. Drawing Ref: 23.0109 08 P1)

2 NON-TECHNICAL SUMMARY

- 2.1 In response to the proposed development at Land adjacent to Hillside House, Cliff Road, Hythe, ('the Site'), a Preliminary Ecological Appraisal of land within the redline boundary (Figure 1) has been undertaken.
- 2.2 The Site occupies approximately 0.0557ha and comprises a garage, deciduous woodland, modified grassland, tall forbs and hardstanding.
- 2.3 Development of the Site will not impact designated sites or areas of ancient woodland. Recommendations to protect a Habitat of Principal Importance (HPI) as listed on s41 of the NERC Act 2006 have been provided.
- 2.4 No evidence of badger was recorded. However, the habitats present are suitable for the species and should a period of >12 months pass, an update badger survey should be conducted.
- 2.5 Seven trees (T1-T4, T6 and T11-T12) within the deciduous woodland to be affected by the proposed development, have been identified as having suitability for roosting bats. In line with current guidance, no further surveys are required. Recommendations for precautionary mitigation measures have, however, been recommended.
- 2.6 Suitable habitat for dormice exists, however, the extent of the impacts are minimal, and no further surveys are required. As a precautionary measure, the clearance of suitable dormouse habitat should be conducted under the supervision of a suitably experienced/licensed ecologist.
- 2.7 Although no evidence was recorded, precautionary methods and appropriate timings to ensure the welfare of herpetofauna and hedgehogs are maintained, has been provided.
- 2.8 Mitigation to protect nesting birds is required.
- 2.9 Proposed biodiversity enhancements for the Site, in accordance with the requirements of the National Planning Policy Framework (NPPF) 2024, include:
- Installation of 1 x tree-mounted bird box on retained trees within the client's wider ownership
 - Installation of 1 x integrated bird box on the proposed development
 - Installation of 1 x tree-mounted bat box on retained trees within the client's wider ownership

- Installation of 1 x log pile within the proposed grassland habitat
- Installation of 1 x invertebrate tower within the proposed grassland habitat
- Incorporation of a wildlife-friendly planting scheme

2.10 Provided the recommendations provided within this report are implemented, the proposed development will not contravene any relevant legislation or planning policies pursuant to nature conservation.

3 INTRODUCTION

3.1 Context

- 3.1.1 In response to a proposed development at Land adjacent to Hillside House, Cliff Road, Hythe (hereafter referred to as 'the Site'), a Preliminary Ecological Appraisal (PEA) of land within the redline boundary were undertaken (see UKHabs Plan, Figure 1).
- 3.1.2 The Site's suitability to support protected and/or notable species and habitats was assessed and appropriate recommendations of further surveys and mitigation, where required, are provided within Section 6 of this report, and opportunities for biodiversity enhancements in-line with the NPPF 2024 are presented in Section 7. Ecological features of interest are depicted in Figure 1: UK Habs Plan and photographs of the Site are provided in Appendix A.

3.2 Site Location

- 3.2.1 The Site is located to the east of the seaside town of Hythe, in Kent, at National Grid Reference: TR 17931 35063. The location of the Site is depicted in Image 1, below.

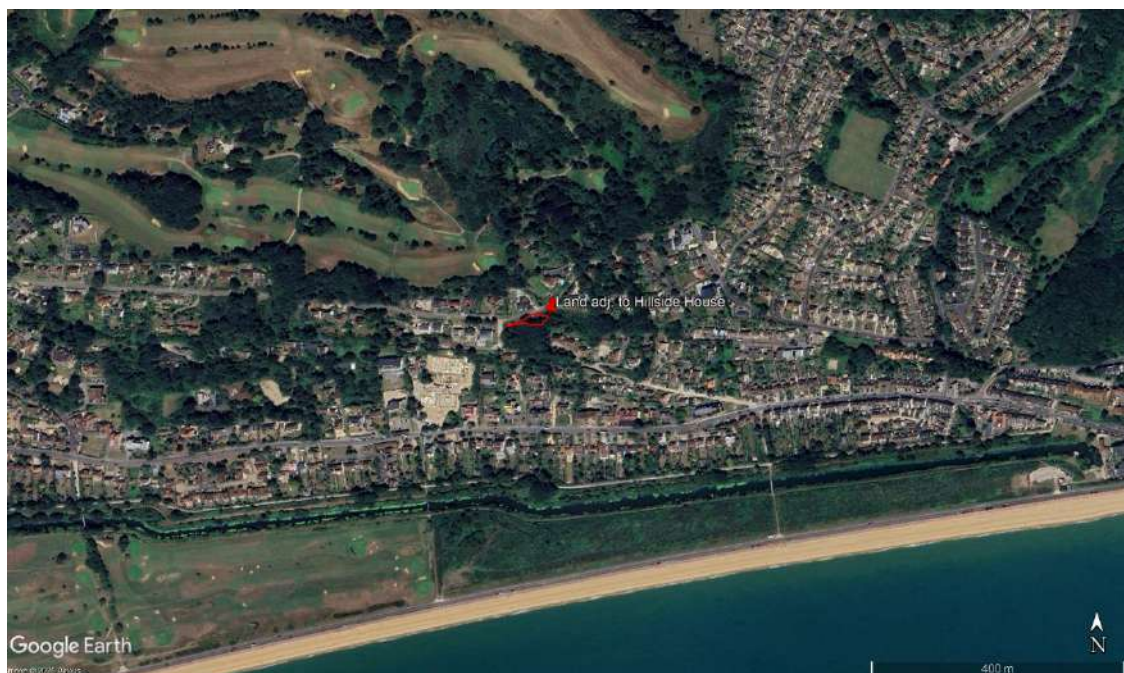


Image 1 – Geographical Location of Land adjacent to Hillside House ('the Site')

3.3 Site Description

- 3.3.1 The Site occupies 0.0557ha and comprises a garage with associated hardstanding, deciduous woodland and small areas of modified grassland and tall forbs.
- 3.3.2 The Site is bound by modified grassland to the north, with Cliff Road beyond and to the west, providing access to the Site. To the south lies deciduous woodland, contiguous with the

woodland on-site and within the wider client ownership boundary. Further deciduous woodland is also present to the east of the Site.

- 3.3.3 The wider landscape comprises residential properties with associated gardens in the south, and a golf course with associated blocks of woodland to the north.

3.4 Legislation and Planning Policy

- 3.4.1 Relevant legislation and policies that apply to ecological issues within England and Wales are:

- [The Conservation of Habitats and Species Regulations 2017 \(as amended\)](#)
- [The Environment Act 2021](#)
- [The Wildlife and Countryside Act 1981 \(as amended\)](#)
- [The Countryside Rights of Way Act 2000](#)
- [The Natural Environment and Rural Communities \(NERC\) Act 2006](#)
- [Hedgerows Regulations 1997](#)
- [The Protection of Badgers Act 1992](#)
- [The Wild Mammal \(Protection\) Act 1996](#)
- [The National Planning Policy Framework \(NPPF\) 2023](#)
- [Government Circular 06/05](#)
- [Folkestone & Hythe District Council Places & Policies Local Plan \(Adopted September 2020\)](#)

- 3.4.2 The above summary serves as guidance only. Further information is presented in Appendix B.

3.5 Objectives of the Survey

- 3.5.1 The objectives of the survey were to:

- Classify the main habitats present within the Site.
- Evaluate the ecological importance of these habitats.
- Assess the suitability for protected species and any otherwise notable species to occur within the Site.
- Provide appropriate recommendations for further surveys and mitigation where required as well as opportunities for biodiversity enhancement.

4 METHODS

4.1 Desk Study

4.1.1 A desk study was undertaken in December 2024 to determine the presence of sites and habitats of conservation importance, along with freely available European Protected Species records of relevance to the Site.

4.1.2 The following bodies were consulted for the desk study:

- Google Earth Pro for aerial imagery.
- Magic Map (Magic.defra.gov.org) for statutory designated sites; European Protected Species Mitigation Licences; and great crested newt pond survey data and class licence returns.
- Kent Landscape Information System (KLIS) for non-statutory designated sites.
- OS mapping for ponds within 250m of the Site.

4.1.3 The desk study involved obtaining the following information:

- International statutory designated sites within 5km.
- National statutory designated sites within 1km.
- Non-statutory designated sites within 1km.
- European Protected Species Mitigation (EPSM) Licences and GCN licence records within 2km.
- Ancient woodland parcels within 30m.
- Waterbodies within 250m.
- Habitats of Principal Importance (NERC Act 2006) within or immediately adjacent to the Site.

4.1.4 These search areas are considered sufficient to cover the potential zone of influence of the proposed development.

4.2 Habitats

UK Habs Survey

4.2.1 The Site was surveyed using the methods outlined in '[The UK Habitat Classification, Version 2.0](#)' (UKHab Ltd, 2023). The techniques applied during the survey involve identifying the main plant communities present on the Site and classifying the habitat types following the UKHab methodology. This technique provides an inventory of the basic habitat types present and enables areas of greater botanical interest which may require further, more detailed, surveys to be identified.

- 4.2.2 Any occurrences of recognised invasive species as listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) were also noted, if present.
- 4.2.3 A map of the habitats and areas of interest (using standard UK Habs typologies) is provided in Figure 1. Photographs of features of interest are presented in Appendix A.
- 4.2.4 The survey was undertaken by GES Ecologist Lottie Gibbons BSc (Hons) MRes QCIEEM on 28th November 2024.

4.3 Protected and Notable Species

- 4.3.1 The survey was extended to consider the suitability of the Site to support protected and notable species. Species considered included those identified during the desk study, or those considered appropriate by the surveyor during the survey. Detailed surveys were not completed for these species. However, based on an understanding of species ecology, consideration was given to the Site's potential to provide sheltering or foraging habitat and/or connectivity from other areas of potentially suitable habitat to allow dispersal between populations. Core species considered during the survey are outlined below.

Badger

- 4.3.2 Evidence of badger *Meles meles* activity within the Site was assessed by searching for signs such as:
- Presence of setts, indicated by suitably sized holes or burrows.
 - Evidence of badger latrines, badger hair and/or footprints.
 - Evidence of well-used runs supported by secondary evidence such as foraging signs.

Bats

Foraging and Commuting Habitat Assessment

- 4.3.3 An assessment of suitable foraging, commuting, roosting and swarming habitat for bats both within the Site and adjacent habitats was carried out in accordance with current good practice guidance (Collins, 2023). The presence of features suitable for bat foraging or commuting was noted and the assessment enabled the Site and surrounds to be categorised as having either 'None,' 'Negligible,' 'Low,' 'Moderate,' or 'High' suitability for bats.

Ground Level Tree Assessment (GLTA)

- 4.3.4 A GLTA of trees within the Site with the potential to be affected by the proposed development, was carried out in accordance with current BCT good practice guidance (Collins, 2023). Trees were inspected for potential roosting features (PRFs) such as splits, fissures, cavities, delaminated bark, heavy ivy *Hedera* sp. cover and woodpecker holes. Evidence such as

droppings, staining and bats themselves were searched for below suitable features, with the use of high-powered torch and binoculars (where necessary). Each tree was categorised as having:

- PRFs suitable for individual bats (PRF-I)
- PRFs suitable for multiple bats (PRF-M)
- Further assessment required (FAR)
- No PRFs.

4.3.5 The above information was used to determine the level (if any) of further surveys required in respect of tree-roosting bats.

Preliminary Roost Assessment

4.3.6 A full external inspection was undertaken of the building (B1) present within the Site, with the use of a high-powered torch and binoculars (where required). Any suitable roosting or access points for bats such as raised fascia boards, missing/lifted tiles, cracks or crevices in brick/blockwork, warped weatherboarding, hanging tiles and gaps in soffit boxes were recorded, where present, and searched for evidence of use by bats (staining, droppings, scratch marks, or the bats themselves). The results of the scoping survey enabled the buildings to be categorised as having either 'None,' 'Negligible,' 'Low,' 'Moderate,' or 'High' suitability for roosting bats. Where evidence of bats was recorded, the building was also categorised as being a 'Confirmed' roost.

4.3.7 The above information was used to determine the level (if any) of further dusk emergence surveys required in respect of bat roosts in buildings.

Dormouse

4.3.8 The Site was surveyed for suitable hazel dormouse *Muscardinus avellanarius* habitat, such as the presence of well-connected broadleaved woodland, hedgerows, mature scrub and suitable food sources such as oak *Quercus sp.*, hazel *Corylus avellana* and other nut-bearing trees, fruiting trees and shrubs and flowers.

Great Crested Newts (GCN)

4.3.9 Any waterbodies within 250m and suitable terrestrial habitat for great crested newts (GCN) *Triturus cristatus* was recorded including long grass, tall ruderal, woodland and hedgerow borders, as well as wood and rubble piles that act as sheltering places.

Reptiles

- 4.3.10 The Site was assessed for any suitable habitat for reptiles, including long grass, vegetated boundaries, woodland and hedgerow borders, as well as wood and rubble piles that provide sheltering opportunities.

Nesting Birds

- 4.3.11 The habitats within the Site were assessed for their suitability to support nesting birds. Factors considered include suitable cover and feeding habitat. Evidence was searched for in the form of any active or disused birds' nests.

4.4 Constraints

- 4.4.1 The survey was carried out outside the optimal period for conducting UK Habs surveys (generally considered to be April to September inclusive) and therefore certain plant species may not have been recorded during the survey. However, the habitat within the Site was restricted to an area of deciduous woodland, mown modified grassland, tall forbs, a building and hardstanding. Therefore, the level of information gathered during this survey is considered sufficient to effectively evaluate the habitats within the Site and does not pose a constraint to the survey findings.
- 4.4.2 The building B1 was not accessible for internal inspection, however, a full external inspection was carried out, and the results of the survey are considered sufficient in evaluating the building's suitability to support roosting bats.
- 4.4.3 The waterbody D1 was inaccessible at the time of the survey and therefore was not subjected to a Habitat Suitability Index (HSI) assessment. However, the waterbody is located c.121m northeast from the Site and only a small area of suitable great crested newt habitat (0.032ha) is to be impacted by the proposed development. Therefore, this is not considered to be a significant limitation in evaluating the Site's suitability to support great crested newts.
- 4.4.4 Any measurements or indications of area provided within this report are estimates and are provided as a guide only.
- 4.4.5 It should be noted that the absence of a species from biological records cannot be taken to represent actual absence. Species distribution patterns should be interpreted with caution as they may reflect survey/reporting effort rather than actual distribution.

5 RESULTS

5.1 Desk Study

Designated Sites

- 5.1.1 Statutory and non-statutory designated sites identified within the potential zone of influence of the proposed development are presented in Table 1 below.

Table 1 – Designated Sites within ZOI of the development

Site Name	Description	Distance and Orientation from Site
Statutory Designated Sites		
<i>Internationally Designated Sites (SPA, SAC, Ramsar)</i>		
Folkestone to Etchinghill Escarpment (SAC)	<i>An extensive area of chalk grassland and scrubland habitats, including one of the largest areas of unimproved chalk downland in Kent. The area contains three nationally plant species are present: early spider orchid (<i>Ophrys sphegodes</i>); late spider orchid (<i>Ophrys fuciflora</i>); and bedstraw broomrape (<i>Orobanche caryophyllacea</i>). The area supports a diverse breeding bird community and insect assemblage including nationally rare flies, moths and butterflies.</i>	3.1km N
<i>Nationally Designated Sites (SSSI, NNR, LNR)</i>		
None within the zone of influence		
<i>Non-statutory Designated Sites</i>		
Royal Military Canal (LWS)	<i>The Royal Military Canal runs for 28 miles from Seabrook to Hythe and provides a diverse habitat for a range of wildlife, including for the lesser spotted woodpecker <i>Dryobates minor</i>, Cetti's warbler <i>Cettia cetti</i> and greater water-parsnip <i>Sium latifolium</i>.</i>	0.24km S
Paraker Wood and Seabrook Stream, Shorncliffe (LWS)	<i>Ancient woodland and stream along the coast, forms part of the Seabrook Valley.</i>	0.5km N

(SPA – Special Protection Area, SAC – Special Area of Conservation, SSSI – Sites of Special Scientific Interest, NNR – National Nature Reserve, LNR – Local Nature Reserve, LWS- Local Wildlife Site)

SSSI Impact Risk Zones (IRZs)

- 5.1.2 The Site lies within the Impact Risk Zone of Seabrook Stream SSSI and Folkestone to Etchinghill Escarpment SSSI and Lympe Escarpment SSSI, and any Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites that the SSSIs underpin.

Ancient Woodland

- 5.1.3 The desk study returned no records of ancient woodland parcels within 30m of the Site.

NERC s41 Habitats of Principal Importance (HPI)

- 5.1.4 The desk study returned one record of a habitat listed under s41 of the NERC Act 2006 within or adjacent to the Site. 'Deciduous woodland' forms the majority of habitat within the southeast of the Site, and also lies directly adjacent to the southern and eastern Site boundary.

European Protected Species Mitigation (EPSM) Licences

- 5.1.5 There are six records of bat EPSM Licences within 2km of the Site, the closest of which is located approximately 100m southwest of the Site, granted for the destruction of a resting place of whiskered bat *Myotis mystacinus* and Daubenton's bat *Myotis daubentonii* from 2015-2019.
- 5.1.6 There are no records of GCN EPSM Licences within 2km of the Site. However, there is one GCN Class Survey Licence Return within 2km of the Site, which is from 2017 and located 1.2km northwest of the Site.
- 5.1.7 There are no records of dormouse EPSM Licences within 2km of the Site.

5.2 Habitats*UK Habs Survey*

- 5.2.1 The following habitat types were recorded within the Site on 28th November 2024:

Grassland

- Modified grassland

Sparsely vegetated land

- Tall forbs

Urban

- Developed land; sealed surface
 - Hardstanding
 - Buildings

Woodland and Forest

- Lowland mixed deciduous woodland

- 5.2.2 A summary of the key botanical species present within each habitat type are included within the descriptions below. While considering this information reference should be made to the UK Habs Plan presented in Figure 1, photographs presented in Appendix A.

Modified Grassland

- 5.2.3 An area of modified grassland exists in the north of the Site, measuring approximately 138m², the grassland is regularly mown with a sward height of <5cm. Grass species present include dominant meadow grass *Poa annua*. Herbaceous species present include frequent creeping buttercup *Ranunculus repens*; occasional dandelion *Taraxacum officinale agg.* and rarely occurring daisy *Bellis perennis*.

Tall Forbs

- 5.2.4 Three areas of tall forbs are present in the Site, measuring approximately 24m², 8m² and 86m² from east to west. All patches of tall forbs are overgrown and are located on the northern edges of the woodland.
- 5.2.5 The largest area of tall forbs in the northeast of the Site comprises dominant nettle *Urtica dioica*. Occasional broadleaved dock *Rumex obtusifolius*, bristly ox-tongue *Helminthotheca echinoides*, meadow grass and bramble are also present.
- 5.2.6 Species present within the two smaller tall forbs parcels in the west and centre of the Site include dominant common nettle, locally frequent winter heliotrope *Petasites pyrenaicus*; frequent bristly oxtongue; occasional bramble, meadow grass, dandelion and broadleaved dock and rarely occurring pendulous sedge *Carex pendula* and creeping buttercup.

Developed Land; Sealed Surface (Hardstanding)

- 5.2.7 There is an area of developed land; sealed surface (HS1) located in the north of the Site, adjacent to building B1, which forms the driveway and provides access from the garage (B1) to Cliff Road. It is formed of tarmac and gravel, with some occasional encroaching moss *Bryophyta sp.* present.
- 5.2.8 In addition, a small strip of Cliff Road forms a small strip (HS2) on the northern boundary of the Site.
- 5.2.9 TN1 on Figure 1 depicts the location of two tree stumps adjacent to the hardstanding driveway.

Developed Land; Sealed Surface (Building)

- 5.2.10 A single-storey garage (B1) is present in the north of the Site; a more detailed description of the building and its suitability to support roosting bats is given in Section 5.3.6.

Lowland Mixed Deciduous Woodland

- 5.2.11 A small area of lowland mixed deciduous woodland measuring approximately 243m², is present in the south of the Site. Connected to a larger area of woodland within the Client's

wider ownership boundaries which extends to the south, the woodland is a mix of young, semi-mature and mature trees, with an average diameter at breast height (DBH) of 300mm. Formed of a dense canopy of dominant sycamore *Acer pseudoplatanus*; occasional pedunculate oak *Quercus robur*, and Wych elm *Ulmus glabra* and a light understory of holly *Ilex aquifolium* and elder *Sambucus nigra*, the ground layer is composed of occasional bramble *Rubus fruticosus* agg., common ivy *Hedera helix*, common nettle *Urtica dioica*, hart's-tongue fern *Phyllitis scolopendrium*, pendulous sedge *Carex pendula*, annual honesty *Lunaria annua*, as well as small areas of bare ground.

5.3 Protected and Notable Species

Badger

- 5.3.1 No evidence of badger activity or setts were recorded within the Site.
- 5.3.2 The tall forbs and lowland mixed deciduous woodland habitat within the Site provide suitable foraging, commuting and refuge habitat for badger.
- 5.3.3 Furthermore, the earth banks along the boundaries of the woodland provide suitable habitat for sett creation. The Site is also connected to suitable badger habitat in the immediate surroundings, in the form of woodland along the southern boundary and to the east.

Bats

- 5.3.4 The small area of woodland habitat within the Site provides suitable foraging and commuting opportunities for bats. Furthermore, the Site is well-connected to areas of woodland and grassland, particularly those in the golf course to the north of the Site, which provide foraging opportunities within the surrounding landscape.

Roosting Habitat – Trees

- 5.3.5 A detailed GLTA was undertaken of the trees to be affected by the proposed development within the Site. The trees T1-T13 form part of the deciduous woodland and are located on an earth bank along the woodland's northern edge. Table 2 below provides a description of each tree. The locations are depicted on Figure 1.

Table 2 – Trees with bat roost suitability within the Site

Tree Ref	Species	PRFs	Level of Suitability
T1	Sycamore	Shallow knot hole on northern elevation at 3m, doesn't appear to extend into trunk. Dead branch on eastern elevation at 3m height.	PRF-I
T2	Sycamore	Snapped off branch on northern elevation at 4m height.	PRF-I
T3	Sycamore	Ivy-clad	PRF-I

Tree Ref	Species	PRFs	Level of Suitability
T4	Sycamore	Shallow knot hole in trunk on northern elevation at 2m height, doesn't appear to extend into trunk.	PRF-I
T5	Sycamore	No PRFs	None
T6	Sycamore	Small amount of ivy on trunk	PRF-I
T7	Sycamore	No PRFs	None
T8	Sycamore	No PRFs	None
T9	Sycamore	No PRFs	None
T10	Sycamore	No PRFs	None
T11	Sycamore	Small knot hole on northern elevation at 7m, doesn't appear to extend into trunk.	PRF-I
T12	Sycamore	Small amount of ivy on trunk	PRF-I
T13	Sycamore	No PRFs	None

Roosting Habitat – Buildings

5.3.6 The single building (B1) is to be affected by the proposed development. The location of building B1 is depicted on Figure 1.

5.3.7 Building B1 is a single-storey garage, measuring approximately 8.5m long x 4m wide. It comprises a flat concrete roof with painted brick walls. Windows are present on the northern and southern elevations, with a garage door present on the western elevation. The building is well-sealed with few access points for bats apart from a small grill on the eastern elevation and a small gap in the brick on the southern elevation.

5.3.8 The structure lacks suitable PRFs and provides limited access points for bats. The building B1 offers 'Negligible' suitability to support roosting bats.

Dormouse

5.3.9 No evidence of dormouse was recorded during the survey.

5.3.10 The Site has suitable dormouse habitat in the form of lowland mixed deciduous woodland and is also well-connected to suitable dormouse habitat in the immediate surroundings in the form of woodland to the south and east of the Site.

5.3.11 However, the woodland is dominated by what appear to be self-sown sycamore trees and small patches of bramble, limiting foraging opportunities for dormice. Furthermore, the Site is located within a residential area, with roads to the north and west of the woodland, resulting in an island of vegetation that (when compared to the woodlands present within the wider landscape) is somewhat subject to human disturbance effects.

*Great Crested Newt**Terrestrial Habitat*

- 5.3.12 The woodland and tall forbs within the Site provide suitable terrestrial foraging habitat for GCN. The tree stumps denoted TN1 in Figure 1 provide suitable refugia for GCN.

Aquatic Habitat

- 5.3.13 A review of available online OS mapping identified a single ditch (D1) within 250m of the Site. The ditch is located c.120m east of the Site. However, the waterbody (D1) was inaccessible at the time of survey and consequently no HSI could be undertaken.
- 5.3.14 The Royal Military Canal is also located 270m south of the Site. This is, however, considered unlikely to support great crested newts due to being faster flowing and presence of fish.

Reptiles

- 5.3.15 The tall forbs provides suitable foraging and commuting habitat for reptiles. The tree stumps (TN1) provide suitable refugia for reptiles. The mown modified grassland and woodland edges to be affected by the proposed works are, however considered sub-optimal for reptiles.

Nesting Birds

- 5.3.16 No nesting birds or disused nests were recorded during the survey.
- 5.3.17 Suitable nesting habitat is present within the Site in the form of the woodland and building, and the Site is well-connected to other suitable woodland habitat in the wider landscape.

Other Species

- 5.3.18 The habitats recorded within the Site provide suitable foraging and resting places for European hedgehog, a “Notable” species and SPI listed under s41 of the NERC Act 2006.
- 5.3.19 Beyond those noted above, the survey identified negligible suitability for other species of conservation concern within the Site.

6 EVALUATION AND RECOMMENDATIONS

6.1 Designated Sites

Statutory Designated Sites

Internationally Designated Sites

- 6.1.1 The Folkestone to Etchinghill Escarpment SAC that is identified 3.1km north of the Site is the only IDS recorded within the desk study area. This site represents one of the largest areas of unimproved chalk downland in Kent. The qualifying features of which include semi-natural dry grasslands and scrub facies on calcareous substrates (*Festuco-Brometalia*) and dry grasslands and scrublands on chalk or limestone.
- 6.1.2 The proposals include the construction of a residential building with associated landscaping and access, that are small in scale (0.06ha) and unlikely to impact the designated site. Furthermore, due to the location of the Site within the urban area of Hythe, the Site is separated from the designated site by residential developments and main roads, including the M20, at a distance of 3.1km. Therefore, direct adverse impacts on Folkestone to Etchinghill Escarpment SAC as a result of the proposed development is not considered likely.
- 6.1.3 In addition, given the nature of the proposed development (i.e. construction of a single residential development within an existing residential area), it is considered unlikely that the works will give rise to additional recreational pressure, traffic or wastewater, and therefore there are no anticipated indirect adverse effects on the designated sites as a result of the operational phase of the proposed development.
- 6.1.4 No further consideration to the Folkestone to Etchinghill Escarpment SAC is required.

Nationally Designated Sites

- 6.1.5 The desk study returned no records of Nationally Designated Sites within 1km of the Site.

SSSI Impact Risk Zones (IRZs)

- 6.1.6 The Site lies within the IRZ of Seabrook Stream SSSI, Folkestone to Etchinghill Escarpment SSSI and Lympne Escarpment SSSI that are located 1.2km north, 3.1km north and 3km west respectively. When considering the small nature of the proposed development and the spatial separation from these designated sites, detrimental impacts are considered unlikely. Furthermore, the proposed development does not meet the criteria that would warrant further consultation with Natural England and no further consideration to SSSIs is required.

Non-Statutory Designated Sites

- 6.1.7 The desk study returned records of two non-statutory designated sites within 1km of the Site. The closest site is the Royal Military Canal LWS, located 0.27km south of the Site.
- 6.1.8 Due to the limited extent and nature of the proposals, coupled with the spatial separation and lack of habitat linkages, no other statutory or non-statutory designated sites are considered likely to be impacted by the proposed development.

6.2 Ancient Woodland

- 6.2.1 Guidance from Natural England and the Forestry Commission state that no development should occur within 15m of an ancient woodland. The proposed development lies beyond 15m of any ancient woodland and therefore no detrimental impacts to ancient woodland will occur.

6.3 Habitats and Botanical Species of Interest

- 6.3.1 The NERC s41 HPI, of 'deciduous woodland' forms the habitat in the south of the Site and is also located adjacent to the southern boundary and to the east of the Site. This habitat meets the criteria set out within the Kent BAP for woodland and scrub.
- 6.3.2 Although the unavoidable loss of c.203m² of HPI deciduous woodland is required to facilitate the proposed works, measures to ensure the integrity of the retained deciduous woodland within and adjacent to the Site is increased, beyond that which currently exists, are to be implemented.
- 6.3.3 Furthermore, the adjacent woodland is the subject of a TPO application, and an approved felling licence (Planning Reference: 25/1095/FH) in which a 10-year rotational coppicing/thinning management plan will be employed. Details of this strategy are presented in the associated woodland management plan (GES, 2025).
- 6.3.4 An outline of the proposed measures are set out below:
- The retained woodland both within and adjacent to the Site should be protected by HERAS security fencing (or similar) with fine-mesh dust netting installed along the extent prior to the commencement of development works.
 - Where practical trees should be retained and to avoid impacts inclusive of root compaction and collision damage, retained trees should be protected in accordance with the British Standard (BS) '5837:2012 Trees in Relation to Design, Demolition and Construction'. An example of such protection is presented in Figure 2.

- Where loss is unavoidable, trees should be replaced on a like-for-like basis using native species such as sycamore, pedunculate oak, holly, wych elm or similar.
- The non-native invasive species of winter heliotrope, adjacent to the woodland, should be removed and destroyed following good practice guidance as available on [RHS Invasive non-native plants](#).
- Drainage channels and trenches should be designed to ensure that water and sediment from the construction site does not enter the woodland.
- Implementation of a long-term woodland management plan will serve to ensure the integrity of the retained deciduous woodland habitat is maintained.
- A sensitive lighting strategy as described in Section 6.4.5 to avoid illumination of the retained woodland and surrounding boundary habitats should be implemented during the construction and operational phases of the development.

6.3.5 Implementation of the above measures will ensure that the retained woodland within the Site and in the wider surroundings will be protected and will result in no deterioration of the retained woodland from the proposed development and works.

6.4 Protected and Notable Species

Badger

6.4.1 Suitable habitat for badger is present within the Site; however, no evidence of badger was recorded within or adjacent to the Site.

6.4.2 Badgers are, however, a highly mobile species that will readily move into new areas and as badgers and their setts are protected under the Protection of Badgers Act 1992, to ensure the welfare of badgers is maintained, the following sensitive working methodology should be implemented throughout the development:

- Should a period of 12 months pass from the writing of this report, an update badger walkover survey should be conducted.
- To prevent badgers or other mammals becoming trapped in excavations, any trenches or deep pits that are to be left open overnight will be provided with a means of escape. This is to be achieved through the construction of a graded bank or the installation of a rough sawn timber board such as a scaffold board or similar, which will allow animals to exit of their own accord. Any trenches or pits left overnight will be inspected each morning to ensure no animals have become trapped.
- Should a trapped animal be encountered, and the means of escape prove ineffective, the ECoW will be contacted to discuss an appropriate manner in which to proceed.

- Should the development require the installation of culverts and/or large diameter piping, the ends of such components will be closed to badgers and other animals overnight.

Bats

Commuting and Foraging Habitat

- 6.4.3 The woodland provides suitable foraging and commuting habitat for bats, however only a small area of woodland is present within the Site, with the majority of suitable habitat off-site to the south and east. Records of EPSML's for bats within 2km of the Site were, however, recorded in the desk study and the Site's habitats are considered to offer 'Moderate' suitability for foraging and commuting bats.
- 6.4.4 However, with the proposed loss of just c.203m² of woodland, the retention of the majority of , and the lack of fragmentation of suitable foraging and commuting habitats, bat activity surveys are, therefore, considered disproportionate in this instance.
- 6.4.5 Since lighting can be detrimental to bats using vegetation for foraging and commuting, any external lighting proposed for the development should be sensitive to the woodland and vegetated boundary habitats, avoiding direct illumination of them. The lighting scheme should be designed in-line with the principles set out in guidance published by the Bat Conservation Trust and the Institution of Lighting Professionals ([BCT & ILP, 2023](#)). Potential design measures include:
- Use of LED lighting, which does not emit UV, and which has a warm white light spectrum (ideally 2700Kelvin or less) and uses wavelengths higher than 550nm.
 - Internal lighting adjacent to windows being recessed to reduce glare and light spill.
 - Directional lighting, such as specialist bollards or low-level downward direction lighting to minimise light spill.
 - Use of motion sensors or timers to restrict lighting to required periods only.
 - Use of the lowest lux possible.

Roosting Habitat – Trees

- 6.4.6 The survey identified 7 x trees (T1-T4, T6 and T11-T12) with 'PRF-I (potential roosting features suitable for supporting individual or low numbers of bats)' and 6 x trees (T5, T7-T10 and T13) with 'None (no potential roosting features present)' suitability to support roosting bats.
- 6.4.7 Bats, and their roosts, are fully protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended), and to ensure the removal of these trees is conducted in accordance with the legislation and

planning policies which serve to protect bat and their roosts, mitigation in line with current BCT good practice guidelines (Collins, 2023) is required. These measures are detailed within Table 3 below.

Table 3 – Trees with Bat Roost Suitability to be Affected by the Proposed Development

Tree Reference	Tree Species	Bat Roost Suitability	Number and Type of Further Survey(s) Required
T1	Sycamore	PRF-I	Inspect and soft-fell
T2	Sycamore	PRF-I	Inspect and soft-fell
T3	Sycamore	PRF-I	Remove ivy and soft-fell
T4	Sycamore	PRF-I	Inspect and soft-fell
T6	Sycamore	PRF-I	Remove ivy and soft-fell
T11	Sycamore	PRF-I	Inspect and soft-fell
T12	Sycamore	PRF-I	Remove ivy and soft-fell

6.4.8 It is recommended that the following precautionary measures are followed during the felling of any the trees listed in Table 3 (should their removal be deemed unavoidable to facilitate the development):

- To account for the potential for roosting bats to be present, prior to the start of any work that will affect the trees identified as supporting 'PRF-I' (as shown in Table 3), the on-site contractors are to be briefed regarding the potential presence of roosting bats.
- The briefing will be in the form of a 'Toolbox Talk', given by a suitably experienced ecologist. The Toolbox Talk will provide information on the ecology of bats and the legal protection they receive.
- Any ivy that has potential to support roosting bats will be removed by a registered climber who can inspect within and behind the ivy using a torch/endoscope. This work should be conducted under the supervision of a suitably licensed ecologist.
- A 'soft-fell' of the tree will then be undertaken under the supervision of a suitably licensed ecologist. This will entail sections of the tree being inspected by torch and/or endoscope (as required and as instructed by the ecologist) prior to removal.
- Should a bat be found at any point during the inspection, all works will stop until an appropriate European Protected Species Mitigation Licence (EPSML) has been sought and obtained from Natural England.

Roosting Habitat – Buildings

- 6.4.9 An external assessment of the building (B1) within the Site identified building B1 to have 'Negligible' suitability for roosting bats and in-line with BCT guidelines (Collins, 2023), no further surveys of building B1 are required.

Dormouse

- 6.4.10 The woodland provides some suitability for dormice, however, no records of dormice EPSM Licences were identified within 2km of the Site, and no evidence of dormice was recorded during the survey. Furthermore, being dominated by relatively young sycamore trees within a residential area results in limited suitability/foraging opportunities and the current proposals result in the loss of just c.203m² of woodland.
- 6.4.11 When considering the above, the application of further surveys for dormouse surveys is considered disproportionate, and no further surveys are required.
- 6.4.12 As a precautionary measure, application of the following sensitive vegetation clearance method is recommended:
- The cutting of the vegetation must be undertaken during the active season for dormice, thereby taking place in April to October in any given year.
 - To enable animals to relocate into suitable retained habitat in the south of the Site, the vegetation should be cut in a north to the south direction, using hand tools only (chainsaws, strimmer, brush cutters acceptable).
 - Prior to the commencement of works a suitably qualified Ecological Clerk of Works (ECoW) should give a Toolbox Talk site briefing to all contractors to explain the potential presence of protected species, the methodology to be followed and what to do in the unlikely event that a dormouse (or any other protected species) is found during works.
 - The ECoW will then undertake a fingertip search of the habitat to be removed for any evidence of dormice or their nests.
 - If clear of dormouse, the ECoW will then instruct the contractors to undertake an initial cut, to the height specified by the ECoW (as far as has been able to be checked thoroughly).
 - This process will continue as such, in a slow and careful manner, with the ECoW inspecting all vegetation before it is cut, until all suitable habitat has been cleared to the ground.
 - If at any point a dormouse or any evidence of a dormouse is found, works must stop immediately, and Natural England contacted (and likely a mitigation licence sought and obtained) before continuing.

6.4.13 Provided the above mitigation strategy is implemented in full, then the welfare of dormice will be maintained, and the development will be conducted in accordance with current legislation and planning policies which serve to protect them.

Great Crested Newt

6.4.14 The desk study identified a single record of GCN Class Survey Licence return from 2017, located c.1.2km northwest of the Site.

6.4.15 However, the Site lies within the 'Green Impact Risk Zone' for GCN (Natural England), and although not accessible during the survey, the only identifiable waterbody within the search radius is a single ditch that lies c.121m northeast of the Site

6.4.16 When considering the limited nature of the impacts, and the lack of waterbodies that are essential to the reproduction of GCN, the proposed development is anticipated to result in no detrimental impact on the Favourable Conservation Status of GCN.

6.4.17 This statement is further supported when the impact areas are entered into Natural England's GCN 'rapid risk assessment' tool, which is used to help examine the likelihood of impact on GCN (and therefore the likelihood of an offence being committed under the Wildlife and Countryside Act 1981 (as amended) and Conservation of Habitats and Species Regulations 2017 (as amended)). Based on habitat to be affected by the development (0.032ha) and the proximity to the waterbody, even in the event that the waterbody was confirmed as supporting GCN, . The calculated risk for the proposed development is 'Green: Offence Highly Unlikely' (Image 2).

Component	Likely effect (select one for each component; select the most harmful option if more than one is likely; lists are in order of harm, top to bottom)	Notional offence probability score
Great crested newt breeding pond(s)	No effect	0
Land within 100m of any breeding pond(s)	No effect	0
Land 100-250m from any breeding pond(s)	0.01 - 0.1 ha lost or damaged	0.01
Land >250m from any breeding pond(s)	0.01 - 0.1 ha lost or damaged	0.001
Individual great crested newts	No effect	0
Maximum:		0.01
Rapid risk assessment result:		GREEN: OFFENCE HIGHLY UNLIKELY

Image 2. Natural England's 'rapid risk assessment' results

6.4.18 In response, no further surveys or consideration to GCN is required.

Reptiles

6.4.19 The tall forbs, tree stumps (TN1) and to a lesser extent the woodland and mown modified grassland provide suitable habitat for reptiles. However, the suitable habitats to be affected

are limited and the application of further surveys to determine the presence/likely absence of reptiles are not required.

- 6.4.20 The precautionary measures set out above for dormice in Section 6.4.12 will, however, serve to ensure the welfare of reptiles is maintained in the unlikely event that reptiles do reside within the habitats to be affected by the proposed development.

Nesting Birds

- 6.4.21 Suitable breeding, nesting and foraging habitat for breeding birds is present within the Site. However, further surveys for birds are considered disproportionate as the area of woodland within the Site is minimal in size with c.203m² lost to the proposed development.

- 6.4.22 As all nesting birds are protected under the Wildlife and Countryside Act 1981 (as amended) it is recommended that works to these areas (where necessary) are conducted outside the core breeding period for birds of late February – August inclusive.

- 6.4.23 Should this timeframe be unobtainable, a survey for the presence of breeding birds should be conducted by a suitably experienced ecologist immediately prior to the start of works. Should evidence of breeding birds be recorded, works within 5m of the nest, or works that have the suitability to destroy the nest(s), should stop until the eggs have hatched, and the chicks fledged, or the nest is deemed by a suitably experienced ecologist to no longer be active.

Other Species

- 6.4.24 The woodland habitat is suitable to support hedgehogs. Should they be present, the precautionary measures set out for dormice (Section 6.4.12) will also serve to ensure the welfare of hedgehogs is maintained.

- 6.4.25 Beyond those noted above, there are no obvious and immediate issues regarding other protected species on the Site and no further surveys to determine the presence of other protected species is required in this instance.

- 6.4.26 Should at any point during the development a protected or notable species be identified within the Site, then all works should **stop**, and the appointed ecologist consulted on the appropriate manner in which to proceed.

7 ECOLOGICAL ENHANCEMENTS

7.1 Opportunities to include biodiversity enhancements within the Site exist and in accordance with the requirements of the NPPF 2024 the following recommendations are considered appropriate for the Site:

- The installation of a range of bird boxes in suitable locations such as trees and/or integrated into the proposed dwelling would increase the Site's suitability for nesting birds. Boxes should be selected from either integrated boxes such as those available from www.habibat.co.uk, or open fronted and hole fronted nesting boxes. To maximise suitability, boxes should be installed on sheltered aspects close to vegetation at a height of 2-3m, preferably on north, northeast or northwest facing elevations. In this instance, 1 x integrated bird box on the proposed development and 1 x [tree-mounted bird box](#) within the woodland in the client's wider ownership are recommended.
- The installation of bat boxes installed in suitable locations would increase the Site's suitability for roosting bats. These boxes should be installed at a height of 3m or more or at eaves height on sunny, sheltered aspects, away from direct illumination by artificial lighting and in a location, which ensures connectivity to foraging habitats within the wider landscape. In this instance, 1 x tree-mounted boxes such as the Kent Bat box or [Schwegler 2FN](#) (or similar) are recommended for any suitable trees within the woodland within the client's wider ownership.
- The incorporation of a wildlife-friendly planting scheme within the Site, including native and wildlife-friendly plant species such as those on RHS plants for pollinators list would be of benefit to invertebrates, and subsequently birds and bats. Night-flowering species which encourage crepuscular/nocturnal invertebrates should also be incorporated into to benefit bats.
- The incorporation of 1 x invertebrate tower would enhance the opportunities within the Site for invertebrates.
- The incorporation of 1 x log pile at suitable locations within the Site would provide an enhancement for hedgehog, invertebrate, reptiles, amphibians and other species.
- Any tree planting should be undertaken using native species such as sycamore, pedunculate oak, holly, wych elm or similar.

8 REFERENCES

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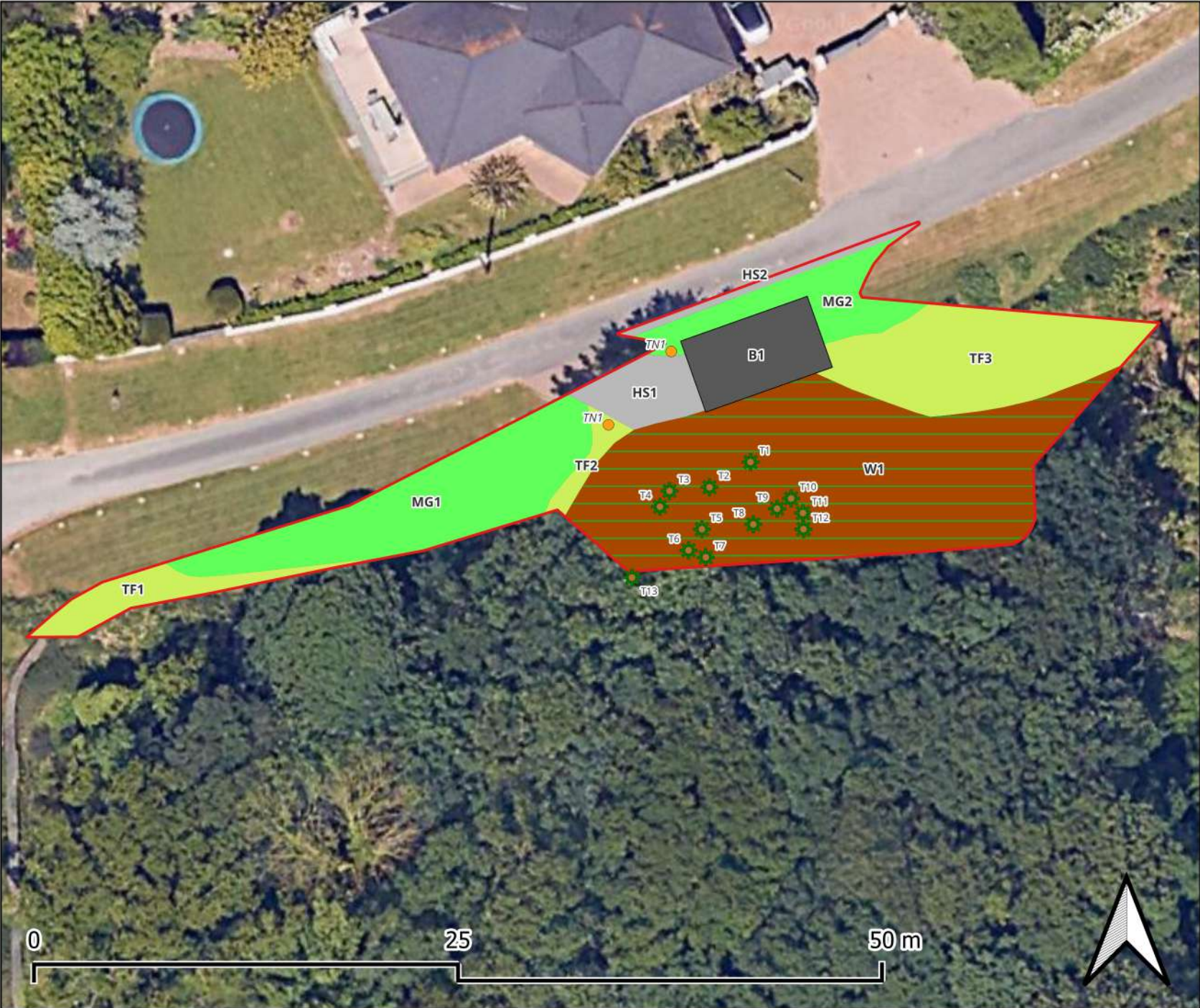
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Figures

Figure 1 - UKHabs Plan (J24-021683_P5 - Land adj. to Hillside House)



Key

Site Details

- Red Line Boundary
- Target Notes
- Trees subject to GLTA

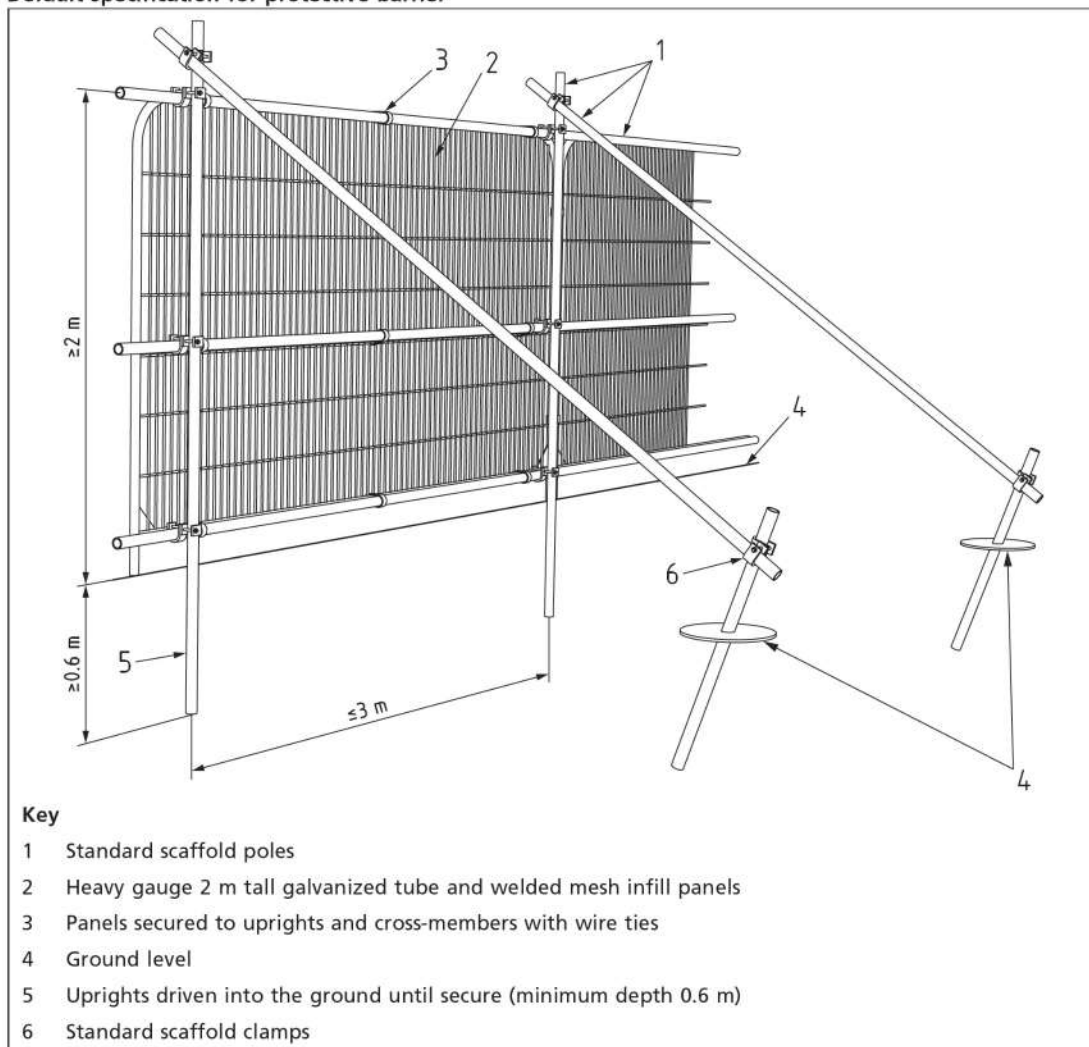
Habitats

- Modified Grassland
- Tall Forbs
- Developed Land; Sealed Surface (Hardstanding)
- Developed Land; Sealed Surface (Buildings)
- Lowland Mixed Deciduous Woodland

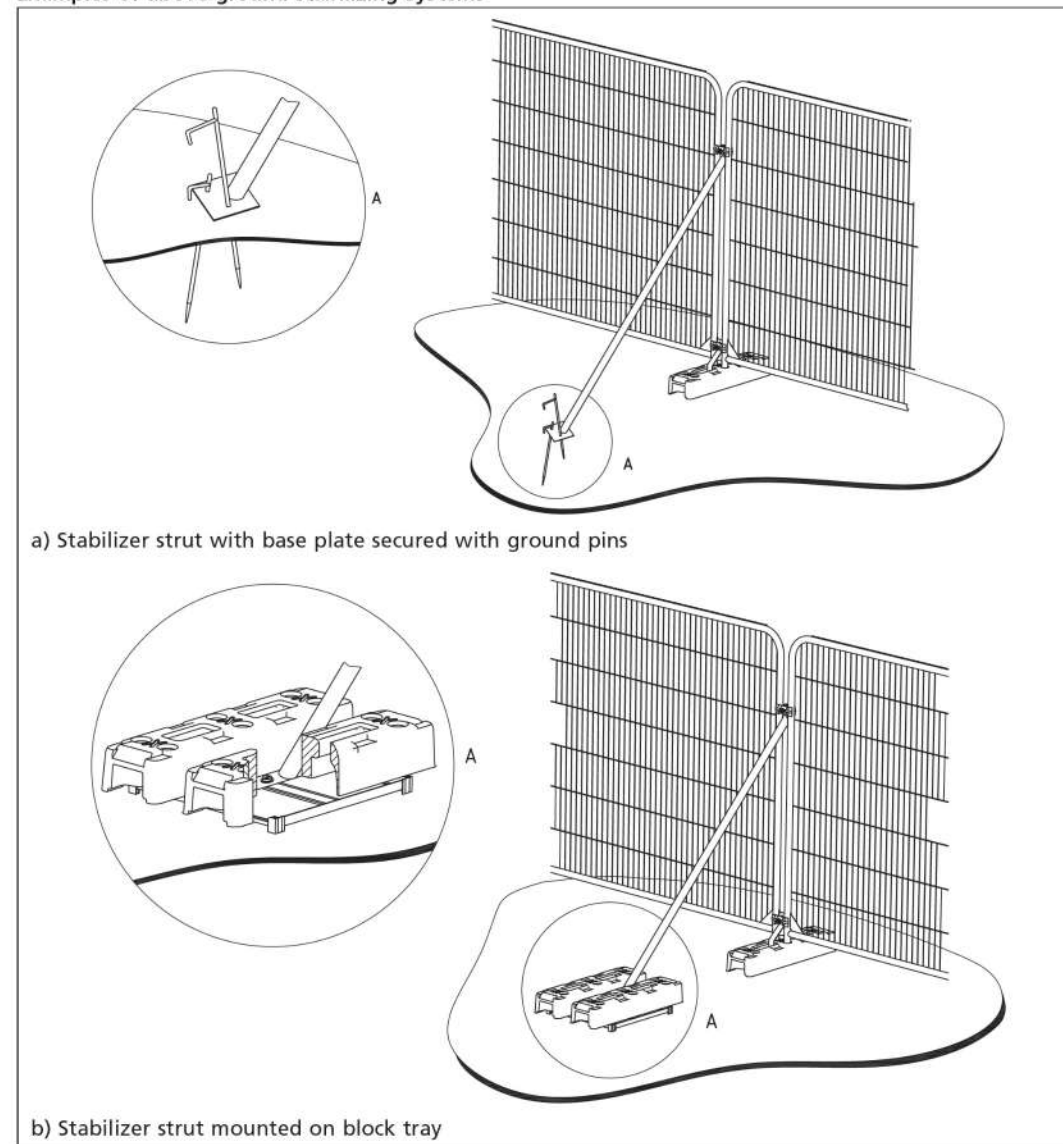
Surveyor: Lottie Gibbons
Survey Date: 28.11.2024
Drawn by: Ryan Richardson
Drawn Date: 28.11.2025
Reference: J24-021683_P5 - Land adj. to Hillside House
Scale: 1:320 @ A4

Figure 2 - Tree Protection Measures (J24-021683_P5 - Land adj. to Hillside House)

Default specification for protective barrier



Examples of above-ground stabilizing systems



Appendices

APPENDIX A – Site Photographs

Photo 1: Garage building (B1), with 'Negligible' suitability to support roosting bats.



Photo 2: Hardstanding driveway, mown modified grassland and building in the north of the Site.



Photo 3: Mown modified grassland in the north of the Site, with tree stump (TN1).



Photo 4: Tall forbs in the north of the Site.



Photo 5: Tree stump (TN1) in north of the Site, adjacent to hardstanding and tall forbs.



Photo 6: Tall forbs modified grassland and lowland mixed deciduous woodland.



Photo 7: Trees in the north of the Site, to be removed under the proposed development. Trees (T1-T4, T6 and T11-T12) PRF-I suitability for roosting bats.



Photo 8: Earth banks surrounding the boundaries of the woodland, suitable for badger sett creation.

APPENDIX B – Legislation and Planning Policies

Legislation

- The Conservation of Habitats and Species Regulations 2017 (as amended) transposes European Union Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive) into National law. These regulations provide for the designation and protection of 'European Sites', the protection of 'European Protected Species' and the adaptation of planning controls for the protection of such sites and species. Under the regulations, public bodies have a duty in exercising their functions to have regard to the EC Habitats Directive.
- The Environment Act 2021 operates as the new framework of environmental protection following the United Kingdom's departure from the EU. The Environment Act allows the UK to enshrine some environmental protection into law, and offers new powers to set new binding targets, including for air quality, water, biodiversity, and waste reduction. The Act mandates the creation of Local Nature Recovery Strategies, Protected Site Strategies, Species Conservation Strategies, and the use of conservation covenants to support the design and delivery of strategic approaches to deliver better outcomes for nature. Additional mandates covered by The Act (Part 7) include:
 - A requirement for Biodiversity Net Gain for developments, to ensure all development deliver a minimum of 10% net gains in biodiversity (Section 98).
 - Strengthening of the duty placed on all public bodies to “conserve” and “enhance” biodiversity (Section 102).
 - Duty placed upon Local Authorities to consult prior to felling street trees (Section 115).
- The Wildlife and Countryside Act 1981 (as amended) provides detail on a range of protection and offences relating to wild birds, other animals, and plants. The level of protection depends on which Schedule of the Act the species is listed on. Licences are available for specific purposes to permit actions that would otherwise constitute an offence in relation to species.
- The Countryside Rights of Way Act 2000 provides additional support to the Wildlife and Countryside Act 1981; for example, increasing the level of protection for certain species of reptiles.
- The Natural Environment and Rural Communities (NERC) Act 2006 imposes an obligation on all public bodies, including local authorities, to consider whether their activities can contribute to the protection of wildlife. The duty is created by section 40(1) of the Act, which states that:

“Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.”

- The Hedgerows Regulations 1997 are enforced under the Environment Act 1995, and serves to: restrict the removal of hedgerows, or parts of hedgerows which are over 20m in length. In this case, removal includes digging up and replanting elsewhere, as well as removing from the land completely or destroying in the course of other actions. This includes developments or activities which destroy the roots, causing the vegetation to die.
- The Protection of Badgers Act 1992 exists to protect badgers *Meles meles* from cruelty. Under the act it is a criminal offense to wilfully kill, injure, take, possess or cruelly ill-treat a badger, or to attempt to do so, or to intentionally or recklessly interfere with a sett.
- The Wild Mammal (Protection) Act 1996 protects wild mammal species from certain cruel acts, including kicking, beating, nailing, or otherwise impaling, stabbing, burning, stoning, crushing, drowning, dragging or asphyxiation of any wild mammal with intent to inflict unnecessary suffering. Crushing and asphyxiation are most likely to occur as a result of development proposals, should these works collapse any mammal burrows, or encounter wild mammals on site.

National Planning Policy

- The National Planning Policy Framework (2024) states (Section 15) that the planning system should identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks; promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. It also states that local planning authorities should refuse planning on the following principles:
 - If significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for.
 - If development is on land within or outside a Site of Special Scientific Interest (SSSI), and is likely to have an adverse effect on it (the exception being where the benefits of the development in the location proposed clearly outweigh its likely impact);
 - If development results in the loss or deterioration of irreplaceable habitats, such as ancient woodland and ancient or veteran trees (unless there are wholly exceptional reasons, and a suitable compensation strategy exists).
 - Additionally, the NPPF states that development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity

improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

- Species and Habitats of Principal Importance for Conservation in England and Wales and priority habitats and species listed in the Folkestone and Hythe District Council Places and Policies Local Plan are species which are targeted for conservation. The government has a duty to ensure that involved parties take reasonable practice steps to further the conservation of such species under Section 41 of the Natural Environment and Rural Communities Act 2006. In addition, the Act places a biodiversity duty on public authorities who 'must, in exercising their functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity' (Section 40 [1]). Criteria for selection of national priority habitats and species in the UK include international threat and marked national decline.

Local Planning Policy

- Folkestone and Hythe District Council Places and Policies Local Plan (September 2020), Policy NE2 'Biodiversity' states:

"All new development will be required to conserve and enhance the natural environment, including all sites of biodiversity or geodiversity value (whether or not they have statutory protection) and all legally protected or priority habitats and species. The Council will support development that:

- Enhances, retains and protects existing sites and features of nature conservation value including wildlife corridors, ancient woodland and geological exposure that contribute to the priorities established through the Biodiversity Action Plan and the Green Infrastructure Plan;*
- Does not reduce, and where feasible, improves species' ability to move through the environment in response to predicted climate change, and to prevent isolation of significant populations of species; and*
- Incorporates features that enhance biodiversity as part of good design and sustainable development, including the creation of new pollinator habitat suitable to the scale of development. The District has a number of undesignated sites, which may nevertheless host rare species or valuable habitats. Where a site is indicated to have such an interest, the applicant should observe the precautionary principle and the Council will seek to ensure that the intrinsic value of the site for biodiversity and any community interest is enhanced or, at least, maintained. Where an impact cannot be avoided or mitigated (including post-development management and monitoring), compensatory measures will be sought. The Council may, in exceptional circumstances, allow for biodiversity*

offsets, to prevent loss of biodiversity at the district level. Such compensation will be directed to Biodiversity Opportunity Areas (BOAs) within the district or projects identified in the Council's Green Infrastructure Plan."