



ECOLOGICAL ADVICE SERVICE

TO: *Folkestone and Hythe DC*

FROM: *KCC Ecological Advice Service*

DATE: *5th February 2026*

SUBJECT: *Combined EAS response for the following planning applications
25/2105/FH - 25/2055/FH - 25/2113/FH - 25/2100/FH*

The following is provided by Kent County Council's Ecological Advice Service (KCC 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 if sufficient/appropriate ecological information has been provided.

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.

In providing the following comments all relevant information has been submitted including ecological information (where submitted) and site plans. In addition other documents when considered useful have been reviewed this will include (but not limited to) the design and access statement and arboricultural reports.

Additional supporting information can be found at the end of the report regarding requests for additional information and BNG.

Where applicable, suggested condition wording can be found at the end of the report. The conditions have been numbered and referred to in the below text.

Planning Applications Reviewed:

Reference Number	Application Name	Planning Officer	Further Information Required
25/2105/FH	Land Opp Action Water Sports, Lydd	Ross McCardle	Yes

25/2055/FH	Rhodesia House, Folkestone	Helena Payne	No
25/2113/FH	Highfields Farm, Stowting Hill	Katy Claw	Yes
25/2100/FH	Methodist Church, 153 Sandgate Rd	Robert Allan	No

Planning Applications

No.	Planning application	Further Information Required?	Reasoning
1	25/2105/FH Land Opp Action Water Sports, Lyd Ross McCardle	Yes	<p>No Ecology information – Preliminary Ecological Assessment required. If any additional surveys are required then there is a need for an ecological impact assessment to be submitted prior to determination of the planning application as the proposed development is/has :</p> <ul style="list-style-type: none"> • Adjacent to a ditch with potential for water voles • Suitable habitat for badgers • Adjacent to the Dungeness, Romney Marsh and Rye Bay SPA, Ramsar and SSSI • Is within a red zone under the Great Crested Newt (GCN) risk <p>BNG – self built exempt. Applicant states that the development will be built by applicant.</p>

2	<p>25/2055/FH</p> <p>Rhodesia House, Folkestone</p> <p>Helena Payne</p>	No	<p>No Ecology information – no survey required. Change of use and refurbishment from hotel to flats following fire damage less than one year ago so unlikely to contain potential for roosting bats.</p> <p>BNG exempt due to the de-minimis exemption : change of use of an existing building and does not affect more than 25m² of habitat</p> <p>Condition required : 1. <i>Ecological Enhancements</i></p>
3	<p>25/2113/FH</p> <p>Highfields Farm, Stowting Hill</p> <p>Katy Claw</p>	Yes	<p>No Ecology information – no survey required as the proposed development is for an access track which already serves as agriculture provision so unlikely to impact any protected/notable species.</p> <p>BNG – applicant states exemption and “<i>Existing access is proposed to be used and only change of use from agricultural to residential is sought with resurfacing works proposed.</i>”</p> <p>However, when looking at aerial pictures, the existing access seems to be either bare ground or vegetated and as such has a BNG value, which will be lost to potential hard standing. In addition, it seems that the access way will go through an area of trees to reach the farm house and we question if trees are to be lost (trees may have to be counted within the BNG calculations).</p> <p>So if BNG applies to this proposed development then the applicant needs to submit a completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date). See more information below on what needs to be submitted prior to determination for BNG.</p>
4	<p>25/2100/FH</p> <p>Methodist Church, 153 Sandgate Rd</p> <p>Robert Allan</p>	No	<p>Ecology information – sufficient.</p> <p>Building has negligible potential for bat roosting to be present but could have nesting birds.</p> <p>Presence of non native invasive species</p>

			<p>(montbretia Crocosmia) listed under Schedule 9 of the WCA that needs to be dug out and be disposed of at an appropriately licensed waste-disposal facility.</p> <p>BNG – exempt as habitat impacted on site under 25m2</p> <p>Conditions Required :</p> <p>1. <i>Ecological Enhancements</i></p> <p>Informative required :</p> <p>1. <i>Breeding Bird Informative</i> 2. <i>Invasive species informative</i></p>
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Additional Information to support the advice provided.

Ecological Information Requested.

The requested ecological information is required prior to determination. This is in alignment with paragraph 99 of the Office of the Deputy Prime Minister (ODPM) Circular 06/2005² which states, *“it is essential that the presence or otherwise of protected species and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision”*.

The EclA will need to include the following:

- Details of the impacts of development proposals on the ecological baseline established via a Preliminary Ecological Appraisal (PEA) and any necessary additional surveys undertaken;
- Details of any necessary and achievable ecological mitigation and/or compensation measures;
- Details of ecological enhancement measures, and;
- Provision of sufficient information to determine whether the project accords with relevant nature conservation policies and legislation.

Biodiversity Net Gain

Any application which is required to achieve a 10% BNG must submit the following information as a minimum¹:

- confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition;

¹ <https://www.gov.uk/guidance/biodiversity-net-gain#para11>

- the pre-development biodiversity value(s), [either on the date of application or earlier proposed date \(as appropriate\)](#);
- where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date;
- [the completed metric calculation tool](#) showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;
- a statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ([‘degradation’](#)), and where they have:
 - a statement to the effect that these activities have been carried out;
 - the date immediately before these activities were carried out;
 - the pre-development biodiversity value of the onsite habitat on this date;
 - the completed metric calculation tool showing the calculations, and
 - any available supporting evidence of this;
- a description of any [irreplaceable habitat](#) (as set out in [column 1 of the Schedule to the Biodiversity Gain Requirements \(Irreplaceable Habitat\) Regulations 2024](#)) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

De-minimis exemption:

- The development will not impact any onsite priority habitat; AND
- The development will not impact more than 25 square metres of onsite habitat with a biodiversity value greater than zero; AND
- The development will not impact more than 5 metres of onsite linear habitat.

N.B: Habitats with a biodiversity value of zero include: buildings, hardstanding, unvegetated garden, and artificial unvegetated; unsealed surface.

Suggested Condition Wording

1. Ecological Enhancements

Prior to any works above slab level, a Biodiversity Enhancement Plan (BEP) shall be submitted to and approved in writing by the local planning authority. The Plan shall include full details of the biodiversity enhancements to be implemented on-site. The Plan shall include provision of durable and suitably-placed bat/bird boxes, the creation of hedgehog highways (by creating small 13×13cm gaps in close board fencing), the

provision of bee bricks and/or the provision of log piles/artificial refugia for reptiles and amphibians.

The Plan shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter.

Suggested Informative Wording

1. Breeding Bird Informative

The applicant is reminded that, under the Wildlife and Countryside Act 1981 (as amended), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or being built. Planning consent for a development does not provide a defence against prosecution under this Act.

Habitats are present on and around the site that provide opportunities for breeding birds. Any work to vegetation/structures that may provide suitable nesting habitats should be carried out outside of the bird breeding season (1st March to 31st August inclusive) to avoid destroying or damaging bird nests in use or being built. If vegetation/structures need to be removed during the breeding season, mitigation measures need to be implemented. This includes examination by a suitably qualified and experienced ecologist immediately prior to starting work. If any nesting birds are found, works must cease until after the birds have finished nesting.

2. Invasive species informative

Invasive non-native species listed on schedule 9 of the Wildlife and Countryside Act 1981 (as amended) which makes it an offence to plant or otherwise cause it to grow in the wild. Planning consent for a development does not provide a defence against prosecution under this act. Measures will need to be undertaken to ensure that any invasive species found on site are eradicated prior to commencement of development to ensure that no offences may occur.