Access Road, King Farm, Redbrook Street, Woodchurch, Ashford, Kent, TN26 3QR

Preliminary Ecological Appraisal

A Report for Price Whitehead

January 2026

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Preliminary Ecological Appraisal

Client:	Price Whitehead	
Project Ref:	King Farm – Access Rd	
Report Ref:	J25-000180_P2	
Author:	**Technical Review:**	**Approved:**
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Revision Ref:	**Status/ Comment:**	**Date of Issue:**
-	Issued	16/01/2025
A	Red Line Boundary Amendments	20/01/2025

Disclosure:

It should be noted that whilst every effort has been made to meet the client's requirements, no site survey can ensure a complete assessment or prediction of the changeable onsite environment.

Should more than 12 months elapse between the date of this survey and any subsequent development, it may be necessary to consider the need for an update survey to be undertaken.

CONTENTS

1 PROJECT OVERVIEW

Client: Price Whitehead

Site Address: Access Road, King Farm, Redbrook Street, Woodchurch, Ashford, Kent TN26 3QR

Attending Ecologists: Lottie Gibbons BSc (Hons) Mres

Survey Date(s): 24th June 2025 (eDNA)

20th November 2025 (PEA)

Site Proposals: Reinstatement and alteration to former farm access road.

Associated Planning Reference Number: Not yet submitted.

Source of Relevant Documents:

Document:	**Source:**
Application Boundary:	Price Whitehead. Drawing Ref: 2297 92 01
Site Location Plan:	Google Earth Pro
Desk Study:	Magic Map (Magic.defra.gov.uk)
Proposed Development:	Price Whitehead. Drawing Ref: 2297 92 01

2 NON-TECHNICAL SUMMARY

2.1 In response to the reinstatement of an access road at King Farm, Ashford ('the Site'), a Preliminary Ecological Appraisal of land within the redline boundary (2297 92 01) has been undertaken.

2.2 The Site occupies approximately 0.19ha and comprises grassland, scrub, hedgerows and tree lines.

2.3 Development of the Site will not impact designated sites or areas of ancient woodland. Recommendations have been provided to protect the hedgerow on site, which is a Habitat of Principal Importance.

2.4 Retained trees are to be protected in accordance with BS 5837:2012 'Trees in relation to design, demolition and construction.'

2.5 No evidence of badgers was recorded on Site. [redacted] Precautionary working measures are provided. Should a period of >12 months pass, an update badger survey should be conducted.

2.6 Mitigation to protect nesting birds, reptiles, GCN and dormice is required. Implementation of this mitigation will avoid the need for further surveys for these species.

2.7 Proposed biodiversity enhancements for the Site, in accordance with the requirements of the National Planning Policy Framework (NPPF) 2024, include:

- Installation of two tree-mounted bird boxes.
- Installation of two tree-mounted bat boxes.
- Installation of one log/brash pile.

2.8 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 reinstatement and alteration to a former farm access road at King Farm, Ashford (hereafter referred to as 'the Site'), a Preliminary Ecological Appraisal (PEA) of land within the redline boundary was undertaken (see UK Habs 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. 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. Photographs of the Site are provided in Appendix A.

3.2 Site Location

3.2.1 The Site is located between Hengherst and Woodchurch, in Kent, at National Grid Reference: TQ 93734 36054. The location of the Site is depicted in Image 1, below.

Image 1 – Geographical Location of the Site

3.3 Site Description

3.3.1 The Site occupies 0.19ha and comprises grassland, scrub, hedgerow and tree lines.

3.3.2 The Site is bounded by agricultural fields of the wider ownership to the north and east; Redbrook Street to the south, and a residential dwelling to the west. The wider landscape is largely rural; and comprises residential properties with associated gardens, agricultural fields, and small blocks of woodland that are interconnected by treelines and hedgerows.

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) 2024
- Government Circular 06/05
- Ashford Borough Council Local Plan 2030

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 2025 to determine the presence of sites and habitats of conservation importance, along with existing records of protected and notable species 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 records of statutory designated sites; European Protected Species Mitigation Licences; and great crested newt pond survey data and class licence returns.
- 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 Licences; and great crested newt pond survey data and class licence returns within 1km.
- 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 The survey identified the main plant communities present on the site, with abundance of identified characterising species noted according to the DAFOR scale. The DAFOR scale characterises species abundance as Dominant (D), Abundant (A), Frequent (F), Occasional (O) or Rare (R). These scores represent the abundance within the defined area only and do not reflect national or regional abundances. Botanical species nomenclature follows Stace (2019).

4.2.3 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.

4.2.4 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.

4.2.5 The survey was undertaken by GES Senior Ecologist Lottie Gibbons BSc (Hons) Mres on 20th November 2025.

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 (and, where possible, on land adjacent to 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 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, telephoto lens camera 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.

4.3.6 No buildings are present onsite.

Dormouse

4.3.7 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. Evidence of hazel dormouse searched for included woven nests and/or dormouse-gnawed nuts.

Great Crested Newts (GCN)

4.3.8 Any 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.

Habitat Suitability Index (HSI)

4.3.9 Where access was available, an assessment of the suitability of each waterbody within 250m of the Site to support GCN was undertaken using a simplified version of the HSI assessment methodology developed by Oldham *et al.* (2000) (ARG, 2010). The HSI incorporates ten suitability indices, all of which are factors considered to affect GCN:

- Location (in Britain)
- Pond area

- Desiccation rate (years out of ten that pond dries)
- Water quality (subjective assessment)
- Percentage of pond shade
- Presence of waterfowl
- Fish population (subjective assessment)
- Number of ponds within 1km
- Terrestrial habitat quality
- Percentage macrophyte cover

4.3.10 The results of the HSI provide a numerical index of between 0 and 1, whereby 0 indicates potentially unsuitable habitat and 1 indicates potentially optimal habitat. The details of the HSI scoring criteria are provided in Table 1. The location of waterbodies within 250m of the Site is shown in Figure 2: Pond Plan, and the full HSI results are provided in Appendix D.

Table 1 – HSI Scoring Criteria

HSI Score	Pond Suitability for GCN
<0.50	Poor
0.50 – 0.59	Below Average
0.60 – 0.69	Average
0.70 – 0.79	Good
>0.80	Excellent

4.3.11 In this instance, waterbody data collected from surveys conducted by GES of the wider landscape in June 2025 is being used to inform this survey. This data includes HIS and eDNA water sampling data of accessible waterbodies within 250m of this Site.

Reptiles

4.3.12 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

4.3.13 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 Measurements and indications of area provided within this report are estimates and are provided as a guide only.

4.4.2 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.

4.4.3 The survey was carried out outside of the optimal period for conducting habitat surveys (considered to be April to September inclusive) and therefore certain plant species may not have been recorded during the survey.

5 RESULTS

5.1 Desk Study

Designated Sites

5.1.1 There were no records of statutory designated sites within the ZOI of the proposed development. The Ponds and Pasture (near Shirkoak) Local Wildlife Site (140m to the north-west of the Site) was the only non-statutory designated site identified within the potential zone of influence of the proposed development.

SSSI Impact Risk Zones (IRZs)

5.1.2 The Site lies within the IRZ of Alex Farm Pastures SSSI, Hoad's Wood SSSI, Orlestone Forest SSSI and Dungeness, Romney Marsh and Rye Bay SSSI.

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 no records of a habitat listed under s41 of the NERC Act 2006 within or adjacent to the Site.

EPSMLs and GCN Class Licence Returns

5.1.5 The desk study returned no records of granted EPSMLs or GCN class licence returns within 1km of the Site.

5.2 Habitats

UK Habs Survey

5.2.1 The following habitat types were recorded within the Site on 20th November 2025:

- Other neutral grassland
- Bramble scrub
- Line of trees
- Native hedgerow

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 Map presented in Figure 1 and the photographs presented in Appendix A.

Other Neutral Grassland

5.2.3 The dominant habitat type within the Site is other neutral grassland. Lacking management, the grassland has a varied sward height of between 10-40cm. Grass species include frequent common bent *Agrostis capillaris,* cock's-foot *Dactylis glomerata,* and Yorkshire fog *Holcus*

lanatus, and occasional meadow barley *Hordeum secalinum*. Although present, Timothy *Phleum pratense* and reed canary-grass *Phalaris arundinacea* are rare occurrences. Herbaceous species present include frequent creeping cinquefoil *Potentilla reptans* and creeping buttercup *Ranunculus repens,* and occasional bristly oxtongue *Helminthotheca echioides*, broad-leaved dock *Rumex obtusifolius*, yarrow *Achillea millefolium,* white clover *Trifolium repens,* common nettle *Urtica dioica* and hogweed *Heracleum sphondylium.* Occasional bramble *Rubus fruticosus agg.* is also present.

5.2.4 An area of unmanaged tall forbs exists in the northwest corner of the Site. Abundant bristly oxtongue, occasional hemlock *Conium maculatum,* broad-leaved dock, creeping buttercup, nettles and Yorkshire-fog. Mugwort *Artemisia vulagris,* spear thistle *Cirsium vulgare* and bramble were also present but in rare occurrences, were all recorded within this habitat type.

Bramble Scrub

5.2.5 An area of bramble scrub is present to the south of TL1. A young wild cherry *Prunus avium* is also present in this location.

Line of trees

5.2.6 Three lines of trees are present within the Site.

5.2.7 Located in the centre of the Site, TL1 is over 1.5m in height and width, and contains frequent hawthorn *Crataegus monogyna,* occasional field maple *Acer campestre*, and rare pedunculate oak *Quercus robur* and Portugal laurel *Prunus lusitanica.* A bird box, denoted TN1 on Figure 1, is present.

5.2.8 TL2, in the north of the Site, is also over 1.5m in height and width and contains frequent field maple and occasional ash *Fraxinus excelsior.*

5.2.9 TL3, along the western boundary of the Site, is present along a ditch, with an earth bank also present at the top of the ditch. TL3 is dominated by oak, with occasional field maple and hazel *Corylus avellana*.

Native Hedgerow

5.2.10 A hedgerow, >1.5m in height and width forms the Site's southern roadside boundary. Denoted H1 in Figure 1, the hedgerow supports frequent field maple, occasional bramble, and rarely occurring holly *Ilex aquifolium,* bay *Laurus nobilis,* grey willow *Salix cinerea* and dog-rose *Rosa canina.*

5.3 Protected and Notable Species

Badgers

5.3.1 No evidence of badgers were recorded within the Site.

5.3.2 Although limited in area, the on-Site habitats provide suitable foraging, sett-building and commuting habitat for badger.

5.3.3 [redacted]

Bats

5.3.4 The scrub, tree lines and hedgerow provide foraging and commuting opportunities for bats. The grassland also provides suitable foraging opportunities for bats, and the Site is well connected to areas of broadleaved woodland and grassland within the surrounding landscape.

Roosting Habitat – Trees

5.3.5 A description of the tree lines and their suitability to support roosting bats is presented in Table 3 below.

Table 3 –GLTA Results

Feature Ref	Tree species	DBH (cm)	Description	PRF Type	Level of Potential	Notes
TL1	Hawthorn , Pedunculate Oak, Field Maple,	<30	Line of young healthy trees located centrally within the Site. Light ivy present, but no visible PRF.	Not Assessed	FAR	Climb and Inspect (Ladder) immediately prior if trees to be affected.
TL2	Ash, Field Maple, Willow	<50	Line of trees located to the rear of the Site and west of the adjacent waterbody. No visible PRF.	Not Assessed	FAR	Climb and Inspect (Ladder) immediately prior if trees to be affected.
TL3	Pedunculate oak, Hawthorn, Field Maple, Hazel.	Mixed	Trees line of mixed age located on Site westernmost boundary. Not to be affected by the proposed development, no significant PRFs were noted within the trees .	Not Assessed	FAR	Climb and Inspect (Ladder) immediately prior if trees to be affected.

Dormouse

5.3.6 The scrub, tree lines and hedgerow provide limited suitable hazel dormouse habitat. The tree lines are connected to other tree lines in the wider landscape. However, TL1 has low structural complexity and a lack of suitable nesting opportunities for dormice. TL2 has medium structural complexity but low species diversity. Hedgerow H2 has medium species diversity but a low structural complexity, and lacks connectivity with habitats in the wider area due to large gaps where the entrances of neighbouring properties intersect the hedge. The bramble scrub is isolated within the grassland and lacks connectivity with other suitable habitat.

5.3.7 No evidence of dormouse was recorded during the survey.

Great Crested Newt

Terrestrial Habitat

5.3.8 The scrub, grassland, hedgerow and tree line bases and earth bank provide suitable terrestrial foraging habitat for GCN.

Aquatic Habitat

5.3.9 A review of available online OS mapping identified 13 ponds and one ditch within 250m of the Site, as depicted on Figure 2.

5.3.10 WB12 and WB13 were accessed during the PEA. All remaining waterbodies were inaccessible at the time of the survey. Waterbody WB12 was dry at the time of the survey therefore no HSI was carried out.

5.3.11 A summary of the results from this survey are presented in Table 5.

Table 5 – Habitat Suitability Index Assessment Results

Reference	Description	Distance from Site	HSI Score	HSI Suitability
WB12	Dry historic pond bed vegetated with grass and bramble. Reedmace present in base, suggests it lies damp for part of the year.	55m NE	N/A	**N/A**
WB13	Historic garden pond set within farmyard, fenced with picket fencing and surrounded by bramble.	7m E	0.79	**Good**
WB27	No access	60m W	N/A	**N/A**
WB28	No access	115m W	N/A	**N/A**
WB29	No access	160m W	N/A	**N/A**
WB30	No access	70m W	N/A	**N/A**
WB47	No access	70m W	N/A	**N/A**
WB48	No access	30m SW	N/A	**N/A**
WB49	No access	35m S	N/A	**N/A**
WB50	No access	125m SE	N/A	**N/A**
WB51	No access	235m S	N/A	**N/A**
WB52	No access	250m E	N/A	**N/A**
D3	No access	200m W	N/A	**N/A**

5.3.12 The eDNA water surveys conducted by GES of waterbodies within the wider landscape in June 2025 identified no GCN within 250m of the Site.

Reptiles

5.3.13 The grassland, scrub, and hedgerow and tree line bases provide optimal habitat for reptiles.

Nesting Birds

5.3.14 Suitable nesting habitat is present within the Site in the form of dense scrub, tall sward grassland, hedgerows and tree lines. A bird box is present within TL3. No nesting birds or disused nests were recorded during the survey.

Other Species

5.3.15 The habitats recorded within the Site provide optimal foraging and resting places for European hedgehog, a "Notable" species and SPI listed under s41 of the NERC Act 2006.

5.3.16 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

Designated Sites

6.1.1 The desk study returned no records of Internationally or Nationally Designated Sites within 5km of the Site.

SSSI Impact Risk Zones (IRZs)

6.1.2 The Site lies within the IRZs of several SSSIs. However, at the location selected, the proposed development is of a type that is unlikely to have a harmful effect on the SSSIs and no consultation with Natural England is required.

Non-Statutory Designated Sites

6.1.3 The desk study returned records of one non-statutory designated site within 1km of the Site. The site is Ponds and Pasture near Shirkoak LWS, located approximately 140m north west of the Site. Due to the limited extent and nature of the proposals, coupled with the spatial separation and lack of habitat linkages, no detrimental impact to this or other non-statutory designated sites will result from the proposed.

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

Hedgerows

6.3.1 At greater than 20m in length, and with more than 80% of its cover being of at least one woody UK native species, the hedgerow to be affected (H1) qualifies as an HPI. The proposed development will result in the loss of 15m of H1 to facilitate the farm entrance. Given the partial loss of H1, and the potential for impacts as a result of the proposed development on the retained section of H1 (such as accidental incursion, root compaction and pollution), the following mitigation and compensation measures are required:

- The retained section of H1 will 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 3. No construction materials will be stored within 5m of H1.

- To compensate for the loss of 15m of H1, 79m of new native hedgerows will be planted within the Site.

6.3.2 The above mitigation will ensure that the retained hedgerow within the Site is protected from potential impacts as a result of the proposed development. Compensatory planting will ensure that the viability of HPIs are maintained within the Site over the long-term.

6.4 Protected and Notable Species

Badger

6.4.1 Although suitable habitat for badgers is present within the Site, no evidence of badgers was recorded. [redacted] It is considered that, if present in the wider area, badgers would likely use the Site for commuting and foraging purposes.

6.4.2 Due to the distance of the mammal holes from the Site, and the lack of evidence within the Site, further surveys are considered disproportionate at this time.

6.4.3 To ensure the welfare of badgers is maintained (should they be present), the following precautionary measures should be applied:

- Prior to the start of work, all contractors will be briefed by a suitably experienced Ecological Clerk of Works (ECoW) regarding the presence of badgers.
- To prevent badgers 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 the badgers to exit of their own accord. Any trenches or pits left overnight will be inspected each morning to ensure no badgers have become trapped.
- Should a trapped badger be encountered, and the means of escape prove futile, then the appointed ecologist will be contacted immediately to discuss an appropriate way to proceed.
- Should the development require the installation of culverts and/or large diameter piping, the ends of such components are to be closed to badgers overnight.
- If mounds of topsoil or soft building materials are required within the Site, they will be subject to daily inspection for the presence of badgers or ring fenced with a badger-proof fencing material. Alternatively, material may be stored off the ground.

- Should badger occupation occur, mounds will be afforded the same level of protection as an established sett and a sett closure licence will need to be obtained from Natural England to remove the spoil.
- To avoid any upset/spillage by badgers, the storage of any chemicals required during the development will be sited away from the buffer fencing and preferably within a steel container. This action will be implemented/enforced by a member of the on-Site contractual team.

6.4.4 Badgers are a highly mobile species that will readily move into new areas. Badgers and their setts are protected under the Protection of Badgers Act 1992. Therefore, should 6 months elapse between the survey date and the commencement of works, an update survey of the Site for evidence of badgers should be undertaken.

Bats

Commuting and Foraging Habitat

6.4.5 The tree lines, hedgerow and scrub provide suitable foraging and commuting habitat for bats. The grassland also provides suitable foraging habitat. Furthermore, the Site is well connected to other areas of suitable habitat. The Site's habitats are considered to offer 'Moderate' suitability for foraging and commuting bats. Current proposals anticipate the retention of tree line TL3, located along the entire western boundary of the Site, but the loss of 6m of TL1 and 7m of TL2, the scrub (0.007ha) and of 15m of H1.

6.4.6 The retention of tree line TL3 (86m), 18m of TL1, 9m of TL2 and 9m of H1 will allow for the continued commuting of bats through the Site, and from review of the provided plans, it is apparent that the additional compensatory hedgerow planting is to be included along the new road. Totalling 79m and as depicted in Figure 2 the inclusion of the hedgerow will compensate for the loss of existing foraging habitat, and provide additional foraging and commuting habitat over the long term, once the planting matures. Approximately 0.12ha of grassland will also be retained and enhanced, providing suitable foraging habitat. Therefore, activity surveys are considered disproportionate at this time.

Roosting Habitat

6.4.7 In line with guidance (Collins, 2024), works to TL1 and TL2 are to be conducted under the supervision of a licenced ecologist. In the event that bats or evidence of bats is recorded within these tree lines, all works must **stop**, as further consideration to the need for surveys and/or an appropriate licence from Natural England will be required.

6.4.8 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 trees and vegetated habitats, particularly TL1, TL2, TL3 and H1, avoiding direct illumination of them. The lighting scheme should be designed using guidance provided by the Bat Conservation Trust (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) 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, low-level downward direction lighting or column lighting to minimise light spill.
- Use of motion sensor lighting or timers to restrict lighting to required periods.
- Dimming or part-night lighting to reduce light levels when bats are most active.
- Use of the lowest lux possible.

Dormouse

6.4.9 The three tree lines, hedgerow and scrub provide limited suitable habitat for dormice within the Site. The tree lines are connected to other tree lines in the wider landscape.

6.4.10 As mentioned above, current proposals anticipate the retention of tree line TL3 (86m). However, 6m of TL1 and 7m of TL2 will be removed to facilitate the access, along with the scrub (0.007ha) and 15m of H1.

6.4.11 The bramble scrub is isolated within the grassland and lacks connectivity with other suitable habitat. Therefore, it's removal will not affect dormice. TL1 provides limited suitability for dormice, due to its low structural complexity and a lack of suitable nesting opportunities for dormice. Given this, it is considered highly unlikely that nesting dormice would be present within TL1. TL2 has low species diversity and medium structural complexity. However, loss is restricted to a 6m length. Hedgerow H2 has medium species diversity but a low structural complexity, and lacks connectivity with habitats in the wider area due to large gaps where the entrances of neighbouring properties intersect the hedge.

6.4.12 Given the above lack of connectivity of the hedgerow and scrub with wider habitats, along with a lack of food resources due to low species diversity within the hedgerows and lines of trees, it is considered highly unlikely that nesting dormice would be present within the Site. In response, dormouse surveys are considered disproportionate in this instance. Furthermore, new hedgerow planting will be undertaken along the length of the new access track. This will

connect existing tree lines and hedgerows through the Site, and provide an enhancement in both nesting and foraging habitat for dormice over the long term. Therefore, the combination of habitat retention (TL3) and the proposed habitat creation, the proposed development will be of benefit dormouse, over the long term.

6.4.13 However, as a precautionary measure, in the unlikely event occasional foraging dormice are present within the Site, the following method of habitat manipulation will be implemented in full:

- Any cutting of the vegetation will be undertaken during the active period for dormice (as well as the core breeding period for bird) (September - October) in any given year.
- To enable small mammals (including dormice, in the unlikely event they are present) to relocate into the retained hedgerow and tree line, the vegetation will be directionally cut towards the retained habitat (i.e from east to west), using hand tools only (strimmer, brush cutters, chainsaw acceptable).
- Prior to the commencement of works a suitably experienced Ecological Clerk of Works (ECoW) will give a Toolbox Talk site briefing to all contractors to explain the potential presence of protected species (including dormice and nesting birds), the methodology to be followed and what to do in the unlikely event that a dormouse (or any other protected species) is found during the works.
- The ECoW will undertake a fingertip search of the habitat to be removed for any evidence of protected species.
- If clear of evidence, vegetation can be cut to ground level, with arisings removed.
- This process will continue in a slow and careful manner, with the ECoW inspecting all vegetation before it is cut, until all sub-optimal habitat has been cleared to the ground.
- Should at any point a dormouse or any evidence of a dormouse be found, all works that may affect dormouse habitats must **stop** and Natural England contacted on an appropriate manner in which to proceed.

6.4.14 The above precautionary working methods will prevent harm to dormice and other protected/notable species, in the unlikely event foraging dormice are present.

Great Crested Newt

6.4.15 The Site lies within an amber impact risk zone for GCN (Natural England) and the habitats within the Site are considered suitable for the species during their terrestrial phase. Furthermore, the HSI assessment of accessible waterbodies within 250m of the Site

conducted by GES in June 2025, identified a single pond within this boundary (WB13) as offering 'Good' suitability.

6.4.16 WB13 is, however, an historic garden pond set located 7m east to the Site. Surrounded by bramble scrub, the June environmental DNA (eDNA) survey did not survey WB13 due to access issues. It is, however, important to note that GCN were confirmed as absent in all waterbodies tested within 250m of the Site. As reasonable effort to determine the presence/likely absence of GCN within 250m of the Site has been applied, and none were recorded, GCN are deemed to be likely absent from the Site.

6.4.17 No further consideration to GCN is therefore required.

6.4.18 Should at any point during the works, a GCN be identified within site, all works must **stop** until an appropriate European Protected Species Mitigation Licence (EPSML) is sought and obtained from Natural England.

Reptiles

6.4.19 The grassland, scrub, and to a lesser degree the hedgerow and tree line bases, provide optimal foraging and sheltering habitat for reptiles within the Site. All UK native reptile species are protected under the Wildlife and Countryside Act 1981 (as amended) from intentional killing and injury amongst other offences. Current proposal plans show the loss of 0.062ha of suitable grassland, scrub (0.007ha), 15m of hedgerow H1, 6m of TL1, and 7m of TL2. However, as the Site is only 0.19ha, presence/likely absence surveys for reptiles are considered disproportionate in this instance.

6.4.20 The following precautionary measures are, however, considered proportionate to protect reptiles from harm, should they be present:

- In order to discourage herpetofauna from entering the construction area and minimize the risk of killing/injuring during the construction period, habitats within the construction zone will be cleared in a phased manner prior to any construction.
- The vegetation clearance will be carried out under the supervision of a suitably experienced Ecological Clerk of Works (ECoW).
- Prior to the start of any works, the contractors working on the project will be subject to a 'Toolbox Talk'. To be given by the suitably experienced ECoW, the 'Toolbox Talk' will outline the current legislation related to reptiles (and GCN), and also the appropriate manner in which to proceed with the works.

- To enable animals to move out of harm's way, all vegetation works will be conducted during the active period March – October (inclusive) in any given year.
- An initial cut of all vegetation within the construction zone will be carried out cutting vegetation to approximately 100mm.
- Following a period of c.5 days, a second cut of all vegetation within the construction zone will be carried out to 50mm.
- Following a period of c.5 days, the ECoW will carry out a fingertip-search of the of the area to be cleared. Should reptile or amphibian species be found they will be relocated to a suitable area of retained habitat out of harm's way. Immediately following this finger-tip search, a final cut of the vegetation will be carried out, clearing it to ground level.
- All the above vegetation clearance will be carried out using hand tools only (brush cutters and strimmers are acceptable) and will be conducted moving from the centre to the boundaries of the site, to encourage animals to relocate to retained and surrounding habitats naturally.
- Any refugia, such as TN1, will be cleared by hand under the supervision of the ECoW during the active period for amphibians and reptiles, which is March - October.
- Should amphibians or reptiles be encountered at any point during any of the works, works will **stop** whilst they are relocated out of harm's way.
- In order to ensure that the construction area remains unsuitable for herpetofauna, regular habitat maintenance will be carried out to ensure that vegetation is not able to recolonise any of the construction area.
- Once the above habitat clearance has been carried out and the construction area has been declared by the ECoW as unsuitable for herpetofauna, construction activities may commence.
- Store all materials on hardstanding and on pallets to avoid creating a refuge for amphibians.
- Backfill trenches and other excavations before nightfall, or leave a ramp to allow animals such as newts to easily exit.

6.4.21 Application of the above precautionary methods will serve to ensure the welfare of reptiles is maintained.

Nesting Birds

6.4.22 Suitable breeding, nesting and foraging habitat for breeding birds is present within the Site. In this instance given that much of the suitable habitats will be retained, further surveys for

birds are considered disproportionate. Measures to retain and create habitat suitable to support breeding birds should be included within the design proposals. Where habitats suitable to support birds require removal, replacement of the affected habitats should be included within the associated landscape strategy. Given the proximity of boundary features and the small size of the Site, it is not considered suitable for ground nesting birds, due to predator deterrence effects.

6.4.23 As all nesting birds are protected under the Wildlife and Countryside Act 1981 (as amended) it is recommended that works to the scrub, hedgerow and tree lines (where necessary) are conducted outside the core breeding period for birds, of late February – August inclusive. Therefore, as mentioned above, works to these habitats must be limited to occurring between September – October, to also occur during the active period for dormice.

6.4.24 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

6.4.25 The habitats within the Site that have the suitability to support hedgehogs and there are suitable connected habitats within the wider landscape. Therefore, the proposed development should incorporate new hedgerow/scrub planting and log/brash piles in appropriate locations on the peripheries of the development.

6.4.26 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.

6.4.27 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 two bird boxes in suitable locations such as trees would increase the Site's suitability for nesting birds. Boxes should be selected from 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.
- The installation two 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, boxes such as the Kent Bat box or Schwegler 2FN (or similar) are recommended for any suitable retained trees on the peripheries of the development within retained 'dark corridors'.
- The incorporation of one log and brash pile at a suitable location, such as near the retained tree line, within the Site would provide an enhancement for hedgehog and other species.
- Any tree planting should be undertaken using native species such as pedunculate oak, small leaved lime *Tilia cordata*, black poplar *Populus nigra*, wild service tree *Sorbus torminalis* or similar.

8 REFERENCES

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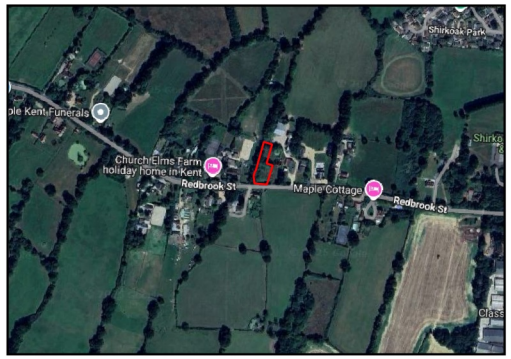
Figures

Figure 1: UK Habs Plan (J25-000180_P2 - King Farm Access Rd)



Key

- Red Line Boundary
- Native hedgerow
- Line of trees

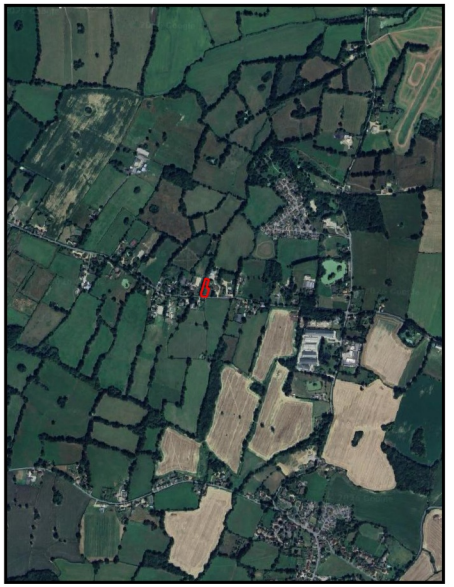
Habitats

- Other neutral grassland
- Bramble scrub
- Target notes

Surveyor: Vic Standing
Survey Date: 16.07.2025
Drawn by: Hana Ketley
Drawn Date: 20.01.2026
Reference: J25-000180_P2
Scale: 1:1000 @ A4

GES Greenspace Ecological Solutions

Figure 2: Waterbodies within 250m (J25-000180_P2 - King Farm - Access Rd)



Key

Red Line Boundary

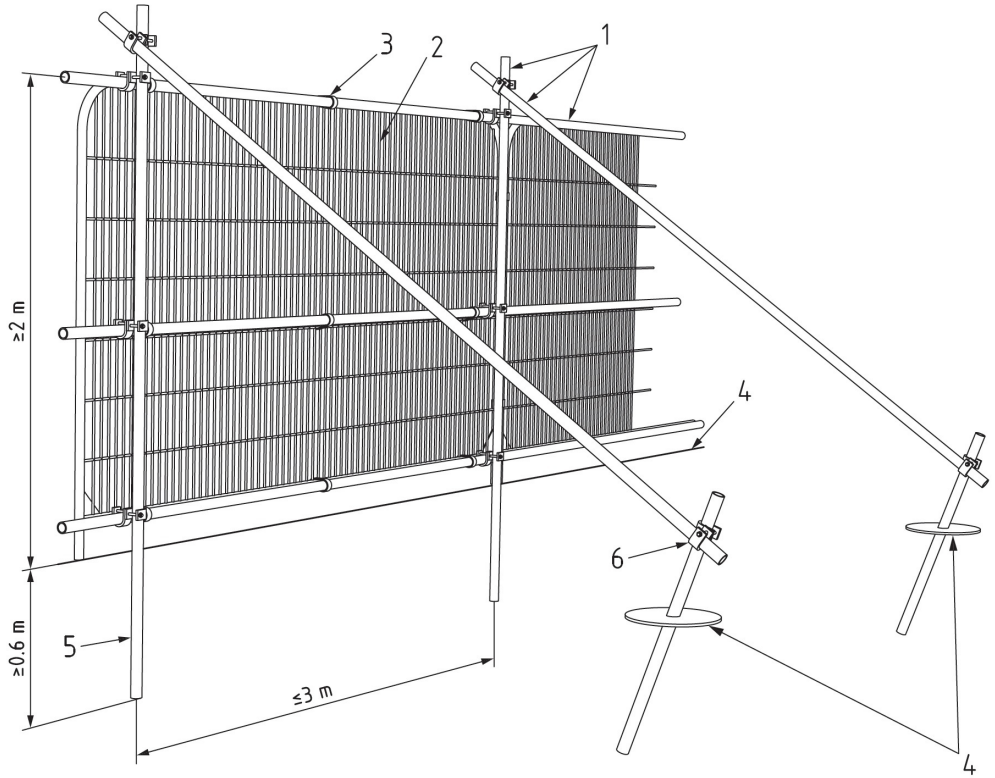
Waterbodies

Drawn by: Hana Ketley
Drawn Date: 20.01.2026
Reference: J25-000180_P2
Scale: 1:4000 @ A4

GES Greenspace Ecological Solutions

Figure 3: Tree Protection Measures (J25-000180_P2 - King Farm - Access Rd)

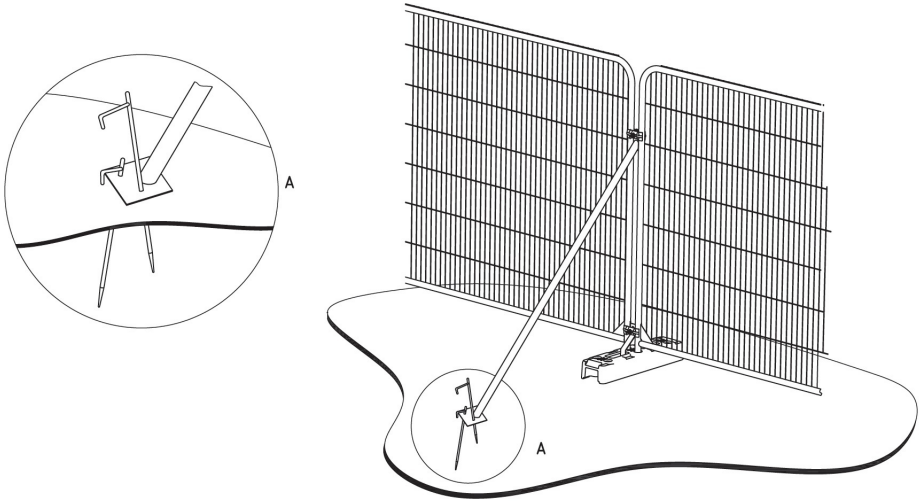
Default specification for protective barrier



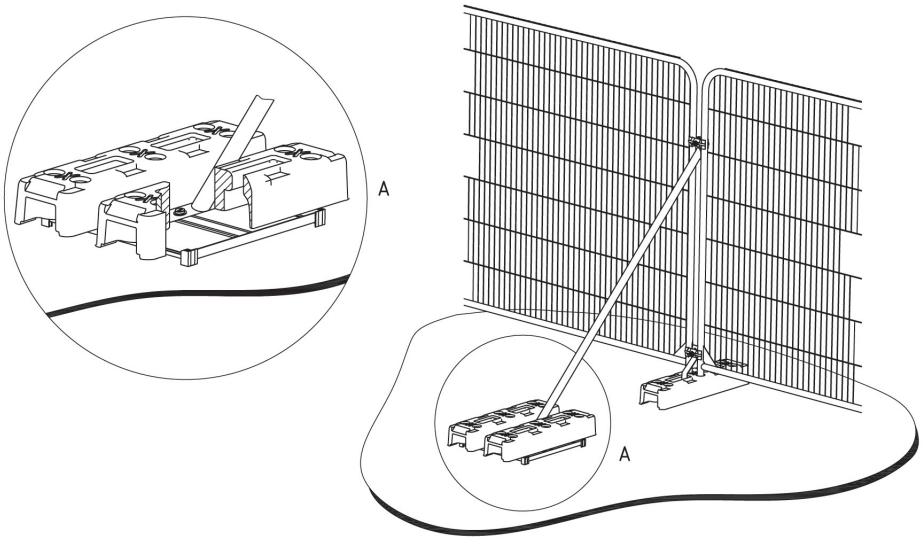
Key

1 Standard scaffold poles
2 Heavy gauge 2 m tall galvanized tube and welded mesh infill panels
3 Panels secured to uprights and cross-members with wire ties
4 Ground level
5 Uprights driven into the ground until secure (minimum depth 0.6 m)
6 Standard scaffold clamps

Examples of above-ground stabilizing systems



a) Stabilizer strut with base plate secured with ground pins



b) Stabilizer strut mounted on block tray

Drawn by: Hana Ketley
Drawn Date: 17.12.2025
Reference:

GES Greenspace Ecological Solutions

Appendices

APPENDIX A – Site Photographs

Photo 1: Other neutral grassland which forms the majority of the Site

Photo 2: Other neutral grassland

Photo 3: Tall forbs within grassland, in north west corner of the Site

Photo 4: Hedgerow H1

Photo 5: Tree line TL1

Photo 6: Tree line TL1

Photo 7: Tree Line TL2

Photo 8: Tree line TL3, with earth bank

	
Photo 9: Area of bramble scrub within the Site	Photo 10: Waterbody WB13

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 (December 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 Ashford Borough Council 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

- Policy ENV1 Biodiversity of the Ashford Borough Council Local Plan 2030 (Adopted 2019) seeks to ensure the protection of designated sites, the conservation of habitats and species of principal importance (HPI and SPI) listed under Section 41 (s41) of the NERC Act 2006 and protected species, as well as requiring biodiversity enhancement. Policy ENV1 is a strategic policy requiring biodiversity to be conserved and opportunities sought to incorporate and enhance biodiversity, in particular opportunities should be sought to connect and improve the wider ecological networks.