



Ashford's Tenterden and Rural Sites Development Plan Document,  
Examination in Public

Matter 9 Tier 3 and Other Settlements

Additional information by  
Kent Wildlife Trust

**Do the sites identified in the DPD represent the best strategy when considered against reasonable alternatives, with particular reference to:**

**9.5 effect on wildlife particularly at ALD1 and BID1**

**Policy BIDD1**

1. Kent Wildlife Trust originally objected to Policy BIDD1 as the site was recorded on the Kent Landscape Information System as Lowland Meadow which is a Biodiversity Action Plan habitat. We argued that Policy BIDD1 was not consistent with national policy contained within PPS9, regional policy contained within the South East Plan NMR5 or CS11 of Ashford Borough Council's Core Policy. Within all the policies noted above Local Authorities have a duty to conserve, enhance, create and add to Biodiversity Action Plan habitats and biodiversity in general, with Lowland Meadow being identified as a priority habitat in SS41 of the Natural Environment and Rural Communities Act 2006.
2. Since this time the Conservation Officer, Policy and Planning Debbie Salmon and Anne Waite, ecologist of Kent Wildlife Trust, have visited BIDD1 to assess the ecological value of the site on the ground. The assessment confirmed that the grassland contained within the site is semi improved lowland meadow with a number of lowland meadow indicators being found within the sward. It was also noted that an indigenous hedgerow was present around the periphery of the site which although slightly fragmented was an important part of the wider hedgerow network, a BAP habitat in its own right. The hedgerow was felt also to be important as it was likely to provide shelter for a number of bird species associated with the farmland habitat. House sparrow and starling were observed or heard on site. Both species are identified under the UK Biodiversity Action Plan as BAP species. A pond was present adjacent to the site which as well as being a BAP and Priority habitat was part of a complex of ponds and so could contain great crested newts protected under European law. We have since been advised that there are great crest newts within the pond, which are likely to use the ditch and hedgerow habitat during their terrestrial phase.

3. However Kent Wildlife Trust acknowledges that the grassland within the site has become very disturbed and much of the site contains poor or absent ground cover with the sward being kept short throughout the site. Much of the ecological interest is present around the periphery of the site within the hedgerow, boundary grassland and the ditch. Due to the poor condition of the site it was felt that providing appropriate mitigation was agreed to compensate for the Lowland Meadow habitat lost within the build, development on site could enhance the biodiversity whilst still delivering the 10 houses planned.
4. A meeting was set up between Kent Wildlife Trust, Rydon Homes and the present owner of the site Mr. E Seaton. Ecological surveys were currently being undertaken and there was no dispute regarding the need for mitigation. Therefore the enhancements below were agreed to ensure the conservation and enhancement of biodiversity within the proposed development in line with PPS9. The Trust would like to point out that this will only compensate for the habitats lost to the build and the BAP species that may be affected. Further mitigation may be required in relation to the great crested newts within the licensing process.
  - Hedgerows to be restored on the boundaries of the site to provide further habitat for bird great crested newt and reptile species.
  - A Lowland Meadow, neutral grassland, verge of at least 2 meters in width to be created adjacent to the proposed footpath, to improve the quality of the lowland meadow habitat on site and provide foraging habitat for bird, bat, reptile, great crested newt and invertebrate species.
  - A lowland meadow, neutral grassland, area to be provided within the site adjacent to the pond, to improve the quality of the lowland meadow habitat on site and provide foraging habitat for bird, bat, reptile, great crested newt and invertebrate species.
  - Bird or bat boxes to be erected on all the houses to enhance the roosting potential of the site for these species.
5. It is Kent Wildlife Trust's opinion that in the light of the habitat disturbance on site providing the above mitigation is included within policy BIDD1 then the policy will be consistent with the Key principals of PPS9 and NRM5 of the South East Plan. CS11 of Ashford's Core Strategy will be adhered to as BAP habitats

are being preserved and enhanced on site. We therefore recommend that the above enhancements be added to Policy BIDD1 to ensure soundness.

**Policy ALD1**

6. As stated within Kent Wildlife Trust's response to Regulations 27 we have no objections in principal to ALD1 being developed. However as we pointed out this site is situated in an ecologically sensitive area adjacent to neutral grassland on the eastern boundary and Quarry wood on the northern boundary. As the woodland has no designation, the grassland within the disused workings appears, from data held on KLIS, to be species poor and the site contains improved grassland which is not a BAP habitat, the Trust would not object to this site being developed. However care will be needed within the planning application process to ensure that the development does not impact on the adjacent woodland and grassland and consideration is given to improved management of the natural habitat within the vicinity as mitigation for any increased human pressure, in line with CS11.