

Helen Forster  
Biodiversity Officer  
Kent County Council

28<sup>th</sup> November 2019

Dear Helen,

**RE: Ecology Comments regarding:19/01411/AS Pinnock Yard, Pluckley**

Please find responses to your comments on ecology in bold below:

*GCN/Reptiles*

The ecological survey has assessed that there is limited potential for reptiles and great crested newts to be present within the site but detailed that a precautionary mitigation approach is required during the site clearance works. From reviewing the site photos, it appears that the site has some suitable habitat for reptiles and GCN when considered in conjunction within the surrounding habitat.

Therefore we are concerned that the proposed precautionary approach is not suitable – particularly as if any species are present they will be “pushed” on to land not within the applicant’s ownership. Prior to determination we advise that additional information is required detailing why the ecologist is satisfied that there is limited potential for reptiles/GCN to be present within the site and why the proposed mitigation is appropriate. We highlight that if the information is not sufficient there may be a need for species surveys/mitigation strategies to be submitted.

**While I appreciate the suitability of habitat in the wider area for reptiles, the habitat is extensive to the north and east of the site, and I would foresee that reptiles would be present within the wider landscape but not dependant upon the application site; which is of a small size, and is subjected to vehicular disturbance and strimming during the year. As such I feel that a precautionary method statement approach which foresees the checking and systematic removal of artificial refugia and potential vegetation cover to protect reptiles (if found), is considered to be appropriate, in this instance.**

**With regard to great crested newts, my overriding opinion is similar to the above. The site is located to the north of Smarden Bell Road, with a close board fence present along the roadside creating an obstruction between all nearby ponds and terrestrial habitat onsite, reducing access to the site via the boundary hedgerows to the west and north, or via the compressed gravel / hardstanding under the access gate to the south.**

**A small meta-population of great crested newts has been recorded between Ponds 5 and 6 approximately 270m south of the application site. The population is separated from the site by grazing pasture, a camping site and two B roads. The closest ponds to the application site; Pond 1, (35m south) and Pond 2 (85m south), have not been previously surveyed, however are positioned within the camping site surrounding by optimal bank side habitat, and amenity and rough grassland in the wider. The ponds were assessed to hold “good suitability” for GCN presence following HSI, however the history of the ponds is unknown. Pond 1 and 2 are over 150m from the known population, and direct connectivity is not anticipated due to the extent of grazing pasture present between the ponds, although hedgerow connectivity is considered to be optimal.**

**The application site falls into the core habitat area associated with a breeding pond (If GCN were present in Pond 1), however, the lack of water bodies to the north of the application site, the road and fence reducing suitability**

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**and connectivity to the application site and optimal connectivity to ponds to the south and west to the existing population suggest that the likelihood of finding GCN during site clearance works is low. As such a site specific method statement which restricts clearance timings, methodology, and secures compensatory habitat is considered a pragmatic approach.**

#### *Bats*

The structures on site were not fully surveyed due to a lack of access at the time of the survey – as they will be demolished as part of the proposed development we advise that a full internal and external examination of the buildings are carried out and results of the survey, and any recommended emergence surveys, are submitted prior to determination of the planning application.

**An updated plan has since been submitted to us from the client and the section to the west of the fence falls outside of the redline boundary as such the structures are no longer proposed for removal, however it is recommended that an internal inspection is undertaken to confirm the bat roost suitability assigned.**

I trust that this information is satisfactory to address your concerns

Yours Sincerely,

Lucinda Sweet MCIEEM

For and on Behalf of  
Brindle & Green Limited



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