

Betteshanger Biodiversity: An Analysis of the Ecological Appraisal

by Sue Sullivan for the Friends of Betteshanger

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Summary

This report relates to the proposed development at Betteshanger (planning application 20/00419. Address. Almond House, Betteshanger Sustainable Parks, Sandwich Road, Sholden CT14 0BF) A proposed development of 200 houses and associated development on the old colliery site at Betteshanger, has been submitted for outline planning permission to Dover District Council. An Ecological Appraisal by Aspect Ecology was submitted by Quinn Estates as part of the planning application.

At a time of unprecedented declines in habitats and species it is paramount that biodiversity is considered and protected. Knowing that much of the Betteshanger site has been rewilding for the past 30 years, I have conducted an analysis of the Ecological Appraisal submitted by Quinn Estates to see whether the habitat and wildlife on the site had been properly taken into account.

The Conclusion of this analysis was that the Ecological Appraisal was not fit for purpose, for the following reasons:

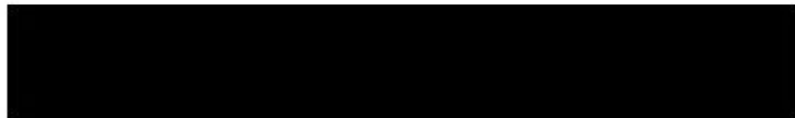
- **Section 5.1** - The Ecological Appraisal by Aspect Ecology does not fully adhere to the Dover District Council Local Requirements: Biodiversity and Geological Conservation 2013
- **Section 5.2** – The Appraisal does not fully conform to the requirements of the National Planning Policy Framework (NPPF) on habitats and biodiversity.
- **Section 5.3** - The Appraisal does not recognize and contribute to emerging Government policy on the Natural Environment as set out in the Environment Bill Summer Policy Statement July 2019.
- **Section 6** - The Appraisal does not fully adhere to the Standing Advice from Natural England Protected species: how to review planning applications.
- **Section 6.1** - The conclusions of the Appraisal are based on an unsuitable survey.
- **Section 6.2** - The survey was carried out at the wrong time of year.
- **Section 6.2** - The conclusions of the Appraisal, on the ecological interest of the site are currently based on surveys that found only 9 common flower species, 18 tree species and 37 bird species.
- **Section 6.2** - The East Kent Wildlife Group have recorded over 100 different bird species on the site including Red Listed species) and the Kent Botanical Recording Group have recorded 180 vascular plants(including rare and Red listed species) Their reports (see Appendix 1 and 2) are a much more reliable indication of the biodiversity value of the site.

- **Section 6.3 and 6.4** - The Appraisal does not provide sufficient information to allow Planning officers and the Planning committee to assess the effects of the proposed development on protected and priority habitats and species. Thus, they are not able to fulfil their statutory duty under the terms of the Natural Environment and Rural Communities Act 2006
- **Section 7 and 8** - There are serious omissions in relation to habitat and species.
- **Section 7 and 11** - Conclusions are drawn that are not justified by the content of the Appraisal.

About the Author: Sue Sullivan was invited to carry out an analysis of the ecological appraisal by the Friends Of Betteshanger. She has lived in East Kent all of her life and grew up in a local farming family. She has a life-long interest in ecology and the natural world.



Contact details for Friends of Betteshanger:



1. Introduction

This analysis shows that the ecological value of the site proposed for development has not been properly assessed and that the Ecological Appraisal by Aspect Ecology (see reference 1) and submitted with Quinn Estates for the proposed development at Betteshanger is not fit for purpose.

Given the alarming declines in U.K. wildlife and the Government's ambitions in its 25-year Environment Plan to leave the environment in a better state than found, ecological appraisal and surveying in respect of planning applications needs to be of the highest standards. The baseline appraisal needs to provide a true picture of the ecological value of the proposed development site, with detailed assessments of both protected and priority species and the effect or likely effect that the development would have on them. It then needs to detail how these effects on species will be avoided, mitigated or compensated for, according to the requirements of the National Planning Policy Framework (23).

This has not been achieved in the Ecological Appraisal by Aspect Ecology. There are major flaws, omissions and timing faults and the conclusions reached are often not justified by the content of the Appraisal.

Dover District Council Planning Officers and Committee need to have sufficient and correct information on the biodiversity of the site if they are to be confident that their legal and other responsibilities towards biodiversity are implemented when considering this planning application. This is entirely dependent on the quality of the Ecological Appraisal and surveys that Quinn Estates and Aspect Ecology submit.

2. Biodiversity at Betteshanger: Why does it matter?

2.1 Global context

“We are pushing our planet to the brink. Human activity – how we feed, fuel and finance ourselves – is taking an unprecedented toll on wildlife, wild places and the natural resources we need to survive.....On average we've seen an astonishing 60% decline in the size of populations of mammals, birds, fish, reptiles and amphibians in just over 40 years....We're facing a rapidly closing window for action and the urgent need for everyone – everyone – to collectively re- think and re- define how we value, protect and restore nature.”

From The Living Planet Report 2018 by World Wildlife Fund (2)