



9<sup>th</sup> January 2024

Ed Fosker  
West Suffolk House  
Western Way  
Bury St Edmunds  
Suffolk IP33 3YU

By email only

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*Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform West Suffolk Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.*

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**Application:** DC/23/1988/FUL  
**Location:** 2 Piperell Way Haverhill CB9 8QX  
**Proposal:** Planning application - a. seven units B2/B8 general industrial/storage and distribution units following demolition of existing offices and structures b. improvements to existing vehicular accesses

Dear Ed,

Thank you for consulting Place Services on the above application.

**Holding objection due to insufficient ecological information on European Protected Species (bats)**

**Summary**

No ecological information has been submitted for review relating to the likely impacts of development on designated sites, protected & Priority species and habitats and identification of proportionate mitigation. We have reviewed the plans and other information which has been submitted.

We are not satisfied that there is sufficient ecological information available for determination of this application. The proposals include the demolition of existing buildings and structures. Without further information relating bats and any potential roosts, it is not possible to fully assess the impacts upon bats.

We recommend that a Preliminary Ecological Appraisal Report, which includes a Preliminary Roost Assessment of buildings and a Ground Level Tree Assessment of the trees is provided so that the LPA can fully assess the impacts of the proposals. The Preliminary Ecological Appraisal should provide details of any survey results, mitigation & enhancement measures. These details are required prior to determination.



To fully assess the impacts of the proposal the LPA need ecological information for the site, particularly for bats, European Protected Species. These surveys are required prior to determination because Government Standing Advice indicates that you should “*Survey for bats if the area includes buildings or other structures that bats tend to use or there are trees with features that bats tend to use nearby*”.

The results of these surveys are required prior to determination because paragraph 99 of the ODPM Circular 06/2005 highlights that: “*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.*”

This information is therefore required to provide the LPA with certainty of impacts on legally protected species and be able to secure appropriate mitigation either by a mitigation licence from Natural England or a condition of any consent. This will enable the LPA to demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006 and prevent wildlife crime under s17 Crime and Disorder Act 1998.

Additionally, no biodiversity enhancement measures are identified in the documents provided. We recommend that, to secure net gains for biodiversity, as outlined under Paragraph 180d of the National Planning Policy Framework December 2023, bespoke biodiversity enhancement measures will need to be provided.

This is needed to enable the LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

We look forward to working with the LPA and the applicant to receive the additional information required to support a lawful decision and overcome our holding objection.

Please contact us with any queries.

Yours sincerely,

**Hayley Dean ACIEEM MSc BSc (Hons)**

Ecological Consultant

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Place Services at Essex County Council

**Sue Hooton CEnv MCIEEM BSc (Hons)**

Principal Ecological Consultant

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**Place Services provide ecological advice on behalf of West Suffolk Council**

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

