



4th June 2021

Lindsey Wright
West Suffolk Council

By email only

Thank you for requesting advice on this application from Place Services' landscape and ecological advice services. This provides advice to planning officers to inform West Suffolk Council planning decisions with regard to potential landscape and 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.

Application: DC/21/0792/FUL
Location: Plot 1 S R Builders Station Road Haverhill Suffolk
Proposal: Planning application - five flats (following the demolition of industrial building)

Dear Lindsey,

Thank you for consulting Place Services on the above application.

With reference to the above named application and submitted documents received by Place Services on the 10/05/21, asking for Ecology comments. As per the agreed timescale, our comments on the Planning Application as submitted are provided below:

Ecology

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

We have reviewed the documents supplied by the applicant, relating to the likely impacts of development on Protected & Priority habitats and species, identification of proportionate mitigation.

We are not satisfied that there is sufficient ecological information available for determination of this application.

No ecological documents have been submitted as part of this application. A desk survey on the Multi-Agency Geographic Information for the Countryside (MAGIC) map identifies that a European Protected Species licence for bats has been granted within approximately 5km of the development and there are several Priority habitats, including deciduous woodland and lowland calcareous grassland within 1km of the site.

All bat species in the UK are protected under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006. Bat species will utilise spaces such as cracks, crevices, loose tiles and roof spaces in buildings.



Therefore, the proposed demolition of the existing building has the potential to impact bat roosting habitat.

We therefore recommend that a Preliminary Ecological Appraisal, including a Preliminary Roost Assessment, is undertaken by a suitably qualified and experienced ecologist to assess the impacts of the development on designated sites, protected and Priority species and habitats. This report should also include any appropriate precautionary mitigation measures and propose reasonable enhancements for biodiversity. If any further bat surveys are recommended, these should be completed prior to determination.

This information is necessary, prior to determination, as paragraph 99 of the ODPM Circular 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 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 me with any queries.

Yours sincerely

Sue Hooton CEnv MCIEEM BSc (Hons)

Principal Ecological Consultant

Place Services at Essex County Council

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.