

Planning reference DC/25/0962/FUL

The Vixen Millfields Way Haverhill Suffolk CB9 0JB

Planning application - change of use and construction of second floor extension to existing public house to create nine flats (class C3 and three commercial units (class E)

Ecology comments 27 October 2025

Information submitted and reviewed

- Amended – Proposed Landscaping Plan (RUS-06 REV A)
- Amended – Biodiversity Net Gain Metric (Matt Liston, May 2025)
- Biodiversity Report
- Application Form
- Amended – Proposed Block Plan (RUS-06 REV A)
- Amended – Site Location Plan (RUS-01 REV A)
- Preliminary Ecological Appraisal Report (ML-Ecology, March 2025)
- Bat activity survey report (ML-Ecology, September 2025)
- Ecology Comments (July 2025)

Ecology comments

Adequacy of Information

Previous ecology comments dated 9 July 2025, state:

The Preliminary Ecological Appraisal Report (ML-Ecology, March 2025) lacks context as no desk study has been provided. The purpose of the desk-based study is to inform on nearby designated sites, protected species, and invasive species.

The site is within 200m of a County Wildlife Site, with good connectivity. There are recent records of a Biodiversity Priority Species (common toad) and multiple Protected and Notable Species (starlings, house sparrows and swifts) within 200m of the site. These need to be fully considered and therefore, a full desk study is required in the Preliminary Ecological Appraisal Report (PEA).

It does not appear the applicant has submitted any amended or additional Preliminary Ecological Appraisals to include a full desk study.

Bats

The PEA (ML-Ecology, March 2025) recommended the following:

two nocturnal emergence surveys are undertaken within the period May to August to confirm the presence or absence of roosting bats.

Emergence surveys are outlined in the Bat activity survey report (ML-Ecology, September 2025) and prove the likely absence of bat roosts within the building impacted by the proposed works. No further surveys for bats are required but mitigation and enhancement measures, as outlined in the Bat activity survey report

(ML-Ecology, September 2025), must be conditioned. Additionally, a wildlife sensitive lighting design scheme will be required for any external lighting.

Nesting Birds

As previously stated in ecology comments:

The PEA states there is potential for nesting birds within the existing building and scattered scrub on the site. However, no construction management proposals, mitigation, or enhancement measures have been proposed regarding nesting birds.

It does not appear that any construction management proposals, mitigation or enhancement measures have been proposed for nesting birds. This must be received and reviewed prior to determination.

Reptiles

Previous ecology comments state:

The debris, overgrown vegetation, and logs, shown photographically across the site in the Preliminary Ecological Appraisal, BNG Metric and Phase One Land Contamination Assessment (Castledine Environmental, April 2025), could potentially support reptiles. As such a precautionary methodology for site clearance of habitat suitable for reptiles is required.

It does not appear a precautionary methodology for site clearance of habitat suitable for reptiles has been submitted by the applicant. This must be received and reviewed prior to determination.

Biodiversity Net Gain (BNG)

Red line

The red line boundary is inconsistent when comparing the Phase 1 Habitat Survey Map found in the Preliminary Ecological Appraisal (ML-Ecology, March 2025) with the amended Block plans and Location plan. The red line must be consistent to ensure that the BNG metric is completed accurately. It does not appear that any updated pre-development habitat mapping has been submitted to reflect the changes to the BNG metric.

The amended location plan shows a site area of approximately 1196 square meters; this is consistent with the area recorded in the amended BNG metric.

Applicants' confirmation that BNG applies or not

The site is subject to statutory biodiversity net gain.

Pre-development Biodiversity Value

The updated BNG metric identifies pre-development on site habitats as developed land; sealed surface and mixed scrub. This appears to be accurate from aerial photography of the site. However, no amended pre-development mapping has been shown to reflect the amended BNG metric.

Government guidance ([Biodiversity net gain: what local planning authorities should do - GOV.UK](#)) states that developers must provide *a plan drawn to an identified scale (including the direction of north), showing on-site habitat existing on the date*

of application (or an earlier date), and any irreplaceable habitat at application stage. An up-to-date map is therefore required prior to any approval being granted.

Metric calculation tool

The Biodiversity Net Gain Metric shows a 21.18% biodiversity net gain.

Biodiversity Gain Hierarchy

Government guidance states that *in relation to all onsite habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains and finally the purchase of biodiversity credits.*

The current proposals for on-site habitat creation are therefore appropriate.

The proposed plans do not indicate significant on-site enhancements and therefore no Habitat Management and Monitoring Plan (HMMP) will be required.

Conclusion

Holding objection.

The applicant needs to submit the following:

- An amended Preliminary Ecological Appraisal, to include:
 - A desk study
 - Mitigation and enhancement measures relevant to any additional information from a desk study
- Working method statements for breeding birds and reptiles
- An amended pre-development habitat map to reflect changes in the redline boundary and BNG metric.

More information is required to inform on any conditions that may apply, should planning permission be granted.