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Preliminary Ecological Appraisal

Survey site:

Land at Sturmer Hall, Church Walk, Haverhill, Essex, CB9 7XD

Client:

AGORA Architects LTD

Survey date:

16th September 2025

Project:

This report is prepared to inform a planning application submitted to Braintree District Council. The proposal is described as:
The construction of 12-15 Care Bungalows and a new SEN School.

PEA survey methodology and legislation can be found in the Arbtech Supplement: [PEA Methodology and Legislation - 2024.](#)

The site survey was undertaken by Craig Williams BSc, MSc, DIC, MRSB (Natural England Protected Species Licence Numbers: [Bats] (2018-33540-CLS-CLS) [Great Crested Newts] (2015-16682-CLS-CLS) [Barn Owls] (CL29/00097))					
Date of survey	Temperature (°C)	Humidity (%)	Cloud Cover (%)	Wind (km/h)	Rain
16/09/2025	16	86	90	16	None

Ecological Survey Factor	Detailed using desk study and site survey (carried out under good weather conditions). Any specific limitations noted within relevant section. This table may include further work you will need to commission (if any) to obtain planning permission or comply with legislation for other consent. All clients are expected to read and understand this section, or to contact the lead surveyor for advice.
Conclusion, Impact or Recommendations	Habitats and plants (see habitat map in appendix 1, location plan in appendix 2, proposal plan in appendix 3 and in photos appendix 4). Botanical species are described with reference to the DAFOR scale (D = Dominant; A = Abundant, F = Frequent, O = Occasional, R = Rare).
<p><i>Summary of Survey Findings</i></p> <p><i>(UKHab codes used)</i></p>	<p>The survey area is centred on National Grid Reference TL 6889 4380 and has an area of approximately 4.22ha</p> <p>The wider site consists of a hotel (Sturmer Hall), a church (St Mary's) and estate buildings set in grass lawns including a large expanse to the west. The site has many scattered trees and tree lines. A large pond is present in the south, with a curved ornamental pond in the centre.</p> <p>The site is surrounded by large arable fields, extending at least 200m in all directions and significantly more to the west, south and east with the main road located ~270m north-east down a long driveway. Small wooded copses are scattered in the vicinity, including along the south-western site boundary, 130m south-east and 200m south. Aside from the two ponds on site, no others are known within 500m.</p>

	<p>The PEA survey site is defined as the area of which works are being considered, rather than the entire ~9ha owned site.</p> <p><u>Site Habitat descriptions</u></p> <p><u>Developed, sealed surface (buildings) [u1b5]</u></p> <p>There are several small outbuildings within the survey area, including the main house, the southern staff building and a small concrete block garage building in the western gravel yard. This has a sloped, felted roof, uncovered eaves and metal garage doors on the south side. The habitat has no associated condition score.</p> <p><u>Developed, sealed surface [u1b6]</u></p> <p>A section of concrete standing is located between the eastern and western gravelled areas. The habitat has no associated condition score.</p> <p><u>Developed, unsealed surface [u1c]</u></p> <p>A gravel driveway runs from the entrance of the site to the estate management area in the south, and then north into the field. A large gravel storage yard is present in the west of the site, although it is becoming overgrown (see ruderal/ephemeral below). Smaller gravel areas are also areas present, with shipping containers and the mobile home situated on them in the south of the site. The habitat has no associated condition score.</p>
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Modified grass [g4]

The site has large areas of mown, modified grass lawn, including a picnic area south of the hotel and driveway, the large western and northern field and a smaller lawn in the north-east behind trees. It is patchy in places. Using the Biodiversity Net Gain (BNG) condition scoring assessment, the grass parcel on site would be rated as poor as it would all fail mandatory criterion A (species diversity is consistently below 6/m²). Perennial rye grass dominates, and typical forb species encountered include creeping buttercup, daisy, dandelion, ribwort plantain and yarrow. Significant rabbit evidence is observed through digging throughout.

Bramble scrub [h3d]

A bramble dominated scrub is found north of the western gravel car park and yard, on an earthen bank, with small sycamore trees occasional. Nettle, hogweed and elder are also found. A rabbit warren is found in bank in the north-east east of site, recently a trimmed from scrub but included within the habitat as it is likely to regrow. The habitat has no associated condition score.

Sparsely vegetated land, ruderal/ephemeral [u1f 81]

A stand of ruderal plants grows over the gravel in the west of the storage yard (including in the habitat where vegetation covers more than 50% of the ground). Mayweed and bristly oxtongue are most common, also with willowherb and barren brome. Scores 'poor' in BNG condition score due to a lack of vegetation structure (failing criteria A), and a lack of diverse plants (failing condition B). It has no non-native species (passing criteria C).

	<p><u>Ornamental garden [u1d]</u></p> <p>A series of flowerbeds are found around the site.</p>
<p><i>Foreseen Impacts</i></p>	<p>Areas of lawn are likely to be lost for the proposals (construction), and small parts of the bramble scrub could also be removed. None of the trees or linear features in the wider owned site are anticipated to be affected.</p>
<p><i>Recommendations</i></p>	<p><u>Biodiversity Net Gain</u></p> <p>A biodiversity net gain (BNG) will likely be required for the proposed development, as although the current proposals are unknown, more than 25m² of habitat with non-zero value will probably be removed, exceeding the limit for the de minimis exemption. The project is also unlikely to proceed under a householder planning application, or be self/custom build, which are other exemptions to BNG.</p> <p>The BNG will show the baseline habitat value for the site, and any net losses in area or area habitat would need compensation for either on site, off-site using habitat units, or as a last resort, statutory credits following the BNG hierarchy.</p> <p>The redline boundary used in the planning application should be tailored to the foreseen impacts of the proposal to the on-site habitats (removal, decrease in condition through management etc). It should not include large areas of habitat that are unaffected and are to be retained, as this will artificially raise the habitat baseline and make a net gain of a least 10% unwarrantedly more difficult to achieve.</p>

	<p>Whichever method (or combination) is chosen for the compensation, biodiversity Gain Plan (BGP) will be required after planning approval. This must include:</p> <ul style="list-style-type: none"> a) information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat b) the pre-development biodiversity value of the onsite habitat, c) the post-development biodiversity value of the onsite habitat, d) any registered offsite biodiversity gain allocated to the development and the biodiversity value of that gain in relation to the development, e) any biodiversity credits purchased for the development. <p>➤ The management and monitoring of any significant habitat to the appropriate condition either on site will need to be accompanied by a Habitat Management and Monitoring Plan (HMMP) secured for at least 30 years - linked to the application through a planning obligation in Section 106 (S106) agreement.</p>
Locality and Designated Sites	
<i>Summary of Survey Findings</i>	The site is not subject to any statutory or known non-statutory designation, and none are found in the locality.
<i>Foreseen Impacts</i>	No direct impacts on any designated statutory or non-statutory site are foreseen from the development proposals either through construction or operation.
<i>Recommendations</i>	None recommended.
Invasive / Non-native species	

<i>Summary of Survey Findings</i>	No problematic invasive or non-native species recorded on site.
<i>Foreseen Impacts</i>	N/A
<i>Recommendations</i>	No further surveys but remain vigilant.
Invertebrates	
<i>Summary of Survey Findings</i>	No significant habitat for protected or notable invertebrates is found within the survey site.
<i>Foreseen Impacts</i>	None foreseen.
<i>Recommendations</i>	No further surveys.
Bats	
<i>Summary of Survey Findings</i>	The building within the development site are considered unlikely to be used as bat roosting habitat due to a lack of observed features. No scattered trees are found within the survey area.
<i>Foreseen Impacts</i>	None foreseen on roosting bats, however any Increased spill on the retained tree lines/hedges around the siter may disrupt commuting/foraging bats.
<i>Recommendations</i>	<p><u>Lighting</u></p> <p>Lighting mitigation may be required based on the outcome of the night bat survey(s) to retain dark corridors.</p> <p>A low impact lighting strategy will be adopted for the site during post-development which outlines the areas of the site that will be retained as dark corridors. Parameters can be found on the Bat Conservation Trust website:</p> <p>https://www.bats.org.uk/our-work/buildings-planning-and-development/lighting-2</p>

	<p><u>Enhancement</u></p> <p>Bat boxes could be incorporated into the site as part of a wider ecological enhancement plan.</p>
Birds	
<i>Summary of Survey Findings</i>	Birds could nest across the survey site, in the building and bramble scrub. No habitat for schedule 1 birds was observed.
<i>Foreseen Impacts</i>	Nesting birds may be impacted when the building/scrub are removed for the proposal.
<i>Recommendations</i>	<p>Standing advice for nesting birds:</p> <p>Any vegetation removal should be undertaken outside the period 1st March to 31st August. If this timeframe cannot be avoided, a close inspection of the building and vegetation should be undertaken immediately prior to the commencement of work. All active nests will need to be retained until the young have fledged.</p> <p>Precautions should be taken with machinery and noise levels when working close to any retained nests so as not to disturb any nearby nesting birds during construction works. At least a 3-5m buffer should be created between any machinery and active nests until the young have fledged.</p> <p><u>Enhancement</u></p> <p>A range of different bird boxes could be installed on retained trees/new buildings as part of the ecological mitigation, enhancement and management plan.</p>
Reptiles	
<i>Summary of Survey Findings</i>	The short lawn grass across the site are not considered suitable for common reptiles, however the small area of bramble scrub and ruderal herb across the gravel yard could be used by small numbers of reptiles

	<p>within the active season, although the site itself is rather isolated from other suitable habitats (surrounded by large arable fields). The site is a significant distance from European protected species of reptiles</p>
<p><i>Foreseen Impacts</i></p>	<p>The proposal could injure or kill individual reptiles without mitigation.</p>
<p><i>Recommendations</i></p>	<p>Owing to the nature of the proposed development and the low potential for impacts to reptiles, further surveys are considered to be disproportionate. A precautionary working method will be implemented for reptiles during construction, including the following measures:</p> <ul style="list-style-type: none"> • A toolbox talk will be given to contractors regarding the possible presence of reptiles at the site. • A pre-commencement inspection of the site will be undertaken reptiles. • A staged approach will be adopted for scrub clearance, whereby the vegetation will be strimmed to 15cm and left overnight to allow any reptiles to disperse. The vegetation can then be cleared to ground level and must be maintained at this level for the duration of construction to deter reptiles from the working area. • Any rubble piles will be dismantled by hand and debris and brash will be stored on pallets or removed from the site to prevent reptiles from utilising these areas. • Best practice pollution prevention measures will be implemented to minimise impacts to retained habitats that reptiles could use. • Any chemicals or pollutants used or created by the development should be stored and disposed of correctly according to COSHH regulations. • If any common reptiles are found in the working area these should be moved by hand to a vegetated area along the site boundaries or in retained habitats away from disturbance. <p><u>Enhancement</u></p>

	<p>Refugia/hibernacula could be installed around the site, and grass meadow areas could be created as part of the ecological mitigation, enhancement and management plan.</p>
<p>Amphibians</p>	
<p><i>Summary of Survey Findings</i></p>	<p>There are two ponds within the wider owned site, one larger round example in the south of the site, fringed by willow trees, pendulous sedge and common reed and another, much shallower curved pond near the main hotel building, which is very shallow, full of leaves from fringing willow and horse chestnut and without any fringing or emergent aquatic plants. The southern pond may provide aquatic habitat value for protected amphibians the curved pond is very unlikely to. The ponds on site are, however, rather isolated from any others within the locality, with none within 500m making a metapopulation in the landscape more difficult.</p> <p>The survey area of the site has very limited terrestrial habitat value for protected amphibians, with closely mown lawn and hard standing/gravel the dominant habitat types. Small areas of bramble scrub are present, however the closest within the survey site is ~40m across an unvegetated car parking area.</p> <p>There are no great crested newt European Protected Species License (EPSL) or previous licence return records of presence within 1.5km of the survey site.</p>
<p><i>Foreseen Impacts</i></p>	<p>The survey site lies in a Natural England GCN Risk Zones (Kent) i.e contain main population centres for GCN and comprise important connecting habitat that aids natural dispersal.</p> <p>Although the survey site is close to a pond with a possible great crested newt presence, with suitable avoidance mitigation and compensation measures (see below), impacts to individual animals and their habitats could be avoided.</p>

<p><i>Recommendations</i></p>	<p>The following excerpt is taken from the great crested newt method statement document:</p> <p><i>Many potentially licensable activities can be avoided by careful planning of the development combined with simple precautionary measures. In many cases, adopting such an approach may mean that no licence is required (as no offence would be committed).</i></p> <p>Therefore, instead of further surveys on the pond and a possible European protected species licence or a district level licence, this project is a good candidate to progress under a <u>non-licensable mitigation plan</u>.</p> <p>This will outline a set of mitigation measure that will be put in place to ensure that no great crested newts will be harmed by the development work in the wider site away from the pond in suboptimal habitats, including mowing the development area and any required access to ground level, the creation of suitable habitat away from the development area to draw newts away from it, timings (works on suitable newt habitat when they are unlikely to be present), ecological supervision of the works, and measures to help newts escape excavations in the unlikely event if they were to commute into the development site e.g. ramps.</p> <p>These measures would avoid offences being caused, and therefore the need for the newt licence.</p> <p><u>Enhancement</u></p> <p>Refugia/hibernacula could be installed around the site, and grass meadow areas could be created as part of the ecological mitigation, enhancement and management plan</p>
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Badger	
<i>Summary of Survey Findings</i>	No evidence of badgers was observed on site or are suspected within 30m based on a lack of field signs (a rabbit warrens was found).
<i>Foreseen Impacts</i>	None foreseen based on the current level of activity of the hole.
<i>Recommendations</i>	<p>As badger activity is dynamic and badgers are known to be present within the local area, an update survey of the site and a 30m buffer area around it should be conducted within three months of the start of work (before any begin) to assess for any new sett holes. (permission for the survey should be secured beforehand for third party land).</p> <p>If active and impacted by the works, a licence would be required to exclude badgers from the sett either temporarily or permanently. These licensable actions can only be undertaken from July-November.</p> <p>Basic precautionary mitigation during works is also recommended:</p> <ul style="list-style-type: none"> • Any excavations will be covered overnight, or a ramp will be installed to enable any trapped animals to escape. • The use of night-time lighting will be avoided, or sensitive lighting design will be implemented to avoid light spill on to habitats which badgers could use. South and west boundaries. • Any chemicals or pollutants used or created by the development should be stored and disposed of correctly according to COSHH regulations. <p>In the unlikely event that a badger sett is identified within 30m during construction, works must cease and advise must be sought from a suitably qualified ecologist.</p>

Riparian animals	
<i>Summary of Survey Findings</i>	There are no watercourses on site or adjacent, although a seasonal ditch runs along the driveway outside of the survey area. No field signs e.g. of otters or water voles were observed anywhere on site. No EPSLs for riparian mammals are known in the local area.
<i>Foreseen Impacts</i>	None foreseen from the proposal
<i>Recommendations</i>	No further surveys are required.
Hazel dormouse	
<i>Summary of Survey Findings</i>	No previous dormouse EPSLs are found in the vicinity. No dormouse habitat is present within the survey site.
<i>Foreseen Impacts</i>	None foreseen from the proposal
<i>Recommendations</i>	No further surveys are required.
Other e.g. hedgehog	
<i>Summary of Survey Findings</i>	Hedgehogs and other small mammals may be found in the boundary woodland and interior shrub.
<i>Foreseen Impacts</i>	None foreseen from the proposal.
<i>Recommendations</i>	No further surveys are required. The badger mitigation above will also protect other small mammals. <u>Enhancement</u> Hedgehog houses could be installed around the site as part of the ecological mitigation, enhancement and management plan.

Appendix 1: Survey/Habitat map



Appendix 2: Location map



Appendix 3: Proposed plan



Site Plan
Scale 1:1250

AGORA ARCHITECTS
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Key/Date

Development Zone
 - Red line: Development Zone
 - Orange line: East of area 3/20/04
 - Green line: Contained area
 - Blue line: Level within the control of the client.

Site Key

- 1. SUITE 1/2/3
- 2. Signage/Storage and Workshop
- 3. Admin and Management Centre
- 4. New Educational Support
- 5. Storage (Subsidiary Support Living)
- 6. Staff Concession to Specialist Care Living
- 7. New Kitchen Office and Accommodation

Other Key

- D. Drop Off Zone
- P. Parking (Secondary)
- M. Main Parking Zone

Rev/Date

- A. Final Issue 2020
- B. Car Park Redesign 2020
- C. Car Park Redesign - Parking Removal 2020
- D. Car Park Redesign - Parking Removal 2020

Scale 1:250

0m 25m 50m

North is as shown on the plan
PROPOSED SITE PLAN

A1 N
 P12 04 20 101 104 00 1400

Appendix 4: Photos



Photo 1: Looking south-east across the southern lawn picnic area adjacent to the driveway.



Photo 2: Looking north across the southern lawn picnic area.



Photo 3: Looking west across the concrete standing area towards the western gravel car park.



Photo 4: Looking east across the concrete standing area at areas of gravel under shipping containers and the mobile home.



Photo 5: Gravel overflow parking area and bramble scrub on bank.



Photo 6: Grass lawn in the north of the site.



Photo 7: Looking east across the western gravel storage yard, with ruderal herb and the garage building.



Photo 8: Looking north at the garage building within the storage yard.

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Version control			
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