



07 May 2024

Savannah Cobbold
West Suffolk Council

By email only

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.

Application: DC/24/0366/FUL
Location: The Fox Ph Haverhill Road Little Wratting Suffolk CB9 7UD
Proposal: Planning application - a. one convenience store b. one drive-through coffee shop with associated parking and landscaping (following demolition of existing public house)

Dear Savannah,

Thank you for consulting Place Services on the above application.

Holding Objection due to insufficient ecological information on European Protected Species (Bats) and Priority habitats (Deciduous Woodland).

Summary

We have reviewed the submitted documents, including the Application for Planning Permission (2024), the Existing Site and Location Plans (Wellsfield Associates, April 2023), Existing Site Block Plan and the Proposed Site Block Plan (both produced by Wellsfield Associates, November 2023).

We note that no ecological reports have been provided as part of this application. Therefore, we have carried out a desk study to confirm the likely impact upon designated sites, protected and Priority species & habitats. This included a review of local records, MAGIC Map and aerial imagery.

From conducting the short desk study using MAGIC, it has been identified that the site lies within the Impact Risk Zone for Trundley and Wadgells Woods, Great Thurlow SSSI. However, the proposed development does not fall within the listed categories and therefore there is no requirement for the LPA to consult Natural England.

Furthermore, the desk study confirmed no potential impacts upon designated sites, protected and Priority species. However, the existing building holds the possibility of having suitability for roosting



bats and a 1.4-hectare parcel of Lowland Mixed Deciduous Woodland Priority habitat is located immediately adjacent to the southwest of the site.

All bat species are EPS listed under Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (as amended). It is a criminal offence to kill, harm, disturb, capture, possess or sell (alive or dead) an EPS, or to destroy/damage/obstruct access to any of the breeding or resting places of an EPS. We are not satisfied that there is sufficient information available for determination due to the proposals of the demolition of the existing public house having the potential to affect any potential roosting bats and the adjacent Priority habitat. The applicant therefore needs to arrange for a Preliminary Roost Assessment (PRA) for bats, to be carried out following standardised methodologies, by a suitably qualified ecologist. This is necessary to inform the need for further bat surveys and mitigation measures and if necessary, a mitigation licence from Natural England.

To fully assess the impacts of the proposal the LPA need ecological information for the site, particularly for Bats. The survey is 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.

In addition, we recommend that the applicant’s ecologist also prepares a Preliminary Ecological Appraisal report to assess the potential for impacts from the development which could affect the adjacent Priority woodland habitat and Priority species with any mitigation measures considered necessary.

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,

Hannah Coutts BSc (Hons)

A Qualifying member of CIEEM

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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.