



20<sup>th</sup> July 2022

Lindsay Trevillian  
Uttlesford District Council  
London Road  
Saffron Walden  
CB11 4ER

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 Uttlesford District 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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**Uttlesford DC Reference: UTT/22/1040/PINS**

**PINS Reference: S62A/22/0000002**

**Location: Former Friends School Mount Pleasant Road Saffron Walden CB11 4AL**

**Proposal: Consultation on S62A/22/0000002 for conversion of buildings and demolition of buildings to allow redevelopment to provide 96 dwellings, swimming pool and changing facilities, associated recreation facilities, access and landscaping**

Dear Lindsay,

Thank you for re-consulting Place Services on the above application.

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

**Summary**

We have reviewed the documents supplied by the applicant including the Biodiversity Validation Checklist (Savills (UK) Ltd., April 2022), updated Ecological Impact Assessment (CSA Environmental, June 2022), Tree Protection Plan, drawing no. 1642-KC-XX-YTREE-TPP01RevA (Keen Consultants, March 2022) and Tree Survey and Impact Assessment (Keen Consultants, March 2022) relating to the likely impacts of development on protected & Priority habitats and species and identification of proportionate mitigation.

We are still not satisfied that there is sufficient ecological information available for determination of this application. Although we have had clarification on the bat roosting potential of the trees and some of the buildings, we are not satisfied that building B12 has had sufficient coverage during the bat emergence surveys.

Table E.1 of the Ecological Impact Assessment (CSA Environmental, February 2022), previously reviewed, states that air vents on the eastern and western gables ends of the pitched roof provide potential access points for bats. The roof void of this section of the building was also said to be inaccessible. The Bat



Survey Results Plan, drawing number CSA/4017/106 does not show a surveyor covering the western aspect of building B12. The reference to the air vents on the western gable has now been removed from the updated Ecological Impact Assessment (CSA Environmental, June 2022) despite the air vents being present on the western aspect (as seen from Google Street View, accessed July 2022). Justification as to why the western aspect of B12 was not surveyed has not been provided.

Further information as to why the western aspect of building B12 was not surveyed or results of appropriate emergence/re-entry surveys, in line with best practice guidance (Collins, 2016), should be provided.

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."*

In addition, Table E.2 shows that three of 27 trees to be removed have low potential to support roosting bats, therefore paragraph 5.12 is incorrect when it states that 'all trees with potential to support roosting bats are to be retained...'. Trees with low potential to support roosting bats do not require further surveys to be undertaken on them but should be soft-felled to protect any bats that happen to be roosting within them at the time of felling, in line with best practice guidance.

This information is therefore required to provide the LPA with certainty of impacts on legally protected and Priority 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.

Subject to the above further information required, we support the proposed biodiversity enhancement measures including the provision of wildlife-friendly species, scattered trees, wildflower grassland and flowering lawns in the landscape strategy and the installation of at least 8 no. bat boxes/and or bat tiles, 8 no. bird nesting boxes and Hedgehog gaps. This is in addition to the mitigation required for the loss/modification of bat roosts on site. Bat loft voids should be incorporated into the mitigation strategy on site. The biodiversity enhancement measures have been recommended to secure net gains for biodiversity, as outlined under Paragraph 174d and 180d of the National Planning Policy Framework 2021. It is recommended that further bird and bat boxes could be installed on site with integrated boxes installed on new buildings. Integrated Swift boxes should also be considered where possible. Log piles to enhance the site for sheltering mammals, amphibians and invertebrates should also be provided. A Biodiversity Enhancement Strategy should be secured by a condition of any consent. The management of the habitats provided on site as enhancements should be outlined within a Landscape and Ecological Management Plan (LEMP) and secured by a condition of any consent.



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

**Ella Gibbs ACIEEM BSc (Hons)**

Senior Ecological Consultant

Place Services at Essex County Council

[placeservicesecology@essex.gov.uk](mailto:placeservicesecology@essex.gov.uk)

**Place Services provide ecological advice on behalf of Uttlesford District 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.