FORMER FRIENDS SCHOOL PLAYING FIELD SAFFRON WALDEN

ECOLOGICAL IMPACT ASSESSMENT (EcIA)

ACD ENVIRONMENTAL

Ecology
Archaeology
Arboriculture
Landscape Architecture

CHASE NEW HOMES

The Excitement is Building

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QUALITY ASSURANCE

This report has been prepared in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Report Writing (2nd Edition, December 2017).

The facts stated in this report are true to the best of our knowledge and belief, and any opinions expressed are held genuinely and in accordance with the accepted standards of the profession. ACD Environmental Ltd is a CIEEM Registered Practice.

Client:	Chase New Homes
Site/job:	Former Friends School, Saffron Walden
Author:	Brian Hicks
Technical review:	Lisa Durrant

CONTENTS

1 EXECUTIVE SUMMARY

Purpose of report	To assess the ecological impacts of a proposed development at Former Friends School Playing Fields, Saffron Walden clearly identifying any 'significant effects' on important ecological features (including designated sites or protected species) and detailing any mitigation and/or compensation measures required, and how these could be secured. The report also confirms how the proposed development could achieve Biodiversity Net Gain.
Description of proposed development	Full planning permission is being sought for '*Erection of 91no. dwellings with associated infrastructure and landscaping. Provision of playing field and associated clubhouse.'*
Brief description of the Site	The proposed development site (hereafter referred to as the Application Site) is a parcel of land comprising grassland, trees, scrub, and woodland. It is located adjacent to the former Friends School, which is in the process of redevelopment.
Designated nature conservation sites	No designated sites will be affected due to the distance from the Application Site.
Key habitats	The most valuable habitats present within the Application Site comprise the woodland and lines of trees, which will be retained.
Key species	Habitats on site are suitable for nesting birds, foraging and commuting bats, and foraging and commuting badger. Hedgehog may also enter the site.
Key impacts & mitigation/ compensation measures	Mitigation to prevent harm to nesting birds and any mammals which may enter the site is described within this report. Lighting proposals will be designed with the requirements of foraging and commuting bats in mind.
Enhancements	To contribute to Biodiversity Net Gain, the woodland will be enhanced from a moderate condition to a good condition, and areas will be set aside for wildflower and meadow seed mixtures. A green roof will be installed on one of the new buildings. Approximately 110 new trees will be planted. Bird and bat boxes will be installed within the walls of new buildings, and in the retained woodland.
Conclusions	The proposed development will comply with Paragraph 180-194 of the NPPF, and Policy GEN 7 of the Uttlesford Local Plan.

2 INTRODUCTION

2.1. This report provides an assessment of the ecological effects of the proposed development of an area of land known as the former Friends School playing fields, Saffron Walden, hereafter referred to as the Application Site (see Image 1). The principal author of this report is Brian Hicks MCIEEM. The client is Chase New Homes Ltd.

Background

2.2. The Application Site is a former playing field associated with The Friends School located in Saffron Walden. The Ordnance Survey Grid Reference for the centre of the site is TL541375.

2.3. The Application Site (Image 1) is located to the east of the Friends School. Mount Pleasant Road forms the boundary to the north with residential properties beyond. Residential properties are also present to the east, south and south-west.

2.4. The client intends to submit a planning application, which this report will accompany, for 91 new homes, with the creation of new sports pitches in the southern part of the field.

Competence

2.5. The Application Site was surveyed on 31st October 2023 by Maydencroft Ecology Ltd.

2.6. This report was written by Brian Hicks, Senior Ecologist at ACD Environmental Ltd. Brian is a Senior Ecologist and has been involved in a wide range of surveys including Extended Phase 1 Habitat Surveys and Phase 2 surveys for protected species and reports including Preliminary Ecological Appraisals (PEAs) and Ecological Impact Assessments (EcIAs). Brian is a Full Member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and holds Natural England Class Licences for bats, hazel dormouse *Muscardinus avellanarius* and great crested newt *Triturus cristatus*.

2.7. A Technical Review of this report has been undertaken in line with ACD Environmental Ltd's Quality Assurance procedures. The Technical Review was undertaken by Lisa Durrant. Lisa is a Senior Ecologist at ACD Environmental Ltd. She has 13 years' experience in ecological consultancy and holds Natural England Class License for bats (Level 2), great crested newts, dormice, and barn owl *Tyto alba*. She is a Full Member of the Chartered Institute of Ecology and Environmental Management (CIEEM).

Purpose of the report

2.8. The purpose of this Ecological Impact Assessment (EcIA) is as follows:

- To identify and describe all potentially significant ecological effects associated with the proposed development
- To set out the mitigation measures required to ensure compliance with nature conservation legislation and relevant planning policy, and to address any potentially significant ecological effects
- To identify how mitigation measures will/could be secured
- To identify any significant residual ecological effects and set out any compensation measures proposed to address these
- To identify appropriate enhancement measures in order to achieve Biodiversity Net Gain
- To set out the requirements for post-construction monitoring

Image 1: Application Site location and approximate site boundary shown in red. Map data (2017): Google.

3 PLANNING POLICY AND LEGISLATION

Legislation

3.1. The following pieces of legislation are of specific relevance to this assessment:

- The Environment Act 2021.
- Wildlife and Countryside Act 1981[1] (as amended, including by the Countryside and Rights of Way Act 2000). This piece of legislation is relevant because the Application Site is within the zone of influence of a Site of Special Scientific Interest (SSSI), which is protected in England under this Act.
- Natural Environment and Rural Communities (NERC) Act 2006[2]. Section 41 includes lists of habitats and species recognised as of 'principal importance' for the conservation of biodiversity. Section 40 of the NERC Act 2006 requires all public bodies to have regard for biodiversity conservation when carrying out their function. This is commonly referred to as the 'biodiversity duty'.

3.2. The following pieces of legislation have been considered, but are not considered to be of specific relevance in this case:

- The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019[3].
- Protection of Badgers Act 1992 (not badger setts are present within the Application Site or sufficiently close to be affected)
- Hedgerows Regulations 1997 (there are no hedgerows within the Application Site or sufficiently close to be affected / the Regulations do not apply to the hedgerows in this context)

Environment Act 2021

3.3. In accordance with the Environment Act 2021[4], mandatory Biodiversity Net Gain (BNG) will apply from January 2024 for developments in the Town and Country Planning Act 1990, unless

[1] Great Britain. *Wildlife and Countryside Act 1981* [online]. Available from: http://www.legislation.gov.uk/ukpga/1981/69/contents
[2] Great Britain. *Natural Environment and Rural Communities Act 2006* [online]. Available from: http://www.legislation.gov.uk/ukpga/2006/16/contents
[3] Great Britain. *The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019* No.579 [online]. Available from: https://www.legislation.gov.uk/ukdsi/2019/9780111179512/contents
[4] https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted

exempt. It will apply to small sites from April 2024.

3.4. Schedule 7A of the Act makes provision for grants of planning permission in England to be subject to a condition, to secure that the 'biodiversity gain objective' is met.

3.5. The 'biodiversity gain objective' is met in relation to development for which planning permission is granted if the biodiversity value attributable to the development exceeds the pre-development biodiversity value of the onsite habitat by at least the relevant percentage.

3.6. The biodiversity value attributable to the development is the total of—

(a) the post-development biodiversity value of the onsite habitat,

(b) the biodiversity value, in relation to the development, of any registered offsite biodiversity gain allocated to the development, and

(c) the biodiversity value of any biodiversity credits purchased for the development.

3.7. The relevant percentage is 10%, but the Secretary of State may by regulations amend this paragraph so as to change the relevant percentage.

3.8. The biodiversity value of any habitat or habitat enhancement are to its value as calculated in accordance with the 'Biodiversity Metric'.

3.9. Every planning permission granted for the development of land in England shall be deemed to have been granted subject to the condition in sub-paragraph (2), which states that the development may not be begun unless:

(a) a biodiversity gain plan has been submitted to the planning authority

(b) the planning authority has approved the plan.

3.10. Local Planning Authorities (LPAs) will have to approve a biodiversity net gain plan for development work before it can start.

Planning policy

National Planning Policy Framework 2023[5]

3.11. Paragraph 180-194 of the NPPF relates to 'Conserving and enhancing the natural environment'. Paragraph 186 of the NPPF states that when determining planning applications,

[5] Great Britain. *National Planning Policy Framework (2023)*. Available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2

local planning authorities should apply the following principles:

- If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused

- Development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest

- Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists

- Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Uttlesford Local Plan 2005[6]

3.12. Policy GEN7 – Nature Conservation

Development that would have a harmful effect on wildlife or geological features will not be permitted unless the need for the development outweighs the importance of the feature to nature conservation. Where the site includes protected species or habitats suitable for protected species, a nature conservation survey will be required.

Measures to mitigate and/or compensate for the potential impacts of development, secured by planning obligation or condition, will be required.

The enhancement of biodiversity through the creation of appropriate new habitats will be

[6] Uttlesford District Council (2005). *Uttlesford Local Plan 2005.*

sought.

3.13. Policy ENV7 - The Protection of the Natural Environment - Designated Sites

Development proposals that adversely affect areas of nationally important nature conservation concern, such as Sites of Special Scientific Interest and National Nature Reserves, will not be permitted unless the need for the development outweighs the particular importance of the nature conservation value of site or reserve.

Development proposals likely to affect local areas of nature conservation significance, such as County Wildlife sites, ancient woodlands, wildlife habitats, sites of ecological interest and Regionally Important Geological/ Geomorphological Sites, will not be permitted unless the need for the development outweighs the local significance of the site to the biodiversity of the District.

Where development is permitted the authority will consider the use of conditions or planning obligations to ensure the protection and enhancement of the site's conservation interest.

3.14. Policy ENV8 – Other Landscape Elements of Importance for Nature Conservation

Development that may adversely affect these landscape elements

- Hedgerows
- Linear tree belts
- Larger semi natural or ancient woodlands
- Semi-natural grasslands
- Green lanes and special verges
- Orchards
- Plantations
- Ponds
- reservoirs
- River corridors
- Linear wetland features

- Networks or patterns of other locally important habitats. will only be permitted if the following criteria apply:

a) The need for the development outweighs the need to retain the elements for their importance to wild fauna and flora;

b) Mitigation measures are provided that would compensate for the harm and reinstate the nature conservation value of the locality.

Appropriate management of these elements will be encouraged through the use of conditions and planning obligations.

Saffron Walden Neighbourhood Plan[7]

POLICY SW11- Ecological requirements for all new domestic and commercial developments.

1. Sustainable drainage systems will be installed in all major developments unless there is clear evidence that this would be inappropriate and will be proportionate and appropriate to the site, where possible to promote the use of multifunctional space to create a healthy environment for people.

2. Sustainable drainage systems will be planted with appropriate plants to encourage a biodiverse habitat, and designed for maximum amenity, using the guidelines and checklists of the CIRIA SuDS Manual 2015 or its successors, and the Essex SuDS Design Guide.

3. Water reuse and recycling and rainwater harvesting and surface water harvesting should also be incorporated wherever feasible to reduce demand on mains water supply.

4. It is the preferred option that foul drainage for all new development is connected to the mains sewerage system

5. Hedgehog holes should be provided in fences to allow for wildlife to increase its range and access to gardens and green spaces in the town. Roosting, nesting and bat boxes should be provided on all new developments.

This policy supports the Neighbourhood Plan Objectives 2,3,4

[7] Saffron Walden Town Council 2021.Saffron Walden Neighbourhood Plan 2021- 2036.

4 METHODOLOGY

Scope of assessment

4.1. The EcIA focuses on 'important ecological features', i.e. those which are considered to be of relevance to the decision-making process and could be affected by the proposed development. Important ecological features include protected species, habitats/species of 'principal importance' for biodiversity conservation (i.e. Section 41 habitats/species[8]), birds of conservation concern[9], invasive non-native plant species[10], and habitats and species identified as priorities for conservation.

Zone of influence

4.2. The 'zone of influence' (ZOI) is the area over which important ecological features (on-site or off-site) may be affected as a result of the proposed development and associated activities. The ZOI can vary for different ecological features, depending on their sensitivity to environmental change.

4.3. The ZOI for statutory designated sites has been informed by Natural England's Sites of Special Scientific Interest (SSSIs) Impact Risk Zones[11] (IRZs). IRZs define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. This has been determined as part of the desk study, as discussed below. In this case it is clear that the Application Site is within the IRZ of several SSSI's; however, the risks listed do not include residential proposals.

Desk Study

4.4. The following information was requested from Essex Field Club for a search area of 2km around the central grid reference of the Application Site:

[8] Section 41 (41) of the Natural Environment and Rural Communities (NERC) Act, which came into force on 1st October 2006, requires the Secretary of State to publish a list of habitats and species which are of principle importance for the conservation of biodiversity in England.
[9] Red list species are those that are globally threatened, whose population or range has declined rapidly in recent years (i.e. by more than 50% in 25 years), or which have declined historically and not recovered. Amber list species are those whose population or range has declined moderately in recent years (by more than 25% but less than 50% in 25 years), those whose population has declined historically but recovered recently, rare species (<300 breeding pairs or <900 wintering individuals), those with internationally important populations in the UK, those with localised populations, and those with an unfavourable conservation status in Europe. Species that meet none of these criteria are Green-listed.
[10] Invasive non-native plants (Section 14) on Schedule 9 of the Wildlife & Countryside Act 1981 (as amended).
[11] Natural England (June 2019). Natural England's Impact Risk Zones for Sites of Special Scientific Interest (For use by Local Planning Authorities to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites and determine when to consult Natural England).

- Statutory and non- statutory wildlife sites
- Species Records

4.5. The data was received on 8th January 2024.

4.6. The MAGIC website[12] was used to carry out a data search for SSSIs, Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) with an IRZ that falls within the Application Site, in April 2024.

Field surveys

4.7. A summary of ecological field surveys is provided in Table 1. Descriptions of full survey methods are provided in Appendix 3.

Table 1: Field surveys

Survey	Surveyor/s	Survey date/s	Study Area	Relevant guidelines
Extended Phase 1 Habitat Survey	Maydencroft Ltd.	25th October 2023	Red line boundary	JNCC (2010)
Ground level tree inspection	Brian Hicks MCIEEM	23rd February 2024.	Red line boundary	Andrews (2018)[13]

Limitations

4.8. There were no limitations to the field surveys.

Assessment methodology

4.9. The habitats and species evaluations and likely effects are made with reference to the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for

[12] *Multi Agency Geographic Information for the Countryside* [online]. Available at: https://magic.defra.gov.uk/
[13] Andrews (2018). Bat Roosts in Trees. Pelagic Publishing.

Ecological Impact Assessment[14].

4.10. The importance of ecological features has been assessed by carrying out a suite of specialist surveys (Table 1) to determine whether protected species/habitats, and/or species/habitats of conservation concern are present in the Application Site or its ZOI, then comparing their status at the international/national/county/regional/local scale, through the use of available contextual information, to establish the importance of those features in a geographical context.

4.11. The overall effect of the proposed development on a given feature has been predicted, considering the baseline data collected through desk study and field survey, and the various impacts expected to occur. An assessment has then been made as to whether the effect on each important ecological feature is likely to be significant or not.

4.12. Significance is the weight that should be attached to effects when decisions are made. For the purpose of EcIA, a likely significant effect is an effect that either supports or undermines biodiversity conservation objectives for important ecological features (which could be species populations/groups of species, habitats, or a designated site), or for biodiversity in general. Effects have been considered significant at a wide range of scales, from national to local.

4.13. A sequential process has been adopted to avoid/mitigate, and if required, compensate for significant negative ecological effects. This is referred to as the 'Mitigation Hierarchy'. Avoidance includes measures to change the design of the proposed development to avoid an impact occurring. Mitigation includes measures to avoid or reduce the negative impacts of the proposed development. Compensation addresses significant negative residual effects (those likely to occur after avoidance and mitigation have been considered). It is this objective of compensation, and not its location, that distinguishes compensation from 'mitigation'.

4.14. In EcIA, it is only essential to assess and report significant residual effects that remain after mitigation measures have been taken into account. However, the potential significant effects without mitigation as well as the residual significant effects following mitigation have been presented where the mitigation proposed is experimental, unproven or controversial and/or to demonstrate the importance of securing the measures proposed through planning conditions or obligations.

Valuation

4.15. The value of important ecological features (sites, habitats and species) is assigned according

[14] CIEEM (2019). Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater and Coastal, Version 1.1. updated September 2019. Chartered Institute of Ecology and Environmental Management, Winchester.

to their scale of importance using the following terms:

- International importance – ecological features of international importance such as SPAs and SACs, and/or sites that support internationally-important populations of species.

- National importance – ecological features of national importance such as SSSIs, features which meet the criteria for designation as a SSSI, and/or sites that support nationally-important populations of certain species.

- Regional importance – ecological features of regional importance, such as a species population that is of importance at a scale greater than the County, but does not meet the criteria for National Importance

- County importance – ecological features of county-scale importance, including features that have been designated as local wildlife sites, or meet the criteria for designation as a local wildlife site, and/or county-important populations of species

- Local importance – ecological features of local importance, including habitats or species populations listed as being of nature conservation importance (e.g. S41, local BAP, or listed in local planning policy) which are not considered to be of County importance by virtue of the quality, size/number, rarity, the extent to which they are threatened throughout their range, or to their rate of decline.

Precautionary principle

4.16. The evaluation of significant effects is based on the results of the ecological surveys carried out in the Application Site and other available evidence. In cases of reasonable doubt, where it is not possible to robustly justify a conclusion of no significant effect, a significant effect is assumed. Where uncertainty exists, it has been duly acknowledged.

5 BASELINE ECOLOGICAL CONDITIONS

Context

5.1. The Application Site is an area of land previously used as a sports field by the Friends School located adjacent to the west. The northern boundary is formed by Mount Pleasant Road. Residential properties are located to the east and south, as well as to the north.

5.2. The Application Site is predominantly grassland, with a line of trees present on the northern and eastern boundaries, and a woodland present in the south-eastern part of the Application Site.

Designated Sites

5.3. SSSIs, SACs and SPAs with IRZs within the boundary of Application Site are shown in Table 2.

Table 2: Statutory designated sites with an IRZ within the Application Site

Name of statutory designated sites	Approximate distance and direction from Application Site	Reason for designation	Scale of importance
Debden Water SSSI	3.4km south	Small freshwater stream with calcareous and neutral grassland	National
Hales and Shadwell Woods SSSI (Hales Wood is also an NNR)	4km north-east	Hales and Shadwell Woods are ancient, coppice-with-standards woods of the wet Ash-Maple woodland type	National

5.4. Local (non-statutory) wildlife sites within 1km of the Application Site are shown in Table 3.

Table 3: Local wildlife sites within 1km of the Application Site

Name of Local Wildlife Site	Approximate distance and direction from the Application Site	Nature Conservation Interest	Scale of importance
Roos Hill Wildlife verge	1km south	Road verge with chalk grassland flora	Local

Audley End Park Wall Protected Roadside Verge	1km west	Road verge with chalk grassland flora	Local

Habitats

5.5. Habitats are listed in order of importance. All the features described are shown on the Phase 1 Habitat Map in APPENDIX 1.

Modified Grassland

5.6. The majority of the Application Site is the former sports field which comprises modified grassland with species recorded including yarrow *Achillea millefolium*, *fescue sp*., Yorkshire fog *Holcus lanatus*, common plantain *Plantago major*, dandelion *Taraxacum officinale*, cocks-foot *Dactylis glomerata*, lesser knapweed *Centaurea nigra*, ribwort plantain *Plantago lanceolata*, creeping thistle *Cirsium arvense*, perennial ryegrass *Lolium perenne*, doves foot cranesbill *Geranium molle*, smallflower buttercup *Ranunculus parviflorus,* cow parsley *Anthriscus sylvestris* and greater plantain *Plantago major*.

Woodland

5.7. An area of woodland of approximately 0.8ha is present in the south-east of the Application Site. Species recorded include small leaved lime *Tilia cordata*, hawthorn *Crataegus monogyna,* horse chestnut *Aesculus hippocastanum*, field maple *Acer campestre,* Sycamore *Acer pseudoplatanus*, Poplar *populus sp*., and ivy *Hedera helix*.

5.8. Ground flora within the woodland was limited to cow parsley *Anthriscus sylvestris* and nettle *Urtica dioeca.*

Lines of Trees

5.9. Lines of trees are present on the northern, eastern and southern boundaries. The northern and eastern boundaries are continuous and include sycamore *Acer pseudoplatanus*, dogrose *Rosa canina,* field maple *Acer campestre*, apple *Malus sp*., privet *Ligustrum Ovalifolium,* snowberry *Symphoricarpos albus*, blackthorn *Prunus spinosa*, small leaved lime *Tilia cordata*, hawthorn *Crataegus monogyna,* hazel *Corylus avellana*, horse chestnut, bramble *Rubus fruticosus agg.*, yew *Taxus baccata* and *cotoneaster sp*.

5.10. The southern tree line comprises small leaved lime, large leaved lime *Tilia platyphyllos,* sycamore and privet.

Fauna

Invertebrates

5.11. The habitats present within the Application Site are common and widespread and are generally unsuitable for any rare or notable invertebrate species.

5.12. Several notable invertebrates are recorded within the data search, including wall brown *Lasiommata megera* and small heath *Coenonympha pamphilus.* Both of these butterflies are found in grassland habitats, although the data search indicates that the records for wall brown are in excess of 30 years old.

5.13. The two records for small heath are from approximately 2km from the Application Site, one to the east and one to the west. Small heath generally do not travel far outside of the colony, and are therefore considered to be unlikely to be present within the Application Site.

Great crested newts

5.14. Two records of great crested newt *Triturus cristatus* are within the data search, one record is from 1.2km to the west, the other is from 1.2km to the north.

5.15. The only waterbody within 500m of the Application Site boundary is part of the River Slade, approximately 370m to the east. This waterbody is separated from the Application Site by residential properties and several roads.

5.16. Due to the lack of records and suitable waterbodies, the Application Site is considered to have negligible value for great crested newt.

Other amphibians

5.17. Three records of common toad *Bufo bufo* are within the data search, the nearest is from 1.2km to the north-east of the Application Site.

5.18. One record of smooth newt is from 1.1km to the north-west of the Application Site.

5.19. Due to the lack of records and suitable waterbodies, the Application Site is considered to have negligible value for amphibians.

Reptiles

5.20. The data search revealed one record of slow worm *Anguis fragilis* within 2km, this record is approximately 860m to the west of the Application Site. Six records of grass snake *Natrix helvetica* are recorded, the nearest is 260m to the south.

5.21. Two records of wall lizard *Podarcis muralis* are within the data search, located approximately 1.2km to the east.

5.22. The field has been historically used as a sports pitch and therefore was closely mown for a significant period of time.

5.23. In addition, the Application Site is within an area of residential properties and therefore separated from other suitable habitats.

5.24. The Application Site is therefore considered to have negligible value for reptiles.

Birds

5.25. There are many bird species that have been recorded within 2km of the Application Site. Notable species include swift *Apus apus,* house sparrow *Passer domesticus,* and starling *Sturnus vulgaris.* These species are all red listed within the Birds of Conservation Concern 515. House sparrows and starlings are also a Section 41 species of Principal importance under the NERC Act[16].

5.26. Birds recorded during the site visits include blackbird *Turdus merula,* robin *Erithacus rubecula* and wren *Troglodytes troglodytes.* It is likely that nesting birds will be present in the woodland and trees within the Application Site.

5.27. Recommendations are provided within this report to prevent impacts to nesting birds during construction.

[15] Stanbury, A., Eaton, M., Aebischer, N., Balmer, D., Brown, A., Douse, A., Lindley, P., McCulloch, N., Noble, D., and Win I. 2021. *The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain.* British Birds 114: 723-747. Available online at https://britishbirds. co.uk/content/status-our-bird-populations.

Bats

5.28. The data search revealed at least nine species of bat have been recorded within 2km of the Application Site. Species include serotine *Eptesicus serotinus*, noctule *Nyctalus noctula*, common pipistrelle *Pipistrellus pipistrellus,* soprano pipistrelle *P. pygmaeus*, brown long-eared bat *Plecotus auritus*, Daubentons *Myotis daubentonii*, Natterer's *Myotis nattereri,* Leisler's bat *Nyctalus leisleri* and *Myotis* sp.

5.29. One granted European Protected Species License is within 1km of the Application Site, adjacent to the west (Friends School Site) granted in 2023 for the destruction of a brown long-eared and common pipistrelle resting place (2023-65571-EPS-MIT-1).

5.30. An inspection of trees in the east of the Application Site scheduled for removal was carried out by Brian Hicks on 23rd February 2024.

5.31. All of the eight trees surveyed have negligible suitability to support roosting bats.

5.32. The tree lines and woodland within the Application Site are considered to have local value for foraging and commuting bats.

Hazel Dormouse

5.33. There are no records of dormouse within the data search.

5.34. The woodland in the south-east of the Application Site is surrounded by residential properties, therefore there is no opportunity for dormouse to find their way onto the Application Site.

5.35. The Application Site is of negligible value for this species.

Badgers

5.36. Three records of badger *Meles meles* are within the data search, these are 380m to the north-west, 350m to the east and 1.3km to the north-west of the Application Site.

5.37. Several badger latrines were recorded in the north- eastern corner of the Application Site.

5.38. The woodland in the south-eastern corner of the Application Site is suitable for badger, and it is likely that badger would use the site for foraging and commuting.

5.39. The Application Site is considered to have site value for badger.

Other mammals

5.40. Hedgehog *Erinaceus europaeus* are recorded on 12 occasions within the data search with the closest record being from 84m to the south-west.

5.41. Hedgehogs are likely to be present on the boundaries of the Application Site, especially in the woodland in the south-east.

5.42. The Application Site is considered to have site value for hedgehog.

5.43. Otter *Lutra lutra* and water vole *Arvicola amphibius* have been scoped out of this assessment due to the distance from suitable waterbodies.

6 SCHEME DESIGN

6.1. The proposals are for the construction of 91 residential properties with associated landscaping and hardstanding, along with the creation of a new sports pitch.

Figure 1: Proposals Plan[17]

[17] DCa Landscape (2024). Walden School Saffron Walden Proposed Site Layout. DWG. 23110 (D) 004

7 ASSESSMENT OF EFFECTS AND MITIGATION MEASURES

7.1. In accordance with CIEEM guidelines, the following important ecological features have been identified with the potential to be affected by the proposed development and carried forward for further assessment:

Table 4: Important ecological features brought forward for impact assessment

Statutory sites	None
Local Wildlife sites	None
Habitats	Woodland and Tree lines
Species and species groups	Nesting birds

7.2. The following ecological features have been scoped out of the ecological impact assessment, owning to the conclusion that no significant effects are predicted:

Table 5: Ecological features scoped out of the impact assessment

Statutory sites	No impacts are predicted due to distance from Application Site
Non-statutory sites	No impacts are predicted due to distance from Application Site
Habitats	The most valuable habitats within the Application Site- Woodland and lines of trees will be retained.
Species and species groups	No impacts on protected species are anticipated although precautionary measures are detailed below.

Woodland and Tree Lines

7.3. The woodland and trees present within the Application Site will be retained and protected during construction within an exclusion zone, demarcated by tree protection fencing as outlined within the arboricultural report.

Nesting Birds

7.4. Nesting birds are likely present in the vegetation during the main nesting season. Works affecting this vegetation could result in harm to nesting birds.

7.5. To account for this, wherever possible, clearance works will be undertaken outside of the nesting season (the nesting season is widely accepted to be March - August inclusive, however climate change is causing some species to nest as early as February. If in doubt an ecologist must be contacted). Where this is not possible, a nesting bird check must be undertaken by a suitably experienced ecologist no more than 24 hours prior to the clearance taking place. If a nest is identified the ecologist will establish a suitably sized buffer around the nest (usually 5m however this may vary depending on species). No work may be carried out in the buffer until the ecologist confirms that the nest is no longer in use.

7.6. No further impacts are anticipated.

Badger, hedgehog

7.7. General measures will be implemented during construction to ensure that any mammals, including hedgehogs, are safeguarded throughout the construction process. These measures include:

- Any excavations will be covered at night to where possible. Where it is not possible a ramp must be provided for any trapped animals to escape of their own accord.
- Temporarily exposed pipes must be capped overnight to prevent animals entering and later becoming trapped.
- Building materials will be stored on pallets wherever possible to avoid creating temporary resting places/hibernacula.
- Spoil piles will be checked daily by the site manager as these features can be attractive for tunnelling by mammals.

7.8. With these measures implemented, no significant impacts on other mammals are anticipated.

Reptiles and amphibians

7.9. The measures detailed above will also be relevant for the protection of reptiles and amphibians, should they enter the construction site.

Bats

Lighting

7.10. Impacts on bats should be kept to a minimum by adhering to the following measures:

- Lighting must only be installed where there is a significant need, and where necessary, minimal amounts should be used, and dimmed during periods of low use.
- Any lighting used during the construction should be switched off overnight to avoid disturbance of commuting and foraging bats.
- Any lighting required overnight e.g., for security purposes must be dimmed and faced away from boundary habitats such as hedgerows, tree lines, and roads. This is particularly relevant in relation to the woodland on the boundaries.

8 BIODIVERSITY NET GAIN

Biodiversity metric

8.1. The Statutory Biodiversity Metric has been completed for the Application Site. This has been calculated using baseline habitat and species information collected during the Extended Phase 1 Habitat Survey and using post-development landscape proposals A full methodology is provided in **Appendix 4**. A completed version of the Biodiversity Metric and the condition sheets have been submitted in full as separate Excel documents.

Table 6: A summary of the results of the Biodiversity Metric.

On-site baseline	Habitat units	43.46
	Hedgerow units	2.38
	River units	0.00
On-site post-intervention	Habitat units	31.72
	Hedgerow units	3.15
	River units	0.00
Total net unit change	Habitat units	-11.73
	Hedgerow units	0.77
	River units	0.00
Total net % change -25.78%	Habitat units	**-25.78%**
	Hedgerow units	**32.49%**
	River units	**0.00**

8.2. The results of the Biodiversity Metric indicate that development of the Application Site will lead to a 25.78% net loss in habitats and a 32.49% gain in hedgerows.

8.3. Credits will need to be purchased from a provider of off-site biodiversity units.

8.4. The following habitat and hedgerow enhancement and creation measures have been incorporated within the landscape masterplan and are included within the Biodiversity Metric calculations. For details on locations of these habitats please refer to the habitat creation plan which is presented within **Appendix 2**.

- Inclusion of EM67 wildflower seed mix and EM6 meadow mixture grassland.
- Inclusion of 110 new trees within the Application Site.
- A green roof on one of the new buildings.

- Enhancement of woodland. The woodland has been classed as moderate condition primarily due to the low diversity of age structure and the poor field layer. The following species are recommended for planting within the understorey.
    - Wayfaring tree (*Viburnum lantana);*
    - Sweet briar (*Rosa rubigniosa);*
    - Wild privet (*Ligustrum vulgare);*
    - Hazel (*Corylus avellana);*
    - Hawthorn (*Crataegus monogyna);*
    - Field maple (*Acer campestre);*
    - Holly (*Ilex aquifolium)*
    - Elder (*Sambucus nigra*);
    - Spindle (*Euonymus europaeus*);
    - Honeysuckle (*Lonicera periclymenum*);
    - Dog rose (*Rosa canina*);
    - Guelder rose (*Viburnum opulus)*
- The woodland will be managed under a 30-year woodland management plan which will include details of thinning and removal of undesirable species.

8.5. In addition to these measures, habitats within the POS of the Application Site will be managed by a management company during the operational phase of the development. Management prescriptions will be included within a post-consent Landscape and Ecological Management Plan (LEMP) and will be designed to ensure long-term maintenance and enhancement of ecologically valuable habitats within the development.

Additional enhancements

8.6. In addition to the habitat and hedgerow enhancements outlined above which have contributed to the Application Site's Biodiversity Metric score, the following enhancements will be included to provide new opportunities for wildlife:

- Each new unit will be fitted with an integrated swift box such as Schwegler Type 1A Swift Nest Box, on a northern or eastern elevation as appropriate at a minimum height of 5m, though boxes should be situated as high as possible. A clear drop beneath

each box must be maintained to ensure access is not hindered, therefore planting beneath the boxes should be height limited. Where possible the boxes should overlook greenspaces.

- Schwegler 1S sparrow terrace boxes will be installed on ten of the new buildings, in similar locations to the swift boxes.
- New integrated bat boxes such as Habibat Bat Boxes will be installed on 20 of the new buildings on a southern or western elevation at a minimum height of 4m, though higher where possible. This will provide permanent roosting opportunities within the built environment. Bat boxes should overlook boundary vegetation if possible.
- Install 5 bat boxes on trees within the woodland, recommended boxes are Schwegler 1FF or similar.
- Install 5 bird boxes within the woodland, to be Schwegler 1B or similar, with a mix of hole sizes, 2x 32mm, 2 x 26mm and 1 oval.
- Wood from felled trees will be used to create a woodpile suitable for stag beetle and reptiles.
- The development will contain a number of new gardens, which will provide habitats for hedgehogs which are a UK BAP priority species[18]. To ensure hedgehogs are able to utilise the new garden habitats, closed board fencing will include a small hole (13cm x 13cm) cut into the base of the panel to facilitate hedgehog movement by creating a 'hedgehog highway'. This size gap is too small for most pets to fit through; but to encourage residents not to block holes signs can be placed above the gaps to illustrate their purpose.

8.7. The above measures are considered to be a significant contribution to the overall biodiversity value of the Application Site. If the above enhancements were delivered, the proposed development would deliver net biodiversity gains.

[18] Biodiversity Reporting and Information Group. (2007). *Report on the Species and Habitat Review*. Available at: https://hub.jncc.gov.uk/assets/bdd8ad64-c247-4b69-ab33-19c2e0d63736 [Accessed 28 November 2022]

9 CONCLUSIONS

9.1. The Application Site is an area of grassland, woodland and tree lines. The habitats are suitable for nesting birds, foraging and commuting badger and hedgehog and foraging and commuting bats.

9.2. The proposals for 91 new homes will result in the loss of approximately 3.5ha of modified grassland, which will be replaced with buildings, hardstanding, and native hedgerows. Part of the existing grassland (1.5ha) will be retained as sports pitches.

9.3. The woodland in the south-eastern part of the Application Site will be retained and enhanced with understorey planting.

9.4. In order to demonstrate Biodiversity Net Gain, it will be necessary to purchase off site biodiversity credits from a registered provider.

9.5. Assuming the implementation of the mitigation and enhancement measure set out in this report, the proposed development would conform to policy GEN7 of the Uttlesford Local Plan (2005), and would deliver biodiversity enhancements in accordance with the NPPF.

APPENDIX 1: PHASE 1 HABITAT MAP

LEGEND

- Boundary
- Target Notes
- Tree
- Tree line
- Fence
- Ephemeral (81)
- Modified grassland (g4 16, 128, 81)
- Broadleaved and mixed woodland (w1g)
- Bramble shrub (h3d)
- Blackthorn scrub (h3a6)

Target Notes

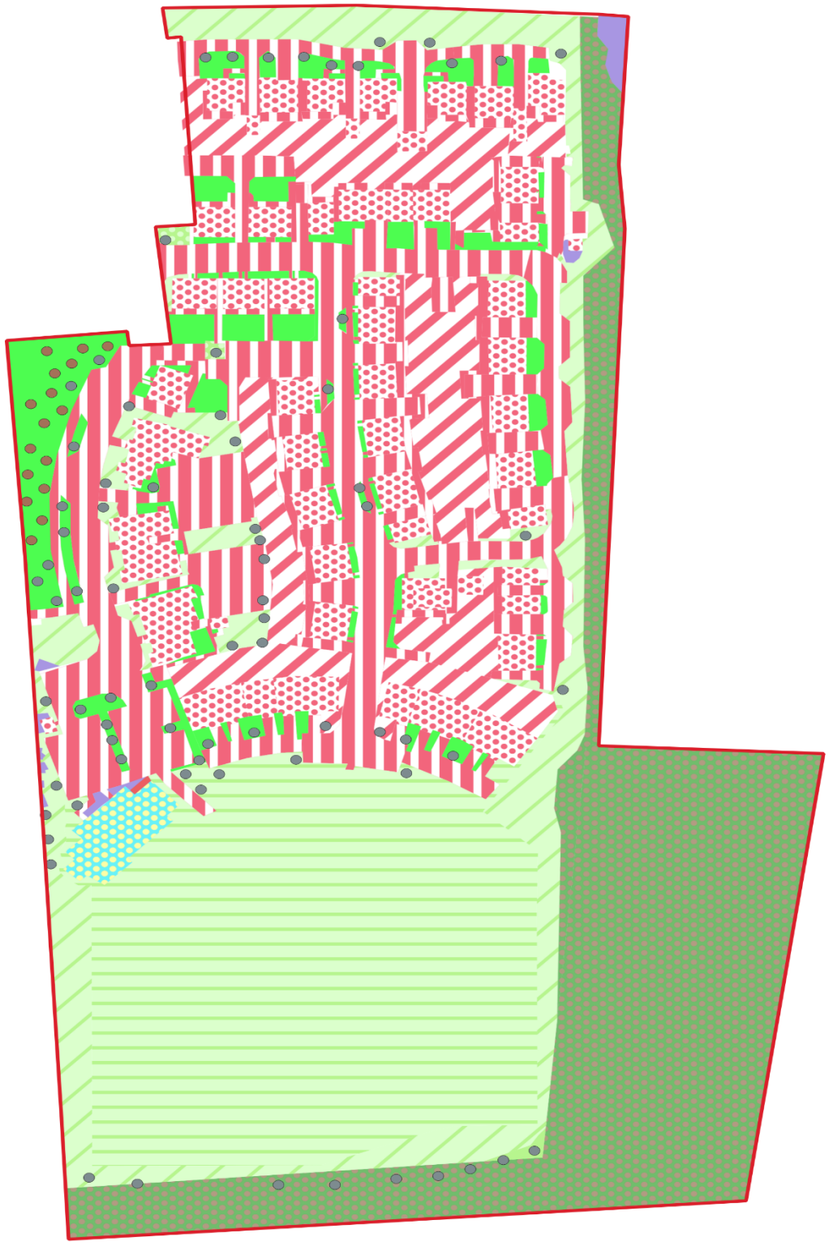
1 mammal paths into bramble
2 deer tracks
3 badger droppings
4 badger latrine

ACD ENVIRONMENTAL

CHASE NEW HOMES

scheme:Friends School Playing Field, Saffron Walden
client:Chase New Homes
drawing:UK Habs Plan
date:March 2024
scale:NTS@A3
drawing no.:CNH24380_60
drawn:LA
checked

APPENDIX 2: PROPOSED SCHEME



LEGEND

- Boundary
- Proposed orchard trees
- Proposed advanced nursery stock trees
- Retained habitat, modifed grass (g4 16, 128, 81)
- Meadow mix grassland (EM6)
- Amenity grassland
- Flowering Lawn Seed (EM1)
- Vegetated gardens
- Retained broadleaved woodland
- Tall shrub
- Low shrubs
- u1 - built-up areas and gardens
- Developed land. sealed surface
- Buildings
- Green Roof

ACD ENVIRONMENTAL

CHASE NEW HOMES

scheme:Friends School Playing Field, Saffron Walden
client:Chase New Homes
drawing:Habitat Creation Plan
date June 2024
scale:NTS@A3
drawing no.:PRI24380_68_B
drawn:LA
checked: BH

APPENDIX 3: FIELD SURVEY METHODOLOGY

Extended Phase 1 Habitat Survey

The Phase 1 Habitat Map is shown in Appendix 1.

The Phase 1 Habitat Survey methodology[19] was used to classify the Application Site into habitat types, as listed in the Phase 1 Manual. Where appropriate, dominant species codes within habitat types were recorded. Descriptive target notes were used for particular areas of interest.

Incidental records of fauna were made during the Phase 1 Habitat survey and the habitats identified were evaluated for their potential to support legally protected species and species of Principal Importance.

Limitations

There were no limitations associated with the Extended Phase 1 Habitat Survey.

Badger field signs survey

A badger field signs survey was carried out during the Phase 1 survey. Badger field signs surveys comprised walking the perimeter and interior boundaries of the Site, searching for evidence of badgers, in accordance with Harris et al[20] (1989) and Scottish Natural Heritage[21] (2018).

Limitations

There were no limitations associated with the badger field signs survey.

Preliminary Bat Roost Assessment

A Preliminary Roost Assessment (PRA) was carried out[22]. This is an external and internal inspection survey, the purpose of which is to search for bats/evidence of bats and assess the likelihood of bats being present and the need for further survey and/or mitigation.

The following equipment was used for the bat survey:

- Binoculars
- Powerful torch to illuminate dark corners from the ground

[19] JNCC, (2010), *Handbook for Phase 1 habitat survey - a technique for environmental audit.* JNCC, Peterborough.
[20] Harris, S., Cresswell, P., and Jefferies, D. (1989). *Surveying Badgers*. Mammal Society.
[21] Scottish Badgers (2018). *Surveying for Badgers: Good Practice Guidelines*. Version 1.
[22] Collins J. (ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn)*. The Bat Conservation Trust, London.

- Ladder
- Collection pots and labels for corpses and droppings;
- Camera to record evidence and potential roosting sites; and
- Personal protective equipment (e.g. boots, gloves, helmet, mobile telephone).

The trees were searched for bats/evidence of bats and assessed for their potential to support roosting bats. The evidence of roosting bats searched for is detailed above with regard to buildings (e.g. bat droppings and feeding remains). The features of bats were searched for on the trees with reference to the three broad categories of Potential Roost Features (PRFs) and sub-categories of PRFs from the Bat Tree Habitat Key[23]. These are as follows:

- Disease and decay PRFs:
    - Woodpecker and squirrel holes;
    - Knot holes;
    - Pruning-cuts;
    - Tear outs;
    - Compression forks;
    - Wounds;
    - Cankers; and
    - Butt rots.
- Association PRFs:
    - Fluting; and
    - Ivy.
- Damage PRFs:
    - Hazard beams;

[23] Bat Tree Habitat Key 2018. *Bat Roosts in Trees – A Guide to Identification and Assessment for Tree-care and Ecology professionals*. Exeter: Pelagic Publishing.

- Frost cracks;
- Subsidence/shearing and helical splits;
- Lightning strikes;
- Desiccation fissures;
- Transverse snaps;
- Welds; and
- Lifting bark.

Limitations

There were no limitations to the Preliminary Roost Assessment.

Bird nesting

Evidence of nesting birds recorded during the PRA and any incidental bird observations/birds heard were noted.

APPENDIX 4: BIODIVERSITY METRIC METHODOLOGY

Assessment Framework

For the purposes of this assessment, the Statutory Biodiversity Metric) has been utilised.

The Biodiversity Metric is accompanied by a 'Calculation Tool'. This was used to calculate the biodiversity units for the Application Site before (baseline) and after development. The User Guide[24] has been followed.

Habitat Measurements

Baseline habitat measurements were carried out in line with the results of the Extended Phase 1 Habitat Survey. Measurements were made using QGIS.

Proposed habitat measurements were taken from the Soft Landscape Proposals[25]

Measurements were entered to the nearest 0.01ha.

Distinction Assessments

Habitats are assigned to distinctiveness bands automatically within the Metric. These are based on an assessment of the distinguishing features of a habitat or linear feature, including the consideration of species richness, rarity (at local, regional, national and international scales), and the degree to which a habitat supports species rarely found in other habitats.

The distinctiveness band of each habitat is preassigned in the Biodiversity Metric. The bands are based upon the UK habitat classification system. A combination of simple rules and professional judgement have been used to assign each habitat type to the appropriate distinctiveness band. The distinctiveness categories used are tailored to habitat type.

Distinctiveness Assessments are assigned according to **Table 7**.

Table 7: Distinctiveness Assessment

Category	Scores	Multiplier
Very High	8	Priority habitats as defined in Section 41 of the Natural Environment and Rural Communities (NERC) Act that are highly

[24] STEPHEN PANKS A, NICK WHITE A, AMANDA NEWSOME A, JACK POTTER A, MATT HEYDON A, EDWARD MAYHEW A, MARIA ALVAREZ A, TRUDY RUSSELL A, SARAH J. SCOTT B, MAX HEAVER C, SARAH H. SCOTT C, JO TREWEEK D, BILL BUTCHER E and DAVE STONE A (2022). *Biodiversity metric 3.1: Auditing and accounting for biodiversity – User Guide. Natural England.*
A – Natural England, B – Environment Agency, C – Department for Environment, Food and Rural Affairs, D – Treweek Environmental Consultants Ltd, E – eCountability Ltd

[25] DCa Landscape (2024). SOFT LANDSCAPE STRATEGY -AREAS FOR BNG. DWG. L23110.01.A

Category	Scores	Multiplier
		threatened, internationally scarce and require conservation action e.g. blanket bog
High	6	Priority habitats as defined in Section 41 of the NERC Act requiring conservation action e.g. lowland fens
Medium	4	Semi-natural habitats not classed as a Priority Habitat
Low	2	Habitat of low biodiversity value. Temporary grass and clover ley; intensive orchard; rhododendron scrub
Very Low	0	Little or no biodiversity value e.g. hard standing or sealed surface

Condition Assessments

Condition assessments for existing habitats can be found in a separate excel document.

Strategic significance

The spatial location of a habitat is treated as a component of the quality of a habitat parcel in the same way as distinctiveness or condition. Strategic significance is used to determine whether the habitat is of increased importance due to its location.

Risk Factors

As part of any proposed habitat creation and restoration, risk factors must be taken into account to correct for disparity, delay or risk. These values are preassigned within the Biodiversity Metric and take into consideration the following factors:

- Temporal risk; and
- Difficulty of creation and restoration.

Advance/delay in habitat creation takes into account any significant time difference in the creation of a habitat type. This time is measured in full years and is entered by the assessor.

Habitat creation in advance is rewarded by reducing the difficulty and temporal risk multipliers applied. This reflects the lower delivery risk - there is less risk of failure when a habitat is already making progress towards its target condition.

Any significant delay in the creation of a habitat type relative to loss of on-site habitats (e.g. due to phased developments and developments that temporarily require parts of the development site for construction purposes) is added to the pre-populated time to target condition and increases the effect of the risk multiplier accordingly.

Limitations

Although the Biodiversity Metric is a valuable tool underpinned by ecological evidence, there are certain limitations that must be considered when applying the metric. The key principles and rules for the use of the Biodiversity Metric have been followed at all times, in line with these limitations. Further detail is available within the Statutory Biodiversity Metric User Guide[24].

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ECOLOGICAL SURVEYS * PROTECTED SPECIES LICENSING * MITIGATION * IMPACT ASSESSMENT
ARBORICULTURAL SITE MONITORING AND SUPERVISION * ARCHAEOLOGY
LANDSCAPE & VISUAL IMPACT ASSESSMENT * LANDSCAPE AUDIT * PROJECT MANAGEMENT
EXPERT WITNESS* LANDSCAPE DESIGN & PLANNING LANDSCAPE MANAGEMENT