

**To:** Case Officer  
**From:** [REDACTED]  
**Company:** Uttlesford District Council  
**SLR Consulting Limited**  
**cc:** Applicant Team  
**Date:** 19 June 2024  
**Project No.** 425.065369.00001

**RE: Land West of Stebbing  
Addendum Ecological Response – Tree Bat PRFs**

## Introduction

SLR Consulting Limited (SLR) has been appointed to provide information to Uttlesford District Council (UDC) in order to resolve a holding objection raised by Essex Place Services (EPS) under application ref. UTT/23/2496/FUL.

The development description is:

*‘Erection of 28 residential dwellings (comprising 14 affordable and 11 private market homes together with 3 self-build plots) and local affordable employment unit/flexible community space; provision of public open space and associated local amenity facilities (activating Local Green Space allocation); together with integrated landscaping and car parking (to include additional community parking facility). Land West of High Street, Stebbing.’*

Previously, ecology survey work and reports had been prepared by several ecological consultants (Hybrid Ecology Ltd<sup>1</sup>, MKA Ecology<sup>2</sup> and TMA Ecology<sup>3</sup>). SLR prepared an addendum on 14<sup>th</sup> March 2024, which provided additional information where needed, including reference to bats and updating ground level tree assessment (GLTA) of all trees proposed for removal under scheme, using the latest best practice guidelines (Collins, 2023<sup>4</sup>). The GLTA was undertaken on 20 February 2024 by Ruth Holland BSc (Hons) ACIEEM (Natural England Class 2 Survey Licence 2018-33409-CLS-CLS).

This Technical Note presents clarification of some points covered in the previous addendum (14<sup>th</sup> March 2024) and the findings of a follow up Potential Roost Feature (PRF) inspection survey on 23<sup>rd</sup> May 2024.

## Tree Bat PRFs

The GLTA undertaken on 20<sup>th</sup> February 2024 sought to assess the suitability of trees for bats (Table 1) and estimate their potential for supporting bats, following best practice guidance<sup>4</sup> on trees that are scheduled to be removed or located within close proximity to the development. Trees were recorded and identified based on the tree constraints plan<sup>5</sup> submitted as part of the planning application.

<sup>1</sup> Preliminary Ecological Appraisal: Land adjacent to Stebbing, Essex, Hybrid Ecology, September 2021

<sup>2</sup> Land at Stebbing, Essex – Reptile Survey, MKA Ecology, November 2022

<sup>3</sup> Update Ecological Site Walkover, The Downs, Stebbing, TMA Ecology, August 2023

<sup>4</sup> Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4<sup>th</sup> edition). The Bat Conservation Trust, London.

<sup>5</sup> TR02.1-A – Tree Constraints Plan & TR02.2-A

**Table 1. Guidance for assessing suitability of trees for bats**

Suitability	Description
None	Either no PRFs in the tree or highly unlikely to be any
FAR	Further assessment required to establish if PRFs are present in the tree
PRF	A tree with at least one PRF present

The trees along the driveway to Stebbing Park, between the two sites, were not surveyed as they are not affected by the application. The plantation woodland at the western boundary of the northern parcel (Plan TR02.1-A) was not surveyed as no impacts are anticipated from the development.

In addition, item G53 was assessed as being scrub, rather than trees. All other trees, including those identified by Place Services at Essex County Council were surveyed and assessed.

Of the 23 trees assessed, eight were assessed as having PRF suitability, as per the above guidance, and categorised with an estimated suitability of PRF-I, meaning they have the potential to support individual or low numbers of roosting bats. Table 2 summarises these trees.

No trees were categorised with an estimated suitability of PRF-M, meaning there are no trees which would be suitable for multiple bats or may be used by a maternity colony.

**Please note** that the trees previously identified as being oak (G57), were reclassified following the most recent inspection as poplar *Populus* species, possibly black-poplar and some PRF descriptions have been edited.

**Table 2. Trees affected by works with PRF**

Tree ID and Species	Potential Roost Feature	Impact from development
T19 – Horse chestnut ( <i>Aesculus hippocastanum</i> )	Weld	Proximity, but negligible risk of disturbance
G57 Tree 1 – Poplar <i>Populus sp.</i>	Large tear out on main stem with split	Removal
G57 Tree 2 – Poplar	Lifted bark from ground on cut out	Removal
G57 Tree 4 - Poplar	Large tear out on main stem	Removal
G57 Tree 6 - Poplar	Large tear out on main stem with split	Removal
G57 Tree 9 - Poplar	Wound / tear out	Removal
G57 Tree 12 - Poplar	Tear out on main stem	Removal
T28 – Elder <i>Sambucus nigra</i>	Common ivy clad on all stems	Proximity, but negligible risk of disturbance



Following current best practice guidelines trees assessed as PRF suitability **require at least one PRF inspection survey**. This will allow for a more detailed assessment of their likely suitability for bats and to look for more conclusive evidence of bats, such as live or dead bats and droppings.

During a PRF inspection survey additional information will be collected, such as:

- PRF entrance width;
- internal height, width and depth of the PRF;
- substrate within PRF;
- whether PRF is dry, damp or wet;
- if evidence of bats is lacking; and
- if present – bat species, number of bats, state of bats (awake or torpor).

### PRF Inspection Survey Results

The PRF inspection survey was undertaken on 23<sup>rd</sup> May 2024 by Ruth Holland BSc (Hons) ACIEEM (Natural England Class 2 Survey Licence 2018-33409-CLS-CLS).

Two trees (T19 and T28), which were outside of the red line boundary, were not assessed.

Of the six trees inspected, two trees were categorised as offering PRF-I suitability and four trees were confirmed as unsuitable for bats, and therefore categorised as offering no suitability. Table 3 summarises these results.

**Table 3. Detailed internal description of PRFs**

Tree ID and Species	Internal description of PRF	PRF Categorisation
T19 – Horse chestnut ( <i>Aesculus hippocastanum</i> )	Not inspected. Outside of red line boundary, no access consented.	N/A
G57 Tree 1 – Poplar <i>Populus sp.</i>	Large tear out on main stem with split no longer present, deadwood fallen away, possibly from storm damage,	NONE
G57 Tree 2 – Poplar	Lifted bark lose at top and open at northern side. 30cm deep x 10cm wide, damp in base	PRF-I
G57 Tree 4 - Poplar	Large tear out on main stem. Wide tear out, 30-50cm, several splits/gaps, all open at top, most damp at base, max. depth 10cm. Slugs present.	NONE
G57 Tree 6 - Poplar	Large tear out on main stem with split. Tear out not suitable, open at top, very shallow. Split (southern side) 45cm long x 10cm at widest point in middle, narrowing to 3-4cm, shallow inside, 10cm, dry. Additional	PRF-I



Tree ID and Species	Internal description of PRF	PRF Categorisation
	PRF inspected, lifted bark (eastern side), 40cm long x 25cm wide x 4-6cm deep, dry.	
G57 Tree 9 - Poplar	Wound / tear-out. Circular wound 10cm diameter, too shallow, 2-3cm, open and wide.	NONE
G57 Tree 12 - Poplar	Tear out on main stem. Several gap/slips, all open at top, max. depth 10-12cm x 5-6cm wide, damp.	NONE
T28 – Elder <i>Sambucus nigra</i>	Not inspected. Outside of red line boundary.	N/A

Following current best practice guidelines trees categorised as offering PRF-I do not require any further surveys but will be felled following a precautionary method of working (PMW). The PMW may include following activities:

- endoscope inspection of PRF;
- section felling of the trees;
- all works will be supervised by a bat licenced ecologist who is authorised to use endoscopes;
- before works commence the supervising ecologist will provide a short toolbox talk to the arborists; and
- should a feature that from aerial inspection is deemed suitable to support a maternity roost (PRF-M) works on that tree will stop until further surveys can be undertaken.

Should a bat roost be discovered during the survey work that tree will be retained until further surveys can be undertaken and a mitigation licence acquired.

## Closure

We trust that this is sufficient to remove the ecology objections to the planning application.

Kind regards

SLR Consulting Limited



Ruth Holland, BSc MSc ACIEEM  
Associate Ecologist

