



17th July 2024

██████████
Uttlesford District Council
London Road
Saffron Walden
CB11 4ER

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 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.

Application: UTT/23/2496/FUL
Location: Land West Of High Street Stebbing
Proposal: 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)

Dear ████████,

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

Holding objection due to insufficient ecological information on Priority habitat (Hedgerow)

Summary

We have reviewed the documents supplied by the applicant including the Landscape Masterplan for North Field (A&B), drawing no. SD 200 (Austin Design Works, September 2023), Landscape Masterplan for South Field (C&D), drawing no. SD 201 (Austin Design Works, September 2023), Proposed Planting Plan and Schedules for North field (A&B), Proposed Planting Plan and Schedules for South field (C&D), Landscape Design & Biodiversity Enhancement (Austin Design Works, September 2023), Proposed Masterplan, drawing no. DR_020 (Alistair Downie Studio, September 2023), Tree Quality Survey, Implications Assessment & Arboricultural Method Statement (Austin Design Works, June 2022), Tree Constraints Plan, drawing no. TR02.1 Rev A (Austin Design Works, September 2023), Tree Constraints Plan, drawing no. TR02.2 Rev A (Austin Design Works, September 2023), National Vegetation Classification Survey (MKA Ecology, November 2022), Reptile Survey report (MKA Ecology, November 2022), Tree Assessment Technical Note (MKA Ecology, November 2022), Great Crested Newt Environmental DNA Surveys letter report (MKA Ecology, August 2022), Preliminary Ecological Appraisal (Hybrid Ecology Ltd., September 2021), Update Ecological Site Walkover (Tim Moya Associates, August 2023), Addendum Ecological



Response (SLR Consulting Ltd., March 2024), Addendum Ecological Response (SLR Consulting Ltd., April 2024), Biodiversity Net Gain Assessment (Tim Moya Associates, September 2023) and Technical Memorandum (SLR Consulting Ltd., June 2024) relating to the likely impacts of development on designated sites, protected & Priority habitats and species and identification of proportionate mitigation. In addition, documents relating to the Great Crested Newt District Level Licensing scheme have been submitted.

We are still not satisfied that there is sufficient ecological information available for determination of this application due to a lack of information in relation to Priority habitat (hedgerows).

Priority habitats

The Addendum Ecological Responses (SLR Consulting Ltd., March 2024 and April 2024) states that adjacent Lowland Mixed Deciduous woodland Priority habitat is to be unaffected by the proposed development.

There are native species hedgerows at the boundary of both fields which are Priority habitats according to the Preliminary Ecological Appraisal (Hybrid Ecology Ltd., September 2021). Four small sections of these hedgerows are being removed for the proposed access points. As these hedgerows are due to have sections removed in order to create access to the site, it is considered appropriate that these hedgerows are included within the red line boundary so that their compensation is included in the proposals. Although mandatory biodiversity net gain is not required for this planning application, Priority habitats should be replaced on a like-for-like or like-for-better basis to ensure no net loss as required by NPPF. Evidence of this has not yet been provided. It is recommended that replacement native hedgerow planting is undertaken at the boundary of the site so that it contributes to functioning foraging and commuting habitat for wildlife. The proposed plans and landscape masterplans show that native hedgerows are to be planted on site, mainly around the boundaries of the proposed back gardens. However, it should be noted that hedgerows planted in association with proposed dwellings/gardens do not count towards Priority habitats. In addition, the Biodiversity Net Gain Assessment (Tim Moya Associates, September 2023) does not include the hedgerows along the eastern boundary of the fields and shows them as being outside of the red line boundary.

A Landscape and Ecological Management Plan (LEMP) should outline how the habitats will be managed and should be secured by a condition of any consent.

Additional information

Great Crested Newt

The Great Crested Newt Environmental DNA Surveys letter report (MKA Ecology, August 2022) surveyed three ponds within 250m of the site, all of which came back negative for Great Crested Newt (GCN), a fourth was unable to be surveyed as it was dry at the time of the survey. A further two ponds were present within 250m of the site and were unable to be surveyed. These ponds are closest to the site and so it was considered GCN could not be ruled out from the site, and it was recommended that the site is registered under Natural England's GCN District Level Licensing scheme. As discussed in the Update Ecological Site Walkover (Tim Moya Associates, August 2023), the LPA will need an Impact Assessment and Conservation Payment Certificate (IACPC) document countersigned by Natural England as evidence of site registration prior to determination where this European Protected Species is likely to be present and affected by development. A countersigned IACPC document has now been submitted with this application and we recommend securing a copy of the DLL licence by a condition of any consent.

Bats

The Addendum Ecological Responses (SLR Consulting Ltd., March 2024 and April 2024) state that an updated Ground Level Tree Assessment was undertaken in February 2024. This survey included all trees to be removed or located within close proximity to the development. It identified eight trees with PRF-I.



The Technical Memorandum (SLR Consulting Ltd., June 2024) provides results of further inspections of six of these trees (the remaining two being offsite). This survey confirmed the surveyed trees provided a maximum of PRF-I suitability and so a Precautionary Working Method Statement (PWMS) has been recommended and outlined. In line with the latest best practice guidance (Collins, 2023; Reason & Wray 2023), it should be noted that as part of the PWMS replacement features should also be provided in retained trees, such as through veteranisation so that the future roost resource for bats is not lost. This finalised PWMS should be secured by a condition of any consent.

In line with the Preliminary Ecological Appraisal (Hybrid Ecology Ltd., September 2021) we recommend that a bat-sensitive lighting plan is implemented at the site and that dark corridors along the site's boundaries are retained. This must follow the [Guidance Note 8 Bats and artificial lighting](#) (The Institute of Lighting Professionals & Bat Conservation Trust, 2023). This lighting design should be secured by a condition of any consent. In summary, it is highlighted that the following measures should be implemented for the lighting design, which could be informed by a professional ecologist:

- Light levels should be as low as possible as required to fulfil the lighting need.
- Warm-White lights should be used preferably at 2700k. This is necessary as lighting which emit an ultraviolet component or that have a blue spectral content have a high attraction effect on insects. This may lead in a reduction in prey availability for some light sensitive bat species.
- If light columns are required, they should be as short as possible as light at a low level reduces the likelihood of any ecological impact. However, the use of cowls, hoods, reflector skirts or shields could also be used to prevent horizontal spill.
- Movement sensors and timers could be used to minimise the 'lit time'.

Reptiles

A series of reptile presence/likely absence surveys undertaken in 2022 identified a likely low population of Grass Snake and Slow-worm onsite. It was recommended that a reptile translocation is undertaken prior to commencement of works onsite and therefore a reptile mitigation strategy would need to be secured by a condition of any consent. The Addendum Ecological Response (SLR Consulting Ltd., March 2024) has stated that the reptiles will be retained on site and habitats enhanced. Given the amount of open meadow proposed on site it is considered possible for the current reptile population to be sustained on site. It is recommended that a reptile mitigation strategy is secured by a condition of any consent.

In addition we note that the site is in close proximity to The Downs, Stebbing Special Roadside Verge (SRV)/Local Wildlife Site (LoWS). It is considered possible for the proposed development to impact upon this SRV/LoWS during the construction phase through airborne pollution and traffic impacts etc. It is recommended that mitigation measures to avoid these non-statutory designated sites are outlined within a Construction and Environmental Management Plan for Biodiversity (CEMP: Biodiversity) secured by a condition of any consent.

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





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.