



1<sup>st</sup> August 2023

Isaac Stringer  
Basildon Borough 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 Basildon 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:** DC/23/02056  
**Location:** Parsonage Green Farm, Parsonage Green, Cockfield, Bury St Edmunds Suffolk IP30 OHB  
**Proposal:** Full Planning Application - Change of use of agricultural building to light industrial (Class E)

Dear Isaac,

Thank you for consulting Place Services on the above application.

**Holding objection due to insufficient ecological information on European Protected Species (Habitat sites), European protected species (bats and GCN), Protected species (Badger) & Priority species & habitats.**

**Summary**

We have reviewed the submitted documents and note that no ecological assessment has been undertaken for this site. Therefore, we have conducted a desk study to confirm the likely impacts upon designated sites, protected and Priority species & habitats. This included a review of Magic Maps (<https://magic.defra.gov.uk>) and aerial photographs of the site.

We note an ecological report has not been provided for this application. As a result, we are not satisfied that sufficient ecological information is currently available for determination as the impacts to legally protected and priority species and habitats have not been identified.

Consequently, we recommend that a Preliminary Ecological Appraisal (PEA) should be conducted for this application. This should be undertaken by a suitability qualified ecologist, following standard methodologies. The survey should include considerations for the likely impacts to bats (European Protected Species), Great Crested Newt (European Protected Species), Badger (Protected Species), birds (Protected Species), Hedgehog and Toad (Priority species). The PEA should include a Preliminary Roost Assessment for roosting bats and reference to the priority deciduous woodland habitat, traditional Orchard and Woodpasture and Parkland to the west of the site (<https://magic.defra.gov.uk>).



We note that five waterbodies are situated within 250 metres of the site with three of them within a 100 metre radius. The site also lies within a Great Crested Newt Amber Risk Zones as identified on open source mapping for [GCN Risk Zones \(Essex\) | GCN Risk Zones \(Essex\) | Natural England Open Data Geoportal \(arcgis.com\)](#). There is therefore a reasonable likelihood of these protected amphibians being present and affected by the development. As a minimum we expect a non-licensed precautionary method statement to manage the risk during the construction phase of the development.

The applicant may be interested to know that Natural England's District Level Licensing for GCN is now available in [Essex – see https://www.gov.uk/government/publications/great-crested-newts-district-level-licensing-schemes](#) - where sites can be registered to be covered by this strategic mitigation scheme. Guidance for developers and registration forms to join the scheme are available and 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.

Further surveys are required prior to determination because paragraph 99 of the ODPM Circular 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 application should also identify and pursue opportunities for securing net gains for biodiversity, as highlighted within Paragraph 174 [d] of the National Planning Policy Framework 2021. Therefore, we recommend that the Preliminary Ecological Appraisal provides recommendations for biodiversity enhancements within this application.

This further information is therefore required to provide the LPA with certainty of impacts on legally protected and Priority species and enable it to demonstrate 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 overcome our holding objection.

Please contact us with any queries.

Yours sincerely,

**Benjamin Shiells, BSc (Hons), PGDip**  
A Qualifying member of CIEEM  
Assistant 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 Basildon Borough 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.