



2nd October 2023

Michael Okocha
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/23/2162/HHF

Location: Casa Mia Stortford Road Clavering CB11 4PE

Proposal: Proposed redevelopment of first floor roof including raising the roof, repositioning roof lights and installation of solar panels.

Dear Michael,

Thank you for 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 application form, Biodiversity Checklist (B & E Partnership, August 2023), Existing Roof Plan, drawing number P/06 Rev A (April 2023), Proposed Roof Plan, drawing no. P/15 Rev A (April 2023), Existing & Proposed Streetscene, drawing no. P/23 Rev A (April 2023) and photographs submitted as supporting information as well as aerial photographs and Magic Map Application ([Magic Map Application \(defra.gov.uk\)](https://defra.gov.uk)) to help identify the likely impacts of development on protected & Priority habitats and species and identification of proportionate mitigation.

We are not satisfied that there is sufficient ecological information available for determination of this application. The proposed extension impacts a lined slate roof and an existing dormer with hanging tiles, both of which have the potential to support roosting bats. With suitable foraging habitat within the nearby mature gardens, there is an elevated risk of bats being present and an ecological assessment has not been undertaken. We recommend that a suitably qualified ecologist undertakes a Preliminary Roost Assessment (PRA) of the existing building to assess if bat roosts are present and if the proposals will directly, or indirectly, impact bats. The survey can be undertaken at any time of year and should follow best practice guidelines (Collins, 2023). We recommend that details of survey methods, results and any mitigation and



enhancement measures are detailed within the survey report. If the building is considered to have the potential to support roosting bats, then further surveys such as emergence/re-entry surveys should be undertaken, in line with best practice guidance (Collins, 2023), the results of which will be required prior to determination. [A Householders' Guide to Engaging an Ecologist | CIEEM](#) may help the applicant.

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."*

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

Additionally, no biodiversity enhancement measures are identified in the documents provided. We recommend that, to secure net gains for biodiversity, as outlined under Paragraph 174d and 180d of the National Planning Policy Framework 2021, reasonable biodiversity enhancement measures, such as bird boxes, will need to be provided.

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)
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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.