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After reading the report of the ecological consultants and the review by Essex Place Services, I would like to share my concerns and inform you of my objection to the current planning application for Sandgate Nurseries (ref DC/23/0189).

I cannot see any acknowledgement or impact mitigation plans for the Cuckoo, Tubular Water-dropwort and Brown Hairstreak Butterfly. These are species that have been recorded on the site and are in the list of priority species under the Natural Environment and Rural Communities Act 2006 Section 41. I would argue that assessments on the site should include some sort of plan for any protected / priority species that have been observed.

Furthermore, I do not think that sufficient habitat protection for foraging bats has been included in the plan. The ecological impact assessment states that *"The treelines and mature scrub belts around the perimeter of the site provided suitable foraging opportunities and commuting links to the surrounding landscape for bats"*. One of the mitigation measures mentioned is *"The retention and protection of the majority of mature broad-leaved treelines and underlying scrub around the edges of the site, to avoid impacts on birds, bats, reptiles, and hedgehog in these areas."*

However, looking at the plan, the locations that I have seen and recorded soprano pipistrelle bats hunting (along the right edge, backing onto the houses on Hollands Road) are in the main development area, and there is no plan for a wildlife buffer area on that side of the site.

As acknowledged in Section 5.9 of the report...

*"Even if a sensitive lighting strategy is enacted, and highest value commuting features retained, it is considered that extensive loss of habitat across the majority of the site would still result in a minor negative effect for foraging and commuting bats, and further compensation will be required. If a sensitive lighting strategy is enacted, and highest value commuting features retained, it is considered that extensive loss of*

*habitat across the majority of the site would still result in a minor negative effect for foraging and commuting bats.”*

This quote highlights that even though some mitigation plans are in place, this protected species will be negatively affected by the development. According to the gov.uk page (<https://www.gov.uk/guidance/bats-protection-surveys-and-licences>), removing ‘commuting habitats’ like hedgerows, watercourses or woodland and changing or removing bats’ foraging areas is something that needs to be accounted for, and I would argue that that the proposed solution does not do this as there is still a negative effect.

The area I mentioned along the right edge of the field is also used as a very common commuting route for the foxes [REDACTED] that live in the field, [REDACTED]

Overall I think a more comprehensive plan including the species that were not included despite being recorded on the site is needed. If the build was to go ahead I think it would be important to get consider the inclusion of a green corridor along the right edge as there is nothing in that area and I think that is an oversight.

I would also like to ask what happens when it comes to species that are possibly on the site but not recorded. According to the gov map database ([Magic Map Application](#)), the area is potential habitat for Lapwing (red listed), Redshank (amber listed), Tree sparrow (red listed) and Turtle dove (red listed).

Are there any plans in place to investigate further or implement any measures for these species in case they are in the area? I am not sure what the process is for this.

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