



Our Ref: JBA 18-351 ECO43SM

9th February 2024
 Revision A – 11th July 2024 (minor amendments)

Persimmon Homes (Suffolk)

RE: Updated Ecological Walkover Survey of Phases 5A and 5C and associated areas of SUDS/LEAP/NEAP/POS at Haverhill, Suffolk.

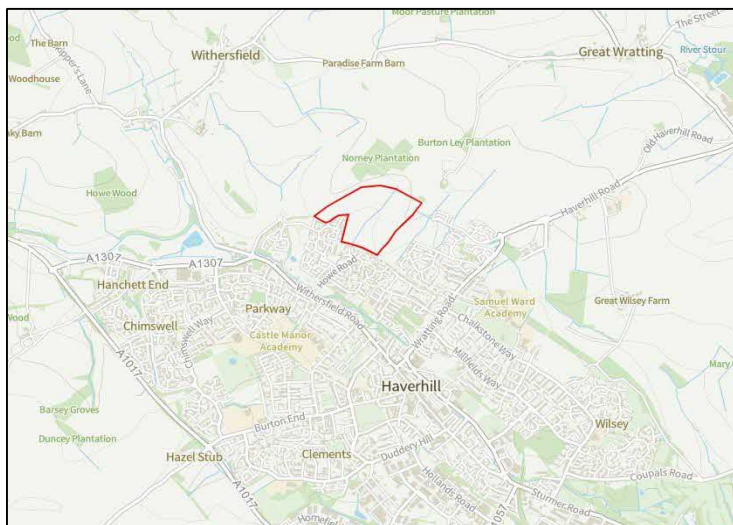
Introduction and Background

James Blake Associates Ltd. (JBA) was instructed by Persimmon Homes (Suffolk) to undertake an updated ecological walkover survey of Phases, 5A, 5B and areas designated as POS/NEAP and SUDS areas at Haverhill, Suffolk to assess the potential for protected species and invasive & non-native species and provide a report to summarise the findings of the walkover survey, highlighting any significant constraints for the site since the previous walkover survey in 2023 (JBA 2023) which also included Phases 4A, 4B and 5B.

The whole site is approximately 34.1 hectares in size and located northwest of Haverhill Road (A143) on the western outskirts of the town of Haverhill, Suffolk. However, Phase 2A, 2B, 3A and 6 are already under construction or construction is finished. Phases 4A and 4B have had some infrastructure work carried out, including installation of the relief road, SUDS basins and a track through an area of poor semi-improved grassland and scattered scrub (cleared under ECoW supervision) to access the SUDS basin in 5B, so this ecology walkover focused on 5A and 5C and areas designated as POS/NEAP or SUDS and neighbouring habitats where possible.

The area surveyed on 7th February 2024 covers approximately 7 hectares. Arable fields border the site to the north and west with residential housing to the south and east. Norney Plantation County Wildlife Site (CWS), an area of ancient, replanted woodland, is approximately 65m north of the site boundary and CWS no 85 230m north-east of Phase 5A. The wider landscape includes mainly arable fields with scattered woodland. The river Stour lays approximately 1.8km east of the site, and the Stour Brook lays approximately 300m south, along with a series of drainage ditches (see Figure 1 below).

Figure 1: Site Location (Reproduced from Magic maps data licence number 100022861)



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A previous phase 1 habitat survey for the relief road was undertaken in 2018, which noted the site as a series of arable and tall ruderal fields with managed hedgerows, scattered boundary trees, and wet and dry ditches. Additionally, in 2019, a preliminary ecological appraisal (PEA) for phases 2-6 was undertaken which described the site as fields of poor semi-improved grassland and tall ruderal vegetation, with amenity grassland margins and defunct species-poor hedgerow. Other habitats recorded on site included:

- Intact species-rich hedgerow
- Defunct species-rich hedgerow
- Dense scrub
- Mixed plantation

An updated ecological walkover survey was also undertaken in March 2022 by JBA, but no changes were noted for Phases 4A, 4B, 5A, 5B and 5C at that time.

A further updated ecological walkover survey was undertaken in January 2023 by JBA of Phases 4A, 4B, 5A, 5B and 5C. Several changes were noted with construction works mainly associated with the relief road running parallel to the north of Phases 4A and 5B and access roads from Phases 6 and 3B to Phase 5A and 5C. Changes since the previous ecological walkover of March 2022, included:

- Clearance of the relief road to the north of Phases 4A and 5B in August/September 2022.
- Partial removal of species-rich hedgerows G22, G29 and G30 as per the tree removal plans (JBA, 2020a) for two access roads in November 2022.
- Clearance of poor semi-improved grassland and tall ruderal vegetation along the access road to the south-east of Phases 5A/C in November 2022.
- Creation of a wet ditch on the northern side of the relief road by the neighbouring farmer and a bund of bare soil created to the south of the relief road in Phase 4A.

The remaining habitat on Phases 4A, 4B, 5A, 5B and 5C though remains unchanged and consists mainly of scattered scrub, tall ruderal vegetation, poor semi-improved grassland, a species-poor hedge, and a (now discontinuous) species-poor hedge with trees, wet and dry ditches.

This report is intended to give an overview of the site habitat(s) and condition at the time of the survey and should be read in conjunction with the previous phase 1 habitat survey (JBA, 2018) and preliminary ecological appraisal (JBA, 2019a). as well as the updated ecology walkover surveys of Phases 4A, 4B, 5A, 5B, 5C of March 2022 (JBA 2022a) and January 2023 (JBA 2023b).

The survey methodology followed the standard Phase 1 methodology of Joint Nature Conservation Committee Guidelines (JNCC, 2010). An extension of this basic methodology was also undertaken to provide further details in relation to notable or protected habitats present within the survey area, or in relation to habitats present that have the potential to support notable or protected species (CIEEM, 2013).

The baseline conditions reported in this document represent those identified at the time of the survey on 7th February 2024. Although a reasonable assessment of habitats present can be made during a single walkover survey, seasonal variations are not observed.

The relevant wildlife legislations and planning policies are listed below:

- Conservation of Habitats and Species 2019 (Amendment) (EU Exit) 2019, ('The Habitats Regulations'). The Habitats Regulations implement The Habitats Directive 1992 (92/43/EEC) into English Law. (Amended by the Conservation of Habitats and Species (Amendment) Regulations 2012 S.I. 2012/1927).

- Wildlife and Countryside Act, 1981 (as amended) (WCA). [Amended by the Countryside and Rights of Way Act (2000)].

- The Natural Environment and Rural Communities Act, 2006 (NERC).

The Protection of Badgers Act, 1992 (The Badgers Act).
The Wild Mammals (Protection) Act, 1996.
The Hedgerows Regulations, 2007.
National Planning Policy Framework, 2023 (NPPF).

Results and Evaluation

The site itself has seen considerable change since the previous reports in 2018, 2019 and 2022, 2023. Consequently, the validity of results within previous species-specific reports has also been discussed within this report. Most changes on site have occurred due to ongoing construction and clearance of the planned housing development on site. However, as stated in the previous PEA (JBA, 2019), the site is still considered suitable for badgers, breeding birds, wintering birds, foraging and commuting bats, hedgehog and potentially reptiles and GCN, away from areas of active construction.

Changes since the previous ecological walkover of January 2023, in relation to Phases 5A and 5C, include:

Partial clearance of the southern section of hedgerow G25 to facilitate drainage pipes and widening of the drainage ditch at the southern end of G15.

Partial clearance of hedgerow G15 to widen access from Howe Road in August 2023 as per the tree removal plans (JBA 2020a) and arboriculture method statement (JBA 2022).

Facing back of areas of two hedgerows G25 and G28, to size of original drawings in February 2024 following a survey to reinstate tree protection fencing along G28.

See an updated habitats map with target notes in Appendix 1.

Hedgerow

The previous hedgerow survey report (JBA, 2019h) highlighted most hedgerows on site as species-rich, with four categorised as 'important' according to the criteria set out in the Hedgerow Regulations (1997).

Changes to this habitat were recorded in the updated walkover survey in 2022, with hedgerows G37 and G43 partially removed, as per the tree removal plans (JBA, 2020a).

Sections of hedgerows G29 and G30 were removed for access roads in November 2022 and a section at the northern end of G22 in August 2022, as per tree removal plans (JBA, 2020a) during clearance for the relief road in August 2022.

Further sections at the southern end of G25 were removed to allow access to the new SuDS on Phase 5B, and also a small section of G15 to widen access to Howe Road from Phase 5C in August and September 2023.

Some facing back of G28 and G27, as well as G25 was carried out to reduce the width of the hedge to match the original measurements taken when plans were drawn up to allow the reinstatement of tree protection fencing on G27 and G28 and ready for the instalment of similar fencing along G25.

The previous species-specific surveys mentioned above, highlight the importance of hedgerow habitat on site and therefore enhancements within the hedgerow survey report should be followed.

Replacement species-rich native hedgerows are to be provided within the site as a whole to mitigate for the loss of these habitats, as laid out in the ecological design strategy.

Badger

The previous reports stated that field boundaries and ditches across the wider site were considered suitable for sett creation, and this remains valid where these habitats remain. However, no definite evidence of badger activity was found on Phases 5A and 5C during the 2024 walkover. There were no signs of badger latrines, hair, or setts, despite suitable habitat for sett creation being found within the area of plantation woodland and scrub offsite and along the central hedge C26 that separates Phase 5A and 5B.

As with previous surveys several large mammal push-throughs were recorded through the poor semi-improved grassland between a number of Phases, however these were likely to be Muntjac deer, Roe deer and possibly fox.

Although no signs were recorded, it remains possible that badger still forage through the remaining poor semi-improved grassland of 5A and 5C and neighbouring Phases 4A and 4B, therefore a pre-commencement badger survey should be undertaken on site prior to any site clearance or ground works, if there is a delay of works by six months from this this walkover survey (7th February 2024).

Bats

There are no trees on Phases 5A or 5C that have any bat roost potential (see Appendix 1).

The bat activity report (JBA, 2019c) found several bat species using majority of the hedgerow on site for foraging and commuting. The updated walkover survey noted that habitats on site, despite the loss of some semi-improved grassland and hedgerow towards the east of the site due to construction, remain 'moderate' in their potential to support foraging and commuting bats.

The January 2023 ecology walkover noted that since the March 2022 ecology walkover survey, there had been a further loss of habitat with the planned removal of sections from hedgerows G22 for the relief road, as well as G29 and G30 for two access roads, which would likely reduce bat foraging activity along the eastern edge of the area surveyed.

Phase 5A and 5C have seen no significant removal of hedgerows since January 2023, except for a small section of G15 to create wider access to Howe Road on Phase 5C and the southern end of G25, meaning the bat commuting and foraging routes along those hedges remains intact.

The compensation and avoidance measures within the bat activity report and ecological design strategy remain valid and should be followed to avoid long-term disturbances to this species.

Hedgehog

The poor semi-improved grassland and scattered scrub present on Phase 5A and 5C still provide moderate suitability for hedgehogs in terms of foraging or sheltering due to hedgerows, tall ruderal vegetation, scattered bramble and dogwood scrub and undisturbed semi-improved grassland away from areas of active construction.

The adjacent areas on Phases 4A, 4B and intended areas of POS between Phase 4B and 5A, and the intended SUDS/POS between 5A and Phase 6 and the proposed area of school and community facilities between Phase 5A and Phase 3B also have similar suitable habitat for foraging and sheltering.

Previous evidence of hedgehog was found on Phase 6 prior to clearance, with droppings and a dead hedgehog (died of natural causes noted) during surveys and clearance work under ECoW supervision.

No evidence of activity was recorded at the time of the 2024 survey. However, precautionary clearance should be followed where vegetation is cut to 20cm and checked for the species prior to removal.

Water vole

The previous PEA (JBA, 2019a) recorded no wet ditches onsite; however, at the time of the updated ecological walkover in 2022 survey several ditches, particularly to the north, east and along the central hedgerow furthest west, were recorded as wet. The previous phase 1 habitat survey (JBA, 2018) also recorded these ditches as wet. Most of these wet ditches were slow flowing and shallow and therefore are still considered unsuitable for water vole.

The current survey found the central ditch that runs alongside hedgerows G22, G23, G24 and G25 between Phases 5A/5C and 5B was still wet with water draining from the ditch into a widened end at the southern end of G25 into a storm drain.

Although the ditch is wet that runs through G25, it is currently unsuitable for water vole as it is overgrown with blackthorn and hawthorn along most of its length.

Dormice

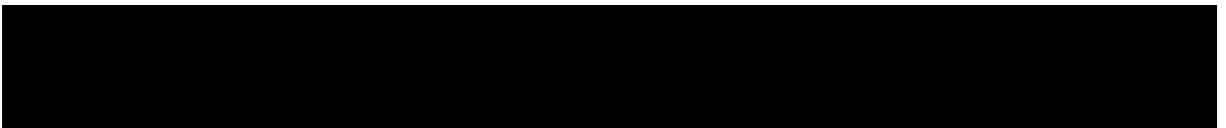
A previous survey for hazel dormice, conducted in 2019 (JBA, 2019d), found no evidence of activity within hedgerow habitat on site that connected to woodland to the north, despite species-rich, continuous hedgerow being highlighted in the previous PEA report.

The hedgerows on Phase 5 were not included within the hazel dormouse report as they are largely defunct and discontinuous or species-poor backing onto existing residential areas so are largely unsuitable for hazel dormouse.

Therefore, results from the hazel dormice report remain valid and recommendations for post-construction habitat enhancement have been provided.

Birds

Hedgerow and trees on site still provide good nesting and foraging opportunities for birds, with an undisturbed area of young trees, poor semi-improved grassland, tall ruderal vegetation, scattered bramble and dogwood scrub (although limited) still present on Phases 5A and 5C.



Furthermore, the wintering bird survey carried out in 2020 (JBA, 2020), confirmed several species wintering on site including skylark, with mitigation recommendations and enhancements provided.

During the updated walkover survey for Phases 5A and 5C on 7th February 2024, no skylarks were observed or heard. This may possibly be due to the rather wet, cool, and overcast conditions.

Seven BoCC amber-listed species: dunnock (*Prunella modularis*), kestrel (*Falco tinnunculus*), meadow pipit (*Anthus pratensis*), redwing (*Turdus iliacus*), song thrush (*Turdus philomelos*), wren (*Troglodytes troglodytes*) and woodpigeon (*Columba palumbus*) were also recorded within habitats on Phases 5A and 5C with kestrel hunting over the poor semi-improved grassland scrub on Phases 5A and 5C and the other species sheltering or foraging across the grassland or within the boundary vegetation and hedgerows.

Other common BoCC green-listed species such as blackbird, blue tit (*Cyanistes caeruleus*), carrion crow (*Corvus corone*), collared dove, great tit and robin (*Erithacus rubecula*) were also noted foraging or sheltering across a wide variety of habitats on Ohase 5A and 5C including hedgerows, bramble and dogwood scrub and poor semi-improved grassland.

A currently vacant magpie was visible within G24 in the hedge line between Phase 5A and an area intended for POS between Phase 5B and Phase 4B.

As a precautionary measure, any scrub, tall ruderal vegetation, and poor semi-improved grassland that may impact future clearance or construction work should be managed to reduce the likelihood of birds breeding close to any active clearance or construction.

The mitigation recommendations and enhancements highlighted within the breeding bird and wintering bird reports should continue to be followed.

Reptiles

The previous PEA and phase 1 habitat survey (JBA, 2019a, 2018) stated the semi-improved grassland and tall ruderal vegetation on site provided moderate quality habitat for reptiles. A reptile survey was carried out in 2019, which found no reptiles present on site (JBA, 2019f); however, a grass snake (*Natrix natrix*) was recorded during clearance work on Phase 2b in August 2021 under ecological supervision.

The updated walkover survey in February 2024 found there were no suitable brush or log piles for sheltering, but there was still suitable habitat within Phases 5A and 5C, with the poor semi-improved grassland, scattered and bramble scrub on the western boundary of Phase 5A offering some foraging and sheltering opportunities, as did the hedge G25 and the intact parts of poor semi-improved grassland scrub on Phase 5A, connected to similar suitable habitat to the north on Phases 3B, 4A and 4B.

As a precautionary measure, vegetation clearance and ground stripping will need to be done under supervision of an ecologist and following the provided reptile method statements, previously used on clearance of all or parts of Phases 2B, 3B, 4A, 4B, 5A, 5B, 5C and 6.

Amphibians

In the previous PEA (JBA, 2019a) four ponds were identified within 500m of the wider site boundaries. Pond 2 had been filled in, Pond 3 was inaccessible, Pond 4 was mostly dry and therefore unsuitable, and Pond 1 was still present and intact. The previous PEA and GCN eDNA survey (JBA, 2019g) calculated Pond 1 as having 'below average' habitat suitability index, and as no change has occurred in the interim. The GCN eDNA survey also found no GCN eDNA within any of the samples for Pond 1. See map of ponds and waterbodies within 500m of the site in Appendix 2.

During the updated February 2024 survey, it was noted that some areas on Phases 5A and 5C still hold some limited potential for sheltering or foraging GCN, mainly within hedgerow G25 that separates the new SuDS basin on Phase 5B and Phases 5C.

Due to the works undertaken near Pond 1 and Phase 2B and 6 being under construction, it is unlikely that GCN would have populated the area surveyed in the interim from the east. Moreover, Ponds 5 and 6 to the west are more than 500m from the area surveyed and GCN are unlikely to attempt colonise from those ponds.

The small stream 465m (watercourse 1 on map) to the west of the site, the new SUDS pond 370m to the south-west (Pond 7 on map) and Stour Brook 440m (watercourse 2 on the map) to the south-west of Phase 5B although within 500m, are also unlikely to have GCN present (see map in Appendix 3) due to the nature of the habitat within them.

It is therefore recommended that at present there is no need to provide further eDNA surveys prior to clearance and construction work being carried out on Phases 5A and 5C. However, precautionary measures should still be followed with vegetation clearance and ground stripping, and this will need to be done under supervision of a licenced ecologist.

Invertebrates

Previous reports recorded the site as unlikely to support a diverse assemblage of invertebrates due to lack of plant diversity and poor semi-improved grassland.

Common butterfly species were noted on Phases 5A and 5C during the pre-commencement badger walkover in August 2022 and during clearance of vegetation from the area of the new SuDS in August 2023. These included common species associated with open areas of semi-improved grassland such as brown argus (*Aricia agestis*), common blue (*Polyommatus icarus*) and small copper (*Lycaena phlaeas*), as well as common species such as comma (*Polygonia c-album*), peacock (*Aglaio io*), red admiral (*Vanessa atalanta*) and small tortoiseshell (*Aglaio urticae*) which are likely drawn to the buddleia or nettles (*Urtica dioica*) on site.

During the updated walkover in February 2024, as with the walkover in January 2023 few insects were recorded as it is winter, other than a few small unidentified gnat species, but buddleia was still patchily distributed across Phases 5A and 5C.

However, the habitat that remains on Phases 5A and 5C have not dramatically increased in terms of plant or invertebrate diversity therefore invertebrate surveys are deemed unnecessary as the plant diversity remains limited.

Flora

Sulphur clover (*Trifolium ochroleucum*), a nationally scarce species and listed as 'near-threatened' on the current red data list for vascular plants in Great Britain, had been identified within previous reports (JBA, 2018, 2019a) and walkovers, but only two plants on a small area on Phase 6, which was later translocated to an area with more plants parallel with hedgerow G37 within a POS/NEAP area, but not for Phases 5A or 5C.

No other rare or protected species were observed within the area surveyed at the time of the current walkover survey, though it should be noted that February is not the optimum time for a botanical survey.

Evaluation Conclusion

No additional evidence, from the previous surveys, of other protected species on, or using, the site was observed at the time of the survey.

The site is still considered suitable for badgers, breeding birds, wintering birds, foraging bats, hedgehog and potentially reptiles and GCN.

No changes to these species, in terms of their activity on site, were observed from the previous reports and repeated survey results are unlikely to differ from those undertaken in 2019/2020, 2022 and 2023; therefore, it is considered that all survey data remains valid. If there is a delay of development by over 2 years, then another ecological walkover should be undertaken to note any changes in the interim and further species surveys may be required.

Precautionary Measures

It is recommended that the vegetation on Phases 5A and 5C and associated SuDS/LEAP/NEAP and POS areas as well as the school and community facilities areas, be kept as short as possible to discourage birds from nesting or sheltering, or reptiles, amphibians, and small mammals from sheltering.

Any vegetation clearance and disturbance (including hedgerow maintenance) should be undertaken outside of the nesting season, although timing considerations for reptiles should also be noted. The nesting season is deemed to be from mid-March to September (times can be temperature dependent). If this is not possible, a nesting bird check must be carried out by an ecologist, no more than 48 hours between the check and the removal. If the 'all clear' is given, then removal/works can commence. The survey lasts for no longer than 48 hours. If works are not completed in this time frame, then a re-survey will need to be carried out.

The above precautionary measures should also be undertaken in relation to edge of parcel clearance to facilitate works associated with the infrastructure phase.

All vegetation clearance works should be undertaken when common reptiles are likely to be fully active (i.e. during March/April to October) to avoid any chance of disturbing reptiles during the sensitive hibernation period.

Clearance of tall vegetation (>10cm) would be undertaken using a strimmer or brush cutter in two parts; the first to be cut down to 20cm, then checked by an Ecological Clerk of Works (ECoW) for the presence of any wildlife. The vegetation will then be cut to ground level under the supervision of an ECoW. The cuttings will be raked and removed the same day it is cut and under the supervision of an ECoW.

Enhancements

The recommendations and enhancements within the preliminary ecological appraisal (2019a) remain relevant and should be followed.

The following general principles for enhancement are recommended, in line with current planning practice and policy:

Where possible, trees and hedgerows at the boundaries of the site should be retained and enhanced to create corridors and shelter/foraging areas for wildlife including birds, bats, reptiles, badgers and hedgehogs. Planting of native hedgerow species in gaps and on boundaries without hedgerows, for example along the northern boundary, will provide further opportunities for these species.

Lighting should be designed so as to not shine directly into any boundary hedgerows with respect to potential bat habitat. Information on lighting is readily available from the Bat Conservation Trust (2023), Bats and the Built Environment series. It is recommended that a lighting strategy is agreed with the Local Planning Authority based upon this information.

The addition of bat and bird boxes on the proposed buildings or retained trees within the site would provide additional roosting and nesting opportunities. Recommendations of appropriate boxes will be provided once the recommended bat and breeding bird surveys are completed, to ensure boxes are tailored to the site.

Landscaping should incorporate native or wildlife attracting trees, shrubs, and wildflower areas as these would likely be of benefit to a variety of wildlife including, birds, bats and invertebrates. 'Hedgehog links' (i.e., 15cm diameter gaps at the base of fences) within the final design, will allow hedgehogs to move freely across gardens and public open space (POS) areas once construction has concluded.

Woodpiles should also be included within POS areas to provide hibernacula for hedgehogs on site.

Details of the ecological enhancements for Phases 5A and 5C and associated POS/LEAP/NEAP/SUDS, as well as school and community facilities are outlined in the Ecological Design Strategy (JBA 2022).

Conclusion

An updated ecological walkover survey was undertaken on 7th February 2024 of Phases 5A and 5C, as well as areas of associated POS/LEAP/NEAP/SUDs and the school and community facilities area at Haverhill, Suffolk.

Habitats on site have seen some change since the January 2023 ecological walkover with clearance of some vegetation for the widening of the drainage ditch at the southern end of G25, removal of a small area of G25 to facilitate this work, widening of access for Howe Road through partial clearance G15 and facing back of G25, G27 and G28 to take the hedge back to original hedge line at the time the initial plans were drawn up for reinstatement or installation of tree protection fencing. However, remaining habitats have not significantly changed since the January 2023 ecological walkover survey.

No further surveys for protected species are considered necessary, although a pre-commencement badger survey should be undertaken on site prior to any site clearance or ground works on Phases 5A and 5C if there is a delay of works by six months from this this walkover survey (7th February 2024).

All precautionary measures for site clearance should be taken in relation to breeding birds, reptiles and hedgehogs, and the mitigation measures provided within the PEA (JBA, 2019) and subsequent species-specific reports and precautionary method statements, should be followed.

If works do not begin within 2 years of this survey, another walkover survey will be required to note any changes in the interim.

Yours sincerely,

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Revised by:

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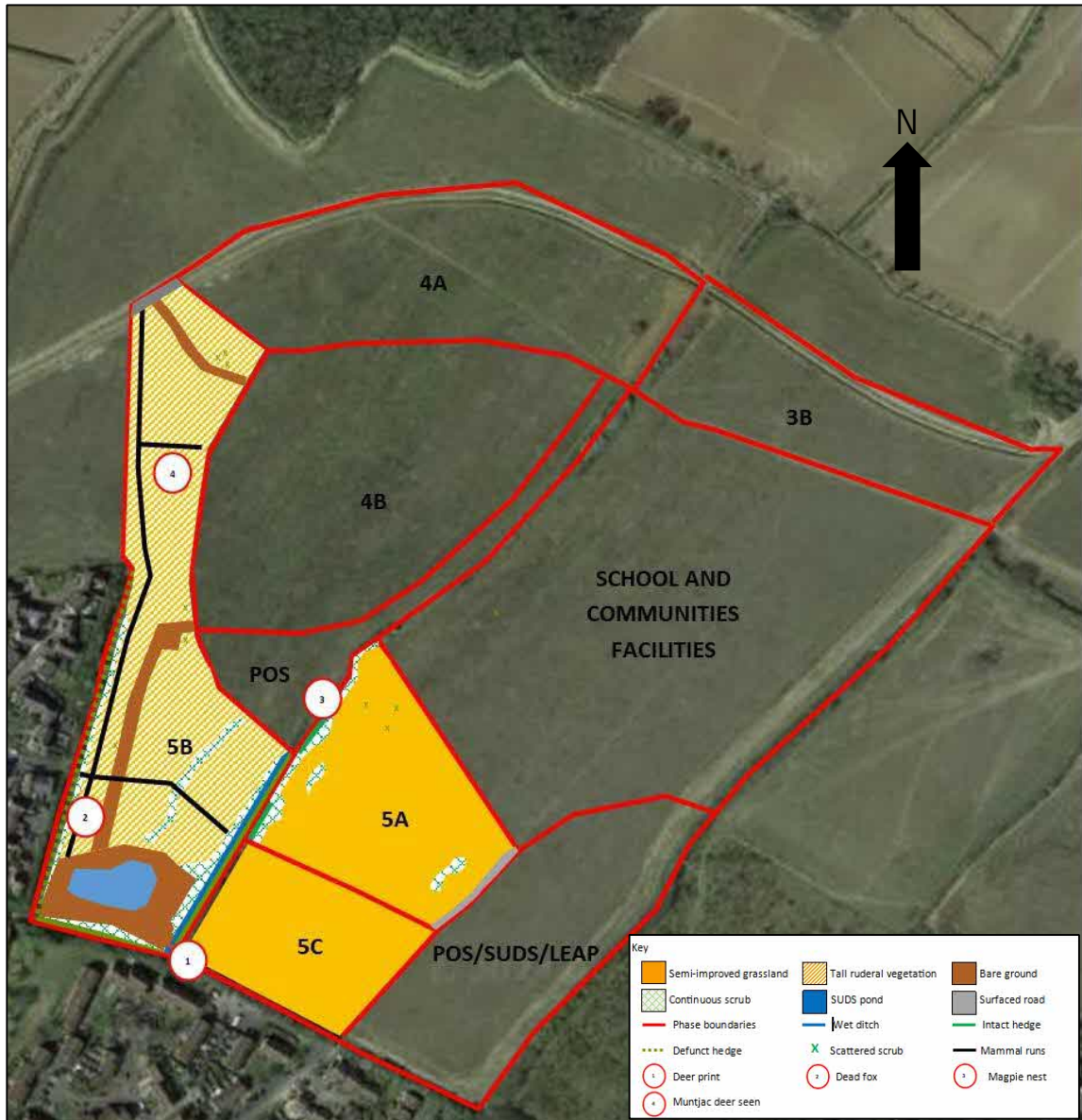
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[Appendices](#)

Appendix 1: Updated Habitat Map



Appendix 2: Ponds/watercourses within 500m of survey area

