Our Ref: JBA 18/351 ECO19 SM/SR

4th November 2021
Revision A – 1st November 2022

Isaac Jolly
On behalf of Persimmon Homes (Suffolk)

Dear Isaac,

RE: Ecology walkover survey report for Phases 3b at Haverhill, Suffolk.

James Blake Associates Ltd was commissioned by Persimmon Homes Suffolk to undertake an updated ecology walkover survey to assess the potential for protected species and invasive & non-native species and provide a letter report to summarise the findings of the walkover survey, noting any changes since the previous walkover and highlighting any significant constraints for phase 3b at land at Haverhill, Suffolk.

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, 2019 (NPPF).

Introduction and Background

The site is located on the edge of the town, to the north east of Haverhill, Suffolk. The site is surrounded by former arable land and residential properties approximately 400m to the south, and west, and an area of deciduous woodland 150m to the north-west, with the A143 to the south-east and the A10307 to the south-west. The upper reaches of the River Stour lie to the east and the wider landscape is dominated by residential, industrial and arable land, with some semi-improved grassland, mixed and broadleaved woodland (see Figure 1).

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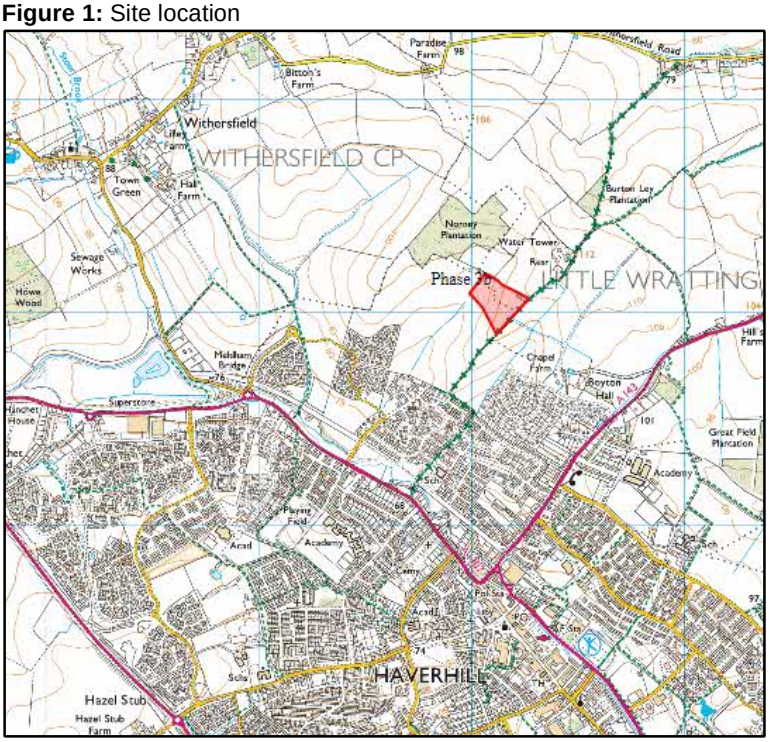
Figure 1: Site location



An ecological walkover survey was conducted on the 29th October 2021 by Sean Minns BA (Hons), to note any changes since the previous Preliminary Ecological Appraisal (PEA) undertaken by James Blake Associates (JBA) in 2019 and the further phase 2 surveys of 2019 and 2020.

Previous phase 2 surveys were undertaken on the site in 2019 and 2020, which included bat (activity), [redacted] great crested newt (*Triturus cristatus*) eDNA, [redacted] reptile, hazel dormouse (*Muscardinus avellanarius*) and botanical surveys. This report should be read in conjunction with the PEA and specific species surveys.

The baseline conditions reported and assessed in this document represent those identified at the time of the walkover survey on the 29th October 2021. Although a reasonable assessment of habitats present can be made during a single walkover survey, seasonal variations are not observed. The walkover survey was conducted in October, which is outside the optimal season for Phase 1 habitat surveys, however this is not considered a significant constraint. All areas were accessible during the time of the survey and at times were viewed externally.

The validation period for this letter is 2 years from the date of the survey 29th October 2021.

Results and Evaluation

The site itself has not changed significantly since the previous PEA (JBA, 2019) and ecological surveys of 2019 and 2020. The site is a former agricultural field bordered by a ditch to the west and hedgerows on three sides (except for the southern boundary) which have begun to return

to nature and is essentially semi-improved grassland with tall ruderal encroachment.

As stated in the previous preliminary ecological report (JBA 2019) the site is considered suitable for badgers, breeding birds (especially Eurasian skylark *Alauda arvensis*), wintering birds, foraging bats, amphibians, hedgehog (*Erinaceus europaeus*) and reptiles. No changes to these species were observed from the reports provided (JBA 2019 and 2020) and repeated survey results are unlikely to differ from those undertaken in 2019/2020; 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 survey may be required.

No badger setts or definite signs of badger were found on site during the walkover, however adverse weather conditions limited the search for hair or latrines. Mammal push-throughs were observed (as on previous surveys), which may be used by badgers. As badgers can move into an area quickly a pre-commencement badger survey is required six months prior to the commencement of works. The most recent badger survey was carried out in July 2021 (JBA 2021) however this was focused on Phase 2B only.

No rare or protected flora species were identified during the walkover survey. Invasive plant species, such as Japanese knotweed (*Fallopia japonica*), were not identified at the site during the walkover survey.

Although no reptiles were recorded during the walkover survey or the reptile survey in 2019, a grass snake (*Natrix natrix*) was recorded during clearance work on Phase 2b in August 2021, under ecological supervision. It is therefore recommended that a reptile method statement detailing reasonable avoidance measures and precautionary methods of working should be produced to ensure that any risk of harm to reptiles is minimised. Precautionary measures will include vegetation clearance and ground strip to be carried out when reptiles are more active (March to October) under ecological supervision.

A nesting bird check will also be required immediately prior to works between the months of March and September to ensure no active nests are damaged during works. If active nests are located, a ~5m ‘no works’ buffer (depending on species) will be erected around the nest and works will be stopped in this location until the young have fledged.

Lighting should be designed to reduce shine directly into any boundary hedgerows with respect to potential bat habitat, particularly the northern boundary. Information on lighting is readily available from the Bat Conservation Trust (2018) (Guidance Note 08/18), *Bats and the Built Environment* series. It is recommended that a lighting strategy is agreed with the Local Planning Authority based upon this information.

It should be noted that top soil and materials in relation to the larger development will be stored temporarily on Phase 3B, during construction and any site clearance works.

Biodiversity Net Gain (BNG)

A BNG assessment has been undertaken for the site-wide development, which includes Phase 3B. Based on the current soft landscape plans for the relief road, infrastructure and Phases 2-3B and 6, it is concluded that the development can potentially deliver an overall gain of 32.08% for habitat units, a 282.93% gain for hedgerows/linear features.

However, it is worth noting that these figures are minimums due to the landscape within the additional phases yet to be planned and finalised; because of this, the area of proposed habitats do not currently match the area of lost habitats. It is expected that as the additional phases progress, further net gain is achievable.

Furthermore, the BNG assessment does not take into account 'material' enhancements such as bird and bat boxes and therefore, the development is likely to increase the BNG if 'material' enhancements are included.

Enhancements

The recommendations and enhancements within the species-specific reports 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.
>
> 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 and reptile hibernacula should also be included within POS areas to provide hibernacula for species such as hedgehogs, reptiles and invertebrates on site.

Conclusion

No significant change to the site was observed since the previous PEA and ecological surveys (JBA, 2019/2020).

The habitat was still considered suitable for badger and therefore a pre-commencement badger survey should be undertaken six months prior to the commencement of works to ensure no badger sett is present.

A reptile method statement should be produced prior to works commencing on site, to safeguard reptile which may be using the site.

If works do not begin within 2 years of this survey another walkover survey will be required to note any changes in the interim and updated species-specific surveys may be required.

Based on the current soft landscape plans for the relief road, infrastructure and Phases 2-3B and 6, it is concluded that the development can potentially deliver an overall gain of 32.08% for habitat units, a 282.93% gain for hedgerows/linear features.

It is considered that with a sensitive landscape scheme, and by including some or all of the additional enhancements given within this report and those within the species-specific reports, the site could be improved for local wildlife post development.

Yours sincerely,

Sean Minns
Ecologist
James Blake Associates Ltd.

Revised by **Sam Rigg**
Head of Ecology
James Blake Associates Ltd.

References

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