



Suffolk Wildlife Trust

Brooke House
Ashbocking
Ipswich
IP6 9JY

01473 890089
info@suffolkwildlifetrust.org
suffolkwildlifetrust.org



Penny Mills
Planning Department
West Suffolk Council
West Suffolk House
Western Way
Bury St. Edmunds, IP33 3YU

23rd July 2020

Dear Penny,

RE: DC/19/1940/RM - Submission of details under Outline Planning Permission DC/15/2151/OUT (Residential development of up to 2,500 units (within use classes C2/C3); two primary schools; two local centres including retail, community and employment uses (with use classes A1/A2/A3/A4/A5, B1 and D1/D2; open space; landscaping and associated infrastructure) Submission of details for the reserved matters access, appearance, landscaping, layout and scale for 503 dwellings (parcels A1, A2 and A8) and associated internal roads, car parking, landscaping, amenity and public open space. Application to Partially Discharge Conditions 4 (Updated survey information), 6 (waste and recycling), 7 (Landscape and Ecological Management Plan), 8 (Landscape), 15 (Open space strategy), 28 (Garage /parking provision), 30 (Travel Plan - Residential), 40 (Arboricultural method statement), 42 (Ecological implementation strategy), and 45 (Biodiversity monitoring) of DC/15/2151/OUT. Land Ne Haverhill, Wilsey Road, Little Wratting

Thank you for sending us details of this application, we wish to make a **holding objection** for the following reasons:

We have read the Landscape and Ecological Management Plan, Ecological Implementation Strategy and Biodiversity Monitoring Strategy (Ecology Solutions, June 2020). We are broadly satisfied with the proposals as outlined in these strategies, but we do have a particular area of concern.

We note the view that a precautionary approach has been developed for hazel dormice as it is concluded that 'the Residential RMA will not have an effect on Dormouse habitat' (Ecological Implementation Strategy, Ecology Solutions, June 2020) and so therefore a Natural England Licence is not required.

We are concerned that it appears that woodland and hedgerows will be affected for this application, particularly for access. If this is indeed the case, then we are of the opinion that a mitigation licence for dormice is required to deliver the proposed development of this site, as first consented under DC/15/2151/OUT, and this should be in place at the start of delivery of all the phases. As one nest was found in a nest tube along hedgerow H13 (as well as a further nest found near the site vicinity), the presence of dormice at this location is not in doubt and it should be assumed that dormice are present in all areas of suitable, interconnected habitat. Therefore, where removal of any suitable habitat is proposed, we strongly recommend that this work is undertaken under a mitigation licence for hazel dormouse from Natural England. This would provide greater certainty of mitigation of

impacts, rather than leaving it to the current precautionary approach. Working under a dormouse licence will also assist West Suffolk planners in ensuring that the three derogation tests of the Habitats Regulations are met, as implemented by the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) Regulations 2019).

Consequently, if any suitable dormouse habitats are to be affected by this development, then prior to any consent of this planning application, we recommend the following in accordance with BS42020:2013 Code of Practice for Planning and Development: Condition D.6.2: Either the Ecological Implementation Strategy is amended to reflect what was originally consented under DC/15/2151/OUT, in that Natural England Dormouse Mitigation Licence is required for future development on this site, or a statement in writing from Natural England is provided to the effect that it does not consider that the specified activity/development will require a licence.

Please do not hesitate to contact us should you require anything further.

Yours sincerely

Jacob Devenney
Planning and Biodiversity Adviser