Suffolk Wildlife Trust
Brooke House
Ashbocking
Ipswich
IP6 9JY

01473 890089
info@suffolkwildlifetrust.org
suffolkwildlifetrust.org

Chris Rand
Planning Department
St. Edmundsbury Borough Council
West Suffolk House
Western Way
Bury St. Edmunds, IP33 3YU

19/07/2016

Dear Chris,

RE: DC/15/2151/OUT Outline Application (Means of Access to be considered) - 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. Great Wilsey Park, Wilsey Road, Little Wratting

Thank you for sending us further details of this application, we have the following comments:

Hazel Dormice
We note the response from FPCR (their letter of 29th April 2016) in response to our letter of 13th April 2016. We also note the Dormice Method Statement and Risk Assessment (FPCR, May 2016). We have the following comments on the information and assessment provided:

In response to the comment on surveying for natural nests, our letter of 13th April 2016 did not suggest that "*direct searches for natural nests should have been completed to confirm an absence of such sites*". Our comment on natural nests was in response to the conclusion that "*the survey results therefore indicate that dormouse are also not breeding within the site*" (FPCR letter of 21st March 2016). This conclusion was based solely on only finding one nest in a nest tube in September. Whilst the finding of the nest has confirmed the presence of the species on the site, dormice do make natural nests. Whilst these can be made in tree holes, they are often found in brambles or other low growing shrubs[1,2].

Whilst nest tubes studies are useful for determining presence/absence of dormice on a site, they should not be used to assess population density[3] and we do not think that it is reasonable to conclude that they are not breeding on site based on the nest tube survey results alone. We therefore reserve the right to maintain our opinion that the dormice population at this site could be of greater value than as currently reported. This is for two reasons:

Firstly, for a nest to be found during the nest tube survey at least one animal must be present on site. This animal must either have migrated in to the site from an adjacent population or must have been born on site. Whilst juvenile dormice have been recorded dispersing several kilometres in the year that they are

[1] Bright, P., Morris, P. and Mitchell-Jones, T. (2006). *The Dormouse Conservation Handbook, 2nd Edition (section 3.2.3 (page 24))*. English Nature, Peterborough
[2] Looser, A. and Bullion, S. (2016). *Using bramble and dormouse nesting activity as a measure of the effectiveness of deer management in Bradfield Woods*. Suffolk Wildlife Trust
[3] Bright, P., Morris, P. and Mitchell-Jones, T. (2006). *The Dormouse Conservation Handbook, 2nd Edition (section 3.6 (page 30))*. English Nature, Peterborough

born[4], adults have not been recorded travelling particularly far from their nests (usually less than 70m)[5].

Whilst it is possible that the nest was built by a juvenile animal migrating in to the site, the location where it was found was approximately 700m (distance along potentially suitable habitat connected to offsite habitat) in to the site meaning that the source population for any dispersal must be relatively close to the application site. Alternatively, as dormice are known to live at low densities[5] it is possible that they have always been present on the site (and in surrounding connected habitats) and have thus far gone undetected.

Secondly, the survey was ended before the end of the survey season. Taking the tubes away at this time prevented information being gathered on autumn nest tube occupancy, which can be high in the East of England, and also reduce the likelihood of finding evidence of breeding on site.

As dormice are known to be present on site it is essential that any development maintains habitat connectivity, both through the site and to adjacent suitable habitats. We note the proposal to proceed with works under a method statement, as well as clearance of any small areas of woodland or hedgerow, any clearance of bramble or other suitable shrub habitat should also be covered under this statement. Any clearance of suitable habitat must be supervised by a suitably licenced ecologist who is experienced at finding natural nests.

Also, as this is an outline planning application, it should be born in mind that updated survey and assessment is likely to be required at the time of any reserved matters application.

Breeding birds
We maintain the comments from our letter of 13th April 2016 in relation to breeding farmland birds, in particular skylark.

If you require any further information, please do not hesitate contact us.

Yours sincerely

Simone Bullion
Senior Conservation Adviser

James Meyer
Conservation Planner

[4] Juskaitis, R. (2008). *The Common Dormouse Muscardinus avellanarius: Ecology, Population Structure and Dynamics*. Nature Research Centre.
[5] Bright, P., Morris, P. and Mitchell-Jones, T. (2006). *The Dormouse Conservation Handbook, 2nd Edition (section 2.1 (page 13))*. English Nature, Peterborough