

Ref No. DC/15/2151/OUT

Proposal	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 (with use classes A1/A2/A3/A4/A5, B1 and D1/D2; open space; landscaping and associated infrastructure
Location	Great Wilsey Park, Wilsey Road, Little Wratting, Suffolk,

Ecology

Constraints

The proposed development site is within the SSSI impact risk zone for Over and Lamb woods SSSI and Trundley woods SSSI however there would be no impact on these resources as confirmed by Natural England in their letter of 22.12.15

The woodland behind the Rising Sun is designated as a local wildlife site and protected by TPO091 (1983) and TPO348(2002). The site is outside of the development site, but will be isolated from the surrounding countryside as a result of the proposals – although better connectivity has been achieved in the revised masterplan.

The Golf practice area, off Coupals Road is also designated as a local wildlife site

The Grassland next to Great Field Plantation and Wilsey Plantation are both designated as a site on nature conservation interest

The vicinity of the site East Town Park is designated as local wildlife site and this is directly connected to the Haverhill Railway walks Local Nature Reserve (LNR) and CWS (locally known as the green spine to CB9) and its associated network of designated sites including Broad Street Old allotments CWS and Norey Plantation CWS. Ann Suckling Way CWS, is located within farmland to the west.

Protected species

There are a number of protected species issues as follows:

Hazel dormice

Survey has established that Hazel Dormice are using some parts of the site – a single nest was found within woodland W4. The main points of contention are whether the survey undertaken and effort employed was sufficient to inform the size of the population and hence whether the information available is sufficient to accurately assess the impact of the proposals on Hazel Dormice. Whilst the applicant's consultant followed guidance on the survey effort and methodology required, account was not taken of regional variations and the tendency for Dormice in East Anglia to favour the latter part of the summer and autumn. Unfortunately the survey undertaken was curtailed in late September/early October and there was no information gathered on autumn nest tube occupancy and therefore there was a reduced likelihood of finding further evidence of breeding on site. Other issues of contention were that the assessment did not take account of the use of

natural nests in coming to its conclusions and the importance of the population of dormice at the site was under valued.

Of particular concern in relation to the proposals is whether the integrity of the existing hedgerow and woodland systems which connect and provide good linkage through the site for dormice can be maintained. The requirement for vehicular and pedestrian access will require vegetation clearance and hedgerow removal.

An addendum to the ES was submitted (dated May 2016) to support the planning application and in particular to address representations made by Suffolk Wildlife Trust. No further survey was undertaken however the addendum took into account dormice data supplied by Suffolk Wildlife Trust. This report concluded that the evidence of dormice found at the site is of regional importance, rather than of local importance as previously stated.

As this is an outline application, concerns about the level of survey provided and information about the extent of dormice population within the application site can be addressed by the requirement for additional surveys to be submitted to support future reserve matters and detailed planning applications.

The addendum document goes on to state that there have been changes to the degree of habitat loss that would result from the development; primarily that breaks in features will be reduced to 12m (as shown on Figure 1 Dormouse nest location plan and associated radii 16.11.16). The applicant has also supplied information showing how gaps of less than 12m can accommodate road, cycle and pedestrian access hence minimising fragmentation of dormice habitat (152-L-120). Discussion with the highway authority has established that a footway on one side only would not be considered acceptable for an adoptable highway layout; however the option to set a footway or shared cycleway back from the road edge to maintain connectivity for sustainable modes while maintaining the ecology corridor with a minimal gap could be explored. The applicant provided sections showing some initial design solutions to give confidence that fragmentation of dormouse habitat can be minimised. The highway authority is of the opinion that when full details are supplied, and reviewed, as part of any subsequent reserved matters application should the site proceed, they are confident that a suitable design detail can be incorporated to achieve the twin goals of an adoptable highway layout and preservation of the ecology corridor.

The addendum states that following the changes to minimise the removal of habitats and the loss of hedgerows and the commitment to a precautionary approach to site clearance (Dormice method statement and risk assessment - Addendum appendix 9.6) a Natural England Licence will no longer be needed. It is for the consultant and the applicant to decide whether a protected species licence is required to implement the proposals. The method statement would need to be implemented by condition. Further dormice survey submitted with any reserve matters application would clarify the position.

Skylarks

The winter bird survey states that although the site will continue to be attractive to birds there will be a shift from farmland birds to those associated with the urban edge. In particular there will be a residual impact on skylarks as a result of the proposals. Skylarks are a Suffolk priority species. JDMPD Policy DM 11: Protected Species requires that suitable measures are taken to reduce disturbance to a minimum and maintain the population identified on site or provide adequate alternative habitats to sustain at least the current levels of population. The issue could be compensated through offsite skylark plots

in adjacent farmland and the developer has been asked to investigate the delivery of this. The proposed solution proposes management measures for the country park that could provide mitigation for farmland birds including skylarks. These include fenced plots and an area to be managed for the provision of wild bird seed mix to increase foraging opportunities.

Shepherd's - needle was not recorded on the site during the Phase 1 survey although specific botanical survey was not undertaken. Future survey to support any reserved matters applications could confirm presence through field margin survey at the appropriate time of year. If the species were to be found on site mitigation could be either through an agri-environment scheme such as un-cropped cultivated margins or plots, and in a non-arable situation through open ground restored and maintained annually.

Bats

The main concern in relation to the impact of the proposals on bats is the fragmentation of linear navigational and foraging corridors through the creation of accesses and lighting of the site during construction and operation.

Appendix 4.3 of the ES includes a lighting assessment of the main access routes and details the main features of a lighting strategy that would be implemented to ensure that dark corridors are retained and the impacts on commuting and foraging bats are minimised. Secondary roads will also be lit however an assessment of these would be undertaken at reserved matters stage. The main features of this are listed below and illustrated in figure 30 (which has not been updated):

- It assumes that all hedges will be reasonably dense and no less than 2m when first planted
- street lighting will be a minimum of 15m from an important hedge or woodland edge (figure 2a appendix 4.3 and figure 30)
- properties backing onto bat routes will be a minimum of 10m from the hedge or woodland edge (figure 3a appendix 4.3 and figure 30)
- properties backing onto hedgerows or woodland edges will be fitted with a suitable security light
- hop over design can be achieved where the maximum width of the road is up to 10m width
- trees of 6m in height will be acceptable close to the road - mature trees of a height of 6m will be planted to achieve this

Of particular concern is the reliance on mature specimens to form the landscaping which will be both expensive and difficult to successfully establish. Fitting of specific security lights to properties does not form a long term solution as these can easily be replaced by the new resident with other less suitable lighting. There are therefore questions about whether the strategy as set out can be successfully delivered. However the concept of dark corridors is clearly established and these are illustrated in the plan. The implementation of these dark corridors will be down to detailing and this can be conditioned to give more certainty.

Representations

Natural England – discussion of comments

Soils: This has been highlighted by NE in respect of the Governments policy for the protection of the best and most versatile land. The proposals would result in the loss of all the arable land within the development site which is shown to be grade 2 (best and most

versatile land). The development site is a total of 167.4 ha and of this 78.28ha will be green infrastructure and will remain as undeveloped. The loss of this land is a consequence of the need for the district to grow sustainably focusing development on the major towns.

Local wildlife sites: These have been considered fully in the application and the impact on the adjacent sites is minimised through the inclusion of multifunctional green infrastructure as part of the development.

Green infrastructure: The principals of green infrastructure have been fully embraced within the proposals although the detailed design and proposed management of this will be important

Biodiversity and landscape enhancements:

The development proposals include a significant level of green infrastructure, however the detail of this has not been developed to such an extent that the biodiversity enhancements could be fully quantified. The country park located on the eastern side of the development would also bring some landscape and biodiversity enhancements. Conditions will seek to ensure that the detailed proposals are based on up-to-date survey information, to secure mitigation packages for all species and to secure biodiversity and landscape enhancements.

SWT – discussion of comments

Discrepancies in plans: The plans should be consistent.

Whilst it is understood that the layout in these plans is largely indicative and the application is outline, there still needs to be sufficient certainty that an appropriate scheme can be delivered. The proposals must be able to describe accurately the impacts on protected species in particular bats and hazel dormice which are potentially affected by habitat fragmentation and disruption. The initial criticism of the Hedgerow Removal Plan was that it did not include all the proposed access easements; however this seems to have been generally rectified. As part of the addendum, the applicant submitted a number of revised plans which amend the planning application listed in the addendum and including a Revised Hedgerow Removal Plan (5055-L-112) and a Revised Habitat / Public Open Space (5055-L-119).

The Revised Habitat / Public Open Space (5055-L-119) I understand to be RevD Feb 2016 – this remains inconsistent with the masterplan on the western boundary close to the school, and shows hedgerow removal that has been superseded by a plan submitted in November 2016

The most recent information in relation to hedgerow removal is shown in the Dormouse Nest Location Plan with associated radii Figure 1 16.11.2016. There does not appear to be a revised hedgerow removal plan.

Hazel Dormice: Initially, based on the submitted plans and ES, SWT were concerned that the impact of the proposals on hazel dormice has not been properly assessed: that dormice in this location is at least of regional significance and could be of national significance; that the distribution and size of the population cannot be predicted based on the single survey that was curtailed in October and does not make allowance for dormice in natural nests; that the proposals show habitat fragmentation and interruption in connectivity and that the mitigation proposed may not be achievable; and that there is not enough information to consider the three tests in the Habitat Regulations.

Following these initial comments and a series of correspondence and clarifications from the applicant's ecological consultant, amendments to the proposed plans have reduced the potential for habitat fragmentation with a commitment to reduce breaks in existing features in most locations to a maximum width of 12m, and a method statement for habitat clearance has been submitted. The addendum to the ES confirmed that the geographical significance of hazel dormice had been reassessed to be of regional value.

SWT have requested, in respect to dormice, that:

- any development maintains habitat connectivity, both through the site and to adjacent suitable habitats.
- any clearance must be supervised by a suitably licenced ecologist who is experienced at finding natural nests.
- updated survey and assessment is submitted to support any subsequent reserved matters or detailed planning applications

However Suffolk Wildlife Trust remains concerned about the assessment of potential impact on dormice as a result of habitat loss proposed as part of this development. This is because, the assessment appears to be based on the assumption that the only part of the site that constitutes dormouse habitat is the nest that was found, and that even this is only considered a 'potential resting place'. SWT dispute this is the case given the location that the nest was found in and the distance to suitable offsite dormouse habitat. Whilst the habitat itself could be broadly defined as being a 'potential resting place', the fact that a nest has been built within a tube means that a dormouse has used it for a period of time in which to shelter, therefore it is a resting place (not a potential one).

SWT remains concerned about the deliverability of the proposed hedgerow/road crossings and whether they are maintainable in the long term.

SWT also disagree that there is "*therefore no requirement to minimise the current habitat losses recorded on the site*" as stated in fpcr letter of 16 November 2016 quoting para 109 of the NPPF.

The position of SWT is supported particularly in the concern about the interpretation of the significance of the survey results and the presence of dormice on the site.

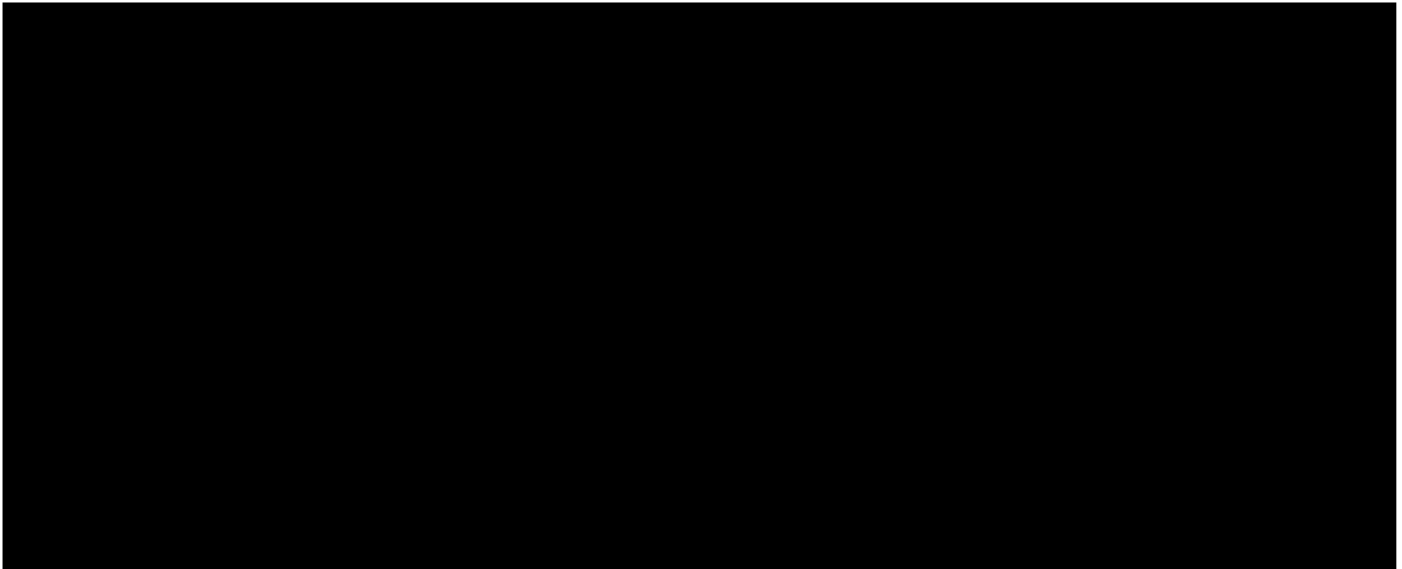
Concern about the delivery on the proposed hedgerow/road crossings is also shared by the council, however liaison with the highway authority on the matter has given some confidence that design solutions are available and can be secured through the conditioning of detail design; the success of these will depend on implementation and monitoring.

Despite the comment made in the fpcr letter, amendments to the proposed plans have reduced the potential for habitat fragmentation with a commitment to reduce breaks in existing features in most locations to a maximum width of 12m, and a method statement for habitat clearance has been submitted as an addendum to the ES. This is further illustrated on the dormouse nest location plan with associated radii (Figure 1 16.11.16) which is also consistent with the revised masterplan layout. This latest plan shows a reduction in the scale of habitat loss and fragmentation associated with the development.

Bats: Concern in relation to bats is also associated with loss of and fragmentation of habitats on the site. In particular that dark corridor should be maintained for bats and some of the hedges currently used by barbastelle bats are shown on the lighting strategy to have lit paths routed alongside. In addition there is concern that the hop-overs that are proposed may not be deliverable. SWT commented that whilst some issues can be resolved at the detail stage, at outline stage the LPA should be reasonably confident the

proposal can be delivered without significant impact on protected species and therefore a level of certainty around lighting requirements is needed and around whether hop over mitigation is deliverable is required.

The changes to the design which have reduced the loss and fragmentation of habitats to a minimum will also be beneficial in retaining dark corridors for bats on the site. Concern over the detailing of hop-overs is shared.



Water voles and otter: Water voles and otter survey should continue to inform any detailed design relating to the River Stour tributary, and any necessary mitigation delivered. – This can be conditioned

Reptiles and amphibians: Displacement is proposed as the means to avoid killing and injury of reptiles. SWT requested that this methodology be reviewed to also allow, where appropriate, the option of translocation of reptiles into suitable habitats on-site, which have been suitably enhanced to support a higher number of animals. In addition SWT was concerned about connectivity between ponds and terrestrial habitat suitable for toads and particularly ensuring that suitable road crossings are incorporated into the design of the scheme. These comments are supported and can be achieved through condition.

Breeding and wintering birds: The loss of farmland will contribute to the loss and fragmentation of populations of farmland birds including skylarks, linnet, and yellowhammer, and the in-combination impacts have not been considered. Offsite compensation (skylark plots) should be secured. This issue remains and the concerns are supported.

Hedgehogs: There is insufficient detail relating to this species in the reports. Hedgehog is a UK and Suffolk Priority species. Winter site clearance should be avoided, unless it can be undertaken in a staged way with an ecologist on site searching for hibernation nests. Clearance at other times of year still requires a check to be undertaken for nest sites. Suitable habitats for nesting should be retained within the site's green infrastructure and any future management of these areas should include enhancement for hedgehog. In addition, we recommend that the design of the individual gardens incorporates holes in fences to enable these areas to become accessible to hedgehogs. The applicant has agreed that measures to address impacts on hedgehogs can be incorporated and these can be conditioned.

Flora

Shepherd's-needle a UK priority plant species has been recorded at this site and Betony, a species indicative of habitat quality was recorded during the Phase 1 survey. Both species should be considered and retained during detailed proposals. The applicant maintains that the majority of the areas where Betony occurs will be maintained as part of the green infrastructure and this appears to be the case. Shepherds needles was not recorded on the site during the Phase 1 survey and specific botanical survey was not undertaken however survey of field margins could be undertaken and submitted to support any detailed or reserved matters application and appropriate mitigation implemented.

Cumulative impacts: This section does not include consideration of impacts on fauna such as farmland birds which will be displaced to neighbouring farmland. There may also be other cumulative faunal impacts and a full review of the assessment of such impacts is undertaken.

Long term management and monitoring: the production and implementation of a landscape and ecology management plan is essential. Such a plan should include mitigation/compensation measures to be implemented; the long term management measures for the site's green infrastructure and the methodologies for long term monitoring of the ecological receptors identified as being impact upon by the proposed development in the ES. This will be secured through a planning conditioned

Further surveys: It may therefore be necessary to update the existing survey and assessment work as part of any reserved matters applications, dependent on the amount of time which elapses between applications. Agreed.

Landscape

The layout of the site is generally acceptable however there are a number of issues that could be addressed at reserved matters taking into account that the layout is indicative. These are:

- The connections between the two main green corridors could be strengthened. This has not been addressed in the new indicative layout.
- The boundary of the site with Samuel Ward School could also be strengthened.

The impact of the development from the wider landscape is illustrated in Appendix 15.2 of the Addendum to the ES. The zone of theoretical visibility provides key evidence of the wider impact of the site and the further information provided in this addendum backs up figure 15.8 of the ES which shows the predicted wider visual effects of the site to be acceptable.

The existing information within the landscape chapter of the ES deals substantially with the periphery and internal parts of the site. The photo viewpoints show the quality and landscape features within the site area many of which are to be retained and included within the development.

SUDs are shown to be part of the GI which is welcomed however these features need to be designed so that they are an ecological and amenity asset and remain safe to the new residents and public. The need for fencing off these features should be avoided where possible through good design.

Connectivity between the existing East Town Park and the new country park will be essential for the operational purposes as well as connectivity for people. Consideration should be given to a crossing on Coupals Road.

The success of the scheme will be highly reliant on the quality of the detailed design that comes forward and whether the landscape mitigation measures that have been relied on in the ES can be delivered; there appears to be no reason why they cannot. The mitigation is listed below; many of the elements are key components of the development proposals illustrated in the illustrative masterplan for the site. The remainder can be delivered through conditions which are set out below.

Landscape Enhancements

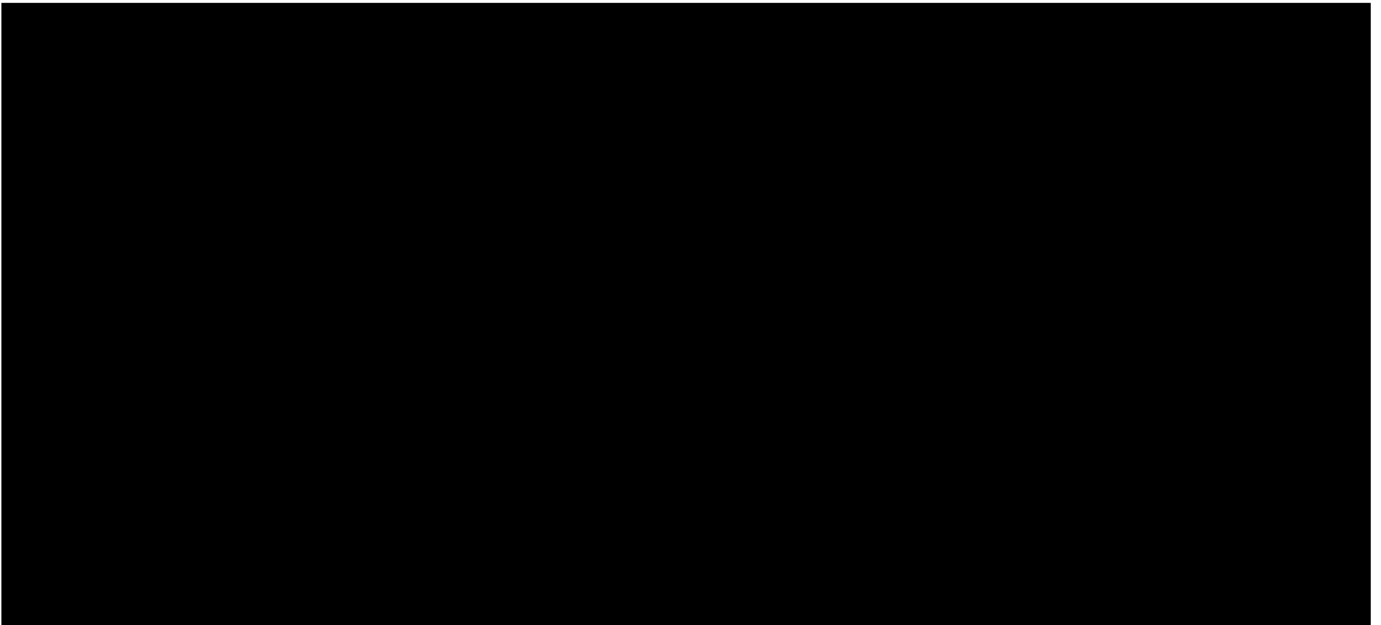
Where landscape enhancements are likely could also be ascertained from the assessment of affects at 15 years post completion. The landscape effects table is in appendix 15.3 but the findings show that there would only be a beneficial effect on site landscape features through the creation of water features and watercourses. No other beneficial landscape effects are listed. Visual effects are in appendix 15.4 and no beneficial effects are listed.

Potential conditions (some streamlining should be possible)

- Construction management plan (CMP) to include
 - information (location and sensitivity) on sensitive habitats
 - storage and disposal of materials
 - site clearance methodology to protect birds and reptiles
 - working practise for sites with reptiles
 - Construction lighting strategy sensitive to bats
- The design, implementation, phasing and management of GI (refer to plan 5055-L-119D). Particular commitments (referred to specifically in the ES) include the following that should be delivered;
 - Buffer to the east of Great Field Plantation
 - Double hedgerow along the route of existing hedgerow H23
 - Boundary planting to the development
 - Open area to the south of A143
 - Structural planting to the southeast and west of Great Wilsey Farm
 - Green corridors along the route of existing footpaths
 - Boundary planting between Mary Cole's Grove and the Country Park
 - Screening to the country park facilities as necessary
 - Planting along Chalkstone Way
- Existing hedgerows on site are to be protected. Any hedgerow section which is to be removed in line with plan *** shall not exceed 12m. This limitation is to be applied during construction and operation. Existing hedgerows to be retained and those to be removed to be mapped accurately and shown on site layout plans.
- LEMP to cover
 - new woodland including coppiced areas to encourage understorey development
 - field margin compensatory habitats
 - new and existing hedgerows including margins
 - all areas of grassland and wildflower mix and hedgerow margins showing different management regimes
 - attenuation ponds and associated areas and habitats
 - watercourse margins and associated areas
 - management of habitat for hedgehogs
 - measures to retain and ensure continued management of those parts of the site that contain notable plant species recorded on the site.
- Habitat (including hedgerows) protection fencing - fixed temporary fencing erected at the start of that phase of construction prior to site clearance activities including archaeology. Fencing to be permeable to wildlife such as otters, XXXXXXXXXX hedgehogs as necessary

- Tree protection plan for all existing woodland and retained trees to include method statement for all operations and situations where construction/disturbance within RPA is required. Any trees to be removed will require additional supporting evidence to demonstrate no impact on bats.
- Soft landscaping scheme to be submitted and implemented to include
 - all new areas of woodland and tree and shrub belts
 - field margin compensatory habitat
 - new hedgerows and gapping up of existing hedgerows
 - all areas of grassland and wildflower mix and hedgerow margins including establishment methods
 - watercourse margins and associated areas
 - attenuation ponds and associated areas and habitats including establishment of vegetation
 - Planting to include trees and shrubs of value to local bird populations.
 - Native planting, tree belts, woodland planting and hedgerows to be protected from grazing by deer
- Boundary treatments plan to show location and design of
 - Permanent hedgerow fencing
 - Fencing of watercourse
 - [REDACTED]
 - All garden boundaries to be adapted to retain accessibility for hedgehogs
- Management plan for existing woodland. This will need to include monitoring of public use of the woodland such that the design of pathways, fencing, hedging and other management operations are iterative so that the design reflects the needs of the new community. Control of litter and dog waste (within normal litter collection) can be part of this iterative process.
Management plan should identify areas for coppicing to encourage understorey development.
- Provision of information through a variety of outlets, such as interpretation boards, new resident packs etc. to the new residents
- Monitoring to cover
 - new and existing hedges
 - attenuation ponds and adjacent areas
 - dormice nesting boxes
 - skylark mitigation
- Groundwork plan for attenuation ponds to show design including existing and proposed ground levels and anticipated water levels for: embayments; spits; smaller ponds and scrapes; reed and marshland habitats. Plans to be informed by survey data relating to otter and watervoles as appropriate

- No removal of vegetation or site clearance between 1 March and 31 August unless preceded by a breeding bird check. Any winter site clearance should be avoided, or be undertaken in a staged way with an ecologist on site searching for hedgehog hibernation nests. Clearance at other times of year requires a check to be undertaken for hedgehog nest sites.
- Strategy for delivery of bird boxes on buildings including residential buildings to be submitted and implemented for each phase of the development
- Reptile and amphibian mitigation strategy for the site to be submitted and implemented. The strategy will need to be updated for each phase of the development and must include:
 - Method statement for site clearance and for excavation of ponds
 - Location of habitats to be retained and protected
 - Working methods including storage of materials, escape routes from excavations
 - Location and method of habitat enhancement and creation
 - Location and creation of hibernacula and refuges
 - Phasing of the above
 - Monitoring



- Lighting strategy for bats to be submitted based on appendix 4.3 of the ES and the mitigation measures in the relevant sections of the ES and additional supporting reports. The lighting strategy must include:
 - Updated figure 30 to reflect the design of the phase being considered and how it relates to the wider strategy
 - Footpath on the southern boundary of woodland W1 will remain an unlit dark corridor

- Location of linear features and associated unlit dark corridor or buffer (of 10m or 15m) to be maintained alongside.
 - Location and detailed design of hop overs
 - Location and design of bat boxes, bricks and tubes to new buildings, woodland edges and suitable trees.
- All reserve matters and detailed planning applications to be supported by up-to-date dormice survey information and an appropriate mitigation strategy based on the findings of this to cover the construction and operational phases of the development. All elements of the mitigation strategy to be implemented. Dormice mitigation should include:
 - Updated and site (development phase) specific dormice method statement and risk assessment
 - Location of potential dormice habitat/ features clearly showing features to be retained and protected and those to be removed
 - New planting and habitat enhancement for dormice including phasing of implementation and protection from deer
 - Details and location of hedgerow fencing