



REDROW HOMES

GREAT WILSEY PARK,
HAVERHILL:
INFRASTRUCTURE
RESERVED MATTERS
APPLICATION


**Landscape and Ecological
Management Plan**

Pursuant to Condition 7 of
DC/15/2151/OUT

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1. INTRODUCTION

1.1. Background

- 1.1.1. Ecology Solutions was commissioned by Redrow Homes in October 2018 to prepare materials to address the requirements of planning conditions for the development at Great Wilsey Park (reference: DC/15/2151/OUT).
- 1.1.2. Reserved Matters Applications (RMAs) for infrastructure and housing are to be submitted in early 2019.
- 1.1.3. Condition 7 requires that a Landscape and Ecological Management Plan (LEMP) be submitted and approved prior to commencement of development. The condition states:

No development shall commence within any phase or reserved matters application until a Landscape and Ecological Management Plan (LEMP) for that phase or reserved matters application has been submitted to and approved in writing by the local planning authority. The content of the LEMP shall include the following.

- a) **Description and evaluation of features to be managed including all new and existing woodland and coppiced areas, tree and shrub belts, field margin compensatory habitat, new and existing hedgerows and gapping up of existing areas of grassland, meadow and hedgerow margins with intended management regimes, those parts of the site that contain notable plant species recorded on the site, watercourse margins, attenuation ponds and associated features.**
- b) **Ecological constraints on site and how these influence management.**
- c) **Aims and objectives of management.**
- d) **Appropriate management options for achieving aims and objectives.**
- e) **Prescriptions for management actions.**
- f) **Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).**
- g) **Details of the body or organisation responsible for implementation of the plan.**
- h) **Ongoing monitoring and remedial measures.**
- i) **Strategy for the provision of information about sensitive habitats through a variety of outlets such as interpretation boards, new resident information packs.**

The management plan for the existing Great Field Plantation woodland must include monitoring of public use of the woodland such that the design of pathways, fencing, hedging and other management operations are iterative, with the aim that the woodland design reflects the needs of the new community. Control of litter and dog waste (within normal refuse collection) can be part of this iterative process. The management plan should identify areas for coppicing to encourage understorey development.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured and the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved details.

The development shall be undertaken in accordance with the approved LEMP. All elements of the mitigation strategy shall be implemented in accordance with the approved details.

Reason: To ensure the satisfactory development of the site and that wildlife habitats and protected species are considered as part of the design process and are not affected adversely by the development.

1.2. Purpose of this Report

- 1.2.1. This report sets out the management of features of ecological interest due to be retained and created and describes the wildlife enhancements and mitigation strategies to be implemented as part of the Redrow's phase of the development.
- 1.2.2. This LEMP has been written with reference to published guidance from the Chartered Institute of Ecology and Environmental Management (CIEEM)¹ and in accordance with Natural England and other relevant guidelines for protected species. It should be read in conjunction with materials produced by Exterior Architecture concerning the landscape strategy.
- 1.2.3. The document is set out as follows:
 - Ecological baseline and evaluation of important features within the site;
 - Objectives of the LEMP in order to maximise the ecological potential of features due to be retained within the site;
 - Specific ecological mitigation and enhancement measures to be provided in order to achieve the objectives;
 - Timescale for the delivery of these measures; and
 - Responsibilities for implementation and compliance.

¹CIEEM (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal. 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.

2. CONTEXT AND CONSULTATION

2.1. The development at Great Wilsey Park is informed by several sources of information, including:

- National Planning Policy Framework (2018);
- St Edmundsbury Core Strategy (2010);
- Haverhill Vision 2031 (2014);
- Joint Development Management Policies Document (2015);
- St Edmundsbury Green Infrastructure Strategy – Final Report (2009);
- Ecology ES Chapter and associated technical reports (2015); and
- ES Addendum (2016).

2.2. In addition to these planning policy and technical sources, reference has been made to information on the natural environment provided by organisations such as Natural England, Suffolk Biodiversity Information Service (SBIS) and Suffolk Biodiversity Partnership (SBP). Regard has been had to designated sites in the locality, to existing habitats and features, and to local nature conservation priorities.

2.3. All these factors have helped to shape the vision and objectives for the Landscape and Ecological Management Plan.

2.4. National Planning Policy Framework

2.4.1. Guidance on national policy for biodiversity and geological conservation is provided by the NPPF, published in March 2012, revised on 24 July 2018 and updated on 19 February 2019. It is noted that the NPPF continues to refer to further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system provided by Circular 06/05 (DEFRA / ODPM, 2005) accompanying the now-defunct Planning Policy Statement 9 (PPS9).

2.4.2. The key element of the NPPF is that there should be “*a presumption in favour of sustainable development*” (paragraphs 10 to 11). It is important to note that this presumption “*does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site*” (paragraph 177). ‘Habitats site’ has the same meaning as the term ‘European site’ as used in the Habitats Regulations 2017.

2.4.3. Hence the direction of Government policy is clear; that is, the presumption in favour of sustainable development is to apply in circumstances where there is potential for an effect on a European site, if it has been shown that there will be no adverse effect on that designated site as a result of the development in prospect.

2.4.4. A number of policies in the NPPF are comparable to those in PPS9, including reference to minimisation of impacts to biodiversity and provision of net gains to biodiversity where possible (paragraph 170).

- 2.4.5. The NPPF also considers the strategic approach that Local Authorities should adopt with regard to the protection, maintenance and enhancement of green infrastructure, priority habitats and ecological networks, and the recovery of priority species.
- 2.4.6. Paragraphs 174 to 176 of the NPPF comprise a number of principles that Local Authorities should apply, including encouraging opportunities to incorporate biodiversity in and around developments; provision for refusal of planning applications if significant harm cannot be avoided, mitigated or compensated for; applying the protection given to European sites to potential SPAs, possible SACs, listed or proposed Ramsar sites and sites identified (or required) as compensatory measures for adverse effects on European sites; and the provision for the refusal for developments resulting in the loss or deterioration of 'irreplaceable' habitats – unless there are 'wholly exceptional reasons' (for instance, infrastructure projects where the public benefit would clearly outweigh the loss or deterioration of habitat) and a suitable compensation strategy exists.
- 2.4.7. National policy therefore implicitly recognises the importance of biodiversity and that with sensitive planning and design, development and conservation of the natural heritage can co-exist and benefits can, in certain circumstances, be obtained.

2.5. **St Edmundsbury Core Strategy**

- 2.5.1. The St Edmundsbury Core Strategy was adopted on 14 December 2010. The Core Strategy sets out the vision, objectives, spatial strategy and overarching policies for the provision of new development in the Borough up to 2031. A single policy within the Core Strategy relates to ecology.
- 2.5.2. *Policy CS2 Sustainable Development* relates to sustainable environmental design measures, appropriate to the location and scale of development. Measures relating to ecology include:
- Protection, conservation and the minimisation of impact to local wildlife and biodiversity;
 - The implementation of a Biodiversity Action Plan (BAP) to identify, create or sustain networks of protected habitat; and
 - Ensuring conformity to appropriate national standards, codes of practice and regulations.

2.6. **Haverhill Vision 2031**

- 2.6.1. The Haverhill Vision 2031 document is a comprehensive plan, guiding the overall direction of future service provision and the management of growth in Haverhill for at least the next 20 years.
- 2.6.2. *Policy HV4: Strategic Site – North-east Haverhill* relates specifically to the Great Wilsey Park development. There are no elements of the policy that relate directly to ecology or nature conservation but does state that a buffer is identified which could provide a variety of supporting uses including Sustainable Drainage Systems (SuDS).

- 2.6.3. *Policy HV18: Green Infrastructure in Haverhill* refers to the maintenance, protection, enhancement and establishment of the green infrastructure network in and around Haverhill through the implementation of the St Edmundsbury Green Infrastructure Strategy. The policy states that opportunities exist to extend the coverage and connectivity of the strategic green infrastructure network and where appropriate, should be undertaken in association with new development.

2.7. Joint Development Management Policies Document

- 2.7.1. The Joint Development Management Policies Document was adopted on 27 February 2015 by Forest Heath District Council and on 24 February 2015 by St Edmundsbury Borough Council. The document replaces a number of policies within each councils existing Local Plan, replacing them with locally specific management policies for a wide range of topics, including preservation of the environment.

- 2.7.2. *Policy DM2: Creating Places - Development Principles and Local Distinctiveness* promotes good design within new developments to ensure a better quality of life for people within the area. Measures proposed include taking mitigation measures into account to not adversely affect sites, habitats, species and features of ecological interest.

- 2.7.3. *Policy DM3: Masterplans* covers analysis of site conditions and key ecological identification for land allocated in Local Plans and Site Allocations DPD, following concept plan preparation, when a Local Planning Authority masterplan is required. This includes:

- Extensive landscaping, green infrastructure and open space to ensure sufficient recreational space and support for local wildlife.
- A full biodiversity plan of species and habitat protection and mitigation, compensation, and habitat creation.

- 2.7.4. *Policy DM10: Impact of Development on Sites of Biodiversity and Geodiversity Importance* mandates the recognition of advice provided by Natural England, the Suffolk Wildlife Trust and other specialist sources, specifically relating to:

- a. the ecological or geological value and objectives for which the site was classified or designated;
- b. the integrity of the site in terms of its wildlife value, its diversity and relationship with other ecological resources;
- c. the cumulative impact of the proposal and other developments on the wildlife or geological value of the site;
- d. the presence of protected species, habitat areas and wildlife corridors, or geological features, and proposed measures to safeguard and enhance them;
- e. the opportunity to create new habitat areas and to improve the conservation status of locally vulnerable species;
- f. guidance set down within Biodiversity Action Plans (BAP), habitat management plans and other relevant sources; and
- g. the extent to which the imposition of conditions or planning obligation:
 - i. would mitigate the effects of the development and/or protect the geological or nature conservation value of the locality;
 - ii. ensure replacement habitat or features; and/or

iii. ensure that resources are made available for the future enhancement and management of the replacement habitat or feature to enable it to attain the quality and attributes that have been lost. Proposals for development which would adversely affect the integrity of areas of international nature conservation or geological importance, as indicated on the Policies Map, will be determined in accordance with the Conservation of Habitats and Species Regulations 2010 (as amended). Proposed development likely to result in adverse effects to a SSSI will not be permitted unless the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs.

2.7.5. *Policy DM11: Protected Species* limits development exclusively to that which does not risk or, where unavoidable, satisfactorily mitigates against adverse impact on species protected under the Conservation of Habitats and Species Regulations (2010) (as amended), the Wildlife and Countryside Act (1981), the Protection of Badgers Act (1992) and the Suffolk Biodiversity Action Plan and subsequent legislation. The policy states that suitable measures should be taken to reduce disturbance to a minimum, maintain the population identified on site, or provide adequate alternative habitats to sustain at least the current levels of population.

2.7.6. *Policy DM12: Mitigation, Enhancement, Management and Monitoring of Biodiversity* states that measures for the protection of biodiversity and the mitigation of any adverse impacts should be included in the design of all developments, and enhancements for biodiversity should be included in all proposals, equal to the scale of the development.

2.8. **St Edmundsbury Green Infrastructure Strategy – Final Report**

2.8.1. The Green Infrastructure Strategy was developed by Land Use Consultants on behalf of St Edmundsbury Borough Council and sets out the green infrastructure requirements for the Borough and a framework of delivery.

2.8.2. Projects relevant to the site include:

- The creation of green corridors to the north of Haverhill, improving links between the Stour Brook and the Stour Valley Path, as well as several other sites of interest. These links are primarily for pedestrian use but will also act as wildlife corridors; and
- Landscape planting to be delivered in advance of, or alongside development to provide landscape and visual mitigation and habitat connectivity.

2.9. **ES Chapter (2015) and Addendum (2016)**

2.9.1. A series of surveys were undertaken to establish the baseline interest and inform the outline planning application process for the site. These were reported in the ES Chapter and accompanying technical appendices.

2.9.2. It was concluded that the adverse effects of the development on designated sites and habitats and species of interest can be avoided or adequately mitigated and / or compensated by the creation of new habitats and wildlife corridors included in the design. The loss of arable farmland and replacement with new semi-natural habitats was seen as being of benefit to

biodiversity. The overall effects on ecology were not considered likely to be significant.

- 2.9.3. The 2016 Addendum reviewed the predicted effects on ecological receptors in light of amendments to the scheme and comments made by consultees. Further information was provided on Badgers *Meles meles* and bats for which surveys continued after the submission of the planning application. Greater definition to the mitigation measures relating to Dormice *Muscardinus avellanarius* was included to satisfy the comments made by Suffolk Wildlife Trust. Other changes were not considered to be significant in the context of the overall evaluation of the effects of the development on ecology as described in the ES Chapter, and mitigation measures and residual impacts were considered to remain the same.

2.10. Designated Sites

- 2.10.1. The site is not subject to any statutory or non-statutory designation, nor is it immediately adjacent to such a designation. The following designated sites are present in the locality, and illustrated on Plan ECO1:

- *Trundley and Wadgell's Wood, Great Thurlow Site of Special Scientific Interest (SSSI)* is situated some 2.7km to the north of the site at its closest point. The site has been designated for its substantial areas of ancient, semi-natural woodland. Both woodlands also possess a network of wide grassy rides.
- *Over and Lawn Woods SSSI* lies on chalky boulder clay and has been designated for its ancient woodland supporting well developed plant and animal communities. It is some 3.9km north-west of the site at its closest point.
- *Haverhill Railway Walks Local Nature Reserve (LNR)* is some 340m to the south of the site. It is designated for its tree and scrub cover, providing a valuable wildlife corridor.

- 2.10.2. The Landscape and Ecological Management Plan will aim to complement these existing nature conservation designations wherever possible, particularly Haverhill Railway Walks LNR, a short distance to the south.

2.11. Suffolk Biodiversity Partnership

- 2.11.1. Suffolk Biodiversity Partnership has prepared a list of the UK Priority Species which occur in the region. The list includes:

- Mammals including Barbastelle Bat *Barbastella barbastellus*, Brown Long-eared Bat *Plecotus auritus*, Lesser Horseshoe Bat *Rhinolophus hipposideros*, Noctule Bat *Nyctalus noctula*, Soprano Pipistrelle *Pipistrellus pygmaeus*, Dormouse, Otter *Lutra lutra*, Water Vole *Arvicola amphibius*, Harvest Mouse *Micromys minutus*, Hedgehog *Erinaceus europaeus*, Polecat *Mustela putorius* and Brown Hare *Lepus europaeus*;

- Birds such as Skylark *Alauda arvensis*, Yellowhammer *Emberiza citrinella*, Linnet *Carduelis cannabina* and Bullfinch *Pyrrhula pyrrhula*;
 - Adder *Vipera berus*, Grass Snake *Natrix helvetica*, Common Lizard *Zootoca vivipara* and Slow Worm *Anguis fragilis*;
 - Common Toad *Bufo bufo*, Great Crested Newt *Triturus cristatus*, and Natterjack Toad *Bufo calamita*; and
 - A wide range of invertebrates and vascular and non-vascular plants.
- 2.11.2. Biodiversity Action Plans (BAP) or factsheets have been prepared for certain species including bats, Dormice, Otters, Water Voles, Skylarks and Linnets.
- 2.11.3. A suite of factsheets is currently being developed, and many of the existing BAPs have now been archived. However, they remain available as they still contain useful information.
- 2.11.4. Ecological survey work undertaken to inform the outline planning application and the recent updates completed by Ecology Solutions has established that the site supports, or has potential to support, several of these local conservation priority species. A key objective of the Landscape and Ecological Management Plan will be to maximise opportunities for these species wherever possible.
- 2.11.5. Suffolk Biodiversity Partnership has Habitat Action Plans (HAP) for the following habitats of relevance to the site and the development. A number of the HAP documents have now been replaced by factsheets. The following HAPs have been considered as part of this strategy:
- Hedgerows;
 - Mixed Deciduous Woodland;
 - Arable Field Margins;
 - Rivers and Streams; and
 - Ponds.
- 2.11.6. Suffolk Biodiversity Partnership has also prepared a Planning Biodiversity Action Plan to assist local authority and other planning departments meet their legal obligations towards biodiversity.
- 2.12. Consultation with Wildlife Trust**
- 2.12.1. Suffolk Wildlife Trust has previously been consulted regarding the scope of the development and their aspirations for the site.
- 2.12.2. It is expected that further opportunities for consultation and feedback will be taken as the development progresses.