



Ecological Assessment
Former Magistrates Court, Haverhill
28th June 2021

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Contents

| | |
|---|----|
| Summary | |
| Section 1: Introduction and Site Context | 1 |
| Section 2: Methodology | 3 |
| Section 3: Ecological Features and Evaluation | 8 |
| Section 4: Potential Impacts, Mitigation and Enhancements | 20 |
| Section 5: Biodiversity Net Gain Assessment | 25 |
| Section 6: Conclusions | 28 |
| References | 29 |

Appendices

- Appendix 1: Planning & Legislation
- Appendix 2: Raw Bat Survey Data
- Appendix 3: Bat Box Specifications
- Appendix 4: Bird Box Specifications
- Appendix 5: PL02 Site Plan

Plans

- Landscape Strategy Plan: 12852/P01a
- Habitat Features and Potential Bat Roost Assessment Plan: 12852/P02
- Bat surveyor Location Plan: 12852/P03

Summary

- S.1. This report has been prepared by Tyler Grange Group Limited on behalf of Churchill Retirement Living (CRL). It sets out the findings of an Ecological Assessment (EA) of a parcel of land at Camps Road, Haverhill (OS Grid Reference TL 66822 45473), hereinafter referred to as the 'site'. The report has been produced to inform a full planning application for the development of a new retirement complex and associated landscaping.
- S.2. The purpose of this report is to describe the results of the EA which includes:
- Phase 1 habitat survey and desk study:
 - Haverhill Railway Walks Local Nature Reserve (LNR) and seven County Wildlife Sites (CWS) are found within a 2km search radius of the site; and
 - The site comprises of building and hardstanding, amenity grassland, ephemeral/short perennial, introduced shrub and scattered scrub.
 - Preliminary Bat Roost Assessment (PBRA) - Building B1 and B4 were considered to have negligible potential to support roosting bats, building B2 was considered to have low potential to support roosting bats, building B3 was considered to have moderate potential for roosting bats and offsite tree T1 was considered to have low potential for roosting bats;
 - Dusk emergence survey – one emergence survey undertaken on building B2 and two emergence surveys undertaken on building B3 during the bat active season (May-August 2020), during which no bats were observed emerging from either building.
 - Biodiversity Net Gain Assessment - The proposals as presented in the Landscape Strategy Plan (12852/P01a) would result in a net gain of **+33.61%** in habitat units and a net gain of **+0.61** hedgerow units.
- S.3. All habitats are proposed to be lost as a result of the proposals and those habitats of ecological importance within the site context only, will be more than mitigated for through the proposed habitat creation that will also provide a range of nesting, foraging and commuting opportunities for fauna.
- S.4. Any vegetation removal should be undertaken outside of the core nesting bird season (March-August, inclusive), otherwise, a pre-works check by an Ecological Clerk of Works (ECoW) should be undertaken to determine whether active nests are present.
- S.5. The amenity grassland found at the northern boundary should be directionally strimmed under the supervision of an ECoW to prevent the triggering of the legislation in relation to reptiles.
- S.6. It has been recommended that the mitigation and enhancement recommendations made throughout this report be secured through the production a Landscape and Environment Management Plan (LEMP) and a Bat Lighting Strategy.
- S.7. In conclusion, it is considered that the future development of the site would accord with relevant planning policy that seeks to protect and enhance ecological features and that the mitigation and enhancement strategy can be secured by planning conditions.

Section 1: Introduction and Site Context

Introduction

- 1.1 This report has been prepared by Tyler Grange Group Limited on behalf of Churchill Retirement Living. It sets out the findings of a Preliminary Ecological Appraisal (PEA) of a parcel of land at Camps Road, Haverhill (OS Grid Reference TL 66822 45473), hereinafter referred to as the 'site'. This report has been produced to inform a full planning application for the development of a new retirement apartment complex and associated landscaping.

Context

- 1.2 The site currently comprises an old police station, magistrates building and associated hardstanding and landscaping. The proposals are for the demolition of the existing buildings and the redevelopment of the site into a new 34 apartment retirement apartment complex and three retirement cottages (see **Appendix 5** for the site plan PL02). The plot immediately adjacent to the western site boundary has already been developed by CRL into a retirement apartment complex.
- 1.3 The indicative site boundary is shown below in **Figure 1.1**.

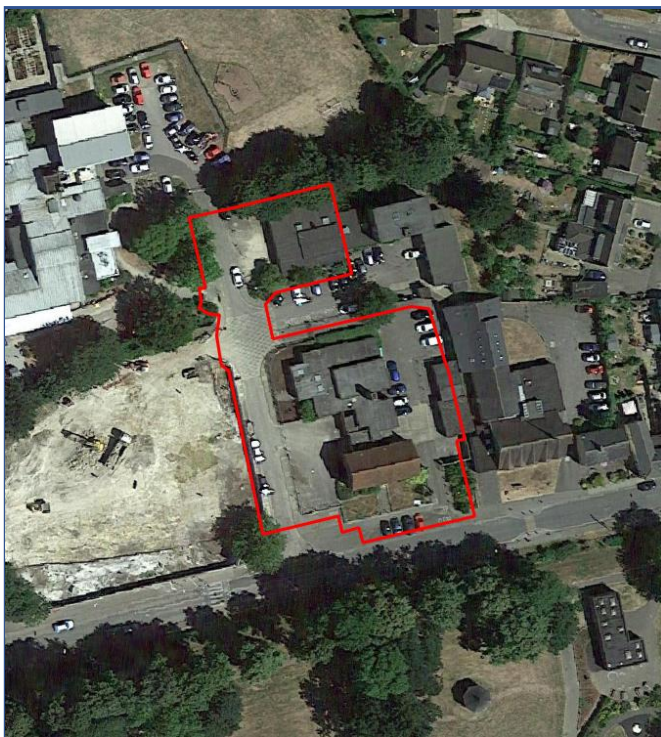


Figure 1.1: Site Context and Boundary
(Aerial Imagery © Google 2020)

Purpose

1.4 This report:

- Uses available background data and results of field surveys, to describe and evaluate the ecological features present within the likely 'zone of influence' (Zol) of the proposed development;
- Describes the actual or potential ecological issues and opportunities that might arise as a result of the site's future development;
- Where appropriate, makes recommendations for mitigation of adverse effects and ecological enhancement, to ensure conformity with policy and legislation;
- Evaluates the proposals in terms of whether they will achieve a biodiversity net gain at the site; and
- Can be used to support a planning application for the site's redevelopment.

1.5 This assessment and the terminology used are consistent with the 'Guidelines for Ecological Impact Assessment in the UK and Ireland' (CIEEM, 2019)¹

¹ Defined as the area over which ecological features may be subject to significant effects as a result of activities associated with a project (CIEEM, 2019)

Section 2: Methodology

Data Search

- 2.1 The aim of the data search is to collate existing ecological records for the site and adjacent areas. Obtaining existing records is an important part of the assessment process as it provides information on issues that may not be apparent during a single survey, which by its nature provides only a 'snapshot' of the ecology of a given site.
- 2.2 The data search has been undertaken for a 10km radius around the Site for European statutory sites, a 2km radius for national statutory and non-statutory sites and a 2km radius for protected and priority² species records.
- 2.3 The following organisations and individuals have been contacted and, where relevant, the information provided has been incorporated with acknowledgement within this report:
- 2.4
- As the 2km search radius from the site boundary overlaps with the boundaries of two Local Environmental Records Centres (LERCs), both The Essex Wildlife Trust and Suffolk Biodiversity Information Service were contacted for details of protected and priority species and non-statutory sites which was received on the 4th of December 2019. Where relevant records were identified, the information provided has been incorporated into the report with due acknowledgement;
 - The Multi-Agency Geographic Information for the Countryside website³ was accessed for information on the location of European designated sites within 10km of the site and 2km for nationally designated sites;
 - The West Suffolk council websites were consulted for details of relevant local planning policies and supplementary planning guidance; and
 - The Suffolk BAP was consulted for priority habitats and species subject to conservation action, to assist with the evaluation of ecological features and to inform Site enhancement strategies.

Extended Phase I Habitat Survey

- 2.5 An 'extended' Phase I habitat survey was undertaken on the 9th of December 2019 by Nathan Jenkinson and Rebekah Baker, experienced field ecologists and Full and Qualifying members of the Chartered Institute of Ecology and Environmental Management (CIEEM) respectively. The technique was based upon Phase I survey methodology (JNCC, 2010). This 'extended' Phase I technique provides an inventory of the habitat types present and dominant species.
- 2.6 The weather conditions for the survey were dry and windy with an air temperature of 7°C.

² UK priority species and habitats are those subject to conservation action and referred to as Species of Principal Importance (SoPIs) or Habitats of Principal Importance (HoPIs). They are listed at Section 41 [42 in Wales] of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act states that local planning authorities must have regard for the conservation of both SoPIs and HoPIs.

³ <http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx>

2.7 As part of this survey work, all habitats were assessed with consideration of the UK Habitat Classification (The UK Habitat Classification Working Group, 2018)⁴ in order to determine their condition and ecological importance. This also enabled the accurate completion of DEFRA's latest Biodiversity Net Gain Metric (The Biodiversity Metric 2.0 (JP029)).

Potential Bat Roost Assessment – Buildings and Trees

2.8 A preliminary bat roost assessment (PBRA) of the buildings and trees present within the site and immediately adjacent to site was undertaken to assess their potential to support roosting bats. This survey was undertaken alongside the 'extended' Phase 1 habitat survey. The surveys followed standard methodologies (Mitchell-Jones, A.J., 2004; Mitchell-Jones, A.J. and McLeish, A.P., 2004; Collins, 2016) which are described below.

2.9 The PBRA for buildings comprised an external, and where possible an internal inspection, of all buildings present on-site to assess their potential to support roosting bats. In summary, this entailed the following:

- A visual inspection of the exterior of the buildings at the site was undertaken on 9th December 2019, examining features such as brickwork, lead flashing, and tiles for evidence of use by bats, including the presence of bat droppings and staining from fur-oil or urine; and
- A number of factors were considered including the presence of features suitable for use by crevice dwelling bats, proximity to foraging habitats or cover, and potential for disturbance from lighting and other sources.

2.10 The PBRA for trees comprised of a ground level inspection of all trees directly adjacent to the site on 9th December 2019 to determine the potential of each tree to support roosting bats. During this survey, Potential Roost Features (PRFs) that may be used by bats, as identified within the BCT Good Practice Guidelines (Collins, 2016), were sought. These included the following:

- Woodpecker holes, rot holes, knot holes arising from naturally shed branches and man-made holes;
- Hazard beams and other vertical or horizontal cracks and splits (such as frost-cracks) in stems or branches;
- Partially detached platey bark;
- Cankers;
- Other hollows or cavities, including butt-rots;
- Partially detached ivy with stem diameters in excess of 50mm; and
- Bird, bat or dormouse boxes.

⁴ <https://ecountability.co.uk/ukhabworkinggroup-ukhab/>

2.11 Evidence of the presence of bat roosts was also sought. These signs include:

- Bat droppings in, around or below a PRF;
- Odour emanating from a PRF; and
- Visible staining below a PRF.

2.12 The potential of each building or tree at the site and immediately adjacent to the site to support roosting bats has been categorised against the criteria described in **Table 2.1**.

| Suitability | Description of Roosting Habitats |
|-------------|---|
| Negligible | Negligible habitat features on-site likely to be used by roosting bats. |
| Low | A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation). A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential. |
| Moderate | A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status. |
| High | A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection conditions and surrounding habitat. |

Table 2.1 – Roost Assessment Criteria (adapted from Collins 2016)

Bat Emergence Survey

2.13 The emergence survey followed standard methodologies set out in the Bat Mitigation Guidelines (Mitchel-Jones, A. J., 2004), the Bat Workers Manual (Mitchell- Jones, A.J. and McLeish, A.P., 2004) and Bat Surveys – Good Practice Guidelines 3rd Edition (Collins, 2016). The methods broadly comprise the following:

- One emergence survey conducted on building B2 which was considered to have a low potential for roosting bats, and two emergence surveys conducted on building B3, which was considered to have a moderate potential for roosting bats.

2.14 Records of bats within 2km of the site were requested and received from The Essex Wildlife Trust and Suffolk Biodiversity Information Service on the 4th of December 2019.

- 2.15 Surveyors were positioned strategically to ensure that the potential bat roost features were covered adequately (see plan 12852/P03). In line with best practice guidance (Collins, 2016), surveyors remained in these positions, observing the buildings from 15 minutes before sunset, through until 1.5 hours after sunset.
- 2.16 Surveyors used a combination of visual observations and echolocation detection to identify any bats emerging from the buildings.
- 2.17 The type of detector used by each surveyor, the surveyor locations and the survey metadata are detailed in **Appendix 2**.

Biodiversity Net Gain Metric

- 2.18 The DEFRA Biodiversity Metric 2.0 was utilised to calculate the pre-development and predicted post-development biodiversity value of the site based on the Landscape Strategy Plan (12852/P01a). This report should be read alongside the completed DEFRA 2.0 metric (12852/Biodiversity Net Gain Metric RevA).
- 2.19 This metric operates by calculating the number of biodiversity units associated with a particular habitat type (both pre-and post-development) – the ‘unit’ value associated with each habitat type is calculated based on the following parameters:
- Size (in hectares)/Length (in km);
 - Distinctiveness (i.e. how rare/valuable a given habitat is);
 - Condition (i.e. how well the recorded habitat fits [or will fit] the standardised description of that habitat);
 - Connectivity (i.e. how well-connected a given habitat is to similar habitats in the landscape); and
 - Strategic significance (i.e. if the existing or proposed habitat is within an area formally adopted in the local plan for green infrastructure or biodiversity improvements).
- 2.20 When considering the creation of new habitats in the post-development site, other factors are also considered when calculating the ‘unit’ value of a given habitat and these are:
- Time to reach the target condition of each habitat; and
 - Difficulty category for the creation of a given habitat.
- 2.21 A calculation has been undertaken using the baseline habitats identified during the ‘extended’ Phase I habitat survey and created/enhanced habitats taken from the Landscape Strategy Plan (12852/P01a).
- 2.22 This calculation is completed separately for non-linear and linear habitats.

Evaluation

- 2.23 The evaluation of habitats and species is defined in accordance with published guidance (CIEEM, 2019)¹. The level of importance of specific ecological features is assigned using a geographic frame of reference, with international being most important, then national, regional, county, borough, local and lastly, within the site boundary only.
- 2.24 Evaluation is based on various characteristics that can be used to identify ecological features likely to be important in terms of biodiversity. These include site designations (such as Sites of Species Scientific Interest (SSSIs)), or for undesignated features, the size, conservation status (locally, nationally, or internationally), and the quality of the ecological feature. In terms of the latter, quality can refer to habitats (for instance if they are particularly diverse, or a good example of a specific habitat type), other features (such as wildlife corridors or mosaics of habitats) or species populations or assemblages.

Limitations

- 2.25 Owing to the timing of the surveys, some plant species may not have been visible. This may have a minor impact on the classification of habitat areas at the site. However, given the nature of the habitats present, this limitation is not considered likely to affect the conclusions of this report. Furthermore, upon further site visits during the bat active season, no substantial changes in plant composition were noted.
- 2.26 Due to the high risk of asbestos noted in the asbestos survey undertaken of buildings B2 and B3 an internal inspection was not possible. However, building B2 was well sealed and does not contain a roof void and so this is not considered likely to affect the conclusions of this report. Building B3 does contain a roof void which was not subject to internal inspection. However, the considering the site context, bat survey effort and low number of bats recorded during the surveys, this is not thought to be a constraint.
- 2.27 Due to restrictions relating to Covid-19 and hotel closures it was not possible to undertake a dawn re-entry survey on the moderate potential building B3 in relation to the health and safety risks associated with driving long distances prior and following a dawn survey.

Quality Control

- 2.28 All ecologists at Tyler Grange Group Ltd are members of CIEEM and abide by the Institutes Code of Professional Conduct.

Section 3: Ecological Features and Evaluation

Context

- 3.1 The on-site buildings are currently disused, except for building B1 which is currently being used as a temporary office space by CRL. In the past the buildings were used as a police station and magistrate's office.
- 3.2 The site sits on Camps Road which abuts a tree lined open green space to the south of the site. To the east of the site is Haverhill Methodist Church and associated hardstanding. The north of the site is adjacent to a primary school playing field, separated from the site by a tree line. Directly west of the site is a recently developed CRL apartment complex. The wider area is characterised by a suburban environment with several tree lines.

Protected Sites

- 3.3 The likely impacts that the development may have on any statutory sites are evaluated and discussed below.

Statutory Sites

- 3.4 There are no internationally designated sites within a 10km radius from the site boundary and no Sites of Scientific Interest (SSSI) within a 2km radius from the search boundary.
- 3.5 The site does fall within the ZOI for two SSSI's, Over and Lawn Woods SSSI and Trundley and Wadgell's Woods, Great Thurlow. However, only development proposals for airports, helipads and other aviation proposals and livestock and poultry units need to be considered with regards to potential impacts.
- 3.6 There is one nationally designated Local Nature Reserve (LNR) with 2km of the site boundary, Haverhill Railway Walks. This site is a 14.1ha urban fringe LNR located 0.5km to the east of the site. It consists of a three-mile footpath and provides a linear wildlife corridor consisting of scrub and large trees for both fauna and flora through the centre of Haverhill.
- 3.7 LNRs are notified under Section 21 of the National Parks and Access to the Countryside Act 1949 by local authorities. They are not necessarily of great ecological importance and are intended for public appreciation and enjoyment of wildlife. The LNR designation does not afford special protection, although LNRs are protected under legislation and planning policy.

Non-Statutory Sites

- 3.8 There are seven non-statutory local wildlife sites found within a 2km radius, which are known as County Wildlife Sites (CWS). The site name, approximate distance and direction from site and reason for designation are detailed in **Table 3.1** below.

| Site Name | Approximate Distance and Direction from Site (km - N/S/W/E) | Description/Summary of Reason for Designation |
|---------------------------------------|---|---|
| Haverhill Disused Railway Line | 0.5km E | This site overlaps with most of the Haverhill Disused Railway LNR and is known to provide an important wildlife corridor for reptiles and a breeding bird survey in 2006 revealed several BoCC red listed species. |
| Broad Street Old Allotment | 0.5km N | A disused allotment now managed for wildlife which contains a mosaic of unmanaged grassland, scrub, ponds and a mixture of deciduous trees. It is known to support reptiles, small mammals, amphibians and breeding birds. |
| Bumpstead Road Grassland | 1.4km SE | A small are of neutral chalk grassland which sits adjacent to Haverhill Disused Railway LNR and supports plants such as sulphur clover <i>Trifolium ochroleucum</i> and bee orchid <i>Ophrys apifera</i> . Neglect has meant that scrub is becoming established on site. |
| Haverhill Flood Park | 1.4km NW | This site consists of a reservoir, grassy embankments supporting over 70 species of wildflowers including sulphur clover and a notable butterfly fauna. |
| Ann Suckling's Way | 1.6km NE | A footpath and bridleway with wide grassy verges that support species rich flora, including crested cow-wheat <i>Melampyrum cristatum</i> and old hedgerows. The site provides an important area of habitat in an area of intensive farming. |
| Ladygate/Poplar Woods | 1.7km SW | A woodland block containing a complex mosaic of ash <i>Fraxinus excelsior</i> and field maple <i>Acer campestre</i> coppice with ash and oak <i>Quercus sp.</i> standards. |
| Norney Plantation | 1.7km N | An ancient woodland listed in the English Nature Ancient woodland Inventory. Semi-natural woodland vegetation is restricted to the woodland edge, as a large part of the woodland consists of sycamore coppice and some ash and oak planting. A large starling <i>Sturnus vulgaris</i> roost has been reported for a number of years. |

Table 3.1 Locally designated sites within a 2km search radius of the site

3.9 CWSs are selected on the basis that they meet the criteria for local wildlife sites selection for sites of importance at a county level. They are therefore of **county importance**.

Habitats and Flora

3.10 The site supports the following habitats:

- Amenity Grassland;

- Bare Ground;
- Building and Hardstanding;
- Ephemeral/Short Perennial;
- Introduced Shrub;
- Scattered Scrub

3.11 For ease of reference, habitat types have been described alphabetically, below. All the features described are shown on the Habitat Features Plan 12852/P02.

Amenity Grassland

- 3.12 There is a small area of overgrown amenity grassland that runs along the northern site boundary.
- 3.13 Species present include Yorkshire fog *Holcus lanatus*, speedwell *Veronica* sp., stinking iris *Iris foetidissima*, common ivy *Hedera helix*, perennial ryegrass *Lolium perenne* and cow parsley *Anthriscus Sylvestris*.
- 3.14 The overgrown amenity grassland comprises mostly of perennial ryegrass and supports common and widespread species. Although this habitat is limited in size, considering the lack of vegetation on site and that it does contain species that will offer some value to pollinating insects such as common ivy and cow parsley it is considered of **ecological importance within the context of the site only**.



Photograph 3.1 Strip of amenity grassland that borders the northern boundary.

Bare Ground

- 3.15 A small area of bare ground sits in between Camps Road and Building B3.

- 3.16 The area of bare ground offers no value to the biodiversity on the site is considered to have **negligible ecological importance**.

Building and Hardstanding

- 3.17 Most of the site currently comprises of building and hardstanding associated with the four onsite buildings, car park, access roads and tarmacked areas around the buildings.
- 3.18 There are four buildings on site. Building B1 is a one-storey building, currently in use by CRL as a temporary office and is located to the north of the site. Building B2 is a disused one-storey brick building located in the centre of the site, building B3 is a disused two-storey brick building located at the south of the site and building B4 is a series of disused garages abutting the eastern boundary.
- 3.19 The buildings and hardstanding are of no inherent ecological value and so are considered to be of **negligible ecological importance**.



Photograph 3.2 Example of hardstanding found onsite.

Ephemeral/Short Perennial

- 3.20 There is a small area of ephemeral/short perennial vegetation located along the eastern boundary of building B2, which comprises of horsetail *Equisetum arvense*.
- 3.21 This species is common and widespread, and the habitat is very limited in size, as such the ephemeral/short perennial is considered to be of **negligible ecological importance**.



Photograph 3.3 Area of ephemeral/short perennial at the eastern side of building B2

Introduced Shrub

- 3.22 There is one area of introduced shrub to the north of building B2 which comprises mostly of snowberry *Symphoricarpos albus*.
- 3.23 The introduced shrub has no inherent ecological value and so is considered to be of **negligible ecological importance**.

Scattered Scrub

- 3.24 There are several areas of scattered scrub found throughout the site that comprise of goat willow *Salix caprea*, holly *Ilex aquifolium*, bramble *Rubus fruticosus*, young sycamore *Acer sp.* and willow *Salix sp.*, buddleja *Buddleja davidii* and cotoneaster *sp.*
- 3.25 The species found within the patches of scattered scrub on site contain common and widespread species, including non-native species, and as such is considered to be of **ecological importance within the site context only**.



Photograph 3.4 Example of scattered scrub habitat found on site.

Offsite habitats

- 3.26 There is a tree line of mature lime *Tilia* sp. and beech *Fagus sylvatica* directly adjacent to the northern boundary and a mature field maple adjacent to the site boundary just north of Building B2.
- 3.27 Mature broad-leaved trees are prevalent in the parkland adjacent to the south of the site. As such, they are considered to be of **ecological importance within the context of the site only**.



Photograph 3.5 Offsite mature tree line.

Fauna

- 3.28 For ease of reference, descriptions of the fauna have been described alphabetically, below.

Amphibians

- 3.29 The data search returned 22 records of common and widespread amphibians, including records of common frog *Rana temporaria*, common toad *Bufo bufo* and smooth newt *Lissotriton vulgaris*. Seven records of common frog were returned, with closest and most recent record being 1.5km east in 2015, three records common toad were returned, with the closest and most recent record being 1.6km east from site in 2015 and 12 records smooth newt were returned, with the nearest record being 1km north from the and the most recent in 2016.
- 3.30 No records of great crested newt (GCN) *Triturus cristatus* were returned within the data search and no ponds are present within a 250m radius from the site boundary. As such it is considered that GCN are likely absent from site and are not discussed further within this report.
- 3.31 The site currently offers little value to common and widespread amphibians and is likely limited to the strip of overgrown amenity grassland that may provide shelter and insect forage to any amphibians in the wider area. It is considered that the development will have a negligible impact on any amphibians present in the wider area.
- 3.32 The site could be enhanced for common and widespread amphibians through the proposed native shrub and hedgerow planting which will improve the site for common and widespread amphibians by increasing the connectivity across the site and providing a range of habitat structures.

3.33 The site could be further enhanced for common and widespread amphibians through the incorporation of habitat piles and hibernacula in the site boundary planting to increase opportunities for hibernating amphibians.

Badgers

3.34 The data search returned one record of Eurasian badger *Meles meles* from 2010, 1.2km north from site.

3.35 The site could offer some foraging habitat for any badgers present in the wider area. However, this is limited to the overgrown amenity grassland located at the northern boundary of the site. Considering the low suitability of the site for foraging badgers, the absence of any setts and the data search only returning one record for badger in the past 10 years, it is considered unlikely that badgers are utilising this site and as such they are not considered further within this report.

Bats



3.36 Ninety-six records of bats were returned by the data search and included the following species:

- Two records of brown long-eared bat *Plecotus auritus*, one record 1km east from site in 2012 and one record 1km west from site in 2017;
- One record of Western barbastelle *Barbastella barbastellus* 1.9km east from site in 2014;
- One record of serotine *Eptesicus serotinus* 1.6km south east from site in 2014;
- Three records of noctule *Nyctalus noctula* with the nearest and most recent record 1km west from site in 2017;
- 12 records of common pipistrelle *Pipistrellus pipistrellus* with the nearest record 0.4km east from site in 2014 and the most recent record in 2015 1.5km south east from site;
- 11 records of soprano pipistrelle *Pipistrellus pygmaeus* with the nearest and most recent record 0.5km south from site in 2014; and
- Two records of unidentified bat and one record of a *pipistrelle sp.*

3.37 No European Protected Species licences (EPSL) were returned within a 2km search radius of the site.

Potential Bat Roost Assessment

3.38 Buildings B1, B2, B3 and B4 and the offsite trees to the north of the site were all subject to a PBRA. **Table 3.2** below outlines the results of the buildings and offsite tree, T1, along with a description of the results of the PBRA. All other offsite trees adjacent to the site boundary, except for Tree T1, supported no potential bat roost features and as such were considered to have negligible potential for roosting bats.

| Photograph | Description |
|--|---|
|  | <p>Building B1</p> <p>A well-sealed one-storey building with a flat bitumen lined roof and solid brick wall located to the north of the site. The building is currently being used by CRL as a temporary office and a full internal inspection was carried out. There were no signs of bat activity on the inside or outside of the building. Any boarded-up windows were checked for bat activity. The building contained no potential bat roost features and was therefore considered to have negligible potential for roosting bats.</p> |
|  | <p>Building B2</p> <p>Building B2 is located at the centre of the site and is a one-storey building with a flat bitumen lined roof and solid brick wall. The building was subject to an external assessment only due to the presence of asbestos within the building. This building is in disuse but is well sealed and only contained one potential bat roost feature. The building has a chimney stack which features a mortar gap that is considered suitable for crevice dwelling species.</p> <p>The presence of one potential roost feature that is suitable for a small number of common crevice dwelling species such as common pipistrelle and soprano pipistrelle mean that the building was considered to have a low potential to support roosting bats.</p> |



Building B3

Building B3 is a two-storey building with a pitched roof and brick walls that could potentially support a cavity wall. The building was subject to an external assessment only due to asbestos being identified within the building. The roof supports several potential bat roost features:

- A soffit gap on the northern elevation that provides access to a potential space for void dwelling species;
- A broken window on the eastern elevation that could potentially provide access to the roof void that could support void dwelling species; and
- Several raised roof tiles which could support crevice dwelling species.

Considering that the building has several features and has the potential to support both crevice and void dwelling species, and that the building is adjacent to a tree line it is considered that the building could potentially support brown-long eared bats which are present in the area and crevice dwelling species such as common and soprano pipistrelle. As such, Building B3 was considered to have a **moderate potential to support roosting bats**.

During the first emergence survey visit in May 2020, it was noted that the broken window had been boarded up. As such, this feature is no longer present.



| | |
|--|---|
|  | <p>Building B4</p> <p>Building B4 is a single storey brick garage unit that is well sealed and contains no potential bat roost features. As such, it is considered that this building has negligible potential to support roosting bats.</p> |
|  | <p>Tree T1</p> <p>Tree T1 is a lime tree, with one potential bat roost feature that consists of a knot hole, however the feature is orientated northwards and would likely not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats protect roosting bats. As such, this tree is considered to have a low potential to support roosting bats.</p> |

Table 3.2 Results of the potential bat roost assessment.

Dusk Emergence Survey

3.39 Building B2 required one surveyor to observe the PRF supported by the building and building B2 required three surveyors to adequately cover the PRFs supported by the building. One surveyor was able to cover PRFs on both B2 and B1, meaning that a total of three surveyors were utilised (see 12582/P03). Following the observation that the broken window on the eastern aspect of building B3 had been boarded up, during the second survey of building B3, it was considered that two surveyors could adequately cover building B3.

- 3.40 During the emergence surveys, no bats were seen emerging from building B2 or B3 and low numbers of three bat species were recorded, common pipistrelle, soprano pipistrelle and serotine. Bats were observed commuting and foraging over the site, although foraging activity was limited. During the first emergence survey visit commuting and foraging bats were observed offsite concentrated along the tree line found to the south of the site on the green public open space.

Birds

- 3.41 The data search returned 342 records for birds. This includes two records of the Schedule 1 barn owl *Tyto alba* with one record occurring 500m from site in 2012 and the most recent record occurring in 2014. The records include 18 species on the Bird of Conservation Concern (BoCC) Red List including eight records of starling *Sturnus vulgaris* and seven records of house sparrow *Passer domesticus*. The records returned also included 14 species on the BoCC Amber List including 31 records of swift *Apus apus* and 6 records of house martin *Delichon urbica*.
- 3.42 The scattered scrub and onsite buildings all present opportunities for common and widespread nesting birds. In addition, two bird boxes are present on the western aspect of building B1.
- 3.43 The site is not considered to contain habitat that would support notable assemblages of either breeding or wintering birds.
- 3.44 There site does not present suitable habitat for barn owl and considerations do not need to be made to survey the site for barn owls.

Invertebrates

- 3.45 Invertebrate records were not returned within the data search; however, the site sits within a recognised B-line. B-lines have been mapped across Norfolk and Suffolk and connect the best wildlife sites for pollinating species in aim of providing connecting habitat for pollinators across the region.
- 3.46 The incorporation of native planting into the scheme will provide an increase in opportunities for pollinating species of insects and will add to the identified B-line that the site sits within.

Reptiles

- 3.47 The data search returned two records of slow worm *Anguis fragilis*, three records of grass snake *Natrix natrix helvetica* and three records of common lizard *Zootoca vivipara* with the nearest and most recent record of both common lizard and slow worm being 1km southeast from the site boundary in 2017. The most recent and nearest record for grass snake returned by the data search is 1.2km southeast from site in 2018.
- 3.48 A small number of records for reptiles were returned by the data search and as most of the site currently consists of building and hardstanding it is considered that much of the site is unsuitable to reptiles and therefore reptiles are unlikely to be on site. However, several of the CWS and the Haverhill Disused Railway LNR are known to support reptiles, which is only 0.5km from the site boundary.

- 3.49 Although the wider landscape does not provide many commuting opportunities for reptiles to move from the disused railway corridor to the site, there are large areas of grassland directly north and south of the site and the overgrown amenity grassland at the north of the site may provide suitable habitat for reptiles.

Western European Hedgehog

- 3.50 There were 23 records of Western European hedgehog *Erinaceus europaeus* returned by the data search with the nearest and most recent record 0.2km from site in 2016 south west from the site boundary.
- 3.51 Considering the small distance between the site and the most recent record of Western European Hedgehog, adjacent parkland to the south of the site, the suburban surroundings and the mobile nature of hedgehogs, it is considered likely that hedgehogs may be present on site. Although, in the sites current state it offers limited opportunities to hedgehogs in terms of green commuting corridors, shelter and foraging opportunities. The overgrown amenity grassland at the north of the site may offer some opportunity in terms of insect forage.

Other notable species

- 3.52 Although one record of Eurasian otter *Lutra lutra* was returned within the data search in 2017, located 1.3km southeast from the site boundary. However, there is no suitable habitat on site or directly adjacent to site for otter.
- 3.53 No records were returned by the data search for hazel dormouse *Muscardinus avellanarius*, water vole *Arvicola terrestris* or white clawed crayfish *Austropotamobius pallipes*. The site is not considered to support any habitats suitable for these species.
- 3.54 It is considered that the proposals will have no significant impact on the above-described species, and as such, they are not considered further within this report.

Invasive Species

- 3.55 Invasive species are those listed under Schedule 9 of the Wildlife and Countryside Act 1981. With regard to invasive plant species (listed under Part II of Schedule 9), it is an offence to plant or otherwise cause to grow in the wild any plant which is included in Part II of Schedule 9.
- 3.56 Although buddleja is not a schedule 9 plant, it is a prolific non-native species and should be removed from site during works.

Section 4: Potential Impacts, Mitigation and Enhancements

Proposed Development

- 4.1 The existing buildings are proposed to be demolished and the site developed into a new 34 apartment retirement complex and three retirement cottages with associated landscaping.
- 4.2 The potential consequences with respect to development of the site are set out below, with reference to relevant legislation and planning policy, which is summarised in **Appendix 1**.

Protected Sites

- 4.3 No protected sites sit within or directly adjacent to the site boundary.

Haverhill Railway Walks LNR

- 4.4 Increases in recreational pressure as a result of development can lead to direct impacts on protected sites. Much of the Haverhill Disused Railway LNR forms part of the public footpath system through Haverhill, and as such it is considered that the site would be managed for recreation. It is considered that any increase in recreational pressure on the LNR following development should not affect the habitat within the LNR as visitors are likely to use the path relating to the public footpath system which will be managed for recreational purposes. As such, it is considered the development plans are not likely to have an adverse effect on the Haverhill Railway Walks LNR.

County Wildlife Sites

- 4.5 With the exception of the Haverhill Disused Railway Line, which is covered by Haverhill Railway Walks LNR and discussed above, the CWSs are considered to be too far from the site to be negatively impacted by either direct or indirect impacts through pathways such as recreation or air quality.

Habitats and Flora

Amenity Grassland

- 4.6 The proposals will result in the loss of the amenity grassland found at the northern site boundary. However, as shown by the Landscape Strategy Plan (12852/P01a), this loss will be more than mitigated for as the habitat will be replaced and two large areas of amenity lawn are proposed to be established in association with the retirement apartment complex and the gardens of the three retirement cottages.

Scattered Scrub

- 4.7 The proposals will result in the loss of all scattered scrub from the site. However, this will be more than mitigated for through the establishment of native shrub planting and native hedgerow planting which will replace those native species to be lost to development (12852/P01a).

- 4.8 Those species that have been recommended to make up the native shrub mix, and native hedgerow includes a variety of native berry and flower producing species, such as hawthorn *Crataegus monogyna*, Blackthorn *Prunus spinosa*, elder *Sambucus nigra*, holly, dog rose *Rosa canina*, common dogwood *Cornus sanguinea* and buckthorn *Rhamnus cathartica*. These will not only provide a range of foraging opportunities for fauna but will also provide a range of habitat structures on site.

Offsite Habitats

- 4.9 As the scattered trees are offsite, they will be retained. All works should adhere to BS 5837:2012 Trees in relation to design, demolition and construction and where possible, lighting should be designed as not to illuminate the tree line at the northern site boundary.

Fauna

Bats

- 4.10 Bats are protected under The Conservation of Species and Habitats Regulations (2010) which makes it an offence to deliberately or recklessly capture, injure or kill such an animal, harass an animal or group of animals and obstruct access to a breeding site or resting place, or otherwise deny an animal use of a breeding site or resting place.

Roosting

- 4.11 As stated in **Section 3** of the report, building B2 and B3 were subject to emergence surveys in line with best practice guidance (Collins, 2016), during which no emergences were recorded. As such, it is considered that bat roosts are likely not present in either building. Therefore, no more work is required in relation to buildings B2 and B3 and a ESPL is not required to permit the demolition of these two buildings. However, in the unlikely event that a bat is found during works, works must cease immediately, and Natural England be consulted.
- 4.12 In addition, if at the point of the works, two years has elapsed since the time of these surveys, update surveys will be required.
- 4.13 Tree T1 has low potential for roosting bats. As such, a sensitive lighting strategy should be incorporated into the site design, ensuring that no light is directed onto tree T1 to maintain the integrity of the PRF.
- 4.14 The site could be enhanced for roosting bats by including bat boxes within the scheme design. This could be achieved by using free hanging exterior bat boxes on the new building or retained trees, such as the “Schweglar 1F Bat Box” or by using enclosed brick bat boxes such as the “Ibstock Enclosed Bat Box” which can be incorporated into the design of the buildings.

Foraging

- 4.15 As detailed in **Section 3**, the foraging activity over the site was limited and was carried out by light tolerant species, common pipistrelle, soprano pipistrelle and serotine.
- 4.16 The site currently offers limited foraging opportunities for bats and the proposals described in paragraph 4.8 will enhance the site for foraging bats. In addition, the establishment of a hedgerow along the western site boundary will provide a green corridor for commuting bats and will provide a link between the playing fields to the south and north of the site.

Lighting

- 4.17 No tangible impacts are predicted in terms of lighting, as the species recorded are light tolerant and the majority of the site is currently well lit. However, to ensure the value of the site for foraging and commuting bats is maximised once to scheme is built, a sensitive lighting strategy should be implemented. Any lighting scheme should be designed to maintain dark, unlit areas by avoiding the illumination of bat foraging and commuting habitats (as below), particularly those that are not already subject to illumination. Sensitive lighting will help to encourage the continued use of the site by bats.
- 4.18 The areas of habitat where sensitive lighting should be employed where possible are the hedgerows and planting at the site boundaries and the offsite tree line to the north of the site. This would maintain an area of dark foraging habitat and dark commuting corridors for bats along the site boundaries.
- 4.19 In addition, lighting should also be designed to avoid illuminating newly installed bat boxes.
- 4.20 Sensitive lighting measures may include low bollard lighting, use of hoods and cowls on lamps and use of low-pressure sodium or, where glass glazing is preferred, use of high-pressure sodium instead of metal halide lamps (Collins, 2016; BCT and Institute of Lighting Engineers, 2009).

Nesting Birds

- 4.21 In England and Wales, birds and their nests are protected under the Wildlife and Countryside Act (1981) (as amended).
- 4.22 The scrub, buildings and bird boxes associated with Building B1 all provide potential habitat for nesting birds.
- 4.23 To reduce the likelihood of triggering the relevant legislation any building demolition, bird box removal and scrub removal should be undertaken outside of the core nesting bird season (March-August, inclusive), although it should be noted that nests can be found at any time of year. If any clearance works are due to be carried out during the core nesting bird season they must be done under the supervision of an Ecological Clerk of Works (ECoW).
- 4.24 The ECoW will undertake a pre-works check of any suitable nesting habitat. Should any nests be found during clearance works an appropriate buffer must be erected to define where works cannot take place until an ECoW can confirm that the chick has fledged, or the nest has failed.

- 4.25 The site will be enhanced for foraging birds through the establishment of native planting as described above in paragraph 4.8 and will increase opportunities for foraging birds through providing a year-round supply of forage. Additionally, this native planting, in particular the hedgerow planting will provide new nesting opportunities.
- 4.26 The site could be further enhanced for nesting birds through the incorporation of either free hanging bird boxes or integrated bat boxes within the scheme design to increase the number of nesting opportunities on site.

Reptiles

- 4.27 All species of reptile in the UK including, slow worm, grass snake, common lizard and adder are protected against killing, injuring or trade under Section 9 (Schedules 1 and 5) of the Wildlife and Countryside Act 1981 (As Amended).
- 4.28 The small area of overgrown amenity grassland at the northern boundary has the potential to support common reptile species and considering that the data search returned records of slow worm, grass snake and common lizard within the past 10 years, precautionary mitigation methods in the form of directional strimming should be implemented under the supervision of an ECoW to avoid injuring or killing any reptiles that may be present on site and avoid triggering the relevant legislation and are outlined below.
- 4.29 The implementation of the below described methods should coincide with the reptile active season (March-October) to reduce the risk of injuring or killing any hibernating reptiles that may be present on site and triggering the relevant legislation.
- 4.30 Prior to any directional strimming taking place the ECoW will give a toolbox talk, this will ensure the contractors are familiar with the legislation surrounding reptiles and will know how to recognise the four common species of UK reptile and what to do in the event one is found during the works.
- 4.31 In the first instance, the over-grown amenity grassland is to be cut to approximately 15cm. The habitat manipulation should be directional and will take place from south to north. This will push any reptiles present on site northwards and into the tree lines and grass buffer habitats off site to the north. Vegetation will be cleared using hand tools such as a strimmer, and arisings should then be left in situ for 24 hours before being removed from site to allow any animals to move before vegetation is collected up. This should involve raking up by hand rather than by machine and then removing the vegetation from site.
- 4.32 After the completion of the first phase of the directional strimming, following at least a week to allow any reptiles remaining on site to move into more suitable habitat off site, the vegetation should be cut to ground level under the supervision of an ECoW.
- 4.33 Following the directional strimming to ground level a destructive search of the area should be used to ensure any remaining reptiles are removed from the area. Any reptiles found should be placed into a container and moved into suitable habitat north of the site boundary.

- 4.34 To decrease the chance of reptiles moving back onto site during the construction phase, a regular cutting regime should be put in place to maintain the semi-improved grassland below 5cm to ensure the site remains unsuitable for reptiles.
- 4.35 No ground works should take place until the habitat manipulation exercise is complete.
- 4.36 Provided the development can proceed in accordance with the above methods, it is considered that any reptiles that may be present on site will not be injured or killed, and the relevant legislation should not be triggered.

Western European Hedgehog

- 4.37 The proposed native hedgerow planting and native scrub planting will increase the insect diversity on site, thus increasing the amount of foraging opportunities for hedgehogs, in addition to providing shelter and green commuting corridors around the boundaries of the site, linking the playing fields to the north and south of the site.
- 4.38 The proposed garden fencing in the associated with the three apartments proposed at the north of the site should contain gaps to maintain connectivity across the site for commuting and foraging hedgehogs.
- 4.39 The site could be further enhanced for hedgehogs through the placement of a hedgehog house or hibernacula within the boundary planting to increase opportunities for hibernating hedgehogs.

Section 5: Biodiversity Net Gain Assessment

- 5.1 A development achieves Biodiversity Net Gain when the total biodiversity units present post development is higher than that of the biodiversity units present on site prior to development. Biodiversity offsetting is used to achieve Biodiversity Net Gain.
- 5.2 Biodiversity offsetting involves the provision of compensatory habitat for residual habitat losses and/or indirect effects arising from development that persists despite the implementation of appropriate avoidance and mitigation measures. A calculation is produced to assess the effects of a scheme on the habitats present versus the proposed compensatory habitat creation and enhancement measures. In order to determine whether offsetting is required, the biodiversity impact assessment metric is used to calculate the biodiversity value of a site before and after development in terms of 'biodiversity units' to give an overall biodiversity net gain or loss.
- 5.3 Through consultation with the West Suffolk Senior Ecology & Landscape Officer it has been confirmed that the Local Planning Authority expect that a 10% net gain should be achieved post development.

Existing Habitats

- 5.4 The following habitats are present within the red line boundary of the application site and are shown on Habitat Features and Potential Bat Roost Features Plan (12852/P02). A brief summary of each habitat is provided below along with the habitat condition and category it is assigned within the biodiversity impact calculator. The rationale for condition assessments are detailed within the metric (12852/Biodiversity Net Gain Metric RevA)⁵.
- 5.5 The Phase 1 Habitat/UK Habitat Classification converter tab within the metric has been used to convert the Phase 1 Habitat Types into UK Habitat as these are the definitions that the metric is based upon.
- 5.6 Habitat areas and condition:
- Amenity grassland (0.006ha): This category includes the discrete patch of amenity grassland present at the northern site boundary and has been assigned a habitat condition of "fairly poor";
 - Urban – Vacant/derelict land/bare ground (0.004ha): This category includes the discrete area of bare ground towards the south of the site and has been assigned a habitat condition of "poor";
 - Urban – Development land; sealed surface (0.318ha): This category includes the buildings and hardstanding found on site, for which habitat condition is not applicable. For clarity, within the metric this category has been split into building (0.087ha) and hardstanding (0.231ha);
 - Sparsely vegetated land – Ruderal/Ephemeral (0.004ha): This category includes the discrete

⁵ <http://publications.naturalengland.org.uk/publication/5850908674228224> (Technical Supplement Document)

area of horsetail found at the eastern aspect of building B2 and has been assigned a habitat condition of “poor”;

- Urban – introduced shrub (0.004ha): This category includes the discrete area of introduced shrub to the north of building B2 and has been assigned a habitat condition of “poor”; and
- Heathland and shrub – Mixed scrub (0.018ha): This category includes the areas of scattered scrub found across the site and has been assigned a habitat condition of “fairly poor”.

5.7 There are no linear habitats or street trees present on site pre-development.

Proposed Habitats

5.8 The Landscape Planting Strategy (12852/P01a) has been used to calculate the proposed habitat areas and linear habitats. It has been assumed that no habitats are to be retained on site. A brief summary of each habitat is provided below along with the habitat condition and category it is assigned within the biodiversity impact calculator. The habitats have been split into habitat areas and linear habitats. The rationale for target condition assessments⁵ are detailed within the metric (12852/Biodiversity Net Gain Metric RevA).

5.9 Habitat areas and target condition:

- Amenity grassland (0.054ha): This category includes the amenity lawns associated with the apartment complex, the small patches of bulb planting within it and the gardens of the retirement cottages and have been assigned a target habitat condition of “poor”;
- Urban – Development land; sealed surface (0.276ha): This category includes the buildings and hardstanding, for which habitat condition is not applicable. For clarity, within the metric this category has been split into building (0.114ha) and hardstanding (0.162ha);
- Urban – Introduced shrub (0.019ha): This category includes the proposed ornamental planting and has been assigned a target habitat condition of “moderate”;
- Heathland and shrub – Mixed scrub (0.002ha): This category includes the proposed native shrub planting and has been assigned a target condition of “moderate”; and
- Urban – Street Tree (0.001ha): This category includes the three proposed street trees which include one native tree and two specimen trees, for which habitat condition is automatically assigned as “moderate”.

5.10 Linear areas and target condition:

- Native Species Rich Hedgerow (0.137km): This category includes the proposed native hedgerow found along the eastern site boundary and has been assigned a target condition of “moderate”; and
- Hedge Ornamental Non-Native (0.108km): This category includes the proposed evergreen and formal clipped ornamental hedges along the southern and western site boundaries and has been assigned a target habitat condition of “moderate”.

Biodiversity Net Gain Metric Results

- 5.11 As described within the biodiversity impact assessment calculator set out below in **Figure 5.1**, based on the habitats present on site that will be lost to development and those proposed habitats, the development would achieve a net gain of **+33.61%** habitat units and a gain of **+0.61** hedgerow units.
- 5.12 It should be noted that as no linear habitat exists in the site baseline, the metric produces an error for the percentage change in hedgerow units. As such, the hedgerow results are set out above in terms of the addition of hedgerow units rather than a percentage change.

| | | |
|--|----------------|------------|
| On-site post-intervention (including habitat retention, creation, enhancement & succession) | Habitat units | 0.19 |
| | Hedgerow units | 0.61 |
| | River units | 0.00 |
| Off-site baseline | Habitat units | 0.00 |
| | Hedgerow units | 0.00 |
| | River units | 0.00 |
| Off-site post-intervention (including habitat retention, creation, enhancement & succession) | Habitat units | 0.00 |
| | Hedgerow units | 0.00 |
| | River units | 0.00 |
| Total net unit change (including all on-site & off-site habitat retention/creation) | Habitat units | 0.05 |
| | Hedgerow units | 0.61 |
| | River units | 0.00 |
| Total net % change (including all on-site & off-site habitat creation + retained habitats) | Habitat units | 33.61% |
| | Hedgerow units | Check Data |
| | River units | 0.00% |

Figure 5.1 Results of the Biodiversity Net Gain Assessment

Management

- 5.13 The results of the DEFRA 2.0 metric are based on the habitats within the site being maintained at a certain condition, as prescribed by the condition assessment sheets published by DEFRA. In order to achieve these conditions and maintain them, specific establishment and management practices will be required.
- 5.14 As such, details of habitat establishment and long-term management could be provided through the production of a LEMP. The LEMP would set out the prescriptions for the establishment and maintenance of the habitats on site and would also outline details on additional ecological enhancements such as the positions of bat and bird boxes and hibernacula.

Section 6: Conclusions

- 6.1. With the implementation of the mitigation and enhancements described in **Section 4** and shown on the Landscape Strategy Plan (12852/P01a) for habitats and fauna, the proposed development would conform with relevant planning policy and legislation, as listed in **Appendix 1**, primarily the West Suffolk Local Plan Policies CS 2, DM11 and DM12 and the Haverhill Vision 2031.
- 6.2. The site does not sit within or directly adjacent to any protected sites and the proposals are not considered to have any direct or indirect impacts on any nearby protected sites.
- 6.3. All habitats are proposed to be lost as a result of the proposals. Those habitats being lost are mostly of negligible ecological importance and require no specific mitigation (building and hardstanding, bare ground, ephemeral/short perennial and introduced shrub). Those habitats being lost that are of ecological importance within the site context only (amenity grassland and scattered scrub) will be more than mitigated for through the proposed habitat creation. Moreover, the site will be enhanced through the inclusion of native hedgerow planting. These proposed enhancements will achieve a biodiversity net gain of **+33.61%** gain in habitat units and a **+0.61** gain in hedgerow units and will satisfy Policy CS 2 of the local plan.
- 6.4. The proposals will improve the habitat diversity onsite, establishing a mosaic of habitats that will provide a range of nesting, foraging and commuting opportunities for species such as bats, birds, , reptiles, common and widespread amphibians and hedgehogs.
- 6.5. Any vegetation removal, building demolition or bird box removal should be undertaken outside of the core nesting bird season (March-August, inclusive), otherwise, a pre-works check by an ECoW should be undertaken to determine whether active birds' nests are present. If nest(s) are present, an appropriate buffer must be instated until the chicks have been confirmed as fledged by an ECoW.
- 6.6. The amenity grassland found at the northern boundary should be directionally strimmed under the supervision of an ECoW to prevent the triggering of the legislation in relation to reptiles.
- 6.7. The mitigation and enhancement recommendations, such a long-term management plan to secure the target conditions of the proposed habitats as listed in the biodiversity net gain metric, could be controlled by appropriately worded planning conditions and would include:
 - A bat lighting strategy; and
 - A LEMP
- 6.8. Species specific enhancements such as the incorporation of insect hotels, bat and bird boxes and hibernacula will increase sheltering, roosting, nesting, and hibernation opportunities and will satisfy Policy DM12 of the West Suffolk Local Plan.
- 6.9. In conclusion, it is considered that the future development of the site would accord with relevant planning policy and seeks to protect and enhance ecological features and that the mitigation and enhancement strategy can be secured by planning conditions.

References

Bats

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Reptiles

Froglife (1999). *Reptile survey: an introduction to planning, conducting and interpreting surveys for snake and lizard conservation*. Froglife Advice Sheet 10. Froglife, Halesworth.

Survey Techniques

Joint Nature Conservation Committee (2010). *Handbook for Phase 1 habitat survey - a technique for environmental audit*. JNCC, Peterborough.

Appendix 1: Planning & Legislation

Legislation

- A1.1. Specific habitats and species receive legal protection in the UK under various pieces of legislation, including:
- The Wildlife and Countryside Act (WCA) 1981 (as amended);
 - The Conservation of Habitats and Species Regulations 2018;
 - The Countryside and Rights of Way (CRoW) Act 2000;
 - The Natural Environment and Rural Communities Act (NERC) 2006;
 - The Hedgerows Regulations 1997; and
 - The Protection of Badgers Act 1992.
- A1.2. The European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, 1992, often referred to as the 'Habitats Directive', provides for the protection of key habitats and species considered of European importance. Annexes II and IV of the Directive list all species considered of community interest. The legal framework to protect the species covered by the Habitats Directive has been enacted under UK law through The Conservation of Habitats and Species Regulations 2018 (as amended).
- A1.3. In Britain, the WCA 1981 (as amended) is the primary legislation protecting habitats and species. SSSIs, representing the best examples of our natural heritage, are notified under the WCA 1981 (as amended) by reason of their flora, fauna, geology or other features. All breeding birds, their nests, eggs and young are protected under the Act, which makes it illegal to knowingly destroy or disturb the nest site during nesting season. Schedules 1, 5 and 8 afford protection to individual birds, other animals and plants.
- A1.4. The CRoW Act 2000 strengthens the species enforcement provisions of the WCA 1981 (as amended) and makes it an offence to 'recklessly' disturb a protected animal whilst it is using a place of rest or shelter or breeding/nest site.

Planning Policy

National Planning Policy Framework (NPPF), February 2019

- A1.5. The National Planning Policy Framework (NPPF) was published in February 2019 and sets out the Government's planning policies for England and how these should be applied. It replaces the first National Planning Policy Framework published in March 2012.
- A1.6. Paragraph 11 states that:
- “Plans and decisions should apply a presumption in favour of sustainable development.”
- A1.7. Section 15 of the NPPF (paragraphs 170 to 177) considers the conservation and enhancement of the natural environment.

- A1.8. Paragraph 170 states that planning and decisions should contribute to and enhance the natural and local environment by:
- a) “protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
 - d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures”
- A1.9. Paragraph 171 states that plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.
- A1.10. Paragraph 174 states that in order to protect and enhance biodiversity and geodiversity, plans should:
- a) “Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
 - b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”
- A1.11. When determining planning applications, Paragraph 175 states that local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:
- a) “if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
 - b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
 - c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁵⁸ and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.”

A1.12. As stated in paragraph 176 the following should be given the same protection as habitats sites:

- a) “potential Special Protection Areas and possible Special Areas of Conservation;
- b) listed or proposed Ramsar sites; and
- c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.”

A1.13. Paragraph 177 states that the presumption in favour of sustainable development does not apply where the planned project is likely to have a significant effect on a habitat site (alone or in combination) unless an appropriate assessment concluded the plan or project will not adversely affect the integrity of the habitats site.

Local Planning Policy

West Suffolk Local Plan

A1.14. *The West Suffolk Local Plan* consists of the Core Strategy (2010), Joint Development Management Policies (2015) and the Vision 2031 (2014). Relevant policies relating to ecology and nature conservation are summarised as follows:

Core Strategy (2010)

Policy CS2 Natural Environment:

A1.15. Areas of landscape, biodiversity and geodiversity interest and local distinctiveness within the District will be protected from harm and their restoration, enhancement and expansion will be encouraged and sought through a variety of measures. Links between such areas will also be sought. Measures will include:

- the designation of Local Nature Reserves (LNR), County Wildlife Sites (CWS) and Regionally Important Geological/Geomorphological Sites (RIGS);
- appropriate management of valuable areas (such as County Wildlife Sites);
- progress towards Biodiversity Action Plan targets (UK, Suffolk and Forest Heath BAPs);
- minimising the fragmentation of habitats, creation of new habitats and connection of existing areas to create an ecological network;
- promotion of Green Infrastructure enhancement and/or provision on all new developments; using Landscape Character Assessment (LCA) to inform development decisions within the District;
- promotion of green corridor enhancement, such as improvement projects along the River Lark and Icknield Way;

- and promotion of agri-environment schemes which increase the landscape, historic and wildlife value of farmland, increase appropriate public access and reduce diffuse pollution.
- A1.16. Particular attention will also be paid to initiatives which will improve the natural environment where it is poor or lacking in diversity, this could include brownfield sites or non-BAP habitats. The protection and management of these sites will be sought accordingly as they are identified and their importance established.
- A1.17. Continuing habitat creation and enhancement projects, such as heathland re-creation around Brandon Country Park and wetland and reedbed creation at the RSPB reserve at Lakenheath Fen, will continue to be supported. Where appropriate, attempts will be made to re-connect fragmented habitats with other existing areas.
- A1.18. Where mitigation measures are employed, they will result in a net gain of biodiversity for the District. Proposals should also seek to incorporate:
- adequate and appropriate landscaping and natural areas informed by Landscape Character Assessment; and
 - increased public access to the countryside through green corridors, these should create convenient and attractive links and networks between development and the surrounding area.
- A1.19. New built development will be restricted within 1,500m of components of the Breckland SPA designated for Stone Curlew. Proposals for development in these areas will require a project level Habitat Regulations Assessment (HRA) (see Figure 3). Development which is likely to lead to an adverse effect on the integrity of the SPA will not be allowed.
- A1.20. Where new development is proposed within 400m of components of the Breckland SPA designated for Woodlark or Nightjar a project level Habitats Regulation Assessment (HRA) will be required (see Figure 3). Development which is likely to lead to an adverse effect on the integrity of the SPA will not be allowed.
- A1.21. New road infrastructure or road improvements will not be allowed within 200m of sites designated as SACs in order to protect the qualifying features of these sites (see Figure 3).
- A1.22. New development will also be restricted within 1,500m of any 1km grid squares which has supported 5 or more nesting attempts by stone curlew since 1995. Proposals for development within these areas will require a project level HRA (see Figure 3). Development which is likely to lead to an adverse effect on the integrity of the SPA will not be allowed.

Joint Development Management Policies Document February 2015

Policy DM10: Impact of Development on Sites of Biodiversity and Geodiversity Importance

- A1.23. When considering development proposals which may have an adverse impact on nature conservation sites or interests, the local planning authority will have regard to the expert nature conservation advice provided by Natural England, the Suffolk Wildlife Trust and other specialist sources and the following criteria:
- 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).

A1.24. 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. Proposals which would result in significant harm to biodiversity, having appropriate regard to the 'mitigation hierarchy', will not be permitted.

A1.25. Note: With respect to criterion g) the provision of replacement habitat or features is viewed as a last resort, rather than a regular development tool. Where compensation has been established as an acceptable approach, it will be necessary to provide replacement areas of at least equivalent value to the lost habitats. The local planning authority will normally expect new habitats to be in place to a satisfactory standard before the original habitats are lost.

Policy DM11: Protected Species:

A1.26. Development which would have an adverse impact on species protected by the Conservation of Habitats and Species Regulations (2010) (as amended), the Wildlife and Countryside Act (1981), the Protection of Badgers Act (1992), and listed in the Suffolk Biodiversity Action Plan, or subsequent legislation, will not be permitted unless there is no alternative, and the local planning authority is satisfied that suitable measures have been taken to:

- a) reduce disturbance to a minimum; and
- b i. maintain the population identified on site; or

ii. provide adequate alternative habitats to sustain at least the current levels of population.

A1.27. Where appropriate, the local planning authority will use planning conditions and/or planning obligations to achieve appropriate mitigation and/or compensatory measures and to ensure that any potential harm is kept to a minimum.

A1.28. Note: Developers should take into account separate legislation, Acts, regulations, case law, planning guidance and any subsequent replacement Supplementary Planning Documents and laws preventing interference with protected species, and should be aware of the need to undertake relevant assessments, studies and surveys as required prior to the submission of planning and related applications.

Policy DM12: Mitigation, Enhancement, Management and Monitoring of Biodiversity

A1.29. In addition to, or as part of the requirements of other policies in this DPD, measures should be included, as necessary and where appropriate, in the design for all developments for the protection of biodiversity and the mitigation of any adverse impacts. Additionally, enhancement for biodiversity should be included in all proposals, commensurate with the scale of the development. For example, such enhancement could include watercourse improvements to benefit biodiversity and improve water quality, habitat creation, wildlife links (including as part of green or blue infrastructure) and building design which creates wildlife habitat (e.g. green roofs, bird and/or bat boxes).

A1.30. All new development (excluding minor household applications) shown to contribute to recreational disturbance and visitor pressure within the Breckland SPA and SAC will be required to make appropriate contributions through S106 agreements towards management projects and/or monitoring of visitor pressure and urban effects on key biodiversity sites.

Haverhill Vision 2031 (2014)

A1.31. The Haverhill Vision 2031 is a comprehensive plan to guide the overall direction and management of the town growth over the next 20 years. The aspects relevant to ecology are as follows.

Historic and Natural Environment Aspirations

A1.32. Aspiration 27: The historic and natural environment is protected, maintained and enhanced.

A1.33. Aspiration 28: Ensure that new green infrastructure is integral to new development.

A1.34. Strategic objective H: To maintain, protect and enhance the biodiversity, geodiversity and natural environment and seek opportunities to increase the provision of green open space and access to the countryside.

Biodiversity Action Plans

A1.35. The UK Post-2010 Biodiversity Framework succeeded the UK BAP partnership in 2011 and covers the period 2011 to 2020. However, the lists of Priority Species and Habitats agreed under the UKBAP still form the basis of much biodiversity work in the UK. The current strategy for England is 'Biodiversity 2020: A Strategy for England's wildlife and ecosystem services' published under the UK Post-2010 UK Biodiversity Framework. Although the UK BAP has been succeeded, Species Action Plans (SAPs) developed for the UK BAP remain valuable

resources for background information on priority species under the UK Post-2010 Biodiversity Framework.

- A1.36. Priority Species and Habitats identified under the UKBAP are also referred to as Species and Habitats of Principal Importance for the conservation of biodiversity in England and Wales within Sections 41 (England) and 42 (Wales) of the Natural Environment and Rural Communities (NERC) Act 2006. The commitment to preserving, restoring or enhancing biodiversity is further emphasised for England and Wales in Section 40 of the NERC Act 2006.

Local Biodiversity Action Plan

- A1.37. The Suffolk Local Biodiversity Action Plan covers all priority species listed under Section 41 of the NERC Act. The priority habitats listed on the Suffolk Biodiversity information service are:

- Hedgerows
- Traditional Orchards
- Open Mosaic Habitats on Previously Developed Land (Brownfield)
- Wood Pasture and Parkland
- Lowland Heathland & Acid Grassland
- Lowland Calcareous Grassland
- Mixed Deciduous Woodland
- Arable Field Margins
- Reedbeds
- Saltmarsh and Mudflats
- Intertidal Mudflats
- Coastal and Floodplain Grazing Marsh
- Lowland Meadows
- Wet Woodland
- Fens
- Rivers and Streams
- Coastal Sand Dunes
- Coastal Vegetated Shingle
- Maritime Cliffs and Slopes
- Ponds
- Saline lagoons
- Seagrass Beds
- Sheltered Muddy Gravels
- Subtidal Sands and Gravels
- Mud Habitats in Deep Water

Appendix 2: Raw Bat Survey Data

A2.1 See the Bat Surveyor Location Plan for the locations of the three surveyors.

| Survey | Date | Survey Times | Weather | | Surveyors |
|-------------------------------------|------------|---|--|---|--|
| | | | Start | End | |
| Dusk Emergence – building B2 and B3 | 18/05/2020 | Sunset: 20:51 Start: 20:36 End: 22:21 | Wind (Beaufort): 2 Temp (°C): 18 Precipitation: dry Cloud cover (% cover): 90 | Wind (Beaufort): 2 Temp (°C): 15 Precipitation: dry Cloud cover (% cover): 0 | Nathan Jenkinson, Rebekah Baker, Ben Nelumbu |
| Dusk Emergence – Building B3 | 23/06/2020 | Sunset: 21:23 Start: 21:08 End: 22:53 | Wind (Beaufort): 2 Temp (°C): 18 Precipitation: dry Cloud cover (% cover): 20 | Wind (Beaufort): 2 Temp (°C): 16 Precipitation: dry Cloud cover (% cover): 0 | Rebekah Baker, Mark Taroni |

Table A2.1 Metadata for the two survey visits.

Emergence Survey Visit 1:

| | | |
|--|-------------------|-----------------|
| Surveyor: Ben Nelumbu | | |
| Date: 18/05/2020 | | |
| Survey: Dusk | | |
| Building: B3 | | |
| Surveyor Location: SL1 | | |
| Equipment used: Bat Logger and Echo Meter Touch | | |
| Sunset time: 20:51 | Start time: 20:36 | End Time: 22:21 |
| Weather | At Start | At End |
| Cloud Cover (%): | 90 | 0 |
| Wind (Beaufort Scale): | 2 | 2 |
| Precipitation | 0 | 0 |
| Temperature (C°) | 18 | 15 |
| Notes: No emergences. Several passes of common pipistrelle, soprano pipistrelle and serotine and foraging common pipistrelle with bats mainly observed commuting along the tree line associated with the public open space to the south of the site. | | |

Table A2.2 survey data for Ben Nelumbu

| | | |
|--|-------------------|-----------------|
| Surveyor: Rebekah Baker | | |
| Date: 18/05/2020 | | |
| Survey: Dusk | | |
| Building: B3 | | |
| Surveyor Location: SL2 | | |
| Equipment used: Bat Box Duet and Ediroll | | |
| Sunset time: 20:51 | Start time: 20:36 | End Time: 22:21 |
| Weather | At Start | At End |
| Cloud Cover (%): | 90 | 0 |
| Wind (Beaufort Scale): | 2 | 2 |
| Precipitation | 0 | 0 |
| Temperature (C°) | 18 | 15 |
| Notes: No emergencies. Several passing common pipistrelle and one foraging soprano pipstrelle with all recorded bats being heard and not seen. | | |

Table A2.3 survey data for Rebekah Baker

| | | |
|--|-------------------|-----------------|
| Surveyor: Nathan Jenkinson | | |
| Date: 18/05/2020 | | |
| Survey: Dusk | | |
| Building: B3 | | |
| Surveyor Location: SL3 | | |
| Equipment used: Bat Box Duet and Zoom | | |
| Sunset time: 20:51 | Start time: 20:36 | End Time: 22:21 |
| Weather | At Start | At End |
| Cloud Cover (%): | 90 | 0 |
| Wind (Beaufort Scale): | 2 | 2 |
| Precipitation | 0 | 0 |
| Temperature (C°) | 18 | 15 |
| Notes: No emergencies. Four common pipistrelle recorded with two foraging and two commuting. | | |

Table A2.4 survey data for Nathan Jenkinson

Emergence Survey Visit 2:

| | | |
|---|-------------------|-----------------|
| Surveyor: Rebekah Baker | | |
| Date: 23/06/2020 | | |
| Survey: Dusk | | |
| Building: B3 | | |
| Surveyor Location: SL1 | | |
| Equipment used: Pearsonic and Anabat Express | | |
| Sunset time: 21:23 | Start time: 21:08 | End Time: 22:53 |
| Weather | At Start | At End |
| Cloud Cover (%): | 20 | 0 |
| Wind (Beaufort Scale): | 2 | 2 |
| Precipitation | 0 | 0 |
| Temperature (C°) | 18 | 16 |
| Notes: No emergences. Low levels of common pipistrelle recorded foraging and commuting. | | |

Table A2.5 survey data for Rebekah Baker

| | | |
|---|-------------------|-----------------|
| Surveyor: Mark Taroni | | |
| Date: 23/06/2020 | | |
| Survey: Dusk | | |
| Building: B3 | | |
| Surveyor Location: SL2 | | |
| Equipment used: Echo Meter | | |
| Sunset time: 21:23 | Start time: 21:08 | End Time: 22:53 |
| Weather | At Start | At End |
| Cloud Cover (%): | 20 | 0 |
| Wind (Beaufort Scale): | 2 | 2 |
| Precipitation | 0 | 0 |
| Temperature (C°) | 18 | 16 |
| Notes: No emergences. Low levels of commuting common pipistrelle and soprano pipistrelle. | | |

Table A2.6 survey data for Mark Taroni

Appendix 3: Bat Box Specifications

- A3.1. External bat boxes (such as the Schwegler 1FF bat box) will be installed onto the walls of the site post-development or internal bat boxes (such as the Ibstock Enclosed bat box “C”) could be integrated into the scheme design. These boxes offer suitable roosting conditions for crevice dwelling species such as soprano pipistrelle and will provide the required mitigation for the loss of the existing roost.



Figure A3.1: Schwegler 1FF bat boxes (image from: <http://nhbs.com/>)



Figure A3.2 Ibstock Enclosed bat box “C” (image from: <http://nhbs.com/>)

- A3.2. The bat boxes should be installed at least 4m off the ground and positioned with an unobstructed approach. If possible, they should be placed where there will be no lighting directed towards them, with the boxes are to be sited on the south, west and east aspects of buildings to receive maximum amounts of sunlight and warmth.

Appendix 4: Bird Box Specifications

- A4.1. External bird boxes such as the “Schwegler 1B Nest Box” could be hung on external walls on the site post-development or internal bird boxes such as the “No. 17 Schwegler Swift Box” and “1SP Schwegler Sparrow Terrace” could be integrated into the building design . These boxes would increase the number of nesting opportunities for birds.



Figure A3.1 Schweglar 1B Nest Box (image from: <https://www.nhbs.com/1b-schwegler-nest-box>)

- A4.2. These bird boxes should be installed at least 2m-4m off the ground, with the entrance facing between north and east.



Figure A3.2 1SP Schwegler Sparrow Terrace (image from <https://gardenature.co.uk/product/sparrow-terrace-1sp-brown>)

- A4.3. This bird box should be installed at least two meters of the ground with the entrance facing between north and east.



Figure A3.3 No. 17 Schwegler Swift Box (image from: <https://www.nhbs.com/no-17b-schwegler-swift-nest-box-single-cavity>)

- A4.4. This bird boxes should be installed at least six to seven meters above ground where there is unobstructive access and if possible, under the shelter of overhanging roofs, with the entrance facing between north and east

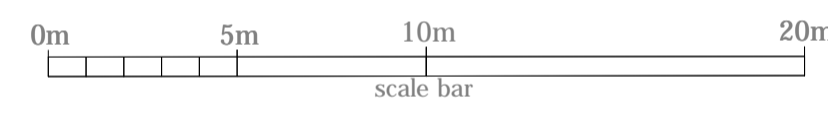
Appendix 5: PL02 Site Plan



Site Plan

| REVISIONS | | |
|-----------|------|----|
| Rev. | Date | By |
| | | |

| BOUNDARY SCHEDULE | |
|-------------------|--|
| A-B | 1100mm METAL RAILINGS WITH MATURE SHRUBS BEHIND |
| B-C | 1100mm METAL RAILINGS ON NEW RETAINING WALL |
| C-D | OPEN (PROPOSED ACCESS ROAD) |
| D-E | PROPOSED 1800mm TIMBER FENCING ON NEW LOW RETAINING WALL |
| E-F | PROPOSED 1800mm TIMBER FENCING |
| F-A | 1100mm METAL RAILINGS ON DWARF BRICK WALL |
| G-H-I | PROPOSED 1800mm TIMBER FENCING |



planning issues
TOWN PLANNING AND ARCHITECTURAL DESIGN
Gideon Lemberg RIBA
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E-mail: design@planningissues.co.uk

Client
Churchill Retirement Living

Project Title
PROPOSED CAT II SHELTERED HOUSING
Site Opposite CRL Development
Camps Road
Haverhill CB9 8HF

Drawing Title
Site Plan

| | | | |
|---------------------|------------|---------|----------|
| Scale | 1:200 @ A1 | Date | JUN 2021 |
| Drawn | GSL | Checked | |
| Drawing No. | | Rev. | |
| 40033HH-PL02 | | | |

Plans

Landscape Strategy Plan: 12852/P01a

Habitat Features and Potential Bat Roost Features Plan: 12852/P02

Bat Surveyor Location Plan: 12852/P03

Design Principles - Soft Landscape Strategy

The proposed development on Camps Road, Haverhill, West Suffolk, includes the creation of 3 cottages to the north and 33 retirement living apartments to the south and associated communal gardens, parking and landscaping. This follows the earlier completed development at Weavers Lodge located to the west of the site.

The planting palette includes both native and non-native species that will not only contribute towards biodiversity enhancement but also contribute towards softening of boundaries and providing visual interest through the seasons. The ornamental planting mixes are defined by a mix of soft grasses, evergreen shrubs with a range of perennials and flowering shrubs to provide seasonal interest and colour. A formal clipped hedge will provide structure to the ornamental planting mixes. A scattering of topiary specimens provides a variety of structure and interest through the ornamental planting mixes. Native hedgerow planting will increase biodiversity within the site, as well as providing a robust boundary to the rear gardens of the three cottages, the eastern boundary of the site. The gardens within the retirement living apartments will include multi-stemmed Snowy Mespilus (*Amelanchier lamarckii*) trees providing showy white flowers in early spring followed by fruits in June as a focal point within the gardens. Swathes of bulb planting will provide seasonal colour through the retirement living apartments garden.

Native shrub planting located within the car park and towards the south west of the three cottages to the north of the site will enhance the biodiversity through the site.

Native Trees (NT)

Suggested Species:



Acer campestre 'Streetwise'

Specimen Trees (ST) - Multi Stem

Suggested Species:



Amelanchier lamarckii

Topiary Specimens (TS)

Suggested Species:



Buxus sempervirens (ball)

Taxus baccata (cone)

Native Hedgerow (NH)

Suggested Mix:



Corylus avellana, *Crataegus monogyna*, *Ilex aquifolium*, *Prunus spinosa*, *Rosa canina*, *Acer campestre* and *Rhamnus cathartica*

Evergreen Hedgerow (EH)

Suggested Species:



Prunus lusitanica

Formal Clipped Ornamental Hedgerow

Suggested Species:



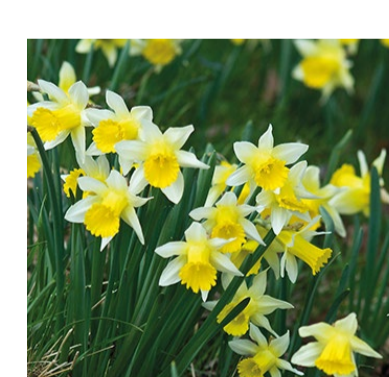
Buxus sempervirens

Bulb Planting (B)

Suggested Species:



Galanthus nivalis



Narcissus pseudonarcissus

Native Shrub Planting (NS)

Suggested Species:



Crataegus monogyna

Prunus spinosa

Rubus fruticosus

Sambucus nigra

Cornus sanguinea

Ornamental Planting Mix 1 (OP1)

Suggested Species:



Allium stipitatum 'Mount Everest'

Carex testacea

Choisya ternata 'Sundance'



Antirrhinum majus 'Admiral White'



Pieris japonica 'Forest Flame'



Deschampsia cespitosa



Fatsia japonica



Panicum virgatum 'Rehbraun'



Rosa 'Flower Carpet Coral'

Ornamental Planting Mix 2 (OP2)

Suggested Species:



Rosmarinus officinalis 'Sunkissed'

Lavandula angustifolia 'Hidcote'

Buddleja davidii 'Black Knight'



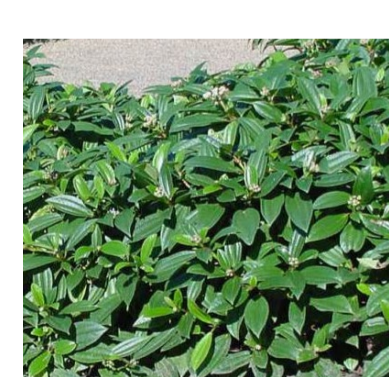
Hydrangea quercifolia



Geranium 'Rozanne'



Lonicera pileata



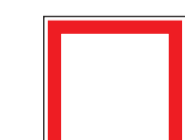
Viburnum davidii



Stipa arundinacea



Miscanthus sinensis 'Morning Light'



Site Boundary



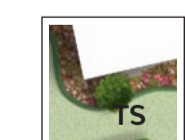
Existing Tree Planting (to be retained)



Proposed Boundary Tree



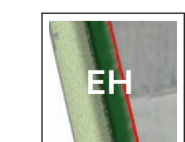
Proposed Specimen Trees



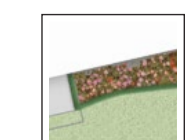
Proposed Topiary Specimens



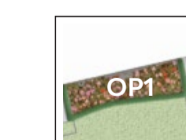
Proposed Native Hedgerow



Proposed Evergreen Hedgerow



Proposed Formal Ornamental Clipped Hedge



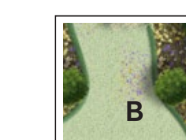
Proposed Ornamental Shrub and Herbaceous Planting Mix 1



Proposed Ornamental Shrub and Herbaceous Planting Mix 2



Proposed Native Shrub Planting



Drifts Bulb Planting



N

Project Camps Road, Haverhill, West Suffolk

Drawing Title Landscape Strategy Plan

Scale 1:200 @ A1

Drawing No. 12853/P01a

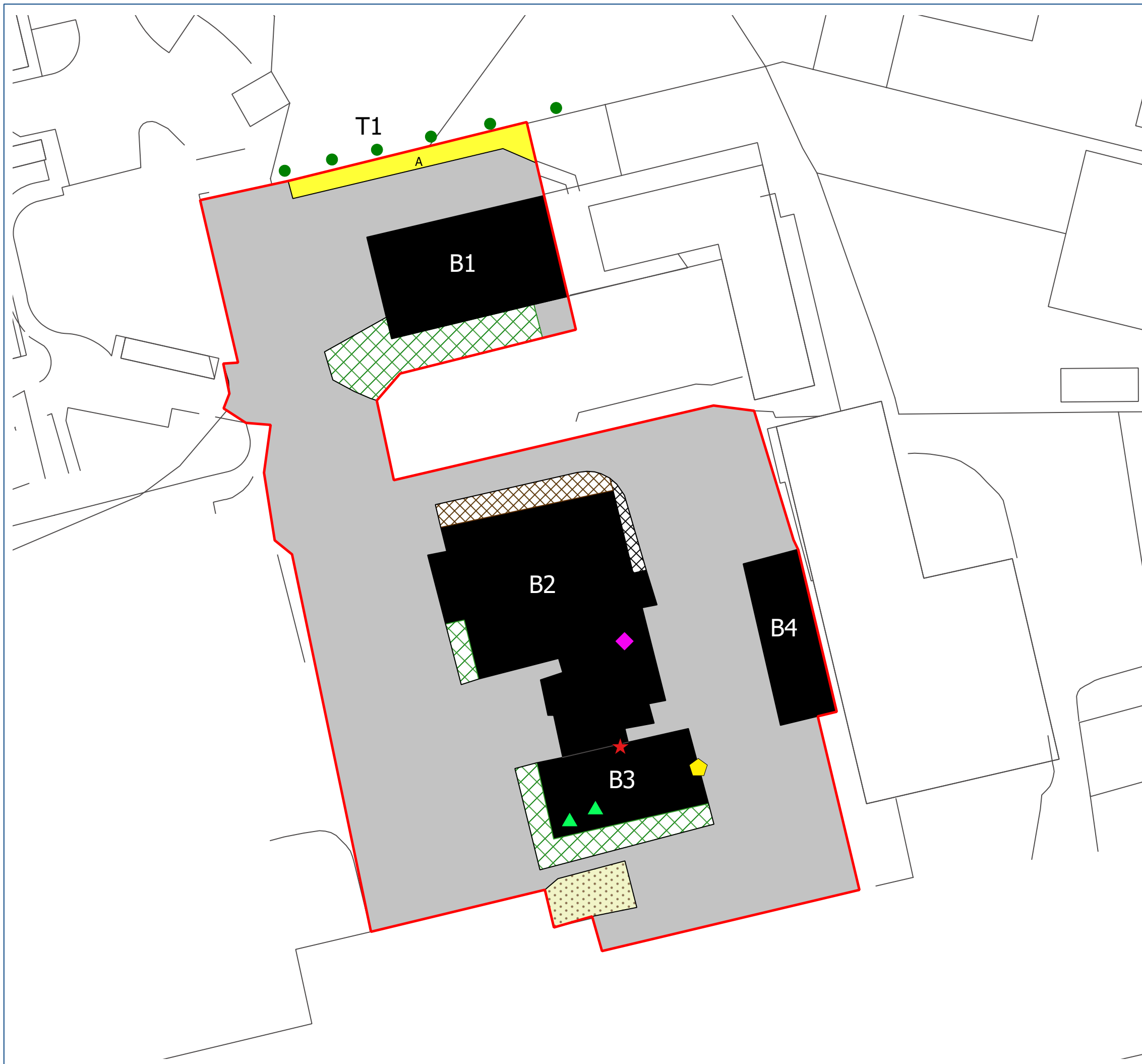
Date June 2021

Checked KL/RB



Marsden Estate, Rendcomb, Cirencester, GL7 7EX
T: 01285 831 804 E: TGlandscape@tylergrange.co.uk W: www.tylergrange.co.uk





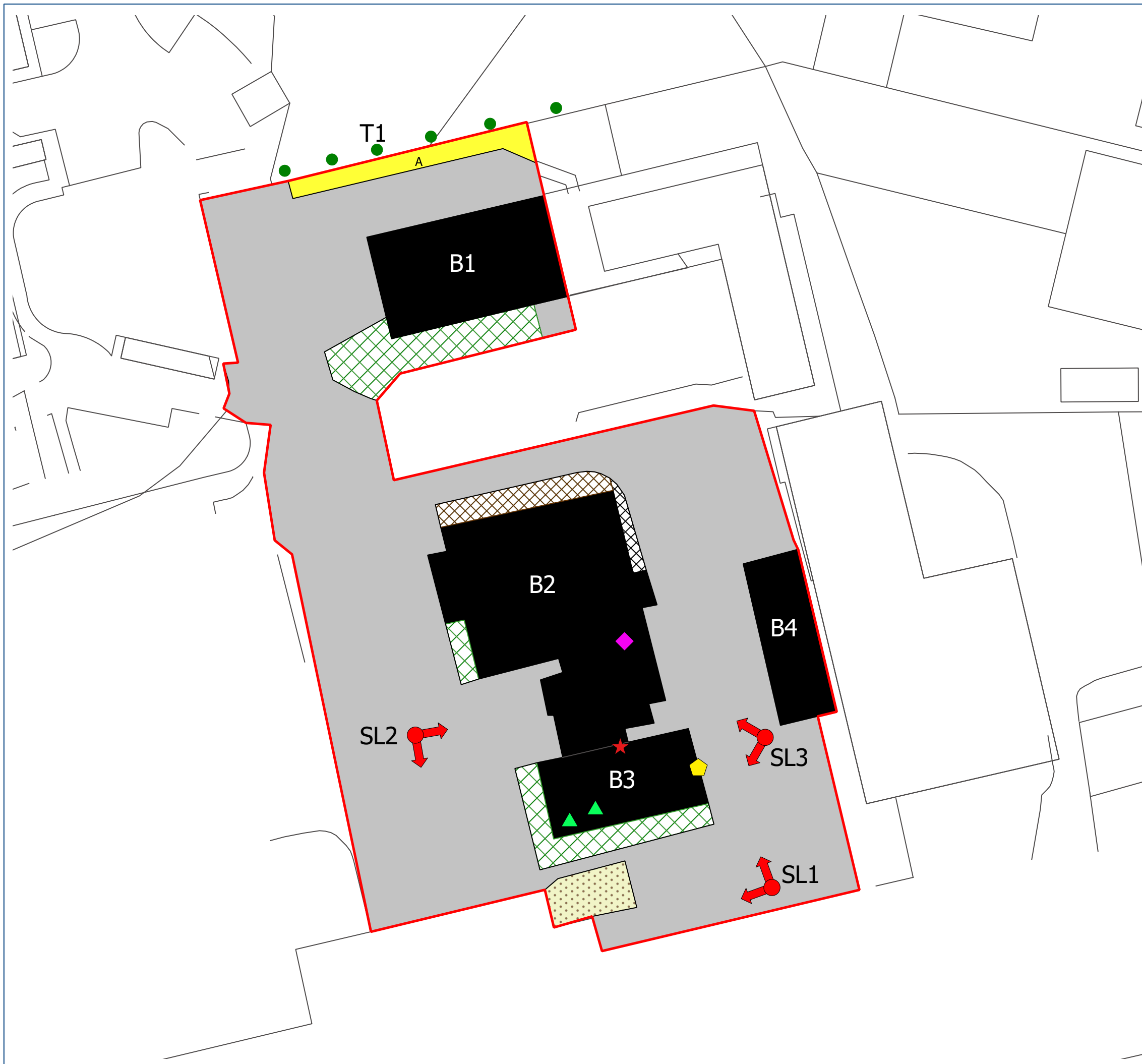
- A Amenity Grassland
 - Bare Ground
 - Building
 - Ephemeral/Short Perennial
 - Hardstanding
 - Introduced Shrub
 - Scattered Scrub
 - Scattered Broadleaved Trees
 - Red Line Boundary
- Potential Bat Roost Features**
- Raised Tiles
 - Broken Window
 - Mortar Gap



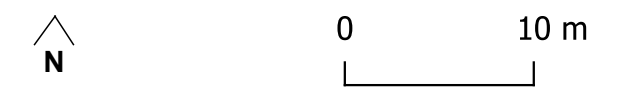
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|---------------|---|
| Project | Former Magistrates Court, Haverhill |
| Drawing Title | Habitat Features and Potential Bat Roost Assessment Plan |
| Scale | As Shown (Approximate) |
| Drawing No. | 12852/P02 |
| Date | Nov 2020 |
| Checked | RB |



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- A Amenity Grassland
 - Bare Ground
 - Building
 - Ephemeral/Short Perennial
 - Hardstanding
 - Introduced Shrub
 - Scattered Scrub
 - Scattered Broadleaved Trees
 - Red Line Boundary
- Potential Bat Roost Features**
- Raised Tiles
 - Broken Window
 - Mortar Gap
 - Surveyor Location



| | |
|---------------|-------------------------------------|
| Project | Former Magistrates Court, Haverhill |
| Drawing Title | Bat Surveyor Location Plan |
| Scale | As Shown (Approximate) |
| Drawing No. | 12852/P03 |
| Date | Nov 2020 |
| Checked | RB |



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