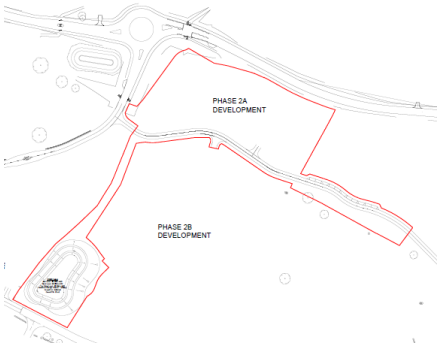
DC/20/0615/RM

Land North of Anne Sucklings Lane, Little Wratting

Reserved Matters Application -Submission of details under SE/09/1283 - the means of access, appearance, landscaping, layout and scale for the construction of 41 dwellings with associated private amenity space, means of enclosure, car parking, vehicle and access arrangement and drainage together with proposed areas of landscaping and areas of open space for a residential development known as Phase 2A

Ecology and landscape comments 17.09.20

The location the site to be considered is shown in the site location plan (below). The planning layout does not address the whole site, neither does it show the full context of how this development will sit within the wider development proposals.

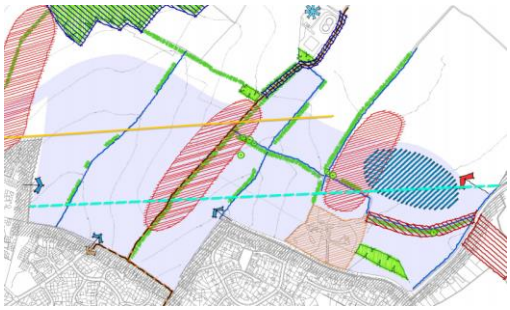


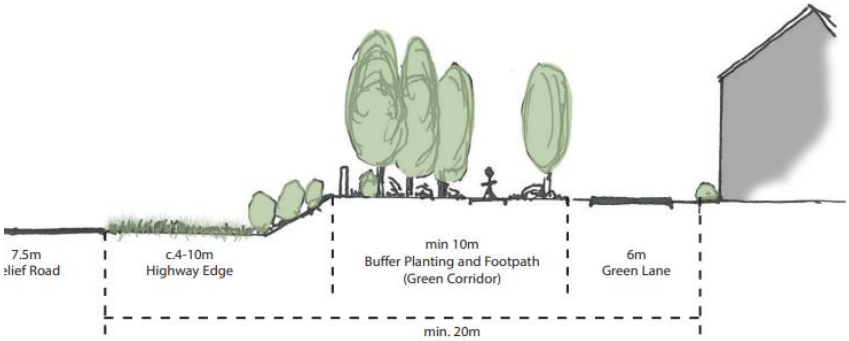
Site context and design requirements

The requirements of this phase of the development are set out in a number of already approved documents. The landscape parameter plan shows, in broad terms, that the development parcel would be set in landscape.

The Landscape strategy 2010 (which forms part of the submission at the outline planning stage) shows the context of the site in relation to the wider development. The context plan (below left) is taken from the Design Code (2017). Section 2.1 of the landscape strategy states that the *landscape structure around the proposal site*

is strong and retention of the existing structure is key to the successful integration of the new development edge into the local landscape.





The space to the north of the site is shown to be part of the primary landscape structure (above right), described as *the main structure of the landscape framework, incorporating the most important hedgerows and providing a strong green link between the town and countryside to the north*. This green corridor will, according to the approved landscape strategy, *be the linear park running around the northern edge of the proposal site and to the south of the proposed Relief Road* – see above. The strategy suggests that *The Primary Landscape Structure will be substantially completed before construction commences on dwellings in adjacent areas.* The Design Code (2017) includes a section of the space between the Green Lane and the relief road edge (above).

Land to the east of the parcel is shown to be playing pitches - covering approximately 0.82 hectares, accommodating a single football pitch with associated parking. The draft layout of this space is shown within the Design Code (below). Whilst this is not part of this application the Primary Street to the south is included.

The central linear park forms part of the secondary structure (see landscape parameter plan, top, and the landscape strategy extract below left). The Design Code describes the linear parks as following *the natural valleys in the proposal*

site and contain many of the proposed swales, attenuation basins and wet ponds. It goes on to suggest that they *are intended to be less formal areas that will help to promote wildlife biodiversity* with the following features:

- connected by the existing widened ditches and proposed swales which will flow in to dry and wet attenuation basins;
- dry basins will be seeded with a wet wildflower mix which contains species suitable for seasonally wet soils and is based on the vegetation of traditional water meadows
- wet attenuation ponds will contain marginal and emergent species native to the area
- existing hedgerows will be bolstered where necessary with native species
- native specimen tress will be planted within the hedgerows and within appropriate areas of the open space

Around and within the parcel (above right), the *tertiary structure of open spaces forms more minor, often linking elements within the Masterplan design. These include:*

• The boulevards with their wide verges and significant tree planting;
• The Streets, with smaller tree planting;
• Local squares;
• Minor areas of buffer planting along the western boundary, along the boundary of Chapel Farm and the area of deciduous woodland east of Boyton Hall; and
• Incidental areas of open space that result from the detailed design and any minor drainage features.

The different approaches to streets are described and illustrated in the Design Code (July 2017). Directly relevant to this application are 'primary streets' and 'green lanes' as follows:

Primary Street will be lined with cultivars of native tree species which will help to tie the development into the surrounding flora. Street trees such as field maple species - Streetwise and Elsrijk - will be used along the lengths of the roads. Where space allows, focal trees, such as Lime (Tilla cordata "Rancho") are proposed.
The plot frontages will be planted with trees and hedges

Green lanes
The frontages of the plots will have ornamental shrub planting and grass lawns to their frontages. Where space allows evergreen hedges, (such as Viburnum tinus or Buxus sempervirens) and lawns will be used.
Small fruiting and flowering trees (such as Prunus "Umineko" / "Kanzan" and Amelanchier lamarckii "Robin Hill") will be used within the street. Larger trees (such as Lime and Hornbeam species) will be used on the edges of the public open space

Connectivity through and around the site is shown in the Design Code (below)

The outline planning application was informed by an Environmenatl Statement, April 2009 and Supplementary Environmental Statement (SES) September 2010. This concluded that the most significant adverse effects of the proposed development relate to some visual and ecological impacts. A summary table (table 16.1) of the findings of the ES and SES is in chapter 16 of the SES. Issues identified in the ES relevant to this parcel must be addressed.

Landscape and green infrastructure

Retention of existing features

The existing features of the site are not shown on the layout – this includes hedges H44, H53, tree groups G37, G40, G41, G43, G48, and individual trees T39, T45, T46, as referred to on the Tree removal plan. It is not clear whether these features could be adequately retained and whether there is sufficient buffer as required by the ecological assessments.

Tree removals plan and AMS

The tree removal plan submitted (JBA 18/351 TR30) covers tree removal for the whole strategic site. It would not be appropriate to consider tree removals for any other area phases as part of this application. A bespoke tree removal plan for this application/phase of the development is required prior to any tree works being undertaken.

The Arboricultural Method Statement relates to the infrastructure application rather than this phase of development. A bespoke tree protection plan for this application/phase will be required prior to any works on site commencing.

Layout
Other infrastructure elements shown, for example the layout of the relief road round-about and footpaths are not consistent with the information submitted for associated applications, for example the relief road landscape details.

The space to the north of the parcel is not sufficient to accommodate the green corridor and the relief road landscaping.

There is insufficient detail to conclude that the layout could adequately accommodate the (landscape and ecological) requirements of the ES.

Landscaping
There is insufficient landscape information to consider landscaping as a reserved matter.

Note that a planting plan has been submitted for the SUD basin – pond 1 which is shown to be a dry pond approximately 1.5m deep. Comments are as follows:

- There are no features designed into the SUD that would lift its status above that of SUD infrastructure.
- There is no information about the central linear park to the north of the SUD and details of the existing ditch.
- There isn't a 3m easement to allow the SUD to be maintained
- No need for amenity grass – use a wildflower mix, floral lawn, or low maintenance grass mix
- This is an ideal space to incorporate some of the ecological measures that are required

The proposals must show how the landscape elements tie into the soft landscaping design of the surrounding infrastructure to provide a high quality and safe environment for the new residents

Ecology

Ecological constraints plan
(November 2019)
This summarises the ecological surveys and highlights the most important features on the site. The report was drafted prior to all the ecological surveys being completed and has not been updated. It is disappointing that some of the features shown to be important are to be lost as part of the proposals, including as part of this phase 2a of the development, and that the issues associated with this are not addressed in the various ecological reports – as such specific mitigation/compensation does not appear to have been included in the proposals. For example, a significant section of hedge H2 (G43 on the TRP) is to be removed yet there appears to have been no consideration as to how the effects could be mitigated, for example replacement hedgerows within and fronting the development parcel.

Reptile Precautionary Method Strategy for Phase 2 (A & B)
(August 2020)

This document sets out a precautionary site clearance method. My concern is that this is not a standalone application but part of a wider development. Care should be taken to ensure that any reptiles are not repeatedly displaced as the development extent increases. This could be achieved if the direction of clearance is towards features, such as hedges, that are to be retained in association with other open space.

The methodology should be conditioned including that the applicant should submit details of the enhancement measures for this phase of the development.

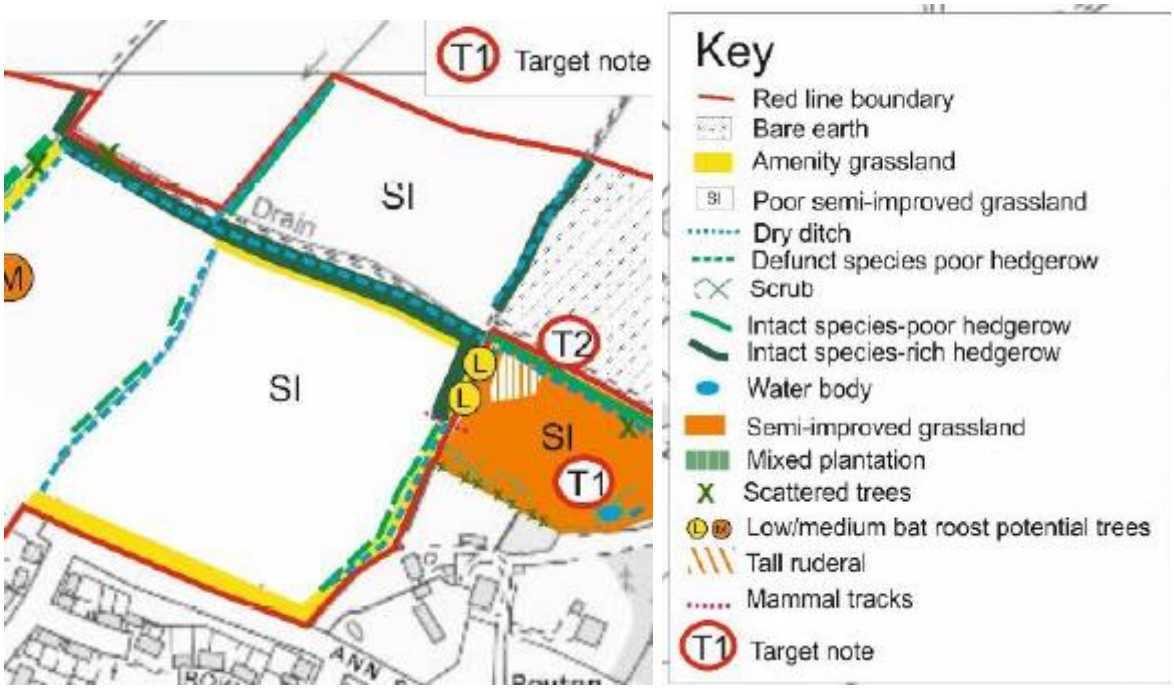
Breeding Bird Survey of Phases 2–6 and Relief Road

(October 2019)
The survey recommends the measures listed below. Whilst it is recognised that the measures apply to the wider application, they equally apply to this part of the development. The proposals submitted do not demonstrate that any of the mitigation measures would be delivered.

- Trees, hedgerows and scrub are retained
- gaps in retained hedgerows are planted up (include hazel, *Corylus avellana*, hawthorn, *Crataegus monogyna*, blackthorn, *Prunus spinosa*, and field maple, *Acer campestre*).
- buffers to retained hedgerows are provided and managed (5m min)
- connectivity for bird is maintained
- POS is planted with shrubs, wildflowers and grasses, such as common bent, *Agrostis capillaris*, red fescue *Festuca rubra*, and smooth-stalked meadow grass, *Poa pratensis*.
- areas set aside primarily for birds and other key species should be fenced off or designed to reduce access by residents and their dogs
- Proposed waterbodies within the SuDS scheme should be planted with emergent and aquatic species, for example marsh marigold (Caltha palustris), bog bean (Menyanthes trifoliata), water forget-me-not (Myositis scorpiodes), common reed (Phragmites australis), reed canary grass (Phalaris arundinacea) and pendulous sedge (Carex pendulus)
- scrub or tree clearance or management should be undertaken outside the nesting bird season
- trees, hedgerows and scrub (including margins) to be retained should be suitably protected throughout the duration of the works
- off-site compensatory habitat, such as skylark nest plots, should be secured in nearby arable land and managed for skylark in perpetuity
- tussock grassland suitable for small mammals (prey of barn owl) should be provided in perpetuity
- a variety of bird boxes should be installed on new buildings within the development including suitable for house sparrow, kestrel, swifts starling, and house martin nest cups
- Specifically designed barn owl nest boxes should be installed on suitably located retained mature trees
- A variety of standard bird boxes with different sized and shaped entrance holes should be installed on suitably located retained mature trees
- A Landscape and Ecological Management Plan (LEMP) should be produced

Preliminary Ecological Appraisal of Haverhill Phases 2-6, Suffolk

January 2019



For this application the following mitigation which is included in thie report should be implemented

- badger check prior to commencement on site

The report recommends a number of additional surveys which appear to have been undertaken with the exception of amphibian survey/GCN and the hedgerow survey (maybe these just haven't been submitted)

In addition general enhancements are suggested which include retention and enhancement of hedges, trees and scrub, and landscpaing that incorporates native or wildlife attracting trees, shrubs, and wildflower areas. The details do not demonstrate that these enhancements will be achieved. More specific enhancements include bird and bat boxes and hedgehog links. Details of these must be secured.

Wintering Bird Survey Report

(February 2020)

The survey recommends a number of measures which are the same as those in the breeding bird survey are listed below – see comments above.

Bat Activity Survey Report of Phases 2-6 and Relief Road

December 2019

The assessment concludes that in the absence of appropriate mitigation, the impacts of lighting from new access roads could have a negative impact on commuting and foraging bats. The following measures are recommended:

- Implementation of a lighting minimisation scheme
- Existing hedgerow gaps to be planted
- Hedgerow planting as part of the new development
- Hop overs to be created adjacent to access points

Whilst it is recognised that the measures apply to the wider application, they equally apply to this part of the development. The proposals submitted do not demonstrate that any of the mitigation measures would be delivered.

Hazel Doremouse Survey Report of Phases 2-6, Haverhill,

No evidence of hazel dormice were found. The report recommended that retained hedgerows are 'gapped up' using native species as part of the wider landscape scheme for the site.

LEMP

(March 2020)
This has not been reviewed as the landscape and ecological proposals are not complete and therefore it is not possible to assess whether the LEMP is adequate. This comment is applicable to Phase 2a but also Phases 2b-6

GCN

(June 2019)
This report has not been submitted with this application however it was submitted as part of the suite of surveys to accompany the relief road. Great crested newt are unlikely to be utilising the site. Enhancement measures are recommended as follows:

- pond creation within open spaces,
- ditch improvement for commuting newts,
- the creation of habitat corridors seeded with wildflower and grassland mixes a
- the incorporation of hibernacula

There is no evidence that these enhancements have been incorporated into the scheme design.

Other issues

Botanical Survey (including Sulphur Clover Survey)(August 2019) has shown the presence of the Nationally Scarce Sulphur Clover on this site in relation to H2 (G43 on the TRP). This issue, highlighted in the ES, has not been considered as part of this application.

Conclusion

I object to the development proposals in their current form and recommend refusal.