



**Suffolk Wildlife Trust**

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Penny Mills  
Planning Department  
West Suffolk Council  
West Suffolk House  
Western Way  
Bury St. Edmunds, IP33 3YU

28<sup>th</sup> May 2021

Dear Penny,

**RE: DC/21/0110/RM - Reserved matters application - submission of details under outline planning permission SE/09/1283 - the means of access, appearance, landscaping, layout and scale for the construction of 127 dwellings, together with associated private amenity space, means of enclosure, car parking, vehicle and access arrangements together with proposed areas of landscaping and areas of open space for a phase of residential development known as phase 2b. Land Nw Of Haverhill, Anne Sucklings Lane, Little Wratting**

Thank you for sending us details of this application, we wish to make a **holding objection** for the following reasons:

We are still concerned that there is not sufficient buffer around the hedgerows onsite, including hedgerow H2 which was recommended to be fully retained within the Ecological Constraints Plan (James Blake Associates, November 2019). This was to protect the hedgerow and ground flora including the nationally scarce sulphur clover. However, we note that sections of the hedgerow will be removed and whilst buffering has been shown within the landscape proposals, it does not appear to consist of 4m. This is also the case for other hedgerows around the site boundary. In accordance with National Planning Policy Framework (NPPF)(2019) Chapter 15, Paragraph 175a, all development proposals should apply the mitigation hierarchy to reduce, as far as possible, negative effects on biodiversity. Enhancement and delivery of biodiversity net gain i.e. an approach that leaves biodiversity in a better state than before should be part of all development proposals, in line with the Government's emerging Environment Act predicted to receive Royal Assent in 2021.

If removal of sections of the hedgerow H2 is required to facilitate the development, then we recommend a detailed method statement is produced for the translocation of sulphur clover to a nearby suitable receptor site. The management should then be reviewed annually for the first five years after translocation, with further reviews every five years for the life of the development. Without such measures, we are concerned that the plant will be lost from the site.

As foraging and commuting bats have been identified as potentially using hedgerows and trees adjacent to the site (Bat Activity Survey Report, James Blake Associates, December 2019), then it is important that there is no light spill from external lighting and that dark corridors are retained around the site for the foraging and commuting bats. Therefore, a lighting strategy in accordance with current

guidelines<sup>1</sup> should be designed. Without such a strategy, there is insufficient information to ascertain whether bats are negatively affected by these proposals. The bat survey report also recommends that where hedgerows are to be removed for access routes, vegetation either side should be encouraged to grow so that it can reconnect and form a 'bridge' over the access route. However, this has not been detailed within the landscape proposals nor in the LEMP. This should be included within these two documents to continue connectivity for bats around the site.

In accordance with NPPF para 175d, proposals should demonstrate a 'measurable' net gain in biodiversity. This is transposed to the emerging Environment Bill which is expected to put a requirement for all proposals to achieve a 10% net gain in biodiversity; whilst not yet formally released, this level is already being implemented as good practice across the country. Therefore, we believe this development should seek a minimum of 10% biodiversity net gain.

There are records of Hedgehog, a UK and Suffolk Priority Species, in the surrounding area. To maintain connectivity for this species, we recommend maintaining hedgehog permeable boundaries (with gaps of 13x13cm at ground level) as part of this development. These should be detailed within a plan.

A Biodiversity Enhancement Strategy should be produced, detailing the how the enhancements and recommendations made within the Ecological Constraints Plan are to be incorporated within the development, including their locations.

Please do not hesitate to contact us should you require anything further.

Yours sincerely

Jacob Devenney  
Planning and Biodiversity Adviser

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<sup>1</sup> ILP, 2018. Bat Conservation Trust Guidance Note 08/18: Bats and artificial lighting in the UK