Preliminary Ecological Appraisal

The Links, Haverhill

for

Mr T Hendrey

22 August 2024



Client Mr T Hendrey

Planning authority West Suffolk District Council

Time limit of reliance

Please note that the reported surveys were conducted on the date(s) stated in the report and that it represents site conditions at the time of the visit. The findings and recommended mitigation are based on these conditions. If site conditions change materially after the site survey, the original report cannot be relied upon and will need to be updated. Ecological reports and surveys can typically be relied on for 18 to 24 months from the date of survey.

Surveys supporting European Protected Species Mitigation Licence applications must be within the current or most recent survey season for bats (May to September), or within two survey seasons for great crested newts (March to June).

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	Signed disclosure	,		
The information, data, a	0	h I have provided is true and has		
	The information, data, advice and opinions provided in this report which I have provided is true and has been prepared in accordance with the Chartered Institute of Ecology and Environmental Management's			
Code of Professional Conduct. I confirm that the opinions expressed are my true and professional bona				
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SUMMARY

Greenlight Environmental Consultancy Ltd. has been commissioned to carry out a Preliminary Ecological Appraisal for a proposed development at The Links, Withersfield Road, Haverhill, Suffolk, CB9 7RN (grid reference: TL 66235 46498).

This report outlines the habitat features on site, the likelihood of protected species being present and any potential effects of the proposed development on such species.

The ecology report is required in support of a planning application for the construction of seven new residential dwellings with associated infrastructure for vehicular access and utility services.

The survey and assessment were completed by independent, qualified and experienced ecologists with Natural England survey licences for the relevant protected species.

The findings of the assessment are that the habitats on the site are of low ecological value and that there are no significant ecological constraints that would prevent the proposed works.

A pre-construction survey for water voles is required to be conducted within 30 days of the proposed start date.

If proposed plans change to affect trees with bat roosting potential, further surveys are required prior to works commencing to inform an ecological impact assessment of the site and an appropriate mitigation strategy.

If the following mitigation and enhancements are incorporated into the proposed layout, there will be a net gain for biodiversity, as is encouraged by the National Planning Policy Framework.

Protected habitats/species	Status	Potential effect	Recommended mitigation and enhancements
Protected sites	One statutory and seven non-statutory protected sites within 2km. One statutory and one non-statutory protected site located partially onsite.	Habitats onsite of low quality and do not match the habitats in LNR or CWS citation. No significant impacts on protected sites and their qualifying features predicted.	<u>Mitigation</u> The LNR/CWS to be retained where possible.
Protected habitats and habitats subject to conservation designations	Modified grassland managed as lawn and several scattered trees will be removed as part of the proposed works. No Priority Habitats will be affected.	Low scale of habitat loss predicted for wildlife.	<u>Mitigation</u> Soft landscaping scheme to include: The planting of new native species- rich hedgerows and trees between plots and around site. Retention of the boundary hedgerows. Species-rich lawns in gardens and wildflower mixtures in open areas, rich in nectar and pollen.

Protected habitats/species	Status	Potential effect	Recommended mitigation and enhancements
			Construction work to be carried out in accordance with BSI (2012), BS 5837:2012, to protect trees and their root protection areas. Construction work is carried out via the
			implementation of a Construction Environmental Management Plan ("CEMP").
Bats	Negligible bat roosting	Potential disturbance	Mitigation
	potential in building one (garage). Low-moderate bat	of bat roosts if present in trees. Low scale loss and	If proposed works change to affect trees with moderate bat roosting potential, further bat surveys will be conducted.
	roosting potential in three trees located on site.	potential light disturbance of commuting and	If proposed works change to affect trees with low bat roosting potential, a soft- fell approach will be adopted.
	Low value commuting and foraging habitat on site.	foraging habitats on site.	Any lighting schemes will comply with Bat Conservation Trust and CIE 150:2003 guidance.
			Enhancement
			Installation of seven integrated bat boxes installed on new buildings.
Breeding birds	Nesting habitats for	Low scale loss of	<u>Mitigation</u>
	hedgerow, tree and building nesting birds present on site, including potential breeding habitat for	nesting habitat on site. Potential disturbance to breeding birds.	Works to any hedgerows, trees and buildings on site to be conducted outside bird nesting season or under watching brief of ecologist if during nesting season.
	Amber listed species. No suitable barn owl		Enhancement
	foraging habitat on site.		Installation of one integrated swift box and one sparrow terrace per dwelling on site, installed on new buildings.
Great crested	Unsuitable terrestrial	GCN unlikely to be	Precautionary mitigation
newts	habitats on site. <mark>Two ponds</mark> within 250m of the site,	present within the proposed area of works.	Cut and maintain vegetation short (maximum height of 10cm) on and around the site until the start of works.
	assessed as poor to good suitability. Site falls within Green risk zone for district level licensing. No GCN records within	No impacts on potential GCN terrestrial or aquatic habitat.	Removal of refugia by hand. In the highly unlikely event GCN are found, work will cease immediately, and a licenced ecologist contacted. Rough sawn planks placed inside any open excavations.
	2km.		Construction materials will be stored off the ground on pallets and waste materials in skips.
Water voles and	Stour Brook River	No loss of potential	Precautionary mitigation
otters	adjacent the site and unsuitable for water voles and otters due to	water vole or otter habitat.	Pre-construction survey for water voles conducted within 30 days of proposed start date.
	low levels of water.		If evidence of water voles is discovered, the nature of planned works within 6m

Protected habitats/species	Status	Potential effect	Recommended mitigation and enhancements
	No water vole or otter records within 2km.		of the bank will require assessment for potential impacts, and to inform an appropriate mitigation strategy. This may include further surveys and a European Protected Species mitigation license. A 6m no-work buffer zone to be applied from the top of the bank using temporary barrier netting wherever possible.
Reptiles	Habitats on site unsuitable. Nine reptile records within 2km.	No impacts predicted.	<u>Precautionary mitigation</u> Mitigation for GCN will be implemented to avoid impacts on reptiles from the proposed work.
Other animals	N/A	Potential harm to animals.	MitigationIf fencing is required, this will be porous and provide openings for hedgehogs.Enhancement Installation of seven bee bricks.

1. METHOD

- 1.1. A walkover of the site was conducted on 20th July 2023 by Lucy Reed and Daniel Howes independent, qualified and experienced ecologists. Survey conditions were as follows: 20°C, 5mph wind, sunny intervals and dry.
- 1.2. All survey methods were carried out in accordance with the most up to date good practice guidance for the relevant protected species. Please refer to Appendix A for the full methodology and species breakdown.
- 1.3. The habitats on and directly adjacent the site were considered unsuitable for the following protected species, with no evidence or signs of use observed. No further surveys or mitigation for these species are detailed in this report:

White-clawed crayfish Austropotamobius pallipes Badger Meles meles (setts) Hazel dormouse Muscardinus avellanarius Natterjack toad Epidalea calamita

2. SITE CONTEXT

Location

- 2.1. The general location of the site is shown in Figure 1 below.
- 2.2. The site is situated within the town of Haverhill, with the A1307 and Stour Brook River located adjacent south of the site.
- 2.3. The site is enclosed by residential dwellings to the north, a park to the east, the A1307 and Stour Brook River to the south and residential dwellings to the west. The wider surroundings are comprised of a mixture of residential dwellings, small blocks of woodland, Haverhill Railway Walks and arable fields lined with mature trees and hedgerows.

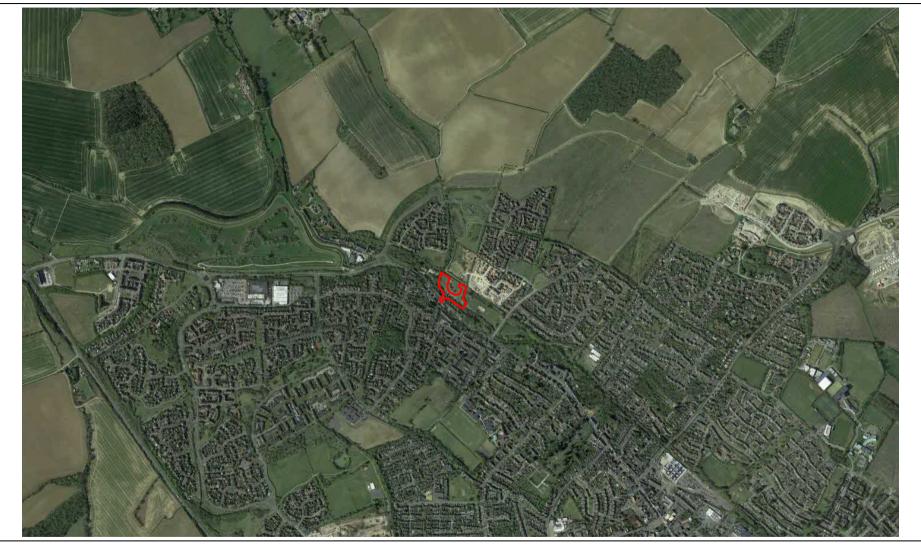


Figure 1 Satellite image of site surroundings, site indicated by red line. Image © Google, date accessed 19/07/24

3. DESCRIPTION OF THE DEVELOPMENT

3.1. The proposals are for the construction of seven new residential dwellings with associated infrastructure for vehicular access and utility services. Please refer to Appendix J for the proposed plans.

4. PROTECTED SITES

Statutory

- 4.1. There is one statutory protected site located within 2km one Local Nature Reserve ("LNR"). Please refer to Appendix C for the full citation.
 - i. <u>Haverhill Railway Walks</u> LNR, partially located on site.

"With much of its length now covered with scrub and larger trees, the railway provides a valuable wildlife corridor. It offers food and shelter to a wide range of birds, animals, insects and plants. All five kilometres (3 miles) of the disused line is now part of the Haverhill Local Nature Reserve."

4.2. The proposed development falls outside of all Sites of Special Scientific Interest ("SSSI") Impact Risk Zones relating to residential developments.

Non-statutory

- 4.3. There are seven non-statutory protected sites located within 2km seven County Wildlife Sites ("CWS"). Please refer to Appendix C for the full citations.
 - i. <u>Haverhill Disused Railway Line</u> CWS, partially located on site.

"Haverhill Disused Railway Line is a habitat mosaic of mixed scrub, hedgerow and lowland meadow which runs NW to SE through the centre of Haverhill. For most of its length the railway walk comprises areas of dense species-rich scrub. The mosaic of habitats on site supports a good range of wildlife and it is particularly important for breeding birds and, in some sections, retains basking areas for reptiles who have been known to use the site in large numbers."

ii. <u>Haverhill Flood Park</u> CWS, approximately 0.4km west.

"The site which lies on the western outskirts of Haverhill was constructed in 1971 to create a flood storage reservoir to prevent flooding in the nearby town of Haverhill.

The grassy embankments of the reservoir support a species-diverse flora which is improving in diversity year by year."

iii. <u>Broad Street Old Allotments</u> CWS, approximately 0.7km southeast.

"Broad Street Old Allotments is a private property in the northern part of Haverhill. It is a disused allotment site immediately adjacent and connected to CWS Haverhill Disused Railway Line. The site has developed into a habitat mosaic of secondary woodland, ponds, grasslands and scrub."

iv. Norney Plantation CWS, approximately 0.8km northeast.

"This ancient woodland is listed in the English Nature Ancient Woodland Inventory. Part of the woodland boundary along the southern and eastern sides forms the parish boundaries between the parishes of Withersfield, Little Wratting and Haverhill."

v. <u>Howe Wood</u> CWS, approximately 1.2km northwest.

"Howe Wood is one of a number of ancient woodlands situated in the intensively farmed landscape north of Haverhill."

vi. <u>Ann Suckling's Way</u> CWS, approximately 1.3km northeast.

"Ann Suckling's Way is a footpath and bridleway which runs in a NE to SW direction from Great Wratting to Haverhill."

vii. <u>Chimswell Dotch</u> CWS, approximately 1.6km southwest.

"Chimswell Ditch is a small watercourse, situated close to the outskirts of Haverhill on the western side. The steep sided watercourse is overgrown with dense scrub consisting of elm, hazel, sycamore, horse chestnut, field maple, oak, hawthorn, ash and blackthorn. This provides important nesting habitat for birds in an intensively farmed landscape."

5. HABITATS

Desktop review

5.1. Priority Habitats to occur within 2km (identified using MAGIC – managed by Natural England), include Good Quality Semi-Improved Grassland, Deciduous Woodland, Traditional Orchards and Woodpasture and Parkland BAP Priority Habitat. The closest of which, is Good Quality Semi-Improved Grassland located approximately 15m east of the site.

Field study

- 5.2. The habitats on the site are of low ecological value, being mainly modified grassland managed as lawn and hedgerows (Priority Habitat) on the site peripheries.
- 5.3. Priority Habitats, as listed under the NERC Act 2006 Section 41 Habitats of Principal Importance found on site include: Hedgerows.
- 5.4. Figure 2 provides a map of the habitats present on the site. NERC Act 2006 Section 41 habitats have been identified where relevant. A full list of plant species recorded on site is attached in Appendix E.

Modified grassland (UK Habitat Classification g4; secondary code: 11 scattered trees, 17 ruderal/ephemeral, 66 frequently mown)

5.5. The majority of the site is comprised of modified grassland managed as lawn with scattered apple Malus x domestica trees. Grassland species include: clover Trifolium sp, cock's-foot Dactylis glomerata, common chickweed Stellaria media, creeping buttercup Ranunculus repens, daisy Bellis perennis, dandelion Taraxacum officinale, dove's-foot cranesbill Geranium molle, black medic Medicago lupulina, bristly oxtongue Helminthotheca echioides, fescue Festuca sp., field madder Sherardia arvensis, ground ivy Glechoma hederacea, hawkbit Leontodon sp., perennial ryegrass Lolium perenne, selfheal Prunella vulgaris and yarrow Achillea millefolium. Ruderal vegetation is present to the east of site. Ruderal species include: cow parsley Anthriscus sylvestris, ladies bedstraw Galium verum, nettle Urtica dioica, ribwort plantain Plantago lanceolata and sow thistle Sonchus sp. There is anecdotal evidence from the landowner that pyramidal orchids Anacamptis pyramidalis and bee orchids Ophrys apifera occur on site, however no official records are present and none were observed during the survey, with the site frequently mown which may have removed any orchids.

Other native hedgerow (UK Habitat Classification h2a6; secondary code: 117 dry, 190 hedgerow with trees, 191 ditch) – Priority Habitat

- 5.6. The site features hedgerows with trees on the north, east, south and west boundaries.
- 5.7. The hedgerows along the north and east boundaries feature blackthorn Prunus spinosa, bramble Rubus fruticosus, dogwood Cornus sanguinea, elder Sambucus nigra and hawthorn Crataegus monogyna, with the eastern hedgerow featuring an associated dry ditch. Tree species include: English oak Quercus robur and hazel Corylus avellana.
- 5.8. The south and west hedgerows feature apple, blackthorn, elder, hawthorn, and rowan Sorbus aucuparia. Tree species include: Italian alder Alnus cordata, Leyland cypress Cupressus × leylandii and willow Salix sp.
- 5.9. These hedgerows do not qualify as "important" under The Hedgerow Regulations 1997, lacking the required number of native woody species or associated features.

Buildings (UK Habitat Classification u1b5)

5.10. There are several buildings on site. Please refer to the bat section detailed below for further information.

Other developed land (UK Habitat Classification u1b6)

5.11. The site features a concrete and compacted gravel hardstanding access driveway to the south of the site.

Other rivers and streams (UK Habitat Classification r2b)

5.12. Stour Brook River is present adjacent south of the site. However, only a small amount of water was present at the time of survey. Most of the riverbed has been replaced with concrete and therefore it is not classified as a Priority Habitat.

Target note	Comments
А	Soil heap with encroaching ruderal vegetation.

Table 1, target notes.

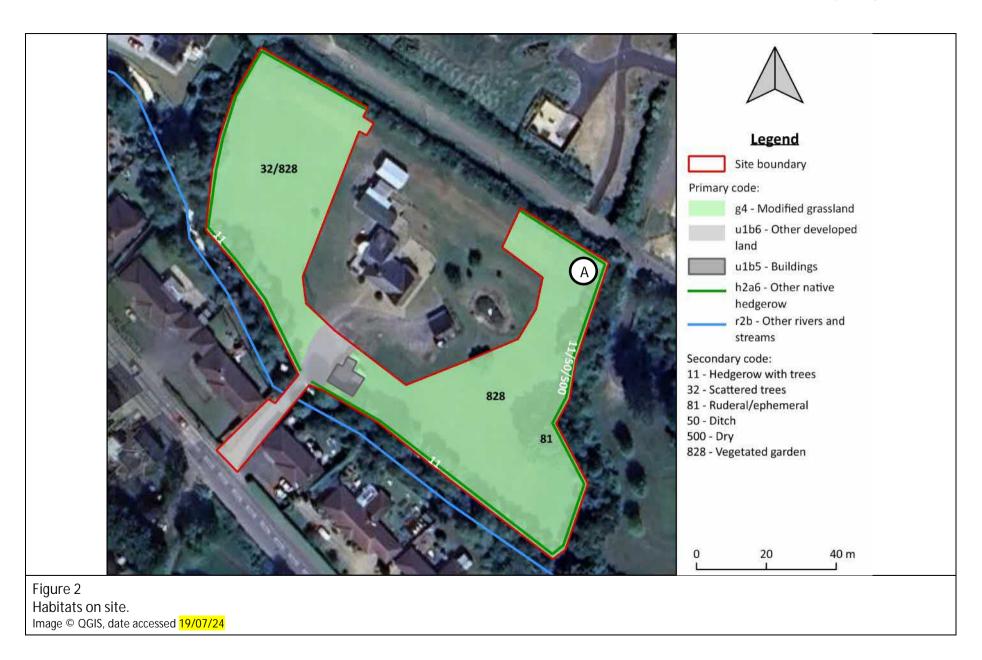




Photo 1, existing hardstanding southern access to the site, looking north.



Photo 2, modified grassland managed as lawn comprising the majority of the site, looking northwest.



Photo 3, looking south along the site's western boundary.



Photo 4, soil heap (target note A) in the northeast corner of the site, looking east.



Photo 5, looking east along the site's northern boundary.

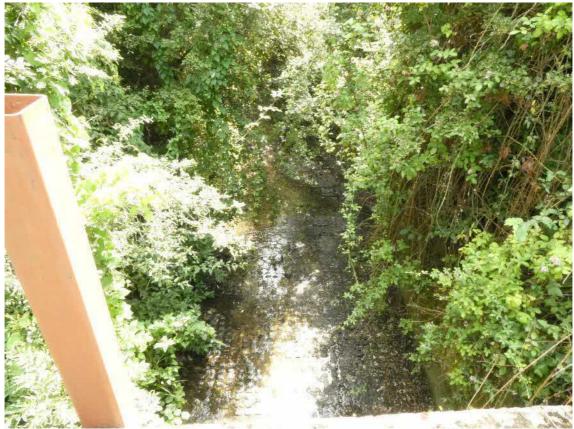


Photo 6, Stour Brook River adjacent south of the site, looking east.

6. PROTECTED AND NOTABLE SPECIES

Desktop review

Data search

- 6.1. The biodiversity data search within 2km of the site indicated 1,067 records from 130 species.
- 6.2. Records of note within 2km and relevant to the proposed development works are:

Seven barn owl Tyto alba records, with the most recent from 2021.

40 swift Apus apus records, with the most recent from 2021.

Nine reptile records, with the most recent from 2022. The closest record is located approximately 0.8km southeast. Species include: slow-worm Anguis fragilis, common lizard Zootoca vivipara and grass snake Natrix Helvetica.

84 hedgehog Erinaceus europaeus records, with the most recent from 2022.

21 bat records, with the most recent from 2021, including common pipistrelles Pipistrellus pipistrellus, soprano pipistrelles Pipistrellus pygmaeus, brown long-eared Plecotus auritus, serotines Eptesicus serotinus, noctules Nyctalus noctula, Daubenton's Myotis daubentonii, Natterer's Myotis nattereri and other unidentified bat species.

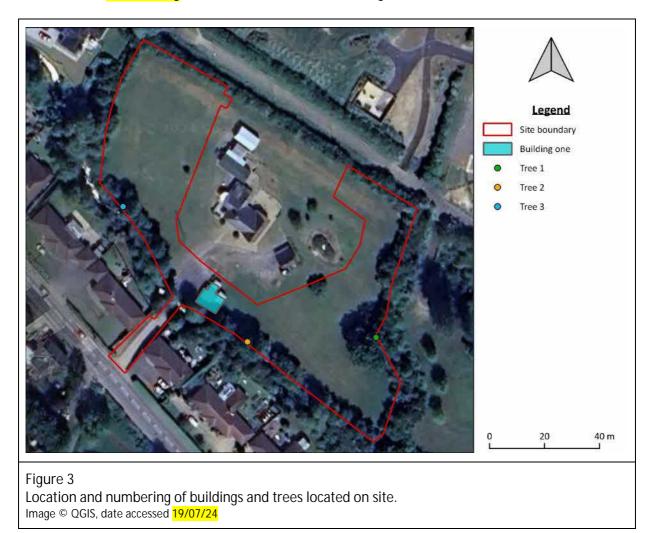
Protected species licences

6.3. A 2km search on http://www.magic.gov.uk/ indicated one record of a granted European Protected Species ("EPS") Mitigation Licence relating to:

Bats (case reference: 2020-50459-EPS-MIT) from 2021, approximately 1.5km northwest. Species on the licence include: common pipistrelle and soprano pipistrelle.

Bats

6.4. There is one building located on site, as indicated in Figure 3 and Photos 7-8.



Building one - garage

- 6.5. The garage is a timber framed structure, clad in timber weatherboarding and features a pitched, corrugated metal roof. Large timber double doors are present on the western aspect and a single garage door on the eastern aspect. A mixture of PVC and timber framed windows are present on the north and east aspects. The building features a breezeblock lean-to, with a corrugated metal roof on the northern aspect.
- 6.6. There were no signs of use by bats on the building exterior or interior and the structure provides an unsuitable roost environment, with no suitable cavities for roosting bats. The building is assessed as negligible (summer and hibernation) roost suitability for bats.



Photo 7, north and west aspects of building one, looking southeast.



Photo 8, north and east aspects of building one, looking southeast.

Trees

- 6.7. The trees around the site boundary were assessed for bat roosting potential.
- 6.8. A total of three trees on or adjacent the site were assessed as having low to moderate roost suitability for bats based on their location, age and suitable features (Table 2, Figure 3).
- 6.9. The remaining trees are assessed as negligible bat roosting potential, due to their age and/or lack of features.

Tree No.	Tree species	What3words	Bat roosting potential	Potential roosting features
1	English oak	sunbeam. different. spices	Moderate	Cavities in branches, ivy cover.
2	Italian alder	spend. pressure. users	Low	Ivy cover.
3	Italian alder	madness. fragments. expectant	Low	lvy cover.

Table 2, trees with bat roosting potential.



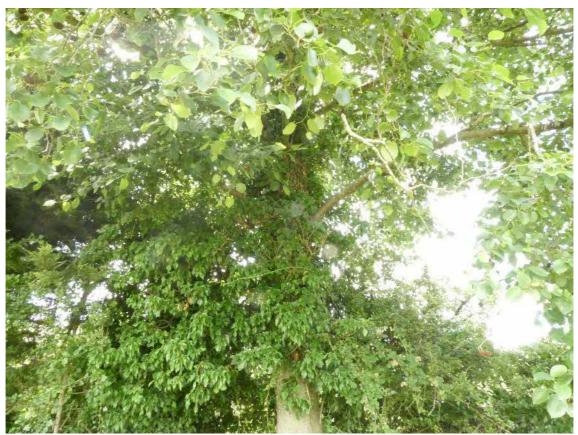
Photo 9, tree one with cavities in branches and ivy cover, looking south.



Photo 10, cavity in branch (highlighted in red) in tree one.



Photo 11, tree two with ivy cover, looking south.



Tree 12, tree three with ivy cover, looking southwest.

Foraging and commuting links

- 6.10. The site itself provides low value foraging habitat for bats along the boundary hedgerows, with bats mainly using nearby woodlands and Stour Brook River for foraging.
- 6.11. The landscape immediately adjacent to the site is considered of low to moderate value for foraging and commuting bats, with linked gardens, hedgerows, treelines and Stour Brook River providing links to the wider landscape. Residential dwellings adjacent the site and within Haverhill have the potential to provide roosting opportunities for bats.

Birds

- 6.12. Birds in the UK are classified into three categories of conservation importance red, amber and green. Factors such as global threat level, population decline, breeding population decline and contraction of breeding range are taken into account to determine classification.
- 6.13. The following bird species were observed during the site visit:

Red listed:

House sparrow

Passer domesticus

Amber listed:	
Dunnock	Prunella modularis
Woodpigeon	Columba palumbus
Green listed:	
Blackbird	Turdus merula
Blue tit	Cyanistes caeruleus
Goldfinch	Carduelis carduelis
Magpie	Pica pica

- 6.14. The site provides suitable nesting habitats for hedgerow, tree and building nesting species.
- 6.15. The site does not provide potential breeding habitat for the Red listed species.
- 6.16. The site provides potential breeding habitat for the following Amber listed species: dunnock and woodpigeon.
- 6.17. No signs of barn owl were found on the site and no foraging habitat is present.

Great crested newts

- 6.18. There are no ponds within the survey site and two further ponds within 250m, which for the size of the development and nature of terrestrial habitat on the site, is a sufficient distance to consider for assessment (Figure 4). GCN are most likely to occupy good quality terrestrial habitat within 250m of a breeding pond (English Nature, 2001).
- 6.19. The terrestrial habitats on the site are considered predominantly unsuitable for GCN, consisting modified grassland managed as lawn and hardstanding, with suboptimal hedgerows on the site boundaries.
- 6.20. Terrestrial habitats adjacent the site include a mixture of unsuitable (modified grassland managed as lawn, roads and residential dwellings with associated gardens and hardstanding) and suitable (hedgerows) GCN foraging, commuting and hibernating habitats.
- 6.21. Ponds 1-2 were assessed as poor to good suitability for GCN (Table 3).
- 6.22. The site falls within the Green risk zone for GCN district level licensing, which is classified as "containing sparsely distributed GCN and are less likely to contain important pathways of connecting habitat for this species" (Natural England, 2021).
- 6.23. Stour Brook River and the A1307 to the south act as habitat barriers and ecologically separate the site from ponds in the local vicinity.

Pond	1	2
Geographic	Zone A	Zone A
location	1.00	1.00
Pond surface area	<50m ²	400m ²
(m²)	0.06	0.80
Desiccation rate	Annually	>3 years out of 10
Desiccation rate	0.10	0.50
Water quality/	Poor	Poor
invert density	0.33	0.33
Sharalina shada (0/)	0%	0%
Shoreline shade (%)	1.00	1.00
Matarfoulimpaata	Absent	Absent
Waterfowl impacts	1.00	1.00
Fich impacts	Absent	Absent
Fish impacts	1.00	1.00
Ponds within 1km	6	6
	0.81	0.81
Terrestrial habitat	Poor	Moderate
quality	0.33	0.67
Macrophyte cover	90%	60%
(%)	0.90	0.90
HSI Score	Poor	Good
	0.46	0.76

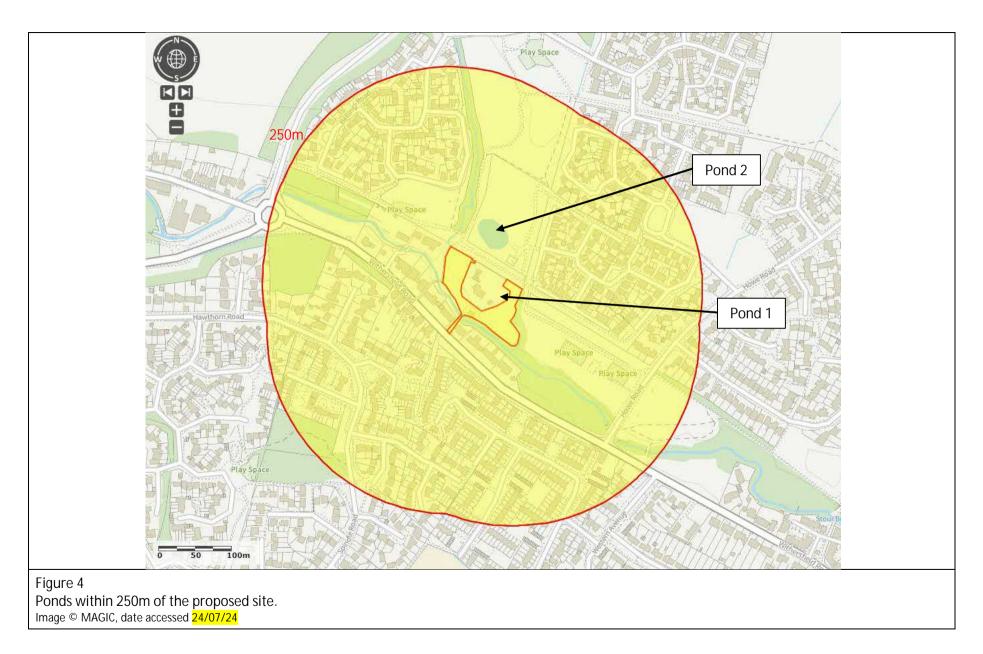
Table 3, HSI score for ponds within 250m of the proposed site.



Photo 13, pond one, looking north.



Photo 14, pond two, looking west.



Water voles and otters

- 6.24. Stour Brook River adjacent south of the site is considered unsuitable for water voles, containing little water (<10cm) and with the southern bankside comprised of concrete. No burrows, latrines or feeding remains were observed on site.
- 6.25. The river was also considered unsuitable for otters due to the amount of water present. No holts, couches or signs of use by otters were observed on site.

Reptiles

- 6.26. The habitats on the site are considered predominantly unsuitable for reptiles, consisting of modified grassland managed as lawn and hardstanding, with suboptimal hedgerows on the boundaries.
- 6.27. Habitats located on the site boundaries including the base of the hedgerows and the dry ditch could be used as commuting habitats by reptiles if they were present in the area.
- 6.28. Terrestrial habitats adjacent the site include a mixture of unsuitable (modified grassland managed as lawn, roads and residential dwellings with associated gardens and hardstanding) and suitable (hedgerows) reptile foraging, commuting and hibernating habitats.
- 6.29. Stour Brook River and the A1307 to the south act as habitat barriers and ecologically separate the site from habitats further afield. Please note, grass snakes regularly use watercourses for commuting and thus Stour Brook River would not create a habitat barrier for this species.

7. DISCUSSION AND CONCLUSIONS

Protected sites

7.1. The development footprint falls outside all identified protected sites (statutory and nonstatutory). There is one statutory protected site and seven non-statutory protected sites located within 2km of the site.

The closest statutory protected site (Haverhill Railway Walks LNR), is located partially onsite and designated for providing a valuable wildlife corridor.

The closest non-statutory protected site (Haverhill Disused Railway Line CWS), is located partially onsite and designated for its habitat mosaic of mixed scrub, hedgerow and lowland meadow.

- 7.2. The north of the site is located within Haverhill Railway Walks LNR and Haverhill Disused Railway Line CWS, which are designated for their habitat mosaic of mixed scrub, hedgerow and lowland meadow, offering food and shelter to a wide range of birds, reptiles, insects and plants.
- 7.3. The habitats on site and within the designated sites are comprised of modified grassland managed as lawn, which is species poor and not managed for wildlife, providing limited habitat for birds, reptiles or insects. Although some species are present on site that are included in the citation, such as birds-foot trefoil Lotus corniculatus and lady's bedstraw, with anecdotal evidence of pyramidal orchids located onsite, no pyramidal orchids were identified on site during the site visit despite being in the peak survey season. The hedgerows on site boundaries that could support a wide variety of species will be retained.
- 7.4. The proposed development could provide benefits to wildlife by seeding species-rich lawn seed mixtures in gardens and wildflower mixtures in open spaces.
- 7.5. Overall, the habitats onsite do not match those within the LNR and CWS citations due to regular mowing of the grassland.
- 7.6. Although the proposed development is not expected to have a significant impact on statutory or non-statutory protected sites or their qualifying features due to the lack of quality habitats onsite and limited predicted impacts beyond the area of works, the scheme will result in the partial loss of the LNR and CWS, which should be retained and enhanced wherever possible.

Habitats

7.7. The proposed works will require the clearance of vegetated habitats on site, including ≈0.5ha of modified grassland managed as lawn and several scattered trees. No priority habitats will be affected by the proposed development. This is expected to result in a low scale loss of nesting

habitat for hedgerow and tree nesting birds, and a low scale loss of foraging features for bats. Please refer to the bat section below for predicted impacts on buildings and trees with potential bat roosts.

- 7.8. As a precautionary measure, the following mitigation will be implemented to avoid impacts on habitats from the proposed works:
 - i. A soft landscaping scheme to include:
 - a. The planting of new native species-rich (≥5 species), hedgerows and trees between plots and around the site (see Appendix F for suggested species).
 - b. Retention of the boundary hedgerows.
 - c. The planting of a native species-rich lawns in gardens and wildflower mixtures in open spaces, which are rich in nectar and pollen (see Appendix F for suggested seed mix).
 - Construction works carried out in accordance with British Standards Institution (2012), BS 5837:2012, Trees in relation to design, demolition and construction recommendations, to protect trees which are to be retained and their root protection areas.
 - iii. Construction work is carried out in accordance with British Standards Institution (2013), BS 42020:2013, Biodiversity Code of Practice for planning and development, to protect waterways from runoff and pollution via the implementation of a Construction Environmental Management Plan ("CEMP").

Bats

- 7.9. The proposed works are expected to result in a low scale loss of potential roosting, foraging and commuting habitats for bats through the relocation of building one on site, clearance of vegetation and through increased noise and light levels.
- 7.10. As a precautionary measure, the following mitigation will be implemented to avoid impacts on bats from the proposed works:
 - If proposed works change to incorporate trees with moderate bat roosting potential on the site, further bat surveys will be conducted prior to work commencing, to assess their potential use by bats.
 - ii. If proposed works change to incorporate trees with low bat roosting potential, a soft-fell approach will be adopted. This is where the tree limbs are cut, slowly lowered to the ground and left overnight with roosting features pointing upwards, to allow any roosting bats the opportunity to disperse. If a bat is found, works must cease immediately and a suitably licensed ecologist sought to advise on appropriate mitigation.

- iii. Any lighting schemes will follow guidance from the Bat Conservation Trust and CIE 150:2003. Warm-white (long wavelength) lights with UV filters will be fitted as close to the ground as possible. Lighting units will be angled below 70° and equipped with movement sensors, baffles, hoods, louvres and horizontal cut off units at 90°. Lighting must be directional away from the boundary trees and hedgerows.
- 7.11. Building Regulations state that the energy efficiency of buildings must be improved where possible and that contractors must assess the condensation risk within the roof space and make appropriate provisions in line with BS 5250:2011. This British Standard states that both High Resistance (bitumen type 1F) and Low Resistance (non-bitumen coated roofing membranes (NBCRM)) underlays are acceptable as long as appropriate ventilation is provided. As NBCRM are proven to entangle bats through regular contact, which also compromises the integrity of the membrane, the Bat Conservation Trust recommend only NBCRM that have passed the snagging propensity test (must be supplied/installed with the necessary certification) or traditional type 1F bitumen are used.
- 7.12. As enhancements, the following will be implemented:
 - One integrated bat box for every new dwelling on site, totalling seven boxes (Bat Block Appendix G).
- 7.13. After these precautionary mitigation measures, we predict no impact on bats as a result of the development plans. We consider that a European Protected Species Licence will not be required, and no further surveys are necessary.

Birds

- 7.14. The proposed works are expected to result in a low scale loss of bird nesting habitat through the relocation of building one and clearance of vegetation, including several scattered trees.
- 7.15. As a precautionary measure, the following mitigation will be implemented to avoid impacts on birds from the proposed works:
 - i. Any works affecting bird nesting habitat such as management of hedgerows, trees or buildings would ideally need to be conducted outside the main nesting season. If work is planned during the bird nesting season (between 1st March and 31st July), then a precautionary check of all habitats will be conducted by a qualified ecologist immediately prior to starting any work. If any nesting birds are found, an appropriate protection zone from the nest will be required and will be maintained until the young have fledged.
- 7.16. As enhancements, the following will be implemented:

- One integrated swift box for every new dwelling on site, totalling seven boxes (Swift Block – Appendix G).
- One sparrow terrace for every new dwelling on site, totalling seven boxes (1SP Schwegler Sparrow Terrace – Appendix G).
- 7.17. Natural England and Local Planning Authorities ("LPA") have recognised a significant decline in swift populations across the country, and are actively endorsing integrated swift boxes to provide a net gain in biodiversity, as is encouraged by NPPF 2021.

Great crested newts

- 7.18. The proposed works are not expected to result in a loss of terrestrial habitats, with the works limited to modified grassland managed as lawn and other developed land (hardstanding). Aquatic habitats will be unaffected by proposed works.
- 7.19. Taking a worst-case scenario of 0.1-0.5ha of land being lost or damaged within 100m of a breeding pond, the risk assessment calculation (set out in the GCN method statement template provided by Natural England) indicates an "offence likely", although goes on to state:

"This generic risk assessment will over- or under-estimate some risks because it cannot take into account site-specific details. In particular, the exact location of the development in relation to resting places, dispersal areas and barriers should be critically examined."

- 7.20. Habitats located within the proposed area of works are considered predominantly unsuitable for GCN, consisting of hardstanding and modified grassland managed as lawn. Therefore, we consider it unlikely GCN would commute/forage across the areas of works.
- 7.21. As a precautionary measure, works will take place under a strict GCN method statement and the following mitigation will be implemented to avoid impacts on GCN from the proposed works:
 - i. Vegetation on site will be cut and maintained short (maximum height of 10cm) until the start of works, to discourage animals from using these areas.
 - ii. A hand destructive search of all suitable amphibian habitat and with an awareness that amphibians may be present. In the highly unlikely event that any GCN are found, work will cease immediately and a licenced ecologist contacted to remove any GCN to safety and advice on how to proceed.

- iii. Any excavations will have a rough sawn plank placed inside to act as a ramp to allow any animals that have fallen in to escape. The excavations will be checked each morning works are scheduled for, to remove any animals trapped.
- iv. Construction materials will be stored off the ground on pallets and waste materials in skips, to prevent providing shelter for animals and subsequent harm when materials are moved.
- 7.22. After these precautionary mitigation measures, we predict no impact on GCN as a result of the development plans, and no further surveys are necessary.

Water voles and otters

- 7.23. Stour Brook River adjacent south of the site is considered unsuitable for water voles and otters due to the low water levels.
- 7.24. The average monthly rainfall for the east of England during July was 45% higher than the long term average (Environment Agency, 2023), with the river still almost completely dry.
- 7.25. As a precautionary measure, the following mitigation will be implemented to avoid impacts on water voles and otters from the proposed works:
 - i. A pre-construction check for water voles to be conducted within 30 days of the proposed start date.
 - If water voles are found to be using the river, the nature of planned works within 6m of the bank will require assessment for potential impacts, and to inform an appropriate mitigation strategy. This may include further surveys and a European Protected Species ("EPS") Mitigation Licence may be required from Natural England for the proposed development to proceed.
 - iii. A 6m no-work buffer zone (includes vegetation clearance) to be applied from the top of the bank using temporary barrier netting wherever possible, to protect potential water vole burrows and prevent pollution/run-off from entering the watercourse. This area will be marked using a temporary barrier netting.
- 7.26. After these precautionary mitigation measures, we predict no impact on water voles or otters from the development plans. We consider that a European Protected Species Mitigation Licence will not be required, and no further surveys are necessary.

Reptiles

- 7.27. The proposed works are not expected to result in a loss of terrestrial habitats, with the majority of the site unsuitable for reptiles, consisting predominantly of hardstanding and modified grassland managed as lawn.
- 7.28. As a precautionary measure, the mitigation for GCN above will ensure there are no impacts on reptiles from the proposed development.
- 7.29. After these precautionary mitigation measures, we predict no impact on reptiles as a result of the development plans, and no further surveys are necessary.

Other animals

- 7.30. The surrounding habitat of the site is considered suitable for hedgehogs. To maintain potential hedgehog routes within the site and between the site and further habitats, any fencing installed will be porous and provide access openings for hedgehogs (see Appendix H for examples).
- 7.31. General mitigation to protect wildlife during the construction period are as follows:
 - i. Any excavations will have a rough sawn plank placed inside to act as a ramp to allow any animals that have fallen in to escape. The excavations will be checked each morning works are scheduled for, to remove any animals trapped.
 - ii. Construction materials will be stored off the ground on pallets and waste materials in skips, to prevent providing shelter for animals and subsequent harm when materials are moved.
- 7.32. As enhancements, the following will be implemented:
 - i. The installation of seven bee bricks on new buildings (Bee brick Appendix I).

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Appendix A Methods

Desktop Review

A desktop review of published data, such as records of protected sites and species, OS maps and satellite images has been carried out. A data search was carried out with the Suffolk Biodiversity Information Service ("SBIS") and Cambridgeshire and Peterborough Environmental Records Centre ("C&PERC").

A field survey visit was conducted to confirm the findings of the desktop review and to record habitats and species located on site.

Equipment available for use during the survey were binoculars, ladders, torches, endoscope and a digital camera.

Habitats

The habitats on site have been defined using the UK Habitat Classification (Butcher et al., 2020). Natural Environment and Rural Communities (NERC) Act (2006) habitats listed under section 41 have been identified where appropriate.

Bats

An assessment of the habitats on and surrounding the site for bat interest was made, in accordance with latest bat survey guidelines (Collins, 2016).

The building(s) on site was assessed for its potential to support roosting bats and involved a thorough internal and external search of all suitable cavities, holes and crevices. All suitable areas, including objects, ledges and floors were inspected for the following signs:

Bat droppings Stains around roosting places and entrance points Urine marks Prey remains Areas devoid of cobwebs Live or dead bats Suitable cracks and crevices for bats to enter

In exposed conditions, the signs of bat usage such as droppings and urine marks can be obliterated by heavy rain.

An evaluation system was applied to the building(s) using the following criteria:

Negligible roost suitability for bats. These buildings have no potential roosting features for bats, or very few or minor features in an isolated or unsuitable location such that the presence of a bat roost is considered highly unlikely. Such buildings usually fall into two main types: generally, well maintained without cracks and crevices, no gaps between bargeboard or soffit and wall, or without an attic space;

or those which contain some or all of the above features, but are both draughty and thick in cobwebs or contain strong odours such as solvents, diesel etc. It must be borne in mind that a building from this latter group can become suitable for bats following refurbishment. This often happens to houses once the attic space has been cleaned and under-felted prior to timber treatment. When no suitable habitats for bats are found, no further surveys or European Protected Species ("EPS") mitigation licence are required.

Low roost suitability for bats. Buildings in this category have one or more potential roost sites that could be used by individual bat opportunistically. These buildings do not however provide suitable conditions (such as space, shelter, temperature, humidity, or light and noise disturbance) to be used on a regular basis by a large number of bats. Structures with low roost suitability for bats will require one dusk emergence <u>or</u> one dawn re-entry survey conducted between May and August to assess their current use by bats.

Moderate roost suitability for bats. These buildings contain one or more potential roosting sites which could be regularly used by bats owing to their size, shelter, protection and conditions. These buildings are however unlikely to support a roost of high conservation status (maternity roost or hibernation roost). Structures with moderate roost suitability for bats will require two surveys, one dusk emergence <u>and</u> one dawn re-entry survey conducted between May and September with at least one of the surveys undertaken between May and August, to assess their current use by bats.

High roost suitability for bats. This group includes buildings with one or more potential roost sites which are obviously suitable for use by a larger number of bats on a regular basis and potentially for longer periods of time owing to their size, shelter, protection and conditions. These buildings may support a roost of high conservation status (maternity roost or hibernation roost) and will require three activity surveys to assess their current use by bats. The surveys should include at least one dusk emergence and at least one dawn re-entry survey (the third survey can either be at dusk or dawn) and should be conducted between May and September with at least two of surveys undertaken between May and August.

Trees on and around the site were assessed for their suitability to support roosting bats. The assessment involved a ground level inspection of the exterior of the trees to search for features offering roosting potential to bats such as split limbs, woodpecker holes, cavities, lifted bark and dense thick-stemmed ivy. An evaluation system was applied to the trees using the following criteria:

Negligible roost suitability for bats. Trees unlikely to be used by roosting bats.

Low roost suitability for bats. A tree of sufficient size and age to contain Potential Roosting Features ("PRFs"), but with none seen from the ground or features seen with only very limited roosting potential. Moderate roost suitability for bats. A 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 roost suitability for bats. A 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 and surrounding habitat.

The habitats on and around the site were assessed for their commuting and foraging potential for bats. An evaluation system was applied to the commuting and foraging potential using the following criteria.

Negligible commuting and foraging potential for bats. Habitat features unlikely to be used by commuting or foraging bats.

Low commuting and foraging potential for bats. Habitats that could be used by a small number of commuting or foraging bats such as, a gappy hedgerow, unvegetated stream or lone trees, but are isolated and not well connected to the surrounding landscape.

Moderate commuting and foraging potential for bats. Habitats that are continuous and connected to the wider landscape such as, lines of trees, scrub, linked back gardens, grasslands and water features.

High commuting and foraging potential for bats. Habitats that are continuous and connected to the wider landscape such as, river valleys, watercourses, hedgerows, lines of trees, deciduous woodland, and grazed parkland. These habitats are likely to be used regularly by commuting or foraging bats and are likely to be close to, or connected to, known roosts.

Birds

The site and its surrounding habitats were assessed for their potential to support breeding birds. Bird nesting habitat could include grassland, hedgerows, scrub, trees and buildings.

Bird species noted during the site visit were recorded. Trees, buildings and grassland were checked for use by barn owls, swifts

Great crested newts

Habitats on and near the site were assessed for their suitability for great crested newts ("GCN"). Water features on and near the site were assessed for their suitability for occupation by GCN, according to a Habitat Suitability Index ("HSI"). The HSI is a theoretical index of a waterbody's suitability to support a breeding population of GCN and is calculated from a series of ten variables recorded on site, as detailed in Table 4.

Indices	Name	Description
SI1	Geographic Location	Lowland England or upland England, Scotland and Wales
SI2	Pond area	To the nearest 50m ²
SI3	Permanence	Number of years' pond dry out of ten
SI4	Water quality	Measured by invertebrate diversity
SI5	Shade	Percentage shading of pond edge at least 1m from shore
SI6	Fowl	Level of waterfowl use
SI7	Fish	Level of fish population
SI8	Pond count	Number of ponds within 1km divided by 3.14
SI9	Terrestrial habitat	Quality of surrounding terrestrial habitat
SI10	Macrophytes	Percentage extent of macrophyte cover on pond surface

Table 4, HSI indices.

The HSI score is the geometric mean of the ten suitability indices calculated:

HSI = (SI1 x SI2 x SI3 x SI4 x SI5 x SI6 x SI7 x SI8 x SI9 x SI10)1/10

Once calculated, the HSI score for a waterbody can be categorised as follows:

Excellent (>0.8) Good (0.7 – 0.79) Average (0.6 – 0.69) Below Average (0.5 – 0.59)

Water voles, otters and white-clawed crayfish

Water features on and adjacent to the site were assessed for use by water vole, otter and white-clawed crayfish. Otters in England typically use areas of fresh water and streams and ditches for moving between habitats. Otter holts are usually located underneath tree roots, in tunnels. Field signs of presence include spraints on prominent features such as bridges, tree bases or boulders, and footprints.

Water voles inhabit burrows in the banks of ponds, ditches, streams and rivers. Field signs include droppings left in latrine spots, burrow entrances or feeding remains.

White-clawed crayfish inhabit streams and rivers with a moderate flow rate, and lakes. Clear, well-oxygenated water is preferred. Typical habitat features include crevices in rocks, gaps between stones, submerged plants and tree roots.

Reptiles

The habitats on the site and within the proposed area of works were assessed for suitability for reptiles. Reptiles rely on conditions that allow them to maintain their body temperature through basking. They require access to direct sunlight, shelter from the elements, sufficiently large populations of prey species and hibernation sites. Reptiles typically favour a habitat mosaic with a diverse vegetation structure, which could include grassland, scrub and woodland.



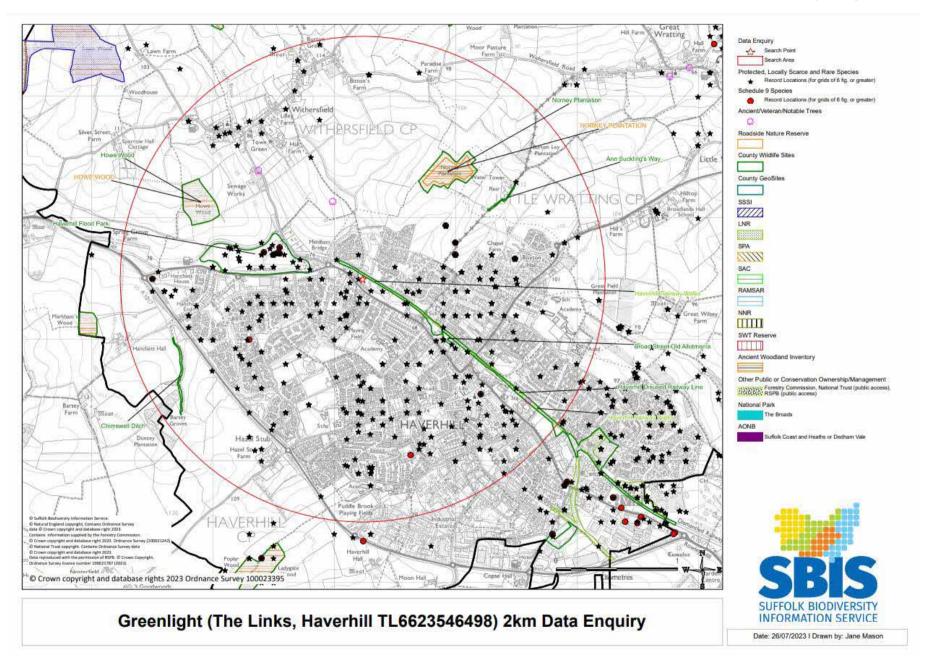
Dormice

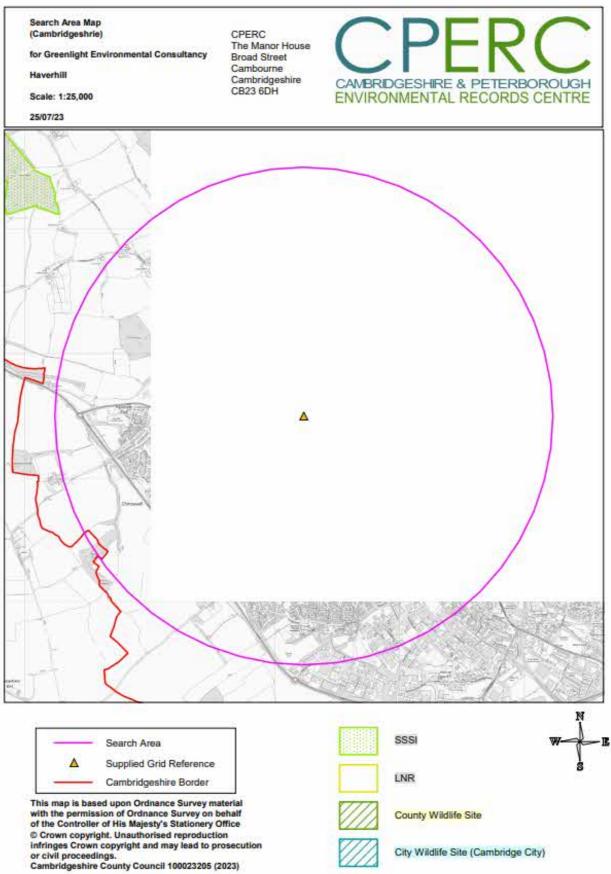
Dormice habitats include deciduous woodland, hedgerows and scrub. Dormice are found mainly in the south of England, including Kent and Sussex, with sporadic populations elsewhere. An assessment of the suitability of site habitats for occupation by dormice was made.

Other protected species

Particular regard was made to the nature of the proposed development and the potential of impact upon any other protected species, species which are nationally or locally scarce, or species subject to other conservation designations such as Red Data Book or Priority S41 species, from the development work, should these be present in the area.

Appendix B Map of protected sites within 2km





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Appendix C Protected sites citations

County Wildlife Sites citations

CWS Number Site Name Parish District

Description

HAVERHILL DISUSED RAILWAY LINE HAVERHILL

St Edmundsbury 133

West Suffolk

NGR TL663465

Haverhill Disused Railway Line is a habitat mosaic of mixed scrub, hedgerow and lowland meadow which runs NW to SE through the centre of Haverhill. For most of its length the railway walk comprises areas of dense species-rich scrub. The mosaic of habitats on site supports a good range of wildlife and it is particularly important for breeding birds and, in some sections, retains basking areas for reptiles who have been known to use the site in large numbers. The line is a valuable link between other important reptile sites in the town, including the Broad Street Old Allotments County Wildlife Site and Millfields - the latter now included in the boundary of this County Wildlife Site. Interspersed with the areas of scrub are small patches of unimproved grassland which support a variety of flowering plants. Millfields, between Millfields Way and the adjoining railway walk at its south-eastern end, is an area of mixed scrub and grasslands which are botanically diverse. Sulphur clover is present along with meadow vetchling, broomrape and pyramidal orchid. Suffolk priority species crested cow-wheat is also now present. Where new development has occurred along the route, the verges have been seeded with native wildflowers and now support yellow rattle, knapweed, bird foot trefoil, kidney vetch, red clover, hedge and lady's bedstraw as well as pyramidal orchid and hoary plantain. In addition, adjacent new development has seen hedgerows and ponds created, creating new habitat connectivity. Breeding bird records include priority species such as linnet, bullfinch, dunnock, reed bunting, starling and house sparrow. Haverhill Disused Railway Line is an important wildlife refuge in the town and is popular with local people.

13.58

CWS Number	St Edmundsbury 132
Site Name	HAVERHILL FLOOD PARK
Parish	WITHERSFIELD
District	West Suffolk
NGR	TL655467
Description	The site which lies on the western outskirts of Haverhill was constructed in
	1971 to create a flood storage reservoir to prevent flooding in the nearby
	town of Haverhill. The grassy embankments of the reservoir support a
	species-diverse flora which is improving in diversity year by year. Over 70
	species recorded in May 2017. In addition to a wide range of fairly common
	wild flowers, e.g. bird's-foot trefoil, field scabious and cowslip, the boulder
	clay soils of the site support a number of scarce species, e.g. pyramidal
	orchid (50 spikes recorded in 1997) and sulphur clover (a nationally scarce
	species). Additionally, adders tongue fern is abundant north of the lake. The
	flood park is also noted for its butterfly fauna. A total of 18 species were
	recorded between 1995 and 1997. In addition, meadow pipit and reed
	bunting breed here in good numbers. The site has been designated as a
	public open space and is well-used by local residents for a range of activities.
Area	17.34

CWS NumberSt Edmundsbury 125Site NameBROAD STREET OLD ALLOTMENTS

0.34

Parish HAVERHILL

District West Suffolk

NGR TL669460

Description Broad Street Old Allotments is a private property in the northern part of Haverhill. It is a disused allotment site immediately adjacent and connected to CWS Haverhill Disused Railway Line. The site has developed into a habitat mosaic of secondary woodland, ponds, grasslands and scrub. A small watercourse and mature hedge border the western edge of the site. The land is managed by the owners to attract and provide suitable habitats for many kinds of wildlife. The site is particularly important for its reptile populations. Slow worms are present in large numbers and use the site for shelter and breeding. In addition, the owners of the site have recorded common lizard and grass snake. Tawny owls regularly use the nest boxes in the woodland which is a mixture of deciduous trees including oak, birch, rowan and Norway maple. The owners have decades of wildlife records from the site which, as well as the reptiles, include Priority species common toad, hedgehog, dunnock, bullfinch and spotted flycatcher. Beyond the wood a mosaic of unmanaged grassland and scrub provide further suitable habitat for a high diversity of small mammals, amphibians, reptiles, invertebrates and breeding birds. There are also several small ponds scattered over the site providing suitable conditions for breeding toads and frogs, dragonflies and damselflies. Situated within urban Haverhill the site provides a valuable refuge for a wealth of wildlife, particularly reptiles and birds.

Area

CWS Number	St Edmundsbury 121
Site Name	NORNEY PLANTATION
Parish	WITHERSFIELD
District	West Suffolk
NGR	TL670474
Description	This ancient woodland is listed in the English Nature Ancient Woodland
	Inventory. Part of the woodland boundary along the southern and eastern
	sides forms the parish boundaries between the parishes of Withersfield,
	Little Wratting and Haverhill. Semi-natural woodland vegetation is restricted
	to the woodland edge as a large proportion of the wood has been planted
	with sycamore, some of which has been coppiced in the past. In addition,
	some planting of ash and oak has taken place in recent years. The ground
	flora is dominated by dog's-mercury and nettle in the more open areas and
	is absent from the heavily shaded parts. The wood is reported to have had a
	large starling roost in it for a number of years. This may have resulted in the
	predominance of nettle in some places. An area of hawthorn in the southern
	section of the wood has been felled.
Area	8.82

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CWS Number	St Edmundsbury 85
Site Name	ANN SUCKLING'S WAY
Parish	LITTLE WRATTING
District	West Suffolk
NGR	TL672470
Description	Ann Suckling's Way is a footpath and bridleway which runs in a NE to SW
	direction from Great Wratting to Haverhill. It varies in width from about six
	metres wide at the northern end, becoming much narrower and more
	overgrown as it nears Haverhill. The wide grassy verges of the middle section
	of path support a species-rich flora including sulphur clover and crested cow-
	wheat. The hedges which border the lane are thought to be very old and are
	colonised by a wide range of species. They are also used by a variety of birds
	including yellowhammer. The lane has connectivity via adjacent hedgerows
	to the wider landscape including another County Wildlife Site, Norney
	Plantation. Ann Suckling's Way is an important refuge and corridor for
	wildlife in an intensively farmed landscape.
Area	0.3

CWS Number	St Edmundsbury 54
Site Name	CHIMSWELL DITCH
Parish	WITHERSFIELD
District	West Suffolk
NGR	TL647461
Description	Chimswell Ditch is a small watercourse, situated close to the outskirts of
	Haverhill on the western side. The steep sided watercourse is overgrown
	with dense scrub consisting of elm, hazel, sycamore, horse chestnut, field
	maple, oak, hawthorn, ash and blackthorn. This provides important nesting
	habitat for birds in an intensively farmed landscape. Of particular botanical
	interest is the presence of a thriving population of green hellebore. This
	plant is very rare in Suffolk and an uncommon plant nationally.
Area	0.84

Appendix D Legislation

European Protected Species

The Ramsar Convention (1971) on Wetlands of International Importance especially as Waterfowl Habitat seeks to promote the conservation and wise use of wetlands, particularly those which support internationally significant numbers of water birds. This is achieved through the designation of Ramsar Sites.

The European Community Council Directive on the Conservation of Wild Birds (79/409/EEC) sets out general rules for the conservation of all naturally occurring wild birds, their nests, eggs and habitats. It requires member states to designate Special Protection Areas (SPAs) for protection of certain species.

The main piece of legislation relating to nature conservation in Great Britain is The Wildlife and Countryside Act 1981 (as amended). This Act is supplemented by provision in The Countryside and Rights of Way (CRoW) Act 2000 and The Natural Environment and Rural Communities Act 2006 (in England and Wales). This act provides varying degrees of protection for the listed species of flora and fauna, including comprehensive protection of wild birds, their nests and eggs.

The Countryside and Rights of Way Act 2000 strengthens the protection given to SSSIs. It revises the procedures for the notification of SSSIs and for the consenting of operations which may damage the special interest of a SSSI. Local authorities have a duty to take steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of SSSIs. The act also strengthens the existing provisions of the Wildlife and Countryside Act 1981 for the enforcement of wildlife legislation, including a new offence of "recklessly" destroying or damaging the habitats of certain protected species.

UK wildlife is also protected under The Conservation (Natural Habitats &c.) Regulations 1994 (which were issued under the European Communities Act 1972), through inclusion on Schedule 2. In 2017, these Regulations, together with subsequent amendments, were consolidated into The Conservation of Habitats and Species Regulations 2017.

The Regulations provide for the designation and protection of 'European sites', the protection of 'European protected species', and the adaptation of planning and other controls for the protection of European Sites. The Regulations make it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2, or pick, collect, cut, uproot, destroy, or trade in the plants listed in Schedule 5. However, these actions can be made lawful through the granting of licenses by the appropriate authorities. Licenses may be granted for a number of purposes but only after the appropriate authority is satisfied that there are no satisfactory alternatives and that such actions will have no detrimental effect on wild population of the species concerned.

The Protection of Badgers Act 1992 consolidates previous badger legislation by providing comprehensive protection for badgers and their setts, with a requirement that any authorised sett disturbance or destruction be carried out under licence.

The Hedgerows Regulations 1997 aim to protect important hedgerows in the countryside. They make it illegal to remove most countryside hedges without first notifying the local planning authority, and provide protection for 'important hedgerows'.

County Wildlife Site is a non-statutory designation used to identify high quality wildlife habitats in a county context. Local Authorities have a responsibility as part of their planning function to take account of sites of substantial nature conservation value and to consider them alongside other material planning considerations. The location of County Wildlife Sites will be included in Local Plans and Development Documents.

National Planning Policy - National Planning Policy Framework (NPPF)

Section 15 of the National Planning Policy Framework 2021 (NPPF): Conserving and enhancing the natural environment states that 'planning policies and decisions should contribute to and enhance the natural and local environment by ... minimising impacts on and providing net gains for biodiversity.'

Office of The Deputy Prime Minister ("ODPM") Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their impact within the planning system.

Paragraph 98 of Circular 06/2005 states that 'the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat'.

Implications of legislation and policies

Without this ecological assessment, the potential developer would be unable to demonstrate due diligence in his responsibilities. Furthermore, the local planning authority would not have been provided with sufficient information for a planning decision to be made. This could result in non-determination or refusal of the application.

With legal responsibilities and planning implications, it is essential that any ecological assessment of a potential development site, including the area of this report, must determine the possible presence or absence of any protected species as part of any planning development consideration.

Where mitigation or compensation measures are required to ensure that no significant impacts will result on biodiversity from the development, the proposed measures may be secured through planning conditions or by EPS Mitigation Licences from Natural England.

Bats

All bat species in Britain are protected under the Wildlife and Countryside Act 1981 through inclusion on Schedule 5. They are also protected under the Conservation (Natural Habitats &c.) Regulations 1994 (which were issued under the European Communities Act 1972), through inclusion on Schedule 2. On 30th November 2017, these Regulations, together with subsequent amendments, were consolidated into the Conservation of Habitats and Species Regulations 2017.

European protected animal species ("EPS") and their breeding sites or resting places are protected under Regulation 42. It is an offence for anyone to deliberately capture, injure or kill any such animal or to deliberately take or destroy their eggs. It is an offence to damage or destroy a breeding or resting place of such an animal. It is also an offence to have in one's possession or control, any live or dead European protected species.

The threshold above which a person will commit the offence of deliberately disturbing a wild animal of a European protected species has been raised. A person will commit an offence only if he deliberately disturbs such animals in a way as to be likely significantly to affect (a) the ability of any significant groups of animals of that species to survive, breed, or rear or nurture their young, or (b) the local distribution of abundance of that species. The existing offences under the Wildlife and Countryside Act (1981) as amended which cover obstruction of places used for shelter or protection (for example, a bat roost), disturbance and sale still apply to European protected species.

This legislation provides defences so that necessary operations may be carried out in places used by bats, provided the appropriate Statutory Nature Conservation Organisation (in England this is Natural England) is notified and allowed a reasonable time to advise on whether the proposed operation should be carried out and, if so, the approach to be used. The UK is a signatory to the Agreement on the Conservation of Bats in Europe, set up under the Bonn Convention. The Fundamental Obligations of Article III of this Agreement require the protection of all bats and their habitats, including the identification and protection from damage or disturbance of important feeding areas for bats.

Barn Owls

The Habitats Regulations (1994), as amended, states that a person commits an offence in the case of Barn Owl only if this species is disturbed in the breeding season. This applies equally to all those bird species listed under Schedule 1.

Breeding Birds

It is an offence to kill, injure or take any wild bird; take, damage or destroy the nest of any wild bird while that nest is in use or being built (even of "pest" species); take or destroy the eggs of any wild bird.

Great Crested Newts

Great crested newts are protected under both English and European law. It is an offence to kill, injure, disturb or take great crested newts or to damage or destroy their places of shelter, whether the animals are present or not.

Water Vole

The water vole received limited legal protection in April 1998 through its inclusion in Schedule 5 of the Wildlife & Countryside Act 1981 (as amended) for some offences. Legal protection makes it an offence to:

intentionally kill, injure or take (capture) a water vole;

possess or control a dead or live water vole, or any part of a water vole;

- intentionally or recklessly damage or destroy access to any structure or place which water voles use for shelter or protection or disturb Water Voles while they are using such a place;
- sell, offer for sale or advertise for sale live or dead Water Voles

Water voles, their breeding sites and resting places are protected by law. In most cases, work can be planned to avoid harming water voles. If works cannot avoid disturbing them or damaging their habitats, you may be able to get a licence from Natural England.

Otters

Otters are protected under Section 9 of the Wildlife and Countryside Act 1981 (as amended) and revised by the Countryside and Rights of Way Act 2004, making it an offence to:

intentionally kill, injure or take an otter;

- possess or control any (live or dead) otter, or any part of or anything derived from an otter;
- intentionally or recklessly damage or destroy or obstruct access to any structure or place used for shelter or protection by an otter;
- intentionally or recklessly disturb an otter while it is occupying a structure or place for that purpose; to sell, offer for sale, possess or transport for the purpose of sale any (live or dead) otter or part or derivative of an otter;

to advertise for buying and selling such things.

Furthermore, otters are included on Schedule 2 of the Conservation (Habitats &c.) Regulations (1994), making it an offence to:

deliberately to capture or kill a wild animal of a European protected species;

deliberately to disturb any such animal;

deliberately to take or destroy the eggs of such an animal; or

damage or destroy a breeding site or resting place of such an animal.

Otters are also listed as a priority species on the UK and Biodiversity Action Plans.

White-Clawed Crayfish

This crayfish is listed under Annex II of the habitats directive and areas are designated as Special Areas of Conservation to protect this species. Outside of this a licence is required to capture this species. It is listed as a priority species under the Biodiversity Action Plan and is a Species of Principal Importance under section 41 of the NERC Act 2006.

Reptiles

Reptiles such as common lizard, slowworm, grass snake or adder are protected under Section 9 of the Wildlife & Countryside Act (1981) as amended. The legislation makes it illegal to deliberately or recklessly kill or injure

any native reptile. This protection therefore requires that reasonable effort be made to avoid harm to reptiles during developments on land occupied by reptiles.

Badger

The Wildlife and Countryside Act (1981) and its subsequent amendment in 1985 made it an offence to take, kill, injure or ill-treat a badger. The badger gained further protection under the auspices of The Protection of Badgers Act (1992) which consolidates all former protective legislation in relation to badgers, except their inclusion on Schedule 6 of the Wildlife and Countryside Act 1981.

Under the 1992 Act, the badger sett is protected against obstruction, destruction, and damage; furthermore, the animal's access to and from the sett must not be impeded. It should be noted that the concept/definition of the sett extends beyond the main sett to include annexe, subsidiary and outlying setts. However, although the badger and its sett are protected (including access to the sett), the wider habitat and foraging ground is not.

Dormice

Dormice are protected from being killed, injured, captured or disturbed and their resting and breeding places should not be damage or destroyed.

Natural England Licensing - EPS Mitigation Licensing

Licences can be obtained from the Wildlife Management and Licensing Service at Natural England to allow certain activities that would otherwise constitute an offence, for the purposes of development (e.g. destruction of a bat roost, loss of great crested newt aquatic and terrestrial habitat, etc).

Appendix E Plant species recorded on site

English name	Scientific name
Apple	Malus sp.
Bird's-foot trefoil	Lotus corniculatus
Black medic	Medicago lupulina
Blackthorn	Prunus spinosa
Bramble	Rubus fruticosus
Bristly oxtongue	Helminthotheca echioides
Clover	Trifolium sp.
Cock's-foot	Dactylis glomerata
Common chickweed	Stellaria media
Cow parsley	Anthriscus sylvestris
Creeping buttercup	Ranunculus repens
Creeping cinquefoil	Potentilla reptans
Daisy	Bellis perennis
Dandelion	Taraxacum officinale
Dogwood	Cornus sanguinea
Dove's-foot cranesbill	Geranium molle
Elder	Sambucus nigra
Fat hen	Chenopodium album
Fescue	Festuca sp.
Field bindweed	Convolvulus arvensis
Field madder	Sherardia arvensis
Field maple	Acer campestre
Field scabious	Knautia arvensis
Ground ivy	Glechoma hederacea
Hawthorn	Crataegus monogyna
Hawkbit	Leontodon sp.
Hazel	Corylus avellana
Italian alder	Alnus cordata
lvy	Hedera helix
Ladies bedstraw	Galium verum
Leyland cypress	Cupressus × leylandii
Nettle	Urtica dioica
Perennial ryegrass	Lolium perenne
Рорру	Papaver rhoeas
Prickly sow thistle	Sonchus asper
Ribwort plantain	Plantago lanceolata
Rowan	Sorbus aucuparia
Selfheal	Prunella vulgaris
Speedwell	Veronica sp.
Timothy	Phleum pratense
Walnut	Juglans regia
Willow	Salix sp.
Yarrow	Achillea millefolium

Appendix F Native species suitable for planting and sowing

Plants should be obtained from specialist nurseries and preferably be of local genetic stock. <u>Key</u>: (f) – fruit and berry species; (e) – evergreen species; (se) semi-evergreen species; (d) – deciduous species

Trees	
Alder (d)	Alnus glutinosa
Apples (f; d)	Malus spp. (local varieties)
Ash (d)	Fraxinus excelsior
Beech (d)	Fagus sylvatica
Bird cherry (f; d)	Prunus padus
Elder (f; d)	Sambucus nigra
Elm (d)	Ulmus procera
Field maple (d)	Acer campestre
Pedunculate oak (d)	Quercus robur
Rowan (f; d)	Sorbus aucuparia
Pears (f; d)	Pyrus spp.
Silver birch (d)	Betula pendula
Small-leaved lime (d)	Tilia cordata
White willow (d)	Salix alba
Wild cherry (f; d)	Prunus avium
Walnut (d)	Juglans regia

S	hrubs
Blackthorn (f; d)	Prunus spinosa
Buckthorn (f; d)	Rhamnus catharticus
Crab apple (f; d)	Malus sylvestris
Dog rose (f; d)	Rosa canina
Dogwood (f; d)	Cornus sanguinea
Field maple (d)	Acer campestre
Guelder-rose (f; d)	Viburnum opulus
Hawthorn (f; d)	Crataegus monogyna
Hazel (d)	Corylus avellana
Holly (e)	llex aquifolium
Honeysuckle (f; d)	Lonicera periclymemum
Spindle (f; d)	Euonymus europaeus
Wild privet (f; se)	Ligustrum vulgare
Yew (f; e)	Taxus baccata

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Flowering plants	
Bird's-foot trefoil	Lotus corniculatus
Black knapweed	Centaurea nigra
Common cat's-ear	Hypochoeris radicata
Common sorrel	Rumex acetosa
Common vetch	Vicia sativa
Cowslip	Primula veris
Field scabious	Knautia arvense
Foxglove	Digitalis purpurea
Lady's bedstraw	Galium verum
Meadow buttercup	Ranunculus acris
Meadow vetchling	Lathyrus pratensis
Oxeye daisy	Leucanthemum vulgare
Primrose	Primula vulgaris
Red clover	Trifolium pratense
Selfheal	Prunella vulgaris
Sweet violet	Viola odorata
Wild daffodil	Narcissus pseudonarcissus
Yarrow	Achillea millefolium

Gr	rasses
Common bent	Agrostis capillaris
Crested dog's-tail	Cynosurus cristatus
Meadow fescue	Festuca pratensis
Red fescue	Festuca rubra
Rough meadow-grass	Poa trivialis
Small timothy	Phleum bertolonii
Smooth meadow-grass	Poa pratensis
Sweet vernal-grass	Anthoxanthum odoratum
Yellow oat-grass	Trisetum flavescens

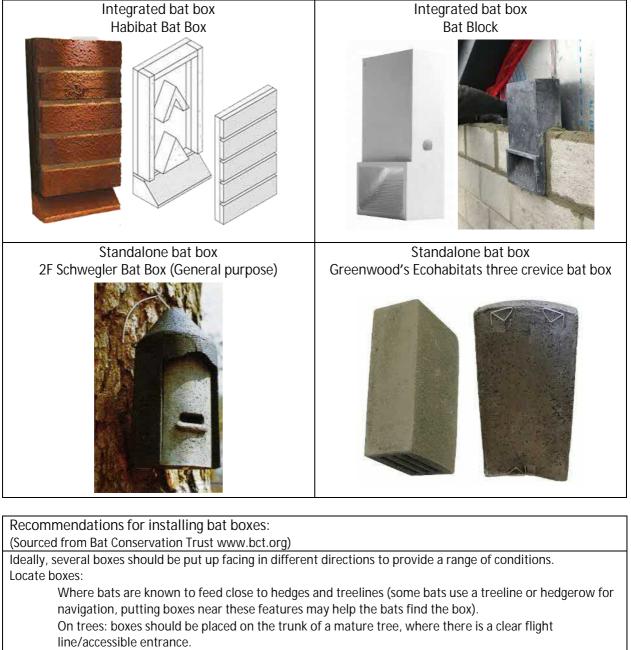
Flowering Lawn Mixture – EL1 Emorsgate Seeds

https://wildseed.co.uk/product/mixtures/complete-mixtures/special-habitat-mixtures/flowering-lawn-mixture/

Wildflower Meadow Mixture – EM3 Emorsgate Seeds https://wildseed.co.uk/product/mixtures/complete-mixtures/general-purpose-meadow-mixtures/special-general-purpose-meadow-mixture/

Appendix G Examples of bat and bird boxes

(images sourced from www.nhbs.com, www.habibat.co.uk, www.manthorpe.co.uk, www.barnowltrust.org.uk and www.greenwoodsecohabitats.co.uk)



On buildings: boxes should be placed as close to the eaves as possible.

As high as possible (ideally, at least 3 to 4m above the ground, where safe installation is possible). In sunny places, sheltered from strong winds (usually between south-west and south-east).

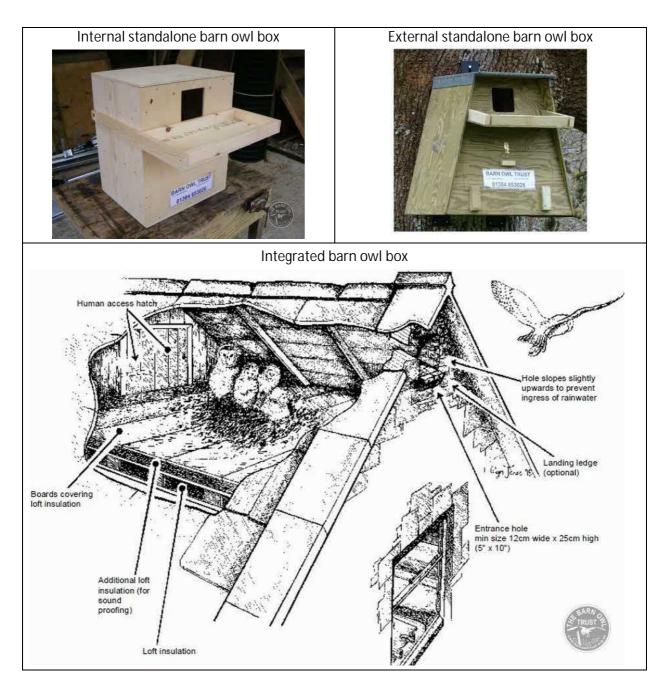
Make sure the boxes are secured.

Boxes can be installed on trees using adjustable ties to avoid damaging the trees. Otherwise, timber screw bolts or nails can be used. Aluminium alloy nails are less likely to damage saws and chipping machinery.

Bats need time to find and explore new homes, and it may be several months or even years before boxes have residents. Once bats find a place they want to live they can return over and over again. Droppings on the landing area, urine stains around the lower parts of the box and chittering noises from inside on warm afternoons and evenings are signs of occupation.



Recommendations for installing bird boxes: (Sourced from British Trust for Ornithology www.bto.org, Manthorpe www.manthorpe.co.uk and Barn Owl Trust www.barnowltrust.org.uk) The highest priority when siting a nest box must be to provide a safe and comfortable environment in which birds can nest successfully. Tips for putting up a nest box: Boxes should be sited 1-3m from the ground, ideally on tree trunks but can be placed on the side of a shed or wall. Avoid areas where foliage obscures the entrance hole. Don't place boxes too close to another nest box of the same type, as this may promote aggressive behaviour between neighbours. Shelter your nest box from prevailing wind, rain and strong sunlight. The box should face between north and east, and angled vertically or slightly downwards to prevent rain entering. Make sure cats cannot get into the box. Keep nest box away from bird feeders. Use galvanized or stainless steel screws or nails. If fixing boxes to trees, galvanised wire can be used to tie the box to the trunk or hang it from a branch. Make sure to regularly inspect these fittings (every two or three years) to ensure the box remains securely attached. Tips for putting up house sparrow terraces and swift bricks/boxes: Locate \geq 5m high on the gable wall of the property and above the level of the insulation zone. Where possible, install in locations that are unlikely to receive large amounts of direct sunlight during the hottest times of the day, ideal places include below the overhang of the verge and barge board. Tips for putting up barn owl boxes: The box should be installed on a building or tree in open farmland, on an isolated hedgerow or along the edge of a woodland. Boxes should be sited at least 3m from the ground, with a clear flight-path for entry and exit. Where possible, install boxes facing suitable habitat and ideally away from the prevailing wind. Nest boxes should ideally be installed in pairs.



Recommendations for installing integrated barn owl box: (Sourced from Barn Owl Trust www.barnowltrust.org.uk)

Standalone barn owl boxes:

Tips for putting up barn owl boxes:

The box should be installed on a building or tree in open farmland, on an isolated hedgerow or along the edge of a woodland.

Boxes should be sited at least 3m from the ground, with a clear flight-path for entry and exit. Where possible, install boxes facing suitable habitat and ideally away from the prevailing wind. Nest boxes should ideally be installed in pairs.

Integrated barn owl boxes:

Design requirements – entrance hole dimensions and ledge (exercise platform):

Entrance hole minimum size: 100mm wide x 200mm high, optimum size: 130mm x 250mm, maximum size: 200mm x 300mm.

The bottom of the hole must not have any sharp edges or narrow gaps in which a toe or talon could get caught.

Where necessary there can be a 'tunnel', minimum 150mm wide x 200mm high, between the entrance hole and the nest space.

A grippable ledge (e.g. stone or slatted timber) below the entrance hole provides an exercise platform for emerging owlets.

In cases where the entrance hole goes directly into a nest space less than 700mm deep, an exercise platform is essential; the bigger the better, but not less than 250mm x 500mm wide with a grippable raised edge.

Design requirements – nest space & dimensions:

Floor area of nest chamber: absolute minimum $0.4m^2$ (e.g. 500mm wide x 800mm high or 400mm wide x 1m high), ideal size is $1m^2$ (1m x 1m). These dimensions are bigger than those for nestboxes, because built-in provision usually lacks an external exercise platform that would permit maximum wing stretching prior to fledging.

Where there is no external exercise platform the internal box depth from the bottom of the entrance hole to floor of nesting area must not be less than 700mm. Note: the ideal depth for Barn Owls is at least 1m, which should be achieved wherever space permits.

Depth from the bottom of the entrance hole to floor of nesting area must be not less than 450mm provided that there will definitely be an easy-to-grip external exercise platform for fledglings to stand on outside the entrance hole.

In a large loft simply partition off a section behind the owls' entrance hole.

Stone, brick and timber are all suitable materials. Although owls are not destructive and seem unharmed by soft insulation materials, these are usually best avoided.

In an unheated building, no insulation is required.

Lining the space is not essential.

An internal perch positioned as high or higher than the access hole may be beneficial as long as the space is big enough to accommodate one without resulting in one perched bird defecating on another underneath.

Design requirements – insulation:

From the owls' point of view, insulation is not required.

However, there should be some form of moisture insulation between the owl space and the building interior.

Where space is at a premium, use a highly efficient heat insulation board (e.g. 50mm Celotex polyurethane foam).

Where space allows, use a more environmentally sustainable (and thicker) heat insulation board (e.g. a wood fibre board like Pavatex) to which a sound insulation board can be added (e.g. 60mm Pavatherm) if required.

Design requirements – human access and cleaning out:

Human access is essential as the nest space will need to be cleared out very occasionally. A generous removable inspection hatch or door in the back of the owl space (accessible from the building interior) is usually the preferred option but in some cases an external arrangement may be a practical option.

In the case of a loft partition, create an integral crawl-through doorway.

The access should permit all or most of the nest space floor to be reached by hand.

Appendix H Examples of hedgehog friendly fencing

(images sourced from www.quercusfencing.com and www.jackson-fencing.co.uk)



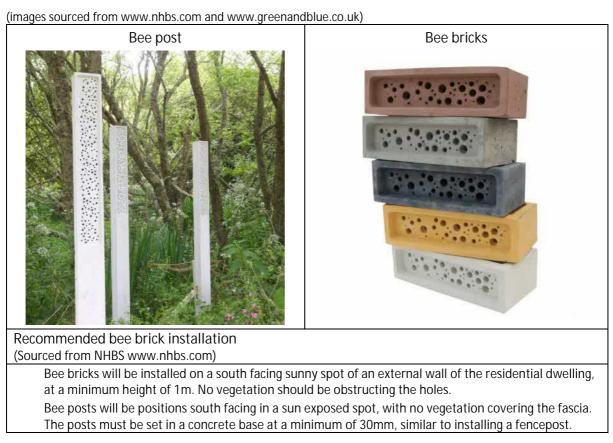
Recommendations for installing hedgehog friendly fencing: (Sourced from Hedgehog Street www.hedgehogstreet.org)

A hedgehog friendly fence should have a gap measuring at least 13cm by 13cm in the gravel board. These gaps allow any hedgehog to pass through but are too small for nearly all pets.

At least one hedgehog friendly fence panel should be located on each side of your garden, to provide unimpeded access.

Almost all fencing materials can be made hedgehog friendly, but may require DIY adaptations. Please note that some concrete gravel boards contain metal rods running along the length of the boards to provide strength and rigidity, and cannot be cut. To overcome this, a gap can be left between the gravel board and post to provide the required gap.

Appendix I Bee Bricks



Appendix J Proposed plans

