Ecological Baseline Report

Site: Great Wilsey Park, Haverhill –Parcel A9

Client: Bloor Homes

Date: November 2025

Crossland Ecology Ltd. Office 5945, 321 High Road, Chadwell Heath, Essex, RM6 6AX

www.crosslandecology.co.uk | info@crosslandecology.co.uk | 01245 806 360

Quality Assurance

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1.0 Summary

1.1 This report presents the Ecological Baseline to support the Reserved Matters Application (RMA) for 95 residential dwellings across parcel A9 at Great Wilsey Park, Haverhill ('the Site'). The RMA is being submitted under outline planning (reference DC/15/2151/OUT).

1.2 Update ecological surveys were undertaken of Parcel A9 as part of the wider Great Wilsey Park Site (the 'Wider Site') to support the RMA in accordance with Planning Condition 4 of the outline planning permission.

1.3 The Wider Site, approximately 23.7 ha in size was predominantly arable habitat with mixed woodland, native hedgerow and a stream. The hedgerow and stream are classified as Habitats of Principal Importance (HoPI).

1.4 In addition to an update ecological site walkover survey, protected species surveys for [redacted] bats, breeding birds, great crested newt (GCN) *Triturus cristatus,* hazel dormouse *Muscardinus avellanarius,* reptiles, water vole *Arvicola amphibius* and otter *Lutra lutra* were undertaken during spring and summer 2025.

1.5 The surveys undertaken have demonstrated that the Wider Site's ecological baseline remains largely consistent with that reported for the outline planning application. The Wider Site supports a number of trees with suitability for roosting bats, a foraging/commuting bat assemblage of up Regional importance, one disused [redacted], a breeding bird assemblage of Local importance, low numbers of common lizard *Zootoca vivipara,* suitable habitat for, but no evidence of hazel dormouse, and presence of water vole along the stream. The Site was also suitable for west European hedgehog *Erinaceus europaeus* and common toad *Bufo bufo.*

1.6 This report provides the methods and results of the above surveys, as well as an assessment of their value in respect of the Wider Site.

2.0 Introduction

2.1 Crossland Ecology Ltd. was commissioned by Bloor Homes to undertake update ecological surveys as part of the Reserved Matters Application (RMA) for 95 residential dwellings across parcel A9 at Great Wilsey Park, Haverhill ('the Site') (Appendix 1). The RMA for Parcel A9 is for submission of details under outline planning permission DC/15/2151/OUT –means of access; appearance, landscaping, layout and scale for 95 dwellings (including 42 affordable); associated internal roads, car parking, amenity and public open space; pumping station and diversion of overhead HV cable; including application to partially discharge conditions 4, 6, 7, 8, 9, 12, 15, 28, 30, 37, 38, 39, 40, 41, 42, 44, 45 and 46. The ecological surveys were undertaken of Parcel A9 as part of the wider Great Wilsey Park Site (the 'Wider Site') to support the RMA in accordance with Planning Condition 4 of the outline planning permission:

Any reserved matters planning application shall be supported by further supplementary ecological surveys to inform the preparation and implementation of corresponding phases of ecological measures required by the Environmental Statement. The supplementary surveys shall be of an appropriate type for the habitats and/or species affected by the proposals and survey methods shall follow national good practice guidelines.

Reason: To ensure that wildlife habitats and protected species are not affected adversely by the development.

2.2 The Wider Site comprises Parcel A9 in addition to A14, A15 and E2 of the Great Wilsey Park Site at Haverhill, centred at Ordnance Survey (OS) Grid Reference TL 6898 4558 (Appendix 1), with outline planning permission approved for the following:

Outline Application (Means of Access to be considered) - Residential development of up to 2,500 units (within use classes C2/C3); two primary schools; two local centres including retail, community and employment uses (with use classes A1/A2/A3/A4/A5, B1 and D1/D2; open space; landscaping and associated infrastructure.

2.3 Parcel A9 will be subject to the development of 95 residential dwellings. The Wider Site has varying levels of ecological importance, ranging from arable fields of low biodiversity interest to hedgerows, woodland, individual trees and a stream providing higher biodiversity interest.

Site Description

2.4 Habitats present within the Wider Site comprised arable fields, mixed woodland, hedgerow habitats and a small brook.

Ecological Surveys and Assessments

2.5 A previous Phase 1 Habitat Survey, protected species surveys and an ecological appraisal were undertaken for the Site by FPCR in 2014 and 2015 which were reported

in the Environmental Statement (Bidwells, 2015) as part of the outline planning application.

2.6 In order to update the ecological baseline for the Wider Site, in accordance with Planning Condition 4 and the Chartered Institute of Ecology and Environmental Management (CIEEM) Advice Note on the lifespan of ecological reports and Surveys (CIEEM, 2019) the following update ecological surveys were undertaken:

- Update ecological walkover survey (including a [redacted] scoping survey);
- Bats;
  - Ground Level Tree Assessment (GLTA);
  - Aerial Inspection Surveys;
  - Activity Surveys;
- Breeding birds;
- Reptiles;
- Hazel dormouse *Muscardinus avellanarius;*
- Water vole *Arvicola amphibius;*
- Otter *Lutra lutra;* and
- Great crested newt (GCN) *Triturus cristatus.*

2.7 The results of these update surveys are provided within this report.

2.8 The details of relevant wildlife legislation in addition to national and local planning policies related to nature conservation and biodiversity are provided in Appendix 2.

2.9 All surveys were undertaken following best practice guidance and were undertaken by suitably qualified, experienced and (where necessary) licenced ecologists under the direction and supervision of Principal Ecologist Vicky Cheung and overseen by Director Sean Crossland CEcol, MCIEEM.

3.0 Methods

3.1 This report has been prepared with reference to British Standards Institution (BSI) BS 42020:2013 'Biodiversity – code of practice for planning and development' (BSI, 2013) and The Chartered Institute of Ecology and Environmental Management's (CIEEM) and Technical Guidance Series 'Ecological Report Writing' (CIEEM, 2017) and Code of Professional Conduct (CIEEM, 2025).

3.2 These surveys will fully inform the predicted impacts of the scheme in accordance with the National Planning Policy Framework (NPPF) as amended (Ministry of Housing, Communities and Local Government [MHCLG], 2024), local planning policy and relevant wildlife legislation (Appendix 2).

Desk Study

3.3 An update web-based search for statutory designated sites via the Multi Agency Geographic Information for the Countryside (MAGIC) spatial data resource magic.defra.gov.uk was undertaken in April 2025 to check for any changes to statutory designated sites: European (up to 10 km from the Wider Site boundary); National (5 km from the Wider Site boundary) and non-statutory (2 km from the Wider Site boundary).

3.4 An online search was also undertaken utilising MAGIC online spatial data resource (https://magic.defra.gov.uk/) in April 2025 for priority habitats listed under the Natural Environment and Rural Communities (NERC) Act (2006), ancient woodland listed on the Ancient Woodland Inventory (AWI) and waterbodies within 250 m.

3.5 Hazel dormouse *Muscardinus avellanarius* records were checked on in April 2025 from the National Biodiversity Network (NBN) Atlas www.nbnatlas.org which holds data from the People's Trust for Endangered Species (PTES). As hazel dormouse is particularly under-recorded, the data search for this species encompassed an area of up to 10 km from the Wider Site boundary.

3.6 The previous ecological survey reports were also reviewed as follows:

- Great Wilsey Park, Haverhill. Environmental Statement – Chapter 9 Ecology (Bidwells, 2015) and associated appendices 9.1 – 9.8;
- Great Wilsey Park. Additional Bat survey Report (FPCR, 2016);
- Great Wilsey Park, Haverhill, Suffolk. [redacted] Survey Report (FPCR, 2016);
- Great Wilsey Park, Haverhill, Suffolk. Breeding Bird Survey Report (FPCR, 2016);
- Great Wilsey Park, Haverhill, Suffolk. Addendum Document Dormice Method Statement and Risk Assessment (FPCR, 2016); and
- Great Wilsey Park, Haverhill, Suffolk. Winter Bird Survey (FPCR, 2016).

Update Ecological Site Walkover

3.7 An update ecological walkover survey was carried out on 06.03.25 by Sean Crossland CEcol, MCIEEM and Tiffany Heaver during appropriate weather conditions. The walkover survey comprised a UK Habitats Classification (UKHab) survey. UKHab survey methods are set out in the UK Habitat Classification User Manual - Version 2.0 (UKHab Ltd. 2023). UKHab is a comprehensive habitat classification system designed for the UK and is intended for ecologists to identify and map habitats to provide outputs that are suitable for ecological impact assessment. Habitat mapping was undertaken using the standard classification to indicate habitat types.

Protected and Notable Species

3.8 The Wider Site was assessed during the update walkover survey for any changes to the suitability for protected and notable species that are likely to occur in the area. Considering the results of the desk study, previous survey data (as per 3.6), the location and habitats present, an assessment was carried out for:

- Flora;
- [redacted]
- Bats (roosting, foraging and commuting);
- Breeding and non-breeding birds;
- Rare or notable invertebrates;
- GCN;
- Hazel dormouse;
- Reptiles;
- Aquatic mammals; and
- Other notable species.

3.9

3.10

Bats

Preliminary Site Assessment

3.11 The Wider Site was assessed for its suitability to support roosting, foraging and commuting bats.

3.12 Good bat foraging habitat generally includes sheltered areas and habitats with good numbers of insects, such as woodland, scrub, ponds, lakes and species-rich or rough grassland. Good commuting habitat generally comprises linear features such as well-connected hedgerows, woodland edge, watercourses. The Wider Site was assigned a level of suitability according to the classification provided by Collins (2023) (Table 1).

Table 1: Guidelines for assessing the potential suitability of proposed development sites for bats (Collins, 2023)

Potential suitability	Description
	Potential flight-paths and foraging habitats
None	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines, or generate/shelter insect populations available to foraging bats).
Negligible	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	Habitat that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat tat could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.

High	Continuous, hi - quality habitat that is well connected tc landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close and connected to known roosts.

Ground Level Tree Assessment

3.13 A Ground Level Tree Assessment (GLTA) was undertaken on 06.03.25 to assess suitability of the trees within and bordering the Wider Site for roosting bats. The GLTA was undertaken using binoculars to identify any potential roosting features (PRFs) and make an assessment of their Bat Roosting Suitability (BRS) in accordance with the Bat Conservation Trust (BCT) bat survey guidelines (Collins, 2023) (Table 2 and Table 3). PRFs within trees include features such as split or torn limbs, knot holes, cankers, lifted bark or woodpecker holes.

Table 2: Guidelines for assessing the suitability of trees on proposed development sites for bats (Collins, 2023)

Suitabilit	Descriptio
NONE	Either no PRFs in the tree or highly unlikely to b .
FAR	Further assessment required to establish if PRFs are pr the tree.
PRF	A tree with at least one PRF pres .

Table 3: Guidelines for categorizing the potential suitability of PRFs on a proposed development site for bats

Suitabilit	Descriptio
PRF- I	PRF is only suitable for individual bats or very small num bats either due to size or lack of suitable surrounding habitats.
PRF- M	PRF is suitable for multiple bats and may therefore be us maternity colony.

Bat Activity Surveys

3.14 Based on the habitat suitability within the Wider Site for foraging and commuting bats and on the results of the previous bat surveys a series of update bat activity surveys were undertaken during spring and summer 2025. Surveys comprised seasonal Night-time Bat Walkover (NBW) surveys (one each in spring, summer and autumn) and monthly automated detector surveys between April and October. The results of the autumn surveys will be provided as an addendum to this report once the surveys have been completed and data analysed.

3.15 The surveys were undertaken during suitable weather conditions and within the appropriate timescales (i.e. no heavy rain, cold temperatures or high winds), commencing at sunset and finishing 2-3 hours after sunset in accordance with the BCT guidelines (Collins, 2023) see Table 4.

3.16 Two static detectors were deployed along the NBW transect and used to record bat activity for at least five consecutive nights monthly between April and October 2025. Survey dates were selected when the weather forecast indicated suitable weather conditions for foraging and commuting bats (i.e. air temperature at sunset above 10°C, no strong winds and no rain). The detectors were set up to continuously record from 30 minutes before sunset until 30 minutes after sunrise.

3.17 The recordings were analysed using Kaleidoscope Pro computer software, with the mean number of registrations per night hour for each species per survey visit recording/location.

Table 4: Night-time Bat Walkover Survey Details

Date	Sunset	Start Time	Finish Time	Weather
10/04/25	19:46	19:46	21:46	Start: Temp - 11ºC, Cloud – 0%, Wind –1, Rain –none. Finish: Temp - 9ºC, Cloud –0%, Wind –1, Rain –none.
24/06/25	21:19	21:19	23:19	Start: Temp - 21ºC, Cloud – 0%, Wind –2, Rain –none. Finish: Temp - 19ºC, Cloud –0%, Wind –2, Rain –none.
08/10/25	18:19	18:19	20:19	Start: Temp - 14ºC, Cloud – 20%, Wind –1, Rain –none. Finish: Temp - 13ºC, Cloud –10%, Wind –1, Rain –none.

Assessment of Habitat Value

3.18 An assessment of the value of the Wider Site for commuting and foraging bats was undertaken in line with appropriate guidance (Wray *et al*, 2010). This guidance provides a scoring system and assesses each bat species at a site in terms of rarity against various factors including the presence/potential presence of bat roosts and habitat types at a site, in order to determine the value of a site at a geographical scale.

3.19 Each bat species is assessed in terms of rarity and given a corresponding score (shown in brackets), as shown in Wray *et al* (2010), Table 5.

Table 5: Categorising bats by distribution and rarity (in England)

Rarity	Species	Score
Rarest (population under 10,000)	Greater Horsesho *Rhinolophus ferrumequinu* Bechstein's Bat *Myotis bechsteinii* Alcathoe *Myotis alcathoe* Greater Mouse-Eared Bat *Myotis myotis* Barbastelle *Barbastella barbastellus* Grey Long-Eared Bat *Plecotus austriacus*	2
Rarer (population under 10,000 – 100,000)	Lesser Horseshoe *Rhinolophus hipposider* Whiskered Bat *Myotis mystacinus* Brandt's Bat *Myotis brandtii* Daubenton's Bat *Myotis daubentonii* Natterer's Bat *Myotis nattereri* Leisler's Bat *Nyctalus leisleri* Noctule *Nyctalus noctula* Nathusius' Pipistrelle *Pipistrellus nathusii* Serotine *Eptesicus serotinus*	5
Common (population over 100,000)	Common Pipistrell *Pipistrellus pipistrellu* Soprano Pipistrelle *Pipistrellus pygmaeus* Brown Long-Eared Bat *Plecotus auritus*	20

3.20 The bat species recorded, and features of a site are given corresponding scores (shown in brackets) as shown in Table 6 (Wray *et al*, 2010).

Table 6: Valuing foraging areas and commuting routes

Species rarity	Number of bats	Roosts/ potential roosts nearby	Foraging habitat characteristics	Type and complexity of linear features
Common (2)	Individual bats (5)	None (1)	Industrial or other site with established vegetation (1)	Absence of (other) linear features (1)
-	-	Small number (3	Suburban areas or inten arable land (2)	Unvegetated fences and large field sizes (2)
Rarer (5)	Small number of bats (10)	Moderate number/ not known (4)	Isolated woodland patches, less intensive arable and/or small towns and villages (3)	Walls, gappy or flailed hedgerows, isolated well-grown hedgerows, and moderate field sizes (3)
-	-	Large number o roosts, or close to a SSSI for the species (5)	Larger or connected woodlar blocks, mixed agriculture, and small villages/hamlets (4)	Well-grown and well-connected hedgerows, small field sizes (4)
Rarest (20)	Large number of bats (20)	Close to or within an SAC for the species (20)	Mosaic of pasture, woodlar and wetland areas (5)	Complex network or matu well-established hedgerows, small fields and rivers/streams (5)

3.21 The individual scores for each aspect/factor as set out in Tables 4 and 5 are then combined to give an overall score, which is then given a geographical level of value as set out in Table 7 (Wray *et al*, 2010).

Table 7: Scoring system for valuing commuting and foraging bats

Geographic Frame of Referenc	Score
Internationa	>50
Nationa	41 - 50
Regional	31 - 40
County	21 - 30
District, Local or Pari	11 - 20
Not importa	1- 10

Aerial Tree Inspections

3.22 Subsequent to the GLTA, eight trees (T1 –T8, Appendix 5) were subject to aerial inspection surveys, whereby the trees were climbed and inspected for PRFs. Trees T1, T2, T5 and T8 required one aerial inspection based on the assessment as PRF-I; trees T3, T4, T6 and T7 were subject to three aerial inspection surveys based on the assessment as PRF-M. These surveys were undertaken on 07.05.25 (all trees) and PRF-M trees only on 29.05.25 and 19.06.25 by appropriately licenced, qualified and experienced ecologists.

Birds

Preliminary Site Assessment

3.23 The Wider Site was assessed for its potential to support breeding birds and significant wintering and/or migratory bird populations. Suitable habitat generally includes scrub, trees and can also include buildings, open grassland and piles of debris. Update

Breeding Bird Surveys

3.24 The field surveys for breeding birds were undertaken between late March 2025 and early June 2025 and comprised of six survey visits.

3.25 The surveys involved a suitably experienced field ornithologist walking a circular transect route through the Wider Site during the daytime, mapping bird species encountered, either visually or through their vocalisations, using standard British Trust for Ornithology (BTO) species codes (Marchant, 1983).

3.26 The transect route was interspersed with stops, during which the ornithologist scanned for birds using binoculars. Birds of particular note observed or heard within approximately 200 m of the Wider Site were also recorded. Special attention was given to undertaking counts of all likely breeding species as opposed to those flying over the Wider Site.

3.27 Survey visits were undertaken in good weather conditions, avoiding heavy rain or fog during which bird activity may be atypical and/or surveying may be impractical.

3.28 Five visits were made at dawn with one visit undertaken at dusk. The dates, timings and weather conditions for the six survey visits are provided in Table 8.

Table 8: Breeding Bird Survey Details

Date	Visit	Start	Start Weathe	Visibilit	Notes
22/03/25	1	06:00	Temp: 10° Wind: 0 Cloud: 48	Good	Grey and overcast, light rain brief
19/04/25	2	07:45	Temp: 12° Wind: E -3 Cloud: 7/8	Good	Cool and largely overcast
04/05/25	3	08:15	Temp: 1:° Wind: NE -3 Cloud: 6/8	Good	Sunny spells, clearing sky
24/05/25	4	08:30	Temp: 15° Wind: S1-2 Cloud: 8/8	Good	Rain until 08:30, warm ar muggy
17/06/25	5	19:00	Temp: 20° Wind: S1 Cloud: 0/8	Good	Gentle breeze, lovely summer evenir
20/06/25	6	07:15	Temp: 17° Wind: - Cloud: 0/8	Good	Warm, clear morning

Invertebrates

Preliminary Site Assessment

3.29 The Wider Site was assessed for its potential to support rare or notable invertebrate species; this assessment was made on the basis of the range of the habitats present.

Great Crested Newt

Preliminary Site Assessment

3.30 The habitats were assessed for their suitability for GCN. Suitable terrestrial habitat generally includes rough grassland and woodland where they can forage and hibernate, with good links to ponds where they breed.

Environmental DNA Survey

3.31 An environmental DNA (eDNA) survey was carried out June 2025 in accordance with best practice guidelines (Biggs *et al*. 2014), with a single pond sampled as shown in Appendix 3.

3.32 GCN eDNA is released into the waterbodies in which they inhabit through the deposition of material such as skin cells, faeces or eggs, and can be detected in the water for several weeks following deposition. Through the use of prescribed sampling techniques, this eDNA can be detected and provide confirmation of GCN presence (or absence if not detected) within waterbodies.

3.33 The equipment required for the eDNA survey, the analysis of the water samples, the results and a summary of the appropriate survey, storage and sample return methods were supplied by ADAS. With the eDNA detection method, a negative result is considered a strong indication of true absence of GCN, and any individual GCN that is in the pond has a higher likelihood of being detected, even in conditions that are not conducive to traditional sampling (e.g. murky waters). This was tested in the research carried out by Biggs *et al*. (2014). Thomsen *et al*. (2012) demonstrated that GCN DNA in water degrades within 20 days, so a positive result shows that the species has

been present recently. The collection, storage and return of eDNA samples followed the ADAS eDNA survey protocol (edition 05) which is summarised below:

Sample Collection

3.34 Twenty samples of 30ml of pond water were collected from around the pond using the sampling ladle, with each of the 20 samples emptied into the Whirl-Pak bag, filling the bag to just under half full. During the pond sampling, a pair of plastic gloves supplied as part of the eDNA sample kit were worn to prevent cross-contamination. Before each ladle sample was taken, the water column was gently mixed using the ladle, without disturbing the mud in the bottom. DNA 'sinks' and so will often be present in larger amounts close to the pond bottom. The collection of sediment within the samples was avoided as this may cause inhibition of the PCR analysis, which could lead to an inconclusive result.

Sample Preservation

3.35 Once the required samples had been collected, the samples were mixed by shaking the Whirl-Pak bag for 10 seconds. This mixed any DNA across the whole water sample. Each conical tube was labelled with the date, the sampler's name, and the pond name along with the sample ID number. Using the clear plastic pipette provided, 15ml of water was taken from the Whirl-Pak bag and transferred into one of the six conical tubes containing 35ml of preserving fluid. The tube was then sealed and shaken vigorously for 10 seconds to mix the sample and preservative thoroughly. This process was repeated for each of the 6 conical tubes in the eDNA kit. Any liquid that had leaked from a tube was wiped away prior to returning the kit to the sample box. The remaining water from the Whirl-Pak bag was emptied back into the pond. Samples were returned to ADAS via courier at ambient temperature in the original packaging for analysis one day after sampling. Storage of samples was necessary prior to their return, and so samples were refrigerated (2-4°C). Samples can be stored in this way for up to 1 month prior to analysis.

Hazel Dormouse

Preliminary Site Assessment

3.36 Habitats within the Wider Site were assessed for their general suitability for hazel dormouse. This species generally uses areas of dense woody vegetation and are more likely to be found where there is a wide diversity of woody species contributing to a three-dimensional habitat structure, a number of food sources, plants suitable for nest-building materials and good habitat connectivity.

Nest Tube Survey

3.37 A hazel dormouse nest tube survey was undertaken from March to August 2025. The survey was arranged and commenced prior to the publication of the current best practice dormice survey guidance (Bullion *et al,* 2025) and therefore followed the previous best practice guidance (Bright *et al*, 2006).

3.38 Surveys involved the installation of 100 nest tubes in suitable habitat on/directly adjoining the Wider Site (hedgerows and woodland). Tubes were subject to routine monthly checks to determine presence or likely absence between March and August 2025.

3.39 The thoroughness of a dormouse survey can be measured using an index of probability. Table 9 below assumes that 50 tubes have been placed in suitable habitat; the points system can be doubled when using 100 tubes. The score from each month that surveys are undertaken are added together, with a score of over 20 required for the survey to be considered valid.

Table 9: Index of Probability to Determine Presence or Likely Absence of Hazel Dormouse

Month	Index of probability (50 tubes)	Index of probability (100 tubes)
April	1	2
May	4	8
June	2	4
July	2	4
August	5	10
Total	14	28

Reptiles

Preliminary Site Assessment

3.40 The Wider Site was assessed for its suitability for the four more widespread UK reptile species; common lizard *Zootoca vivipara*, slow-worm *Anguis fragilis*, grass snake *Natrix helvetica* and adder *Vipera berus*. Specific habitat requirements vary between species. Common lizard and slow worm prefer rough grassland although they can be found in a variety of habitats ranging from woodland glades to walls and pastures. Grass snakes have similar habitat requirements but have a greater reliance on ponds and wetlands. Adder is more associated with dry grasslands, heathland and woodland edge habitats.

Presence/Absence Survey

3.41 Based on the presence of suitable reptile habitat within the Wider Site and previous reptile presence, an update seven-visit reptile presence/absence survey of the Wider Site was carried out. The survey was conducted during April to July 2025, and followed published best practice guidance (Froglife, 1999; Gent and Gibson, 2003).

3.42 The surveys involved the placement of artificial reptile refugia (c. 0.5 m x 0.5 m pieces of roofing felt) within suitable habitat areas across the Wider Site (Appendix 8). These refugia were then checked on seven separate survey visits for basking or sheltering individuals during suitable weather conditions (generally when the air temperature is

between 9ºC and 18ºC, no rain or wind). Details of the reptile surveys are provided in Table 10.

Table 10: Reptile survey details

Survey Visit	Date	Weather
0 – survey set-up	13/05/25	N/A
1	20/05/25	Temp - 16ºC, Cloud – 0%, Wind – 1, Last Rain >24 hours
2	05/06/25	Temp - 17ºC, Cloud – 100%, Wind – 3, Last Rain >24 hours
3	11/05/25	Temp - 14ºC, Cloud – 90%, Wind – 3, Last Rain >24 hour
4	17/06/25	Temp - 17ºC, Cloud – 10%, Wind – 2, Last Rain >24 hou
5	23/06/25	Temp – 17.5ºC, Cloud – 0%, Wind – 1, Last Rain <24 hou
6	04/07/25	Temp - 17ºC, Cloud – 0%, Wind – 1, Last Rain <24 hou
7	17/07/25	Temp – 17.5ºC, Cloud – 30%, Wind – 2, Last Rain <12 hours

Aquatic Mammals

Preliminary Site Assessment

3.43 An assessment was made for the suitability of the Wider Site (particularly the Brook) for otter and water vole.

3.44 Water vole habitat preferences include well vegetated banks of slow flowing rivers, ditches and streams. They require steep banks in which to dig their burrows.

3.45 Otters prefer rivers and streams that provide good cover and abundant foraging resources.

Otter and Water Vole Survey

3.46 A detailed visual search of c.1 km of watercourse along the north-eastern Wider Site boundary was undertaken, through searches of both banks (where accessible) for field signs indicating otter, water vole, and mink *Neogale vision* activity. Where accessible, surveyors inspected the banks from within the channel. The northernmost section of the watercourse was rarely accessible, however showed low suitability with abundant overhanging vegetation creating heavily shaded areas. There was a low percentage of in-channel vegetation throughout.

3.47 Surveyors searched for field signs such as water vole feeding stations, latrines, lawns (grazed vegetation around land holes), runways in vegetation, and burrows; otter holts, slides (flattened, often muddy land where the bank meets the water), runways

in vegetation, spraint (droppings), footprints, and feeding remains; As well as mink field signs such as scat, dens, and feeding remains.

3.48 Two survey visits were carried out in accordance with the Water Vole Conservation Handbook (Strachan *et al,* 2011) on 16.04.25 and 06.08.25. In addition, camera traps were installed to monitor a potential otter holt and were checked every two weeks over a six week period during May and June 2025.

Other Notable Species

Preliminary Site Assessment

3.49 The Wider Site was assessed for its potential to support NERC Act 2006 Species of Principal Importance (SoPI) which are likely to occur in the local area especially west European hedgehog *Erinaceus europaeus,* brown hare *Lepus europaeus* and common toad *Bufo bufo*.

Assessment of Nature Conservation Value

3.50 CIEEM guidelines for Ecological Impact Assessment in the United Kingdom (2024) have been utilised to assess the impacts upon habitats within the ZoI of the Wider Site. CIEEM suggests that it is best to use the geographical scale (i.e., International, National, Regional etc.) at which a feature (i.e. a habitat, species or other ecological resource) may or may not be important, as the appropriate measure of value. As such, data from the data search and UKHab survey have been reviewed and the likely occurrence of protected and notable species/species groups assessed. This has allowed predictions of impacts to be made along with recommendations for mitigation, compensation and enhancement. If needed, further targeted survey has been recommended to refine the evaluation and associated recommendations.

3.51 The following geographical scale categories are applicable for the Wider Site:

- International;
- National (England);
- Regional (South-east);
- County (Suffolk);
- District (West Suffolk);
- Local or Parish (Haverhill); and
- Zone of Influence only.

Constraints

3.52 Desktop data searches are a valuable tool in evaluating a site's potential to hold rare and protected species, it is not however an absolute in confirming presence or absence of notable species due to the nature of how the records are collected.

3.53 Where any data supplied by the client, or any other sources have been used, it has been assumed that the information is correct. No responsibility can be accepted by Crossland Ecology Ltd. for inaccuracies in the data supplied by any other party. The conclusions and recommendations in this report are based on the assumption that all relevant information has been supplied by those bodies from whom it was requested.

3.54 All the species that occur in a habitat would not necessarily be detectable during survey work carried out at any given time of the year, since different species are apparent at different seasons. The assessment of the Wider Site was undertaken in March, which falls outside of the optimal plant growing season. However, given the nature of the habitats present and based on the previous habitat information and repeat visits to the Wider Site during the spring and summer period enabling identification of any additional plant species, an accurate characterisation of the habitats was made. The timing of the survey is therefore not considered a significant limitation.

3.55 The bat surveys were completed with the assistance of bat detectors. Surveys using bat detectors have an advantage over other methodologies (such as radio tracking or trapping) in that they are 'non-intrusive' and will therefore not have an adverse effect on the conservation status or welfare of bats. However, all survey techniques for bats are subject to bias and bat detector surveys may under record species with weak echolocation calls, such as brown long-eared bats *Plecotus auritus*. Bats from the *Myotis* genus can be difficult to identify to species from call structure alone (Russ, 2012).

4.0 Baseline Ecological Conditions

Site Description

4.1 The Wider Site was approximately 23.7 ha in extent and comprised mostly of arable fields with mixed woodland, hedgerows and a brook (Appendix 3).

4.2 The Wider Site is located at the south-eastern edge of Haverhill, surrounded by existing arable land to the east and north (mostly comprising Parcels A10, A11, A12, A13 and C1 of the Great Wilsey Park Site) and south (proposed Country Park as part of the Great Wilsey Park Site), existing residential development and open space to the west and parcels A7 and A8 (within which development activities have commenced) to the north-west. The woodland within the west of the Wider Site continues to the north-west.

Habitats

4.3 Habitats present within the Wider Site comprised mostly of cereal crop fields, with a swathe of mixed woodland forming the western edge of the Wider Site. The eastern Wider Site boundary is formed by the brook, located within a corridor of mixed woodland. One native (species-poor) hedgerow is located at the southern end of the Wider Site, and a bare ground track forms the western-most boundary of the Wider Site between the woodland and residential area.

4.4 The UKHab Baseline Plan of the Wider Site (also showing the Site boundary) is presented in Appendix 3; the update ecological walkover survey confirmed that the habitats present within the Wider Site remain consistent with those mapped previously and as described above, comprising:

- c1c –Cereal crops
- w1f –Lowland mixed deciduous woodland (immediately adjacent to the Wider Site off-site)
- w1h –Other woodland, mixed
- r2a –Rivers (priority habitat)
- 510 –Bare ground
- H2a6 –Other native hedgerow

4.5 These habitats (arable, woodland, hedgerows and trees and the brook) remain consistent with the habitats recorded and reported in the ES (Bidwells, 2015).

4.6 The hedgerow is considered to meet the criteria as a Habitat of Principal Importance (HoPI) under the NERC Act 2006. Furthermore, the surveys of the Brook confirmed the presence of water vole (see water vole sub-section below), meaning that the Brook also meets the criteria for the Rivers HoPI. However, these habitats were

assessed as relatively poor condition, being species-poor (hedgerow) and densely shaded with encroaching woodland/scrub and very low water levels (brook).

Summary

4.7 Overall, the Wider Site has varying levels of ecological importance, ranging from the arable fields of low biodiversity interest to the hedgerow, woodland and Brook providing higher biodiversity interest. The arable field was considered to be of **Site** importance for biodiversity, the higher value habitats were considered to be of up to **Local** importance. Whilst the brook and hedgerow are classified as HoPI, due to the relatively poor condition of these habitats, they have been valued as Local importance rather than County importance. Confidence in this assessment is **high**.

Protected and Notable Species

4.8 Protected species are animals and plants protected under the Wildlife and Countryside Act (WCA) (1981, as amended), the Conservation of Habitats and Species Regulations 2017 (as amended), The Protection of Badgers Act 1992, or listed in Section 40 or 41 of the NERC Act 2006.

Protected and Invasive Flora

4.9 No protected or notable species were observed on-site during the update surveys.

4.10 The Wider Site habitats are relatively common and widespread, and it is considered unlikely that protected flora are present. The Wider Site is therefore considered to be of **Site** importance for flora. The confidence in this assessment is **high**.

[redacted]

4.11 [redacted]

4.12 [redacted]

4.13 The Wider Site is currently considered of **Site** importance for [redacted]. Confidence in this assessment is **high**.

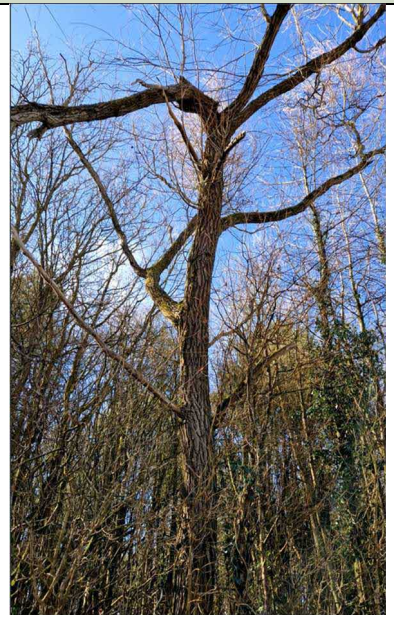
Bat- Roosting

4.14 The previous surveys identified four trees within bat roost suitability (BRS) within the Wider Site boundary habitats. The update walkover survey and GLTA recorded eight trees with BRS, four with PRF-I and four with PRF-M. Following the aerial tree inspections, two trees were downgraded from PRF-I to negligible, whilst the remaining

six trees retained the classifications as assessed during the GLTA. No bats or evidence of bat roosts were found during the aerial inspections (see Appendix 5 and Table 11).

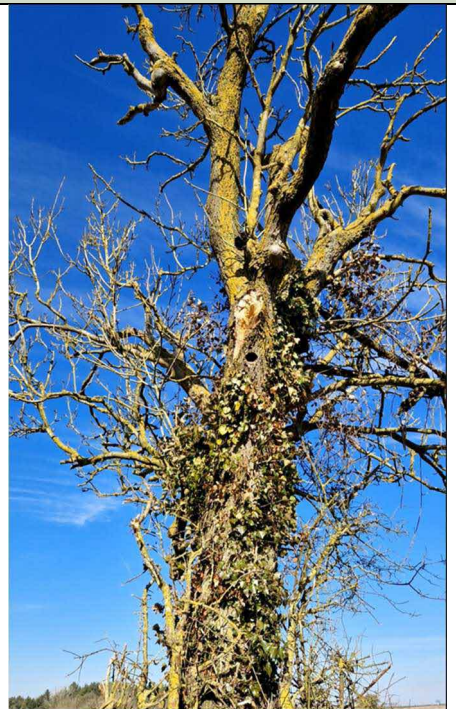
4.15 The Wider Site is currently assessed as being of **Site** importance for roosting bats. Confidence in this assessment is **high.**

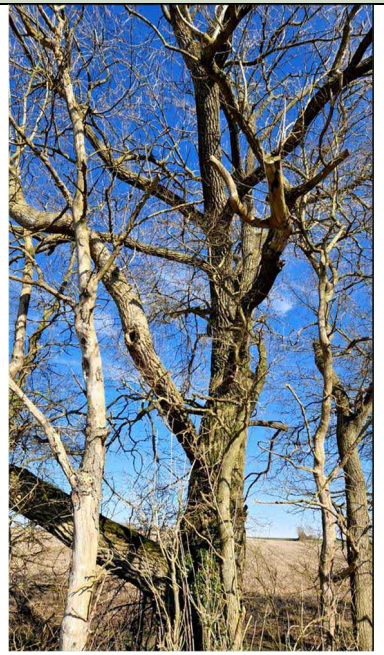
Table 11: GLTA and Aerial Inspection Results

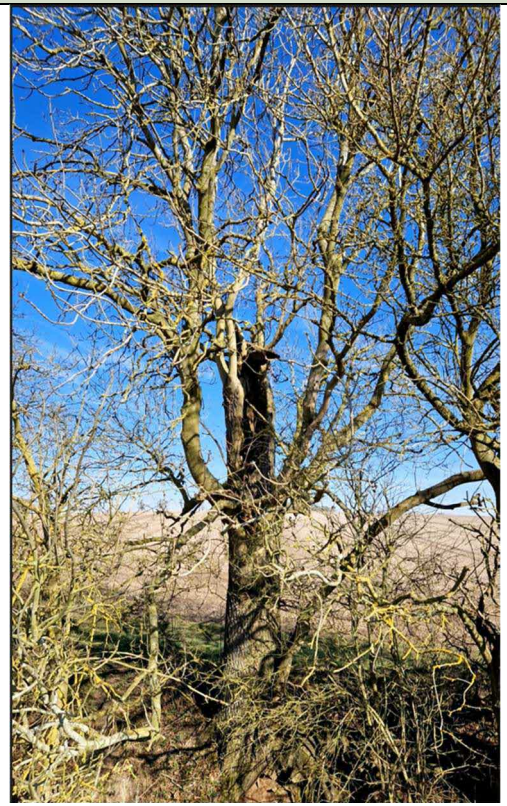
Tree Number (Crossland Ecology Plan)	Species	Feature and Description (GLTA)	Suitability post-Aerial inspection	Recommendations	Photo
T1	Willow	• PRF-I – stem tear ou	Negligible	No further surveys or recommendations	

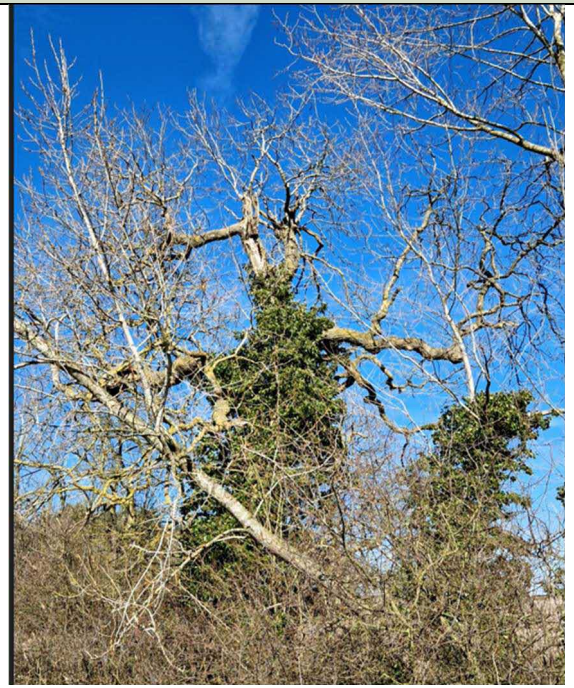
Tree Number (Crossland Ecology Plan)	Species	Feature and Description (GLTA)	Suitability post-Aerial inspection	Recommendations	Photo
T2	Cherry	• PRF-I rot in trunk 1	PRF-I	A pre-works inspectio should be undertaken by a suitability qualified ecologist immediately prior to felling to ensure no bats are present. Note can be done from ground level.	

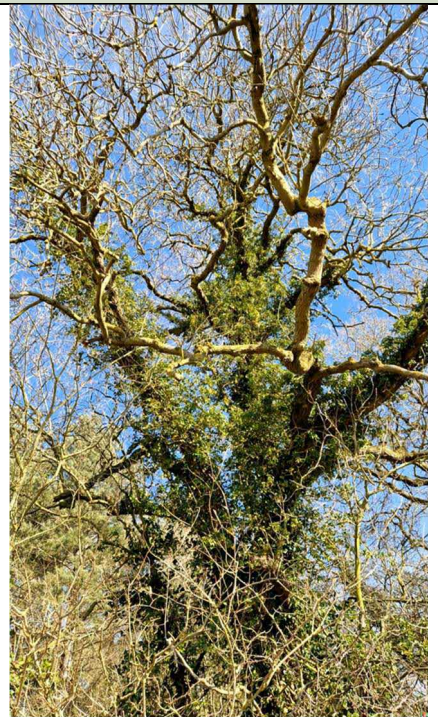
Tree Number (Crossland Ecology Plan)	Species	Feature and Description (GLTA)	Suitability post-Aerial inspection	Recommendations	Photo
T3	Ash	• PRF-M – woodpecker hole and trunk split	PRF-I x 1 PRF-M x 2	A pre-works inspection should be undertaken by a suitability qualified ecologist immediately prior to felling to ensure no bats are present.	

Tree Number (Crossland Ecology Plan)	Species	Feature and Description (GLTA)	Suitability post-Aerial inspection	Recommendations	Photo
T4	Ash	• PRF-M – woodpecker hole	PRF-I x 1 PRF-M x 1	A pre-works inspection should be undertaken by a suitability qualified ecologist immediately prior to felling to ensure no bats are present.	

Tree Number (Crossland Ecology Plan)	Species	Feature and Description (GLTA)	Suitability post-Aerial inspection	Recommendations	Photo
T5	Willow	• PRF-I – limb break	PRF-I x 1 (limb breaks) Others (knot holes) neg	A pre-works climber inspection of the limb breaks should be undertaken by a suitability qualified ecologist immediately prior to felling to ensure no bats are present. Note majority of features could be inspected with pole camera/ladder but access is difficult. No further surveys or recommendations required for the knot holes (negligible).	

Tree Number (Crossland Ecology Plan)	Species	Feature and Description (GLTA)	Suitability post-Aerial inspection	Recommendations	Photo
T6	Ash	• PRF-M – stem failur	PRF-M x 2	A pre-works inspectio should be undertaken by a suitability qualified ecologist immediately prior to felling to ensure no bats are present.	

Tree Number (Crossland Ecology Plan)	Species	Feature and Description (GLTA)	Suitability post-Aerial inspection	Recommendations	Photo
T7	Ash	• PRF-M – woodpecker holes and stem split	Ivy – neg Woodpecker holes PRF-M Limb split –neg Limb rot – PRF-M	Both PRF-M - a pre-works inspection should be undertaken by a suitability qualified ecologist immediately prior to felling to ensure no bats are present. Ivy and limb split - no further surveys or recommendations required	

Tree Number (Crossland Ecology Plan)	Species	Feature and Description (GLTA)	Suitability post-Aerial inspection	Recommendations	Photo
T8	Ash	• PRF-I – ivy and limb breaks	Negligible	No further surveys or recommendations required	

Bat- Foraging and Commuting

4.16 The previous surveys recorded up to seven species during the bat activity transect surveys including western barbastelle *Barbastella barbastellus.*

4.17 The update walkover survey confirmed that the habitats present within the Wider Site remain largely consistent with those recorded during the previous surveys.

4.18 The NBW transect and locations of the static detectors are shown in Appendix 5 and the results from the NBW and automated bat detector surveys are provided in Table 12 - Table 14 and summarised below.

Table 12: NBW Transect Survey Summary

Species	Recordings	% of Recordings
April 202		
Barbastelle	6	10
Daubenton's	1	2
Leisler's	3	5
Common pipistre	41	71
Soprano pipistre	5	9
Brown lon - eared	2	3
Total	**58**	**100**
June 202		
Barbastell	3	4
Leisler's	1	15
Noctule	1	15
Nathusius' pipistre	2	3
Common pipistre	62	86
Soprano pipistre	3	4
Total	**72**	**100**
October 2025		
Common pipistre	40	95
Soprano pipistre	2	5
Total	**42**	**100**

Table 13: Automated Detector Recordings per Location

STATIC LOCATION	TOTAL NUMBER OF RECORDINGS
Static : ///dupe.drag.magnets (south)	7130
Static ///asteroid.servants.fools (north)	2448
Total	**9578**

Table 14: Automated Detector Total Registrations (April 2025 –October 2025)

Species	Total Recordings	% Recordings	Mean recordings per night hour
Common pipistre	8127	84.85%	13.82
Soprano pipistre	649	6.78%	1.08
Nathusius' pipistrelle	258	2.69%	0.41
Pipistrellus spp.	0	0.00%	0.00
Noctule	25	0.26%	0.04
Leisler's	172	1.80%	0.27
Nyctalus spp.	0	0.00%	0.00
Serotine	125	1.31%	0.21
Big bat	0	0.00%	0.00
Daubenton's	10	0.10%	0.01
Natterer's	0	0.00%	0.00
Myotis spp.	0	0.00%	0.00
Brown lon - eared	4	0.04%	0.01
Barbastelle	208	2.17%	0.30
Total	**9578**	**100.00%**	

4.19 Surveys have recorded an assemblage of nine bat species on-site, including: common pipistrelle, soprano pipistrelle, Nathusius' pipistrelle, noctule, Leisler's bat, serotine, Daubenton's bat, brown long-eared bat and barbastelle.

4.20 Most of the recorded activity from the static detectors pertained to common pipistrelle (8127 registrations of a total of 9578, or 84.85%), 6.78% of recordings were soprano pipistrelle (649 registrations), 2.69% were Nathusius' pipistrelle (258 registrations), 2.17% were barbastelle (208 registrations), 1.80% were Leisler's (172 registrations), 1.31% were serotine (125 registrations) and all other species made up less than 1% of the total recordings. The majority of the registrations from the static

detectors were obtained during the month of June, followed by May, July, April, August, September and October.

4.21 Recorded activity levels by the automated detectors were highest along the edge of the western boundary woodland, with a total of 7130 registrations compared to the eastern brook corridor, which had a total of 2448 registrations.

4.22 Activity appeared to be driven by use of the Wider Site for foraging and commuting mostly along the woodland edge and northern boundary.

4.23 Based on the assemblage of bats recorded and the valuation methodology in accordance with Wray *et al* (2010), the Wider Site is considered to be of **Regional** importance for foraging/commuting bats overall, with the vast majority of recordings belonging to the commonest species common and soprano pipistrelles. Confidence in this assessment is **high**.

Birds

4.24 The previous Breeding Bird Surveys (BBS) recorded an assemblage of typical and common species up to local importance. One pair of skylarks were recorded within the Wider Site.

4.25 The survey results are provided in Table 15. There was a total of 36 species recorded over the six visits within and adjacent to the Wider Site. There were five red-listed species, eight amber-listed species, 21 green-listed species and two introduced species.

4.26 The breeding bird assemblage was quite rich with 36 species; this reflected the habitat diversity within the Wider Site and especially the value of the plantation woodland and streamside woodlands. The plantation woodland held a diverse assemblage including breeding sparrowhawk, corvids, warblers, thrushes, finches and tits. The streamside woodland supported the yellowhammer pairs as well as good numbers of warblers and tits. The mature woodland adjacent to the stream held stock dove and dunnock.

4.27 The arable fields supported two pairs of skylark but were of limited value to other species. Yellowhammers were recorded feeding on farm tracks and field margins. The Wider Site was often disturbed by dog walkers on public footpaths.

4.28 The breeding bird assemblage with breeding skylark and yellowhammer was typical of intensively managed arable habitats and was comparable to the previous BBS results and hence was considered of **Local** importance.

Table 15: Breeding Bird Survey Results Table

				Visit							
English name	**Scientific nam**	**BOCC 5[1]**	**S41[2]**	**1**	**2**	**3**	**4**	**5**	**6**	**Max**	**Notes**
Swift	*Apus apu*	Red		0	0	0	3	0	1	3	Foraging high over Wider Site
Herring Gull	*Larus argentat*	Red		0	0	0	0	0	0	2	Overflying Wider Site
Skylark	*Alauda arvensi*	Red		3	3	2	3	3	4	4	2 pairs withi Wider Site from Ma
Fieldfare	*Turdus pilari*	Red		1	0	0	0	0	0	1	Late wintering recc
Yellowhammer	*Emberiza citrinel*	Red		3	1	3	0	2	2	3	2 pairs on edge o Wider Site along strear
Stock Dove	*Columba oena*	Amber		2	1	0	2	0	1	2	1 pair in woodland to east Wider Site
Woodpigeon	*Columba palumbu*	Amber		2	1	3	2	2	1	3	4 pairs in woodla
Oystercatcher	*Haematopus ostraleg*	Amber		0	0	2	0	0	0	2	Overflying Wider Site
Rook	*Corvus frugilegu*	Amber		0	1	0	0	0	0	1	Overflying Wider Site
Whitethroat	*Curruca commun*	Amber		0	0	1	0	0	1	1	One pair along streamsic
Wren	*Troglodytes troglodyt*	Amber		2	2	3	1	2	1	3	4 pairs
Song Thrush	*Turdus philomelo*	Amber		1	0	0	1	2	1	2	1 pair in woodlar
Dunnock	*Prunella modulari*	Amber		1	0	0	0	0	1	1	1 pair in woodland to east Wider Site
Sparrowhawk	*Accipiter nisu*	Green		0	0	0	1	0	1	1	Possible breeding in woodla
Red Kite	*Milvus milvu*	Green		0	0	0	1	0	0	1	Overflying Wider Site
Buzzard	*Buteo bute*	Green		1	0	1	0	0	0	1	Overflying Wider Site
Great Spotted Woodpecker	*Dendrocopos majo*	Green		1	0	1	1	1	0	1	1 pair in woodland to east Wider Site
Green woodpecker	*Picus viridis*	Green		1	0	0	0	1	2	2	Foraging within Wider Sit
Jay	*Garrulus glandarius*	Green		1	0	0	0	1	0	1	1 pair or - site
Magpie	*Pica pica*	Green		4	2	4	1	1	3	4	2 pairs o - site
Jackdaw	*Coloeus monedul*	Green		2	1	0	0	0	0	2	1 pair or - site
Carrion Crow	*Corvus corone*	Green		2	2	2	1	1	1	2	1 pair or - site
Coal Tit	*Periparus ate*	Green		1	0	0	0	0	0	1	1 pair or - site
Blue Tit	*Cyanistes caeruleu*	Green		8	3	2	4	1	4	8	3 pairs o - site
Great Tit	*Parus majo*	Green		2	1	1	3	1	2	3	3 pairs o - site
Swallow	*Hirundo rustic*	Green		0	0	0	0	1	0	1	Overflying Wider Site
Long-tailed Ti	*Aegithalos caudat*	Green		2	0	0	0	0	0	2	1 pair adjacent t Wider Site
Chiffchaff	*Phylloscopus collyb*	Green		1	3	3	1	2	1	3	2 pairs o - site; 1 pair adjacer
Blackcap	*Sylvia atricapil*	Green		0	1	3	2	1	2	3	3 pairs o - site; 1 pair adjacer

				Visit							
English name	Scientific nam	BOCC 5[1]	S41[2]	1	2	3	4	5	6	Max	Notes
Nuthutch	*Sitta europae*	Green		1	0	0	0	0	0	1	Territory adjacen Wider Sit In large oak
Blackbir	*Turdus meru*	Green		2	3	1	0	3	3	3	3 pairs o - site
Robin	*Erithacus rubecu*	Green		1	3	1	1	0	0	3	2 pairs o - site
Chaffinch	*Fringilla coelel*	Green		2	0	0	0	0	0	2	1 pair adjacent t Wider Sit
Goldfinch	*Carduelis cardue*	Green		0	0	0	2	0	0	2	1 pair or - site
Greylag Goose	*Anser anse*	Introduce		4	0	0	0	0	0	4	Feeding in fie
Pheasant	*Phasianus colchicu*	Introduce		1	1	0	0	1	0	3	1 male adjacent t Wider Sit

[1]BOCC 5 Birds of Conservation Concern 5 (Stanbury *et al*, 2021)
[2]Priority Species under the Natural Environment and Rural Communities (NERC) Act 2006

Great Crested Newt

4.29 No GCN were recorded during previous surveys; one waterbody was noted within 250 m of the Wider Site and was subject to an eDNA survey.

4.30 The Wider Site contained suitable terrestrial habitats for GCN, however the eDNA results were negative (Appendix 9) indicating that GCN are absent from the waterbody. No other suitable aquatic habitat was noted within 250 m of the Wider Site and as such GCN are considered likely absent.

4.31 The Wider Site is considered to be of **Negligible** importance for GCN with confidence in this assessment **high**.

Hazel Dormouse

4.32 The previous surveys recorded hazel dormouse within the Wider Site, along the eastern boundary woodland.

4.33 The updated walkover survey confirmed that the habitats present within the Wider Site remain largely consistent with those recorded during the previous surveys and therefore suitability for dormice remains.

4.34 No evidence of hazel dormouse was recorded during the nest tube survey however, and therefore it is considered that this species is likely absent from the Wider Site.

4.35 It is considered that the Wider Site is of **Negligible** importance for dormice. Confidence in this assessment is **high**.

Reptiles

4.36 The previous surveys recorded grass snake and common lizard within the Wider Site, and the update walkover survey confirmed the continued suitability of the Wider Site (excepting the arable fields) for reptiles.

4.37 The update presence/absence survey confirmed the presence of low numbers of common lizard only. No other reptile species were recorded (Table 16 and Appendix 8).

4.38 The Wider Site was therefore assessed as of **Site** importance for reptiles. Confidence in this assessment is **high**.

Table 16: Reptile Survey Results

Survey Number	Date	Slow Worms				Common Lizards				Grass snake		Adder			
		M	F	Total	J	M	F	Total	J	Ad	Juv	M	F	Total	J
1	20/05/25	0	0	0	0	0	1	1	0	0	0	0	0	0	0
2	05/06/25	0	0	0	0	0	0	0	0	0	0	0	0	0	0
incidental sitir	10/06/25	0	0	0	0	0	1	0	0	0	0	0	0	0	0
3	11/05/25	0	0	0	0	0	1	1	0	0	0	0	0	0	0
4	17/06/25	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	23/06/25	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	04/07/25	0	0	0	0	0	0	1	0	0	0	0	0	0	0
7	17/07/25	0	0	0	0	0	0	1	0	0	0	0	0	0	0

Aquatic Mammals - Otter and Water Vole

4.39 Previous surveys did not record any evidence of otter or water vole within the Wider Site. The update walkover survey confirmed some suitability of the brook for both species with follow-up surveys undertaken.

4.40 The results of the surveys confirmed the presence of water vole with burrows, latrines, footprints and an individual water vole observed (Appendix 10). The survey in August found that the stream was largely dry, with only infrequent areas of standing water left (up to 1 m deep in some areas). These areas were found to have water vole footprints and burrows, however no latrines were found on this second survey. Feeding stations were not identified during either survey.

4.41 Additionally, evidence of otter was recorded with a spraint and footprint observed during the April survey, and evidence of mink was recorded during both surveys.

4.42 The evidence suggests that otters may utilise the stream in this area for commuting and/or foraging, but usage is likely transitory with three potential holts monitored with a 24 hour camera for six weeks, showing no signs of otter activity.

4.43 Mink scat was found in multiple areas along the stream on prominent logs laying across the river, mink footprints, and mink dens were also recorded in the southern side of the bank.

4.44 The Wider Site was assessed as **Site** importance for water vole and otter. Confidence in this assessment is **high**.

Other Notable Species

4.45 Common toad *Bufo bufo* were previously recorded within the surrounding Great Wilsey Park area, and the update walkover confirmed the continued suitability of habitats for this species and additionally for west European hedgehog *Erinaceus europaeus*.

4.46 The Wider Site was considered to have potential to be of up to **Site** importance for other notable species. Confidence in this assessment is **high**.

Summary

4.47 A summary evaluation of the Wider Site in relation to ecology features is provided in Table 17.

Table 17: Evaluation of existing ecological features

Feature	Summary Description	Importance	Confidence
Statutory Designated Sites	Haverhill Nature Walks LNR	National	High
Non-statutory Designated Sites	Four CWS	County	High
Priority Habitats off-site	Lowland Mixed Deciduous Woodland	County	High
Habitats	Arable, mixed woodland, hedgerow (HoPI), brook (HoPI)	Site (arable field) Local (woodland, hedgerow and brook)	High
Flora	Common and widespread habitats wit notable or protected species recorded and considered unlikely to be present based on the habitats present.	Site	High
Badgers	Suitable sett building, foraging and comm habitat. Disused sett present; no further evidence.	Site	High
Bats	Six trees with PRFs along Wider Site boundaries. At least nine species recorded foraging and/or commuting including barbastelle. Suitable habitats comprise woodland edge and boundary habitats.	Site Regional	High High
Birds	Overall, the Wider Site supports a common and typical assemblage of breeding and non-breeding species, including skylark and yellowhammer.	Local	High
GCN	GCN absent –negative eDNA from a single pond within 250 m.	Negligible	High

Feature	Summary Description	Importance	Confidence
Hazel dormouse	Wider Site has suitable habitat (woodland and hedgerow habitats) however updated survey results were negative and therefore likely absent.	Negligible	High
Reptiles	Low numbers of common lizard recorded around Wider Site boundary habitats.	Site	High
Otter and water vole	Water vole confirmed present along the b in addition to American mink. Otter evidence recorded during April survey only, suggesting transient use.	Site	High
Other notable species	Boundary habitats suitable for hedgehog and common toad.	Site	High

5.0 Conclusions

5.1 The Wider Site comprised of arable fields with mixed woodland, hedgerows and a brook, with no significant habitat changes when compared to the previous ecological surveys undertaken for the outline planning application (Bidwells, 2015).

5.2 A suite of update ecological surveys undertaken during spring and summer 2025 confirmed the ecological baseline remains largely the same as that reported in the ES (Bidwells, 2015), except for water vole presence and evidence of transient otter use now being recorded along the brook, and hazel dormouse now likely absent.

5.3 The results of the update ecological surveys are generally consistent with the previous surveys undertaken for the outline planning application. Both the previous survey and update survey results have informed the development of the Ecological Implementation Strategy for the Wider Site (Crossland Ecology Ltd., 2025) to include mitigation requirements and enhancement measures.

6.0 References

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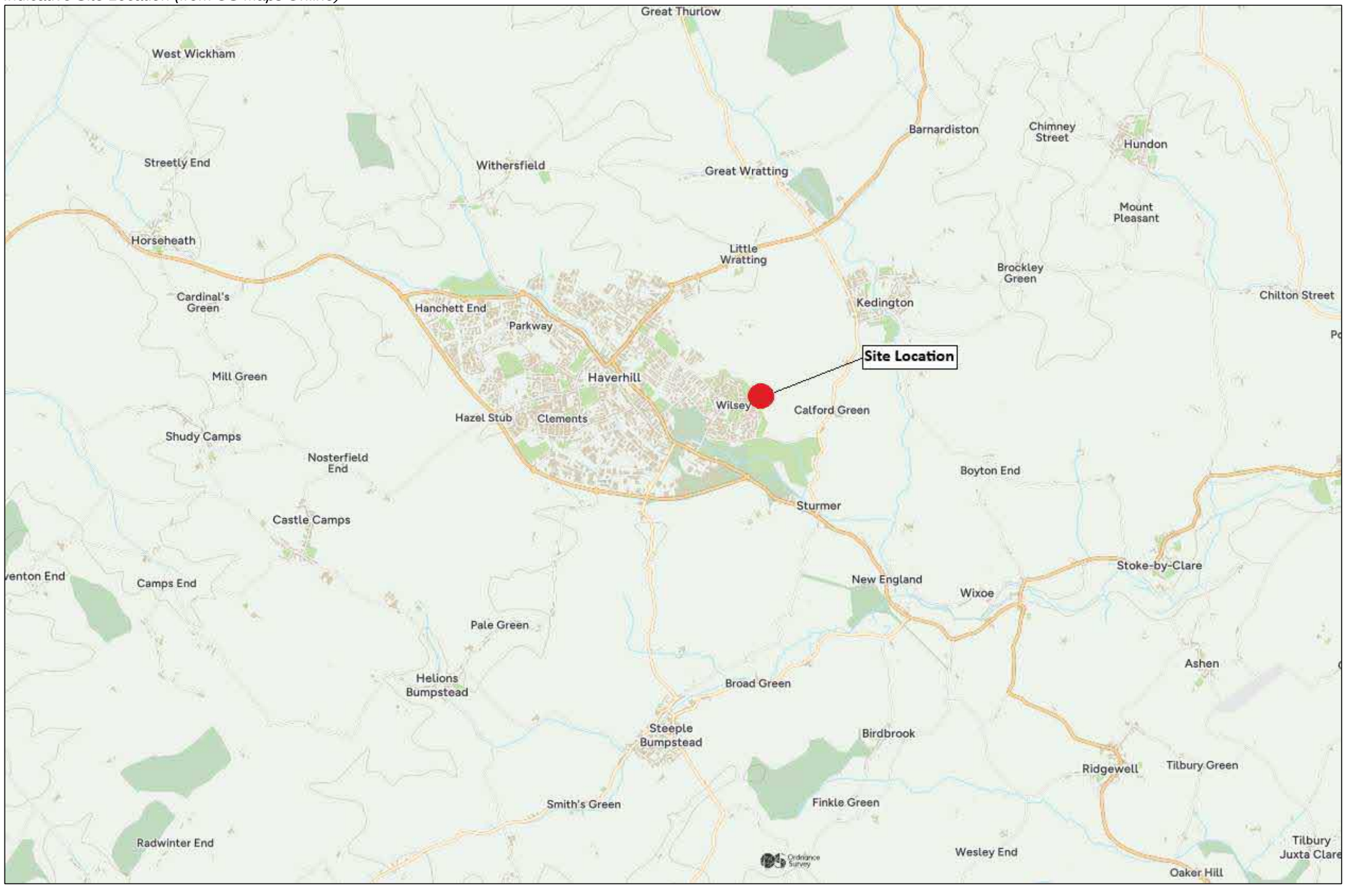
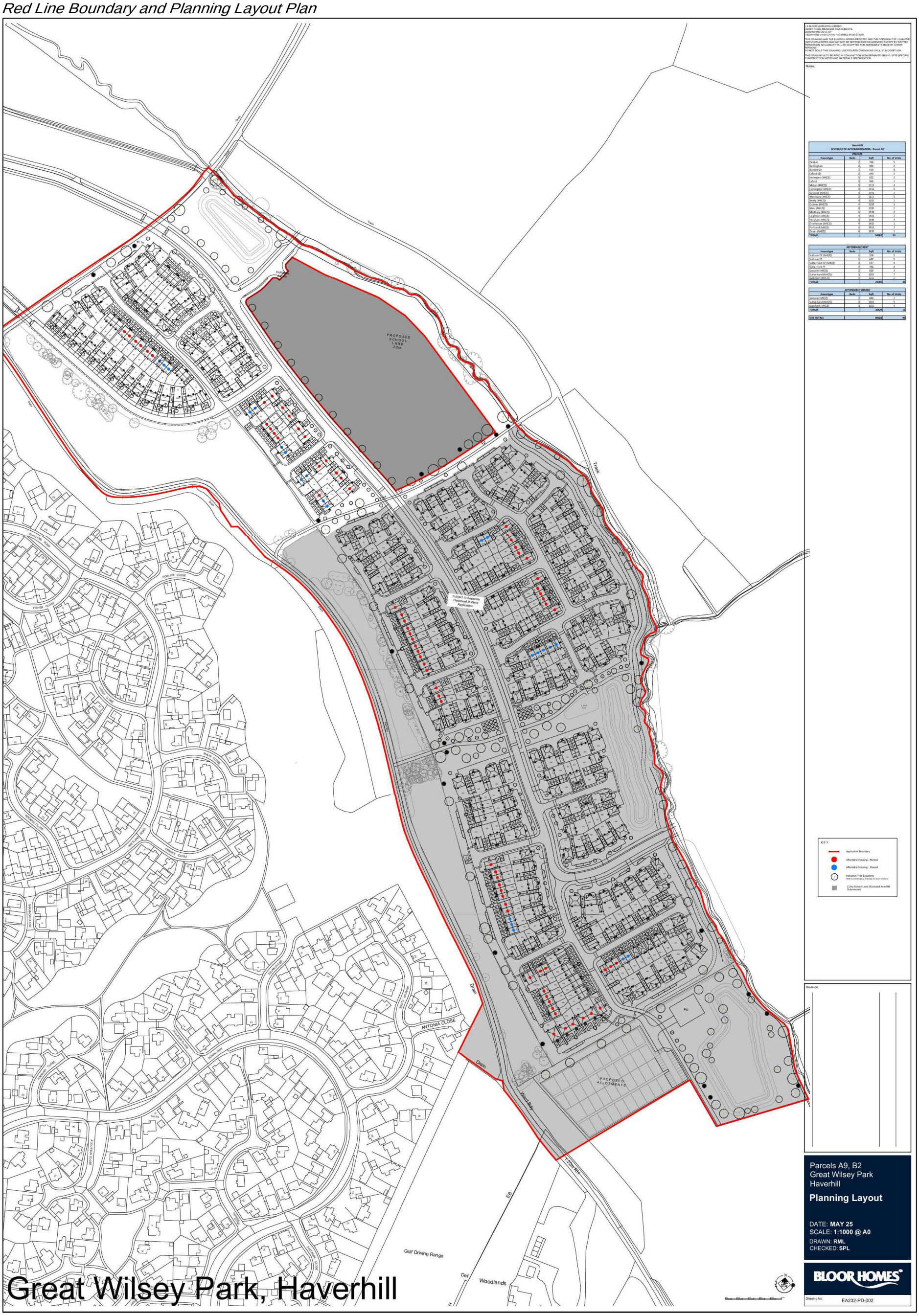
Appendix 1: Site Location, Red Line Boundary and Proposed Layout Plans

Indicative Site Location (from OS Maps Online)



Red Line Boundary and Planning Layout Plan



Haverhill
SCHEDULE OF ACCOMMODATION - Parcel A9

PRIVATE

Housetype	Beds	Sqft	No. of Units
Oakley	2	796	5
Rellingham	2	990	7
Buxton SD	2	936	8
Lyford SD	3	940	2
Helmsten (M4(3))	3	922	2
Lyford	3	940	1
McCall (M4(3))	3	1115	4
Lymington (M4(3))	3	1216	4
Chilcote (M4(3))	3	1216	3
Wellbury (M4(3))	3	1311	5
Beely (M4(3))	4	1355	1
Grainer (M4(3))	4	1359	3
Ilen (M4(3))	4	1395	3
Mollbary (M4(3))	4	1398	3
Leighton (M4(3))	4	1455	2
Horsham (M4(3))	4	1498	4
Chadthorpe (M4(3))	4	1542	1
Portland (M4(3))	4	1553	3
Dover (M4(3))	4	1630	1
TOTALS		54867	53

AFFORDABLE RENT

Housetype	Beds	Sqft	No. of Units
Sullivan (SF (M4(3))	1	538	5
Sullivan FF	1	647	5
Sutterfield GF (M4(3))	2	657	6
Sutterfield FF	2	766	4
Sansom (M4(3))	2	850	4
Sutherland (M4(3))	3	1001	7
Lieberson (M4(3))	4	1141	2
TOTALS		24306	33

AFFORDABLE SHARED

Housetype	Beds	Sqft	No. of Units
Sansom (M4(3))	2	850	2
Sutherland (M4(3))	3	1001	5
Sapphard (M4(3))	3	1031	4
TOTALS		10629	11

SITE TOTALS		89802	97

Notes.

Great Wilsey Park, Haverhill

Appendix 2: Legislative and Policy Framework

This document has not been prepared by a legal or planning professional and should be read as an interpretation of relevant statutes and planning policy guidance only. The information presented within this document has been reported in good faith and are the genuine opinion of Crossland Ecology on such matters. Crossland Ecology does not accept any liability resulting from outcomes relating to the use of this information or its interpretation within this document.

National Planning Policy Framework (NPPF)

The NPPF as amended (MHCLG, 2024) outlines what the planning system should do to contribute to and enhance the natural and local environment through the following policy statements:

Paragraph 8
Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

c) an environmental objective –to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Paragraph 20
Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

Paragraph 29
Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.

Paragraph 77:
The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;

Paragraph 108
Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve:

f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure –including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.

Paragraph 124
Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.

Paragraph 125
Planning policies and decisions should:

a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains –such as developments that would enable new habitat creation or improve public access to the countryside;
b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;

Paragraph 151
Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

Paragraph 187
Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services –including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;

Paragraph 188
Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other

policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

Paragraph 192
To protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

Paragraph 193
When determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Paragraph 194
The following should be given the same protection as habitats sites:

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

Paragraph 195
The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

Paragraph 198

Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

Local Policy

The West Suffolk Local Plan 2024 –2041 policies relevant to this report are:

Policy SP8 Biodiversity net gain and enhancements

In line with biodiversity gain hierarchy biodiversity net gain will preferentially be delivered on-site where this would deliver the most appropriate outcome for biodiversity and to provide local benefit.

Locally defined ecological networks identified in the local nature recovery strategy (LNRS) will be the focus for the delivery of registered off-site habitat and landscape scale biodiversity net gain.

For meaningful contributions to nature recovery, biodiversity net gain actions and biodiversity enhancements should seek to deliver bigger, better, more and joined up habitat, safeguarding and enhancing habitat connectivity at a site level, locally and at the wider landscape scale.

For developments which fall outside the scope of mandatory biodiversity net gain, enhancement for biodiversity must be included as part of the proposals, commensurate with the scale of the development.

Policy SP9 Protected sites, habitats, and features

All development must seek to protect sites designated for their biodiversity and geodiversity value, and conserve, restore and enhance important habitats (including priority habitats) and other important biodiversity features on development sites or affected by developments.

Proposals which do not conserve and enhance biodiversity, failing to have appropriate regard to the 'mitigation hierarchy', will be refused.

Proposals for development which could adversely affect the integrity of areas of international or European nature conservation importance, as indicated on the policies map, will be determined in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) or successor legislation.

Proposed development likely to damage or destroy the interest features of a nationally important site of special scientific interest (SSSI) will not be permitted unless the benefits of the development, at the site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs.

Development resulting in the loss or deterioration of irreplaceable habitats such as lowland fens, ancient woodland, ancient and veteran trees will be refused unless it accords with the exceptional reasons identified within the National Planning Policy Framework. If exceptional reasons are justified, a suitable compensation strategy including its delivery will need to be secured as part of any planning permission.

Development proposals which would have a direct or indirect adverse effect on locally designated sites, including county wildlife sites and county geodiversity sites, protected or priority habitats including rivers, floodplains and wetlands, will not be permitted unless the benefits of the

development clearly outweigh the impacts on the features of the site and the wider network of habitats. In addition, proposals must demonstrate that:

- The mitigation hierarchy has been implemented.
- Mitigation, compensation and enhancement measures are provided as necessary to ensure there is a biodiversity net gain in such sites.

Any enhancement measures should be informed by the relevant nature recovery priorities (if any) set out in the Suffolk Local Nature Recovery Strategy when completed.

Policy LP13 Protected species

Development which would have an adverse impact on protected or priority species will not be permitted unless there is no alternative, and the local planning authority is satisfied that suitable measures have been taken to:

a. Reduce disturbance to a minimum.
b. Maintain the population identified on site, or where this is not possible provide adequate alternative habitats to sustain at least the current levels of population; and
c. Provide enhancement measures to benefit the species.

Any enhancement measures should be informed by the relevant nature recovery priorities (if any) set out in the Suffolk Local Nature Recovery Strategy when completed.

All planning applications must be supported by appropriate protected species survey and ecological impact assessment, undertaken in accordance with national good practice guidelines.

Wildlife Legislation

The two principal wildlife statutes are the Conservation of Habitats and Species Regulations 2017 (as amended)which deals with internationally important sites and species, and the Wildlife and Countryside Act (WCA) 1981 (as amended), which deals with nationally important sites and species.

Certain habitats and species within discrete sites are protected as SSSI under the WCA 1981 (as amended). A proportion of these are more strictly protected as proposed or designated SPA, SAC and Ramsar sites under the Conservation of Habitats and Species Regulations 2017 (as amended) . These designations protect features and resources listed as being of international importance from both direct and indirect effects arising from a range of issues including proposed development. In addition, non-statutory designated sites (e.g. Local Wildlife Sites) are protected under the National Parks and Access to the Countryside Act 1949 Section 21.

Certain species listed on Schedule 5 of the WCA 1981 (as amended), including all bat species, great crested newt *Triturus cristatus,* hazel dormouse *Muscardinus avellanarius* and otter *Lutra lutra* are also protected under Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (as amended) making them European Protected Species (EPS). Taken together it is illegal to:

- Deliberately kill, injure or capture any wild animal of EPS;
- Deliberately disturb wild animals of any EPS in such a way to be likely to significantly affect:
- The ability of that species to survive, breed, rear or nurture their young; or
- The local distribution of that species.
- Recklessly disturb an EPS or obstruct access to their place of rest;
- Damage or destroy breeding sites or resting places of such animals;
- Deliberately take or destroy the eggs of such an animal;
- Possess or transport any part of an EPS, unless acquired legally; and/or
- Sell, barter or exchange any part of an EPS.

A range of species other than birds, including water vole *Arvicola amphibius*, is protected from disturbance and destruction under the WCA 1981 (as amended) through inclusion on Schedule 5.

All breeding birds are protected from deliberate destruction under the WCA 1981 (as amended). Certain species are further protected from disturbance at their nest sites being listed on Schedule 1 of the WCA 1981 (as amended).

Common reptiles including common lizard *Zootoca vivipara,* slow-worm *Anguis fragilis*, grass snake *Natrix helvetica* and adder *Vipera berus* are protected under the WCA 1981 (as amended), they are listed as schedule 5 species, therefore part of Section 9(1) and section 9(5) apply; the Countryside and Rights of Way (CRoW) Act 2000 also strengthens their protection.

[redacted] is protected from [redacted] disturbance and destruction under the Protection of

Section 40 of The Natural Environment and Rural Communities (NERC) Act 2006 places a legal duty on Local Authorities to conserve biodiversity. Section 41 (S41) sets out a list of 943 species and Habitats of Principal Importance. These species are known as England Biodiversity Priority (EBP) species and are those identified as requiring action under the former UK Biodiversity Action Plan (BAP) and which continue to be regarded as conservation priorities under the UK Post-2010 Biodiversity Framework.

Native, species-rich hedgerows that fit certain criteria are protected as being ‘important’ under the Hedgerow Regulations 1997.

Japanese Knotweed *Fallopia japonica*, along with other introduced and invasive species are listed under Schedule 9 of the WCA 1981 (as amended). Japanese knotweed is highly invasive, and its rhizomes cause damage to buildings and other infrastructure. Hence it is also classed as controlled waste under the Environment Protection Act 1990 and has therefore either to be removed or disposed of in a licensed landfill or the rhizomes buried to a depth of at least 5 m.

Appendix 3: Baseline Habitats Plan

Survey Information

- Site boundary
- Wider site boundary
- c1c - Cereal crops
- g4 - Modified grassland
- w1f - Lowland mixed deciduous woodland (offsite)
- w1h - Other woodland; mixed
- 510 - Bare ground
- 42 - Pond (offsite)
- h2a6 - Other native hedgerow
- r2a - Rivers (priority habitat)

Source: Ordnance Survey © Crown copyright 2025, All rights reserved. Licence Number 100049837.

0 25 50 100 150
Metres

PROJECT TITLE

GREAT WILSEY – PARCEL A9

DRAWING TITLE

Figure 2.A - Baseline Habitat Map

VER	DATE	REMARKS	Drawn	Checked
2.2	10/11/25	Baseline	MP	VC

DRAWING NUMBER:

CrosslandEcology/GreatWilsey/Baseline/A9

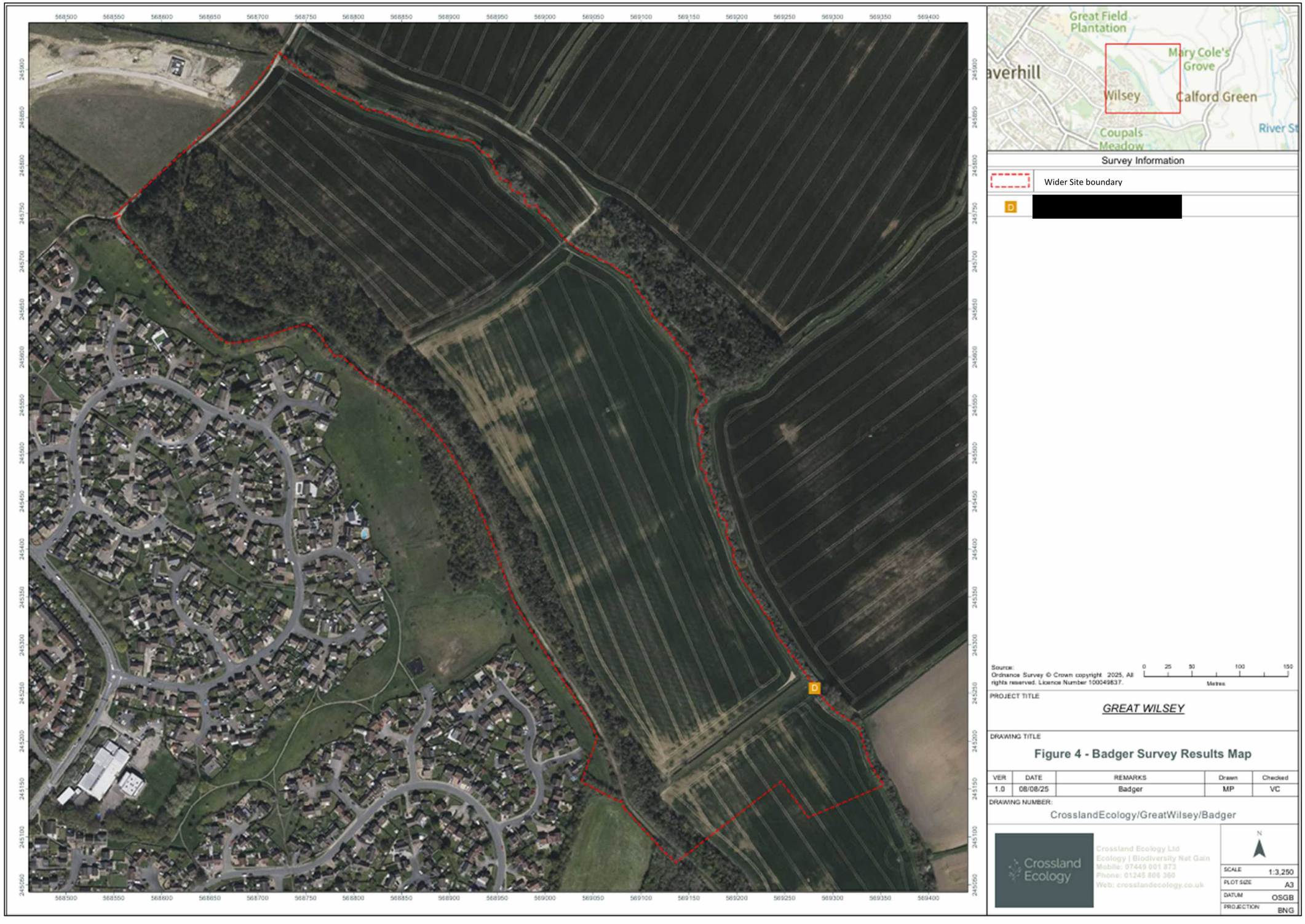
Crossland Ecology

Crossland Ecology Ltd
Ecology | Biodiversity Net Gain
Mobile: 07449 001 873
Phone: 01245 806 360
Web: crosslandecology.co.uk

N

SCALE	1:3,250
PLOT SIZE	A3
DATUM	OSGB
PROJECTION	BNG

Appendix 4: [redacted] Survey



Survey Information

Wider Site boundary

D [redacted]

Source: Ordnance Survey © Crown copyright 2025. All rights reserved. Licence Number 100049837.

0 25 50 100 150
Metres

PROJECT TITLE

GREAT WILSEY

DRAWING TITLE

Figure 4 - Badger Survey Results Map

VER	DATE	REMARKS	Drawn	Checked
1.0	08/08/25	Badger	MP	VC

DRAWING NUMBER:

CrosslandEcology/GreatWilsey/Badger

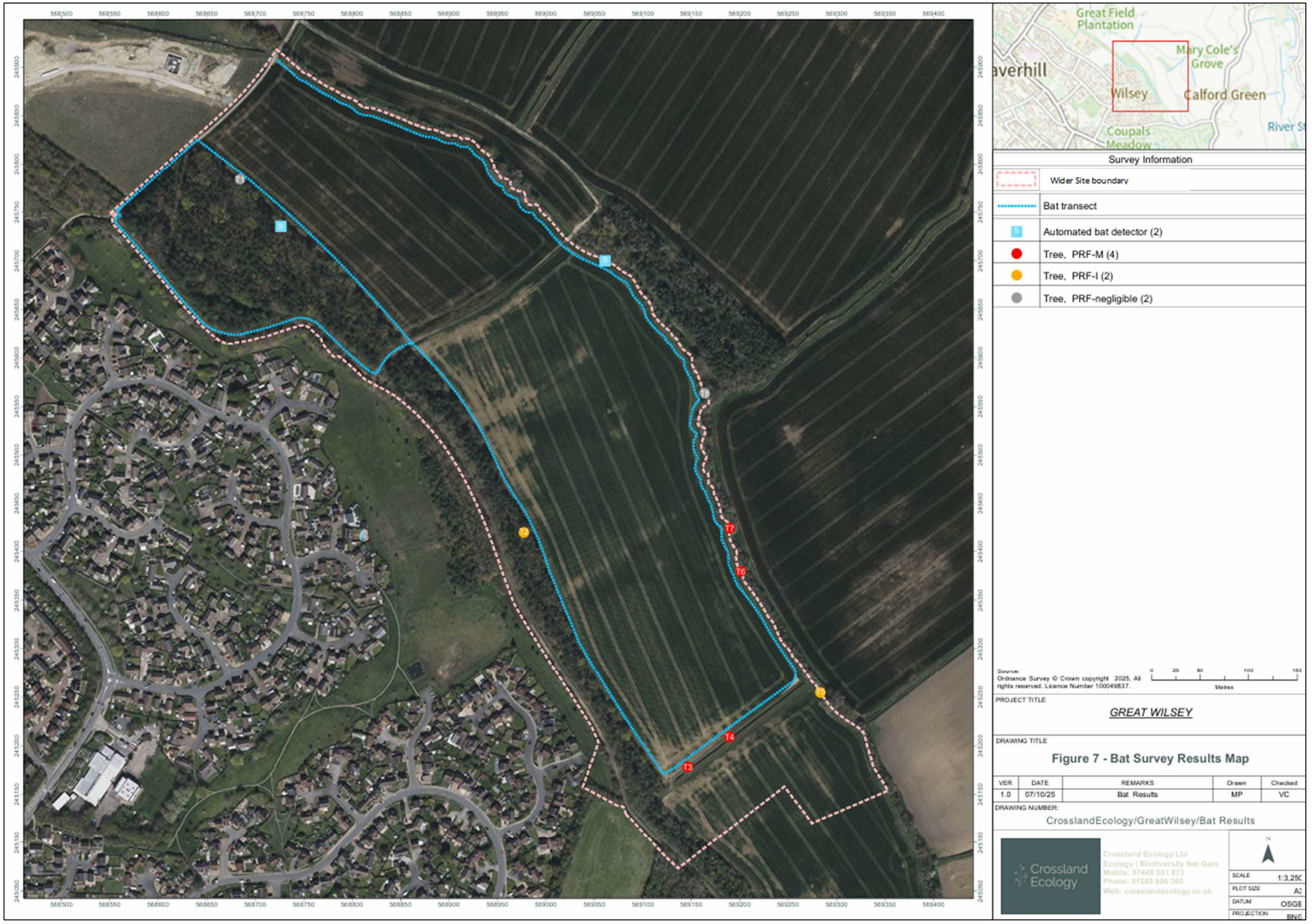
Crossland Ecology

Crossland Ecology Ltd
Ecology | Biodiversity Net Gain
Mobile: 07449 001 873
Phone: 01245 806 360
Web: crosslandecology.co.uk

N

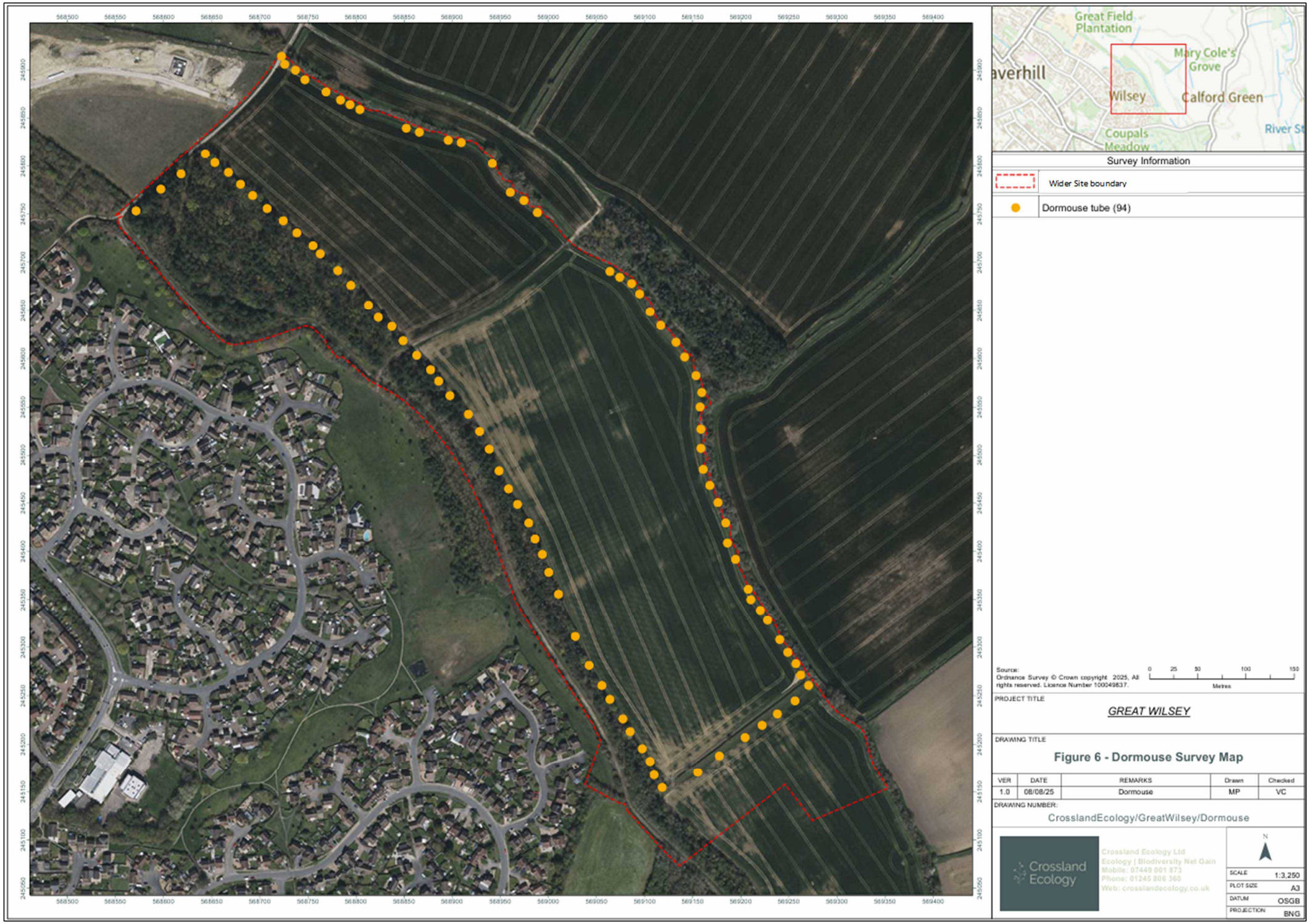
SCALE	1:3,250
PLOT SIZE	A3
DATUM	OSGB
PROJECTION	BNG

Appendix 5: Bat Survey

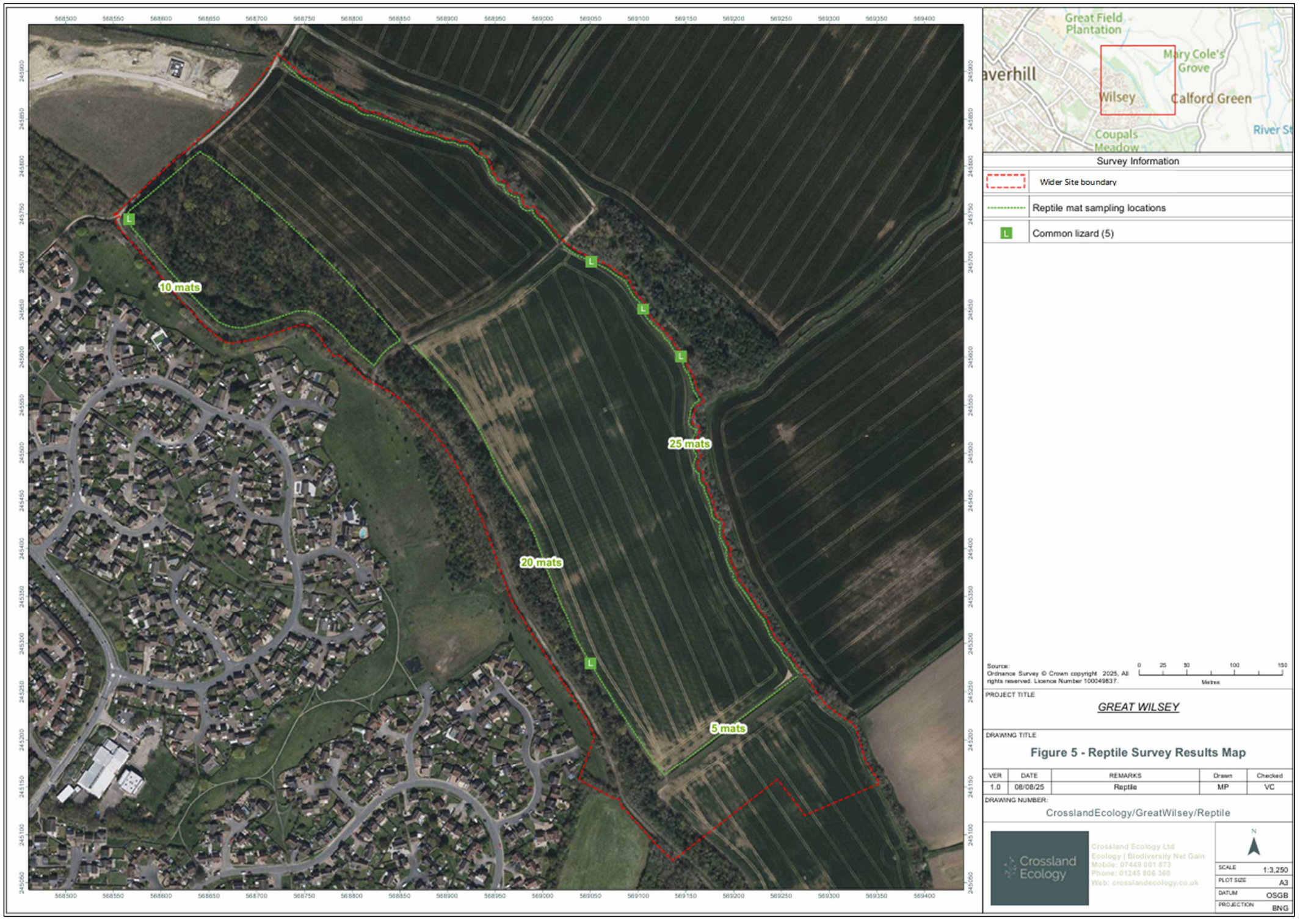


Appendix 6: Breeding Bird Surveys –Composite Territories Map

Appendix 7: Hazel Dormouse Survey –Nest Tube Locations



Appendix 8: Reptile Survey



Appendix 9: GCN

eDNA Results

Client:
Great Wilsey, Sean Crossland, Crossland Ecology
1040079-1333, Great Wisley, version 1

RSK ADAS Ltd
Spring Lodge
172 Chester Road
Helsby
WA6 0AR

Tel: 01159 229249
Email: Helen.Rees@adas.co.uk

www.adas.uk

Sample ID: ADAS-9221	
Client Identifier: P1	Grid references/coordinates: Not Supplied
Description: pond water samples in preservative	Condition on Receipt: Good
Date of Receipt : 09/06/2025	Volume: Passed

Determinant	Result	Method	Date of Analysis
Inhibition Control†	2 of 2	Real Time PCR	06/12/2025
Degradation Control§	Within limits	Real Time PCR	06/12/2025
Great Crested Newt*	0 of 12 (negative)	Real Time PCR	06/12/2025
Negative PCR Control (Nuclease Free Water)	0 of 4	Real Time PCR	As above for GCN
Positive PCR Control (GCN DNA 10^{-4} ng/µL)¥	4 of 4	Real Time PCR	As above for GCN
Report Prepared by:	Dr Helen Rees	Report Issued by:	Dr Ben Maddison
Signed:		Signed:	
Position:	Director: Biotechnology	Position:	MD: Biotechnology
Date of preparation:	12/06/2025	Date of issue:	12/06/2025

eDNA analysis was carried out in accordance with the stipulated methodology found in the Technical Advice Note (WC1067 Appendix 5 Technical Advice Note) published by DEFRA and adopted by Natural England.

** If all PCR controls and extraction blanks give the expected results a sample is considered: negative for GCN if all of the replicates are negative; positive for GCN if one or more of the replicates are positive.*

† Recorded as the number of positive replicate reactions at expected C_t value. If the expected C_t value is not

§ No degradation is expected within time frame of kit preparation, sample collection and analysis.

¥ Additional positive controls (10^{-2}, 10^{-2}, 10^{-3} ng/µL) are also routinely run, results not shown here.

Appendix 10: Water Vole and Otter Survey