



Our Ref: JBA 18-351 ECO29 BFH

25<sup>th</sup> March 2022

Revised 9<sup>th</sup> June 2022

Persimmon Homes (Suffolk)

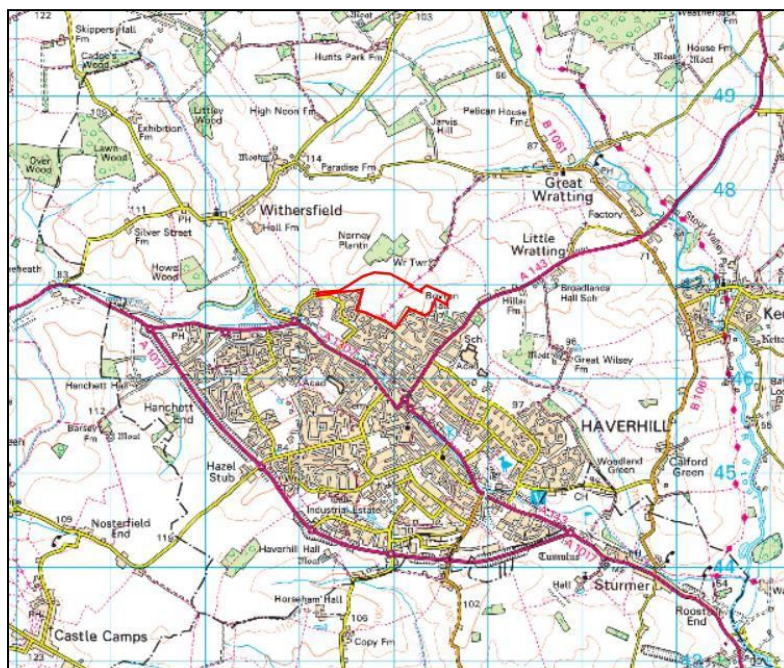
## RE: Updated Ecological Walkover Survey of Phases 2-6 and the relief road at Haverhill, Suffolk.

### Introduction and Background

James Blake Associates Ltd. (JBA) was instructed by Persimmon Homes (Suffolk) to undertake an updated ecological walkover survey of land at Haverhill, Suffolk to assess the potential for protected species and invasive & non-native species and provide a report to summarise the findings of the walkover survey, highlighting any significant constraints for the site since the previous surveys in 2018 and 2019 and previous species-specific reports (2019-2020).

The site is approximately 34.1 hectares in size and located northwest of Haverhill Road (A143) on the western outskirts of the town of Haverhill, Suffolk. Arable fields border the site with residential housing to the south. Norney Plantation County Wildlife Site (CWS), an area of ancient, replanted woodland, is approximately 65m north of the site boundary. The wider landscape includes mainly arable fields with scattered woodland. The river Stour lay approximately 1.8km east of the site, and the Stour Brook lay approximately 300m south, along with a series of drainage ditches (see Figure 1 below).

**Figure 1: Site Location** (Reproduced from Magic maps data licence number 100059700)



A previous phase 1 habitat survey for the relief road was undertaken in 2018, which noted the site as a series of arable and tall ruderal fields with managed hedgerows, scattered boundary trees, and wet and dry ditches. Additionally, in 2019, a preliminary ecological appraisal (PEA) for phases 2-6 was

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undertaken which described the site as fields of poor semi-improved grassland and tall ruderal vegetation, with amenity grassland margins and defunct species-poor hedgerow. Other habitats recorded on site included:

- Intact species-rich hedgerow
- Defunct species-rich hedgerow
- Dense scrub
- Mixed plantation

The updated ecological walkover survey was undertaken on the 22<sup>nd</sup> March 2022 by Bethan Feeney-Howells BSc (Hons) and Sarah Jarrett MSc. This report is intended to give an overview of the site habitat(s) and condition at the time of the survey and should be read in conjunction with the previous phase 1 habitat survey (JBA, 2018) and preliminary ecological appraisal (JBA, 2019a).

The survey methodology followed the standard Phase 1 methodology of Joint Nature Conservation Committee Guidelines (JNCC, 2010). An extension of this basic methodology was also undertaken to provide further details in relation to notable or protected habitats present within the survey area, or in relation to habitats present that have the potential to support notable or protected species (CIEEM, 2013).

The baseline conditions reported in this document represent those identified at the time of the survey on 22<sup>nd</sup> March 2022. Although a reasonable assessment of habitats present can be made during a single walkover survey, seasonal variations are not observed.

The relevant wildlife legislations and planning policies are listed below:

- Conservation of Habitats and Species 2019 (Amendment) (EU Exit) 2019, ('The Habitats Regulations'). The Habitats Regulations implement The Habitats Directive 1992 (92/43/EEC) into English Law. (Amended by the Conservation of Habitats and Species (Amendment) Regulations 2012 S.I. 2012/1927).
- Wildlife and Countryside Act, 1981 (as amended) (WCA). [Amended by the Countryside and Rights of Way Act (2000)].
- The Natural Environment and Rural Communities Act, 2006 (NERC).
- The Protection of Badgers Act, 1992 (The Badgers Act).
- The Wild Mammals (Protection) Act, 1996.
- The Hedgerows Regulations, 2007.
- National Planning Policy Framework, 2021 (NPPF).

### Results and Evaluation

The site itself has seen some change since the previous reports in 2018 and 2019. Consequently, the validity of results within previous species-specific reports has also been discussed within this report. Majority of changes on site have occurred due to ongoing construction works of the planned housing development on site. However, as stated in the previous PEA (JBA, 2019), the site is still considered suitable for badgers, breeding birds, wintering birds, foraging and commuting bats, hedgehog and potentially reptiles and GCN, away from areas of active construction.

Construction works has commenced on Phases 2A/B and clearance works has commenced on Phase 3A and 6, with protection fences in place.

Further changes recorded include partial removal of species-rich hedgerow towards the northeast (G37 and G43) as per the tree removal plans (JBA, 2020a), clearance of the majority of scrub towards the southern boundary although the mixed plantation on the south boundary has been retained, and several ditches which were previously recorded as dry in the PEA (JBA, 2019a), are now wet due to recent clearance works to open up these habitats (See Appendix 1 for updated Habitat Map).

### *Badger*

The previous reports stated that field boundaries and ditches on site were considered suitable for sett creation, and this remains valid where these habitats remain, with several large mammal push-throughs recorded at the time of the updated survey along central hedgerow (G22 – G25) (JBA, 2020a). A previous badger activity survey (JBA, 2019b) found three dung pits on the northern boundary, ten territorial markings of badger dung, several push-throughs throughout the site, and no setts found.

No evidence of badger activity was recorded on site at the time of the updated survey, except several mammal push-throughs along central hedgerow. A pre-commencement badger survey should be undertaken on site prior to any site clearance or ground works, if there is a delay of works by six months from this this walkover survey (22<sup>nd</sup> March 2022).

### *Bats*

The previous PEA and phase 1 habitat surveys identified one 'moderate' bat roost potential (BRP) tree, and two 'low' BRP trees, all of which remain present on site and unchanged in their BRP (see Appendix 1). These trees will be retained and not impacted but the proposed development works.

The bat activity report (JBA, 2019c) found several bat species using majority of the hedgerow on site for foraging and commuting. The updated walkover survey noted that habitats on site, despite the loss of some semi-improved grassland and hedgerow towards the east of the site due to construction, still remain 'moderate' in their potential to support foraging and commuting bats.

Therefore, the recommendations as well as the compensation and avoidance measures within the bat activity report remain valid and should be followed to avoid long-term disturbances to this species.

### *Hedgehog*

Habitats on site still provide moderate suitability for hedgehogs due to hedgerows, scrub, field margins and undisturbed semi-improved grassland away from areas of active construction.

No evidence of activity was recorded at the time of the survey. However, precautionary clearance should be followed where vegetation is cut to 20cm and checked for the species prior to removal.

### *Water vole*

The previous PEA (JBA, 2019a) recorded no wet ditches onsite; however, at the time of the updated survey several ditches, particularly to the north, west and along the central hedgerow furthest west, were recorded as wet. The previous phase 1 habitat survey (JBA, 2018) also recorded these ditches as wet. Majority of these wet ditches were slow flowing and shallow and therefore are still considered unsuitable for water vole.

A habitat assessment for water vole was undertaken in October 2020 which concluded '*majority of the watercourse at the western boundary of the site is considered suitable or sub-optimal for water vole*' and that '*the proposed relief road development is unlikely to come within 10m of the suitable water vole habitat; however, works within 10m of the suitable habitats (if required) will be undertaken under the supervision of an ecologist*'. These observations remain unchanged, and the recommendations are still valid.

### *Dormice*

A previous survey for hazel dormice, conducted in 2019 (JBA, 2019d), found no evidence of activity within hedgerow habitat on site, despite species-rich, continuous hedgerow being highlighted in the previous PEA report. Results from the updated walkover survey show hedgerow have not increased in their suitability for dormice, with the previously mentioned species-rich hedgerow (G37 and G43) having

been cleared, and therefore results from the hazel dormice report remain valid and recommendations for post-construction habitat enhancement have been provided.

### *Birds*

Hedgerow and trees on site still provide good nesting and foraging opportunities for birds, with undisturbed semi-improved and tall ruderal fields away from construction in the east, also still considered suitable for ground nesting birds, with skylarks (*Alauda arvensis*), a Birds of Conservation Concern (BoCC) red listed species (RSPB, 2021), recorded at the time of the updated survey towards the northwest of the site, and also within the previous phase 1 habitat survey and breeding bird survey (JBA, 2018, 2019e). One pair of skylarks were recorded within the infrastructure red line boundary, within the POS NEAP area (as shown on appendix 2). The breeding bird survey highlighted the need for compensation for 7 pairs of skylarks, and this is currently in progress. Appendix 2 shows the indicative locations of skylark territories identified during the breeding bird surveys in 2019.

Furthermore, the wintering bird survey carried out in 2020 (JBA, 2020), confirmed several species wintering on site including skylark, with mitigation recommendations and enhancements provided.

Bird species recorded on site at the time of the updated survey included buzzard (*Buteo Buteo*), house sparrow (*Passer domesticus*), blackbird (*Turdus merula*), dunnoek (*Prunella modularis*), and great tit (*Parus major*). A population of starlings, a BoCC red listed species, was also recorded at the time of the survey within the southern scrub boundary. Therefore, the mitigation recommendations and enhancements highlighted within the breeding bird and wintering bird reports should be followed.

### *Reptiles*

The previous PEA and phase 1 habitat survey (JBA, 2019a, 2018) stated the semi-improved grassland and tall ruderal vegetation on site provided moderate quality habitat for reptiles. A reptile survey was carried out in 2019, which found no reptiles present on site (JBA, 2019f); however, a grass snake (*Natrix natrix*) was recorded during clearance work on Phase 2b in August 2021 under ecological supervision. Furthermore, two log piles and one brash pile was recorded at the time of the updated survey towards the western boundary, which provides suitable habitat. Any vegetation clearance or ground striping will need to be done under supervision of a licenced ecologist and following the provided reptile method statements.

### *Amphibians*

In the previous PEA (JBA, 2019a) four ponds were identified within 500m of the site boundaries. Pond 2 has been filled in, Pond 3 was inaccessible, Pond 4 was mostly dry and therefore unsuitable, and Pond 1 was still present and intact. The previous PEA and GCN eDNA survey (JBA, 2019g) calculated Pond 1 as having 'below average' habitat suitability index, and as no change has occurred in the interim. The GCN eDNA survey also found no GCN eDNA within any of the samples.

Hedgerow, scrub and semi-improved grassland was identified as potential sheltering and foraging opportunities for GCN, with log and brash piles recorded at the time of the updated survey offering further suitable habitat; however, due to the works undertaken in close proximity of Pond 1, it is unlikely that GCN would have populated here in the interim. It is therefore considered unnecessary to update the eDNA survey.

### *Invertebrates*

The previous report recorded the site as unlikely to support a diverse assemblage of invertebrates due to lack of plant diversity and poor semi-improved grassland. At the time of the updated survey, several butterfly and other insect pollinator species were recorded on site, as well as buddleia (*Buddleja davidii*) recorded across the site to the west - an important floral resource for these species. However, invertebrate surveys are deemed unnecessary as majority of the plant diversity remains limited.



### *Hedgerow*

The previous hedgerow survey report (JBA, 2019h) highlighted majority of hedgerows on site as species-rich, with four categorised as 'important' according to the criteria set out in the Hedgerow Regulations (1997). Changes to this habitat were recorded in the updated walkover survey, with hedgerows G37 and G43 partially removed, as per the tree removal plans (JBA, 2020a). The previous species-specific surveys mentioned above, highlight the importance of hedgerow habitat on site and therefore enhancements within the hedgerow survey report should be followed. Replacement species-rich native hedgerows are to be provided within the site as a whole to mitigate for the loss of these habitats.

### *Flora*

Sulphur clover (*Trifolium ochroleucum*), a nationally scarce species and listed as 'near-threatened' on the current red data list for vascular plants in Great Britain, has been identified within previous reports (JBA, 2018, 2019a). As a result, a sulphur clover translocation and working method statement has been issued (JBA, 2022), with the sulphur clover clump clearly delineated and awaiting translocation in April – May, under supervision of an ecologist. Post-location monitoring and management information has also been provided in this report. During supervised clearance works in relation to Phase 6, another small area of sulphur clover was identified and fenced off for protection. No other rare or protected species were observed on site at the time of the updated walkover survey.

### *Evaluation Conclusion*

No additional evidence, from the previous surveys, of other protected species on, or using, the site was observed at the time of the survey. The site is still considered suitable for badgers, breeding birds, wintering birds, foraging bats, hedgehog and potentially reptiles and GCN.

No changes to these species, in terms of their activity on site, were observed from the previous reports and repeated survey results are unlikely to differ from those undertaken in 2019/2020; therefore, it is considered that all survey data remains valid. If there is a delay of development by over 2 years, then another ecological walkover should be undertaken to note any changes in the interim and further species surveys may be required.

### Precautionary Measures

Any vegetation clearance and disturbance (including hedgerow maintenance) should be undertaken outside of the nesting season, although timing considerations for reptiles should also be noted. The nesting season is deemed to be from mid-March to mid-August (times can be temperature dependent). If this is not possible, a nesting bird check must be carried out by an ecologist, no more than 48 hours between the check and the removal. If the 'all clear' is given, then removal/works can commence. The survey lasts for no longer than 48 hours. If works are not completed in this time frame, then a re-survey will need to be carried out.

The above precautionary measures should also be undertaken in relation to edge of parcel clearance to facilitate works associated with the infrastructure phase.

All vegetation clearance works should be undertaken when common reptiles are likely to be fully active (i.e. during March/April to October) to avoid any chance of disturbing reptiles during the sensitive hibernation period.

Clearance of tall vegetation (>10cm) would be undertaken using a strimmer or brush cutter in two parts; the first to be cut down to 20cm, then checked by an Ecological Clerk of Works (ECoW) for the presence of any wildlife. The vegetation will then be cut to ground level under the supervision of an ECoW. The cuttings will be raked and removed the same day it is cut and under the supervision of an ECoW.

The trees with BRP are to be retained as part of the proposed development, however if any maintenance works are required then an ECoW should be present during works and a toolbox talk should be provided to site personnel prior to the maintenance works in relation to bats and roosts.

### Enhancements

The recommendations and enhancements within the preliminary ecological appraisal (2019a) remain relevant and should be followed.

The following general principles for enhancement are recommended, in line with current planning practice and policy:

- Where possible, trees and hedgerows at the boundaries of the site should be retained and enhanced to create corridors and shelter/foraging areas for wildlife including birds, bats, reptiles, badgers and hedgehogs. Planting of native hedgerow species in gaps and on boundaries without hedgerows, for example along the northern boundary, will provide further opportunities for these species.
- Lighting should be designed so as to not shine directly into any boundary hedgerows with respect to potential bat habitat. Information on lighting is readily available from the Bat Conservation Trust (2018) (Guidance Note 08/18), Bats and the Built Environment series. It is recommended that a lighting strategy is agreed with the Local Planning Authority based upon this information.
- The addition of bat and bird boxes on the proposed buildings or retained trees within the site would provide additional roosting and nesting opportunities. Recommendations of appropriate boxes will be provided once the recommended bat and breeding bird surveys are completed, to ensure boxes are tailored to the site.
- Landscaping should incorporate native or wildlife attracting trees, shrubs, and wildflower areas as these would likely be of benefit to a variety of wildlife including, birds, bats and invertebrates.
- 'Hedgehog links' (i.e., 15cm diameter gaps at the base of fences) within the final design, will allow hedgehogs to move freely across gardens and public open space (POS) areas once construction has concluded.
- Woodpiles should also be included within POS areas to provide hibernacula for hedgehogs on site.

### Conclusion

An updated ecological walkover survey was undertaken on the 22<sup>nd</sup> March 2022 of land at Haverhill, Suffolk. Habitats on site have seen some change due to ongoing construction works towards the east of the site; however, remaining habitats have not significantly changed since the PEA (2019) and phase 1 habitat survey (2018).

No further surveys for protected species are considered necessary. However, precautionary measures for site clearance should be taken in relation to breeding birds, reptiles and hedgehogs, and the mitigation measures provided within the PEA (JBA, 2019) and subsequent species-specific reports, should be followed.

If works do not begin within 2 years of this survey, another walkover survey will be required to note any changes in the interim.

Yours sincerely,

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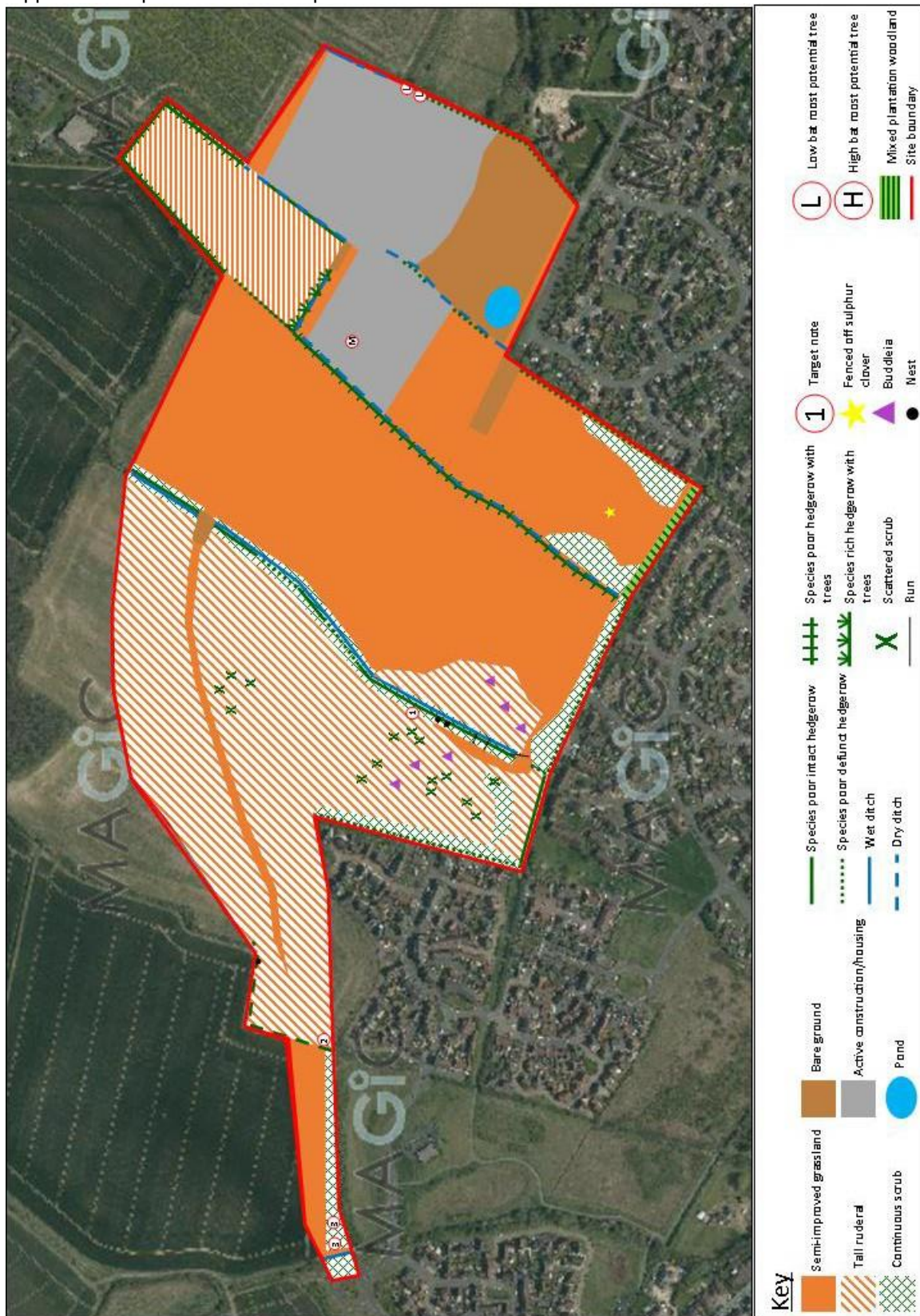
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- JBA (2019c) *Bat Activity Survey Report of Phases 2-6 and Relief Road, Haverhill, Suffolk on behalf of Persimmon Homes (Suffolk)*
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- JBA (2020a) *Tree Removal Plan AMS Infrastructure Rev J-TR03*
- JBA (2020b) *Wintering Bird Survey of Phases 2-6 and Relief Road, Haverhill, Suffolk on behalf of Persimmon Homes Suffolk*
- RSPB (2021) *Royal Society for the Protection of Birds 'BIRDS OF CONSERVATION CONCERN 5 – SUMMARY'*



## Appendix

## Appendix 1: Updated Habitat Map





## Appendix 2: Indicative skylark pair locations

