JAMES BLAKE ASSOCIATES

Our Ref: JBA 18/351 ECO44 AW

6th February 2025
7th February 2025- Rev A

Isaac Jolly,
Persimmon Homes (Suffolk)

RE: Ecological Walkover Survey of Haverhill Phases 4a, 4b and 5b, Suffolk

Introduction and Background

James Blake Associates Ltd. (JBA) was instructed by Persimmon Homes (Suffolk) to undertake an ecological walkover survey for Haverhill Phases 4a, 4b and 5b, Suffolk to assess the potential for protected species and invasive & non-native species and provide a report summarising the findings of the walkover survey. The report, highlights any significant constraints associated with the proposed residential development in the context of the site.

The development site mainly consists of sparsely vegetated land, modified grassland with tall ruderal vegetation and scattered patches of bramble scrub with artificial unvegetated unsealed surface running through the centre. Other habitats found within the red line boundary include mixed scrub (western boundary), individual trees and a native hedgerow along the western boundary separating the site from the existing residential dwellings found within Mason Close. See Appendix A for UKHab habitats map.

The immediate environment includes residential development to the south and west, with an active construction site to the north and east. The wider landscape consists mainly of agricultural fields with boundary hedgerow to the north, west and east. Norney Plantation County Wildlife Site (CWS), an area of ancient, replanted woodland, is situated approximately 0.1km to the north with smaller patches to the northeast and west.

The development site is located within the town of Haverhill, Suffolk, and 1.5km south-east of the village of Withersfield. The A1307 is located 0.57km to the south of the site boundary. See Figure 1 for site location.

Figure 1: Buildings and land surveyed

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Previous Ecological Assessment

A Preliminary Ecological Appraisal (PEA) encompassing the whole development, including phases 4a, 4b and 5b, was undertaken by JBA in 2019. This PEA identified the habitats across the whole site as:

'*fields of poor semi-improved grassland with false oat-grass (Arrhenatherum elatius) and meadow-grasses (Poa spp), and tall ruderal with amenity grassland margins. Defunct species-poor hedgerow vertically separates field margins. Along the northern boundary is an intact species-rich hedgerow with dense scrub mostly comprising bramble (Rubus fruticosus). The southern boundary hedgerows are intact species-poor and defunct species-poor with dense scrub. Hedgerows are dominated by common hawthorn (Crataegus monogyna), blackthorn (Prunus spinose) and field maple (Acer campestre) with scattered pedunculate oak (Quercus robur) and elm (Ulmus sp.). Dry ditches separate four of the fields; a dry ditch on the north-eastern boundary leads to a pond. A newly planted mixed plantation is located along the southern boundary adjacent to Moneypiece Close with a row of semi-mature field maple and elm and common ash (Fraxinus excelsior)'*

An updated ecological walkover of phases 4a, 4b, 5a, 5b, 5c and associated areas of SUDS/LEAP/NEAP/POS (JBA, 2023) highlighted that the majority of the habitats identified within the areas associated with these phases, as part of the previous PEA, had seen changes in the constituent habitats including the following notable changes:

- clearance of the relief road to the north of Phases 4A and 5B in August/September 2022;
- partial removal of species-rich hedgerows G22, G29 and G30 as per the tree removal plans (JBA, 2020a) for two access roads in November 2022; and
- clearance of poor semi-improved grassland and tall ruderal vegetation along the access road to the south-east of Phases 5A/C in November 2022.

Updated Ecological Assessment

Habitats found during the site visit included:

- Artificial unvegetated unsealed land
- Sparsely vegetated land
- Mixed scrub,
- Bramble scrub
- Modified grassland with ruderal vegetation
- Native Hedgerow with trees

The ecological walkover survey was undertaken on 26th November 2024 by Alex Ward BSc (Hons). This report is intended to give an overview of the baseline habitat(s) present on site, the habitat condition at the time of the survey and recommendations for site clearance.

The survey methodology followed the standard UKHab Habitat Classification (2023) An extension of this basic methodology was also undertaken to identify any constraints associated with notable or protected habitats that maybe present within the survey area, or the sites suitability to support notable or protected species (CIEEM, 2017.

The baseline conditions reported in this document represent those identified at the time of the survey on 26th November 2024. Although a reasonable assessment of the 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, 2024 (NPPF).

Results and Evaluation

The habitats within the area surveyed predominately consisted of artificial unvegetated unsealed surface (currently used as a digger track) along a central band through the site, sparsely vegetated land to the north and modified grassland. Patches of bramble (*Rubus fruticosus agg.)* scrub can be found throughout the modified grassland with an area of dense mixed scrub along the northeast boundary associated with a wet ditch which runs through the centre. Other habitats found within the site boundary consist of native hedgerow with standard trees on the western boundary. See Appendix B below for detailed photos and descriptions.

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Bats

At the time of the walkover survey, two individual oak (*Quercus robur)* trees were present. Both trees were assessed for bat roosting suitability and were deemed to have a suitability of NONE (Collins, 2023) for roosting bats due to the age class of the trees (young) and a lack of suitable features capable of supporting roosting bats for example ivy cover.

The previous overarching PEA for the wider site boundary (JBA, 2019a) classified the habitats within survey area as 'moderate' for foraging bats. A bat activity survey for the wider site (JBA, 2019) identified that a total of five bat species including common pipistrelle (*Pipistrellus pipistrellus)* and barbastelle (*Barbastellus barbastellus)* were using the hedgerows and grassland for foraging and commuting and set out appropriate compensation such as the creation of hedgerow throughout the site. Since the 2019 reports, an updated ecological walkover was undertaken (JBA, 2023) which concluded that the site offered 'moderate' suitability for foraging and commuting bats despite the removal of sections from hedgerow G22, G29 and G30 since the initial PEA and bat activity surveys were undertaken.

The updated ecological walkover survey, carried out in November 2024, concurred with the findings of the 2023 walkover survey, in concluding that the survey area continued to hold 'moderate' suitability for foraging and commuting bats. The hedgerows with trees and dense scrub are considered to be suitable flight paths however, due to the active construction, taking place within the wider site, the dense scrub connecting to the wider landscape has become fragmented. Additionally, the sparsely vegetated land and artificial unvegetated land offer negligible foraging opportunities for bats while the modified grassland provides foraging habitat of 'low' suitability for this species group.

The compensation and avoidance measures outlined in the bat activity report (JBA, 2019) and the ecological design strategy (JBA, 2023b) should be followed to avoid long term disturbances.

Badgers

The sparsely vegetated land and artificial unvegetated land offer no suitable habitat for badgers due to the lack of suitable cover, however, the modified grassland habitats provide suitable habitat for foraging. The hedgerow and dense mixed scrub offer more suitable habitat providing suitable cover for sett creation.

The immediate landscape has become fragmented particularly to the east due to the adjacent active construction site, however, the remaining landscape offers habitats of greater suitability for badgers including parcels of woodland (98m north) and arable fields (140m north) with some fragmented connectivity to the site.

The previous ecological walkover survey (JBA, 2023a) identified a badger print along the proposed relief road and snuffle holes were recorded within the modified grassland during this updated walkover survey. However, no setts or other activity was noted during the most recent walkover visit. Given the previous and current evidence, supporting the presence of badgers, it is concluded that badgers use the site for foraging and commuting purposes and are likely have a sett within the local landscape. No setts were identified within the site boundary or within 30m of the site boundary.

Mammals (other)

The site offers 'moderate' habitat for hedgehogs (*Erinaceus europaeus)* due to the modified grassland; bramble scrub, mixed scrub and hedgerow that provide suitable shelter and foraging habitats for this species. The sparsely vegetated land and artificial unvegetated land holds negligible suitability for this species, due to the previous and current use of the habitat. No evidence of hedgehogs were recorded during the walkover survey.

A fox (*Vulpes vulpes)* was recorded during the site walkover visit within the sparsely vegetated land. No fox dens were noted within or near the site boundary, however, the confirmed presence of this species would imply that an active fox den lies within the local landscape. It should be noted that no fox dens were located within the site boundary itself.

Water vole (*Arvicola amphibius*)

The wet ditch located on the eastern boundary runs through the centre of dense mixed scrub and is considered to be slow flowing and shallow and shallow banks with no suitable plant flora for foraging, it is therefore considered unsuitable for water vole due to the heavy shading created by the scrub as well as the lack of suitable foraging opportunities. No evidence of water vole was found during the walkover visit.

Dormice

The previous PEA (JBA, 2019a) indicated that the wider site held suitability for hazel dormice (*Muscardinus avellanarius)* largely due to the unmanaged nature of the hedgerows which provide connectivity to the wider landscape supporting suitable habitat such as woodland. Within the surveyed area, the hedgerow present along the western boundary were noted as having gaps within the canopy which reduce the suitability of this habitat for hazel dormouse, however, the mixed scrub along the eastern boundary provides suitable cover and foraging opportunities and is considered suitable for this species. The dense scrub has become fragmented from the suitable habitat woodland habitat 98m to the north which has reduced the suitability of the habitat for the species making the presence of dormice unlikely.

Birds

The updated walkover (JBA, 2023a) recorded nineteen bird species including one schedule one species (WCA, 1981), red kite (*Milvus milvus)*, four red listed species including skylark- (*Alauda arvensis)* and six amber listed species including dunnock (*Prunella modularis)*. It was noted during the walkover survey that skylark was present within phase 5a of the development and the mitigation recommendations outlined in the breeding bird survey (JBA, 2019d) and wintering bird survey (JBA, 2020b) reports should be followed.

The hedgerow and dense scrub surrounding the site provides suitable habitat for nesting and foraging birds. The modified grassland offers suitable habitat for ground nesting birds such as skylark, however the current disturbance within the site boundary as well as the immediate landscape reduces the suitability for ground nesting birds. See table 1 for a summary of the birds identified during the walkover visit.

Figure 1: Birds identified during the walkover visit

Common name	Latin name
Kestrel	*Falco tinunculus*
Woodpigeon	*Columba palumbus*
Swift	*Apus apus*
Jackdaw	*Coloeus mondedula*
Blackbird	*Turdus merula*
Goldfinch	*Carduelis carduelis*
Robin	*Erithacus rubecula*
Chiffchaff	*Phylloscopus collybita*
Magpie	*Pica pica*
Skylark (different phase)	*Alauda arvensis*
Starling	*Sturnus vulgaris*
Blue tit	*Cyanistes caeruleus*
Carrion crow	*Corvus corone*
Meadow pipit	*Anthus pratensis*
Wren	*Troglodytes troglodytes*

Reptiles

A reptile survey was undertaken by JBA in 2019 (JBA, 2019b) which concluded that no reptiles were present within the site boundary however, a grass snake (*Natrix helvetica* was recorded during subsequent clearance work undertaken by JBA in August 2021. The previous ecological walkover undertaken by JBA in 2023 (JBA, 2023)

outlined that phases 4a and 4b had suitable habitat for reptiles and vegetation clearance should be undertaken under the supervision.

The modified grassland continues to offer suitable habitat for reptiles with the hedgerow, scattered bramble scrub and mixed scrub all offering suitable cover, hibernation and basking opportunities. The artificial unvegetated land separates the two patches of modified grassland, however, this does provide a habitat edge suitable for basking. Additionally, the presence of earth mounds further enhances the suitability of the habitat for this species.

Amphibians

Two ponds were identified within 250m during the desk study search. Pond 1 is a Sustainable Urban Drainage System (SuDS) attenuation pond and is located adjacent to the northern boundary. Pond 2 (referred to as Pond 4 in the PEA) is located 240m northeast of the site boundary. A HSI assessment (Oldham et al., 2000) was undertaken for Pond 1 which concluded that the pond held 'good' suitability for breeding great crested newts (GCN) (*Triturus cristatus)*. Pond 2 was not assessed at the time of the walkover survey due to time constraints however, the previous PEA (JBA, 2019a) and the ecological walkover (JBA, 2023a) classified the pond as dry.

The hedgerows, scrub and modified grassland provide suitable sheltering and foraging opportunities for GCN.

Invertebrates

The modified grassland and sparsely vegetated land are unlikely to support a notable assemblage of invertebrates due to the lack of habitat diversity however, the areas of scattered scrub, mixed scrub and hedgerows provide suitable habitat for common species of invertebrates such as butterflies and bumblebees.

Flora

Sulphur clover (*Trifolium ochroleucum)*, a nationally scarce species had been previously identified on site and reported (JBA, 2019a), however, these records solely pertain to phase 6. No rare or protected plant species were recorded during the site visit; however, the walkover survey was conducted outside the optimal period for botanical surveys.

Invasive species such as Japanese knotweed (*Fallopia japonica)* were not identified within the site boundary however, buddleia (*Buddleja davidii)* was abundant throughout phase 5a.

Plant species, such as cocks foot (*Dactylis glomerata)*, bramble, curled dock (*Rumex crispus)*, dog rose (*Rosa canina)*, bristly oxtongue (*Helminthotheca echioides)*, broadleaved dock (*Rumex obtusifolius)*, cut leaved cranesbill (*Geranium dissectum)*, greater plantain (*Plantago major)*, spear thistle (*Cirsium vulgare)*, oak, great willowherb (*Epilobium hirsutum)*, meadow foxtail (*Alopecurus pratensis)*, yarrow (*Achillea millefolium)*, blackthorn (*Prunus spinosa)*, buddleia, pine (*Pinus sp)*, silver birch (*Betula pendula)*, hazel (*Corylus avellana)*, hogweed (*Heracleum sphondylium)*, strawberry clover (*Trifolium fragiferum)*, perennial rye grass (*Lolium perenne)* and common dogweed (*Heracleum sphondylium)* were all recorded on site.

Table 2: Target Notes

Reference	Description	Photo
1	Deer slots	

Reference	Description	Photo
The 2	Snuffle hole	

Recommendations/Mitigation

Table 3. Impact and Recommendations

Ecological receptor	Anticipated ecological impact	Recommendations
Habitats	The loss of habitats particularly the modified grassland, young, scattered trees and patches of bramble scrub are considered to be of low ecological value. The mixed scrub running along the eastern boundary is considered of moderate ecological value.	It is recommended that the scrub habitat is retained as part of the development, wherever possible.
Bats	The addition of external lighting could dissuade bats from using the boundary habitats such as the western hedgerow and eastern dense scrub for commuting and forging.	Bat boxes should be installed on new buildings within the site to provide roosting opportunities for this species group. A sensitive lighting design strategy should be implemented across the site.
Birds	Loss of grassland habitat which could be used by ground nesting birds as well as the loss of scrub habitats which could be used by nesting birds. If the mitigation recommendations are followed any residual impacts are unlikely to be sigficant.	**Vegetation clearance** It is recommended that any vegetation clearance and disturbance is undertaken outside of the nesting season, or following a pre-commencment bird check by an ecologist. The nesting season is deemed to be from March to September, although these times can be temperature dependent. Bird boxes can also be placed on the new residential units. The specification of the bird box scheme will be covered in more detail in the ecological enhacement strategy.
Reptiles	Loss of suitable foraging and sheltering habitat for reptile species. No significant impact anticipated.	**Vegetation clearance** Any vegetation or ground clearance activities should be carried out under the supervision of an ecologist and following the reptile method statements, previously used to facilitate the ground clearance on previous phases (2B,3B, 5C and 6).

Ecological receptor	Anticipated ecological impact	Recommendations
	Should reptiles be present, site clearance could result in the death or injury of individual reptiles.	Clearance of tall vegetation (>20cm) should be undertaken using a strimmer or brush cutter in two parts; the first cut down to 20cm, then checked by an Ecological Clerk of Works (ECoW). The vegetation can then be cut to ground level under the supervision of the ECoW. **Refuge Creation** Hibernacula and/or log piles could be installed within the public open space/green spaces to provide suitable shelter for these groups.
Amphibians	If GCN occupy Pond 1 adjacent to the northern boundary, then the species is likely to use the development for during their terrestrial phase. Should GCN be present, site clearance could result in the death or injury of individual GCN.	Further surveys are recommended and/or the development should join the District Level Licence (DLL) Scheme. To determine the presence/likely absence of GCN the waterbodies within 250m of the site should be subject to an HSI assessment. Where the HSI identifies that the ponds are suitable for GCN subsequent eDNA analysis should be undertaken. If the waterbodies provide a positive result for GCN presence, then the site should be covered under District Level Licensing (DLL). The site occurs within the green zone (as confirmed by Natural England's risk zone mapping).
Mammals – other	Clearance of modified grassland and scrub habitats to facilitate the development will result in the removal of foraging habitat for mammal species.	**Vegetation clearance** Precautionary methods for habitat clearance to protect small mammals during the course of the works will be required: Any scrub and/or dense vegetation which requires removal should first be cut to 20cm and checked for the presence of any sheltering animals prior to vegetation being cut to ground level. **Habitat connection** 'Hedgehog links' (i.e. 15cm diameter gaps at the base of fences) are recommended along the site's northern boundary and along any other fence installed (such as the proposed fence separating the two dwellings) to enable hedgehogs and small mammals to move throughout the development.

Conclusion

An ecological walkover survey was undertaken on 26th November 2024 to support the proposed development of residential dwellings at Haverhill Phases 4a, 4b and 5b, Suffolk.

Since the PEA (JBA, 2019a) and subsequent walkovers (JBA, 2023) the habitats, especially the modified grassland, have become degraded, particularly within the northern section of the site, largely due to the impact of past plant and vehicle movements associated with the adjoining construction site. Despite this the site still has the potential to support protected species such as reptiles, breeding birds and GCN.

A further assessment for GCN with regard to Pond 1 is considered necessary as well as a pre-commencement badger survey which should be undertaken on site prior to any site clearance.

All precautionary measures, pertaining to breeding birds, reptiles, GCN and badgers, outlined within this report, as well as the mitigation measures outlined within the PEA (JBA, 2019a) and subsequent reports should be followed.

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

Yours sincerely,

Alex Ward
Assistant Ecologist
James Blake Associates

References

Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: good Practice Guidelines (4th Edition). The Bat Conservation Trust, London. ISBN-978-1-7395126-0-6

James Blake Associates (2019a) *Preliminary Ecological Appraisal of Haverhill Phases 2-6, Suffolk.* On behalf of Persimmon Homes (Suffolk).

James Blake Associates (2019b) *Reptile Survey of Haverhill Phases 2-6, Suffolk Rev A.* On behalf of Persimmon Homes (Suffolk).

James Blake Associates (2019c) *Bat Activity Survey Report of Haverhill Phases 2-6, Suffolk Rev A.* On behalf of Persimmon Homes (Suffolk).

James Blake Associates (2019d) *Breeding Bird Survey of Haverhill Phases 2-6, Suffolk Rev A.* On behalf of Persimmon Homes (Suffolk).

James Blake Associates (2020a) *Reptile Precautionary Method Strategy for Haverhill Phase 2 (A& B), Haverhill, Suffolk Rev A.* On behalf of Persimmon Homes (Suffolk).

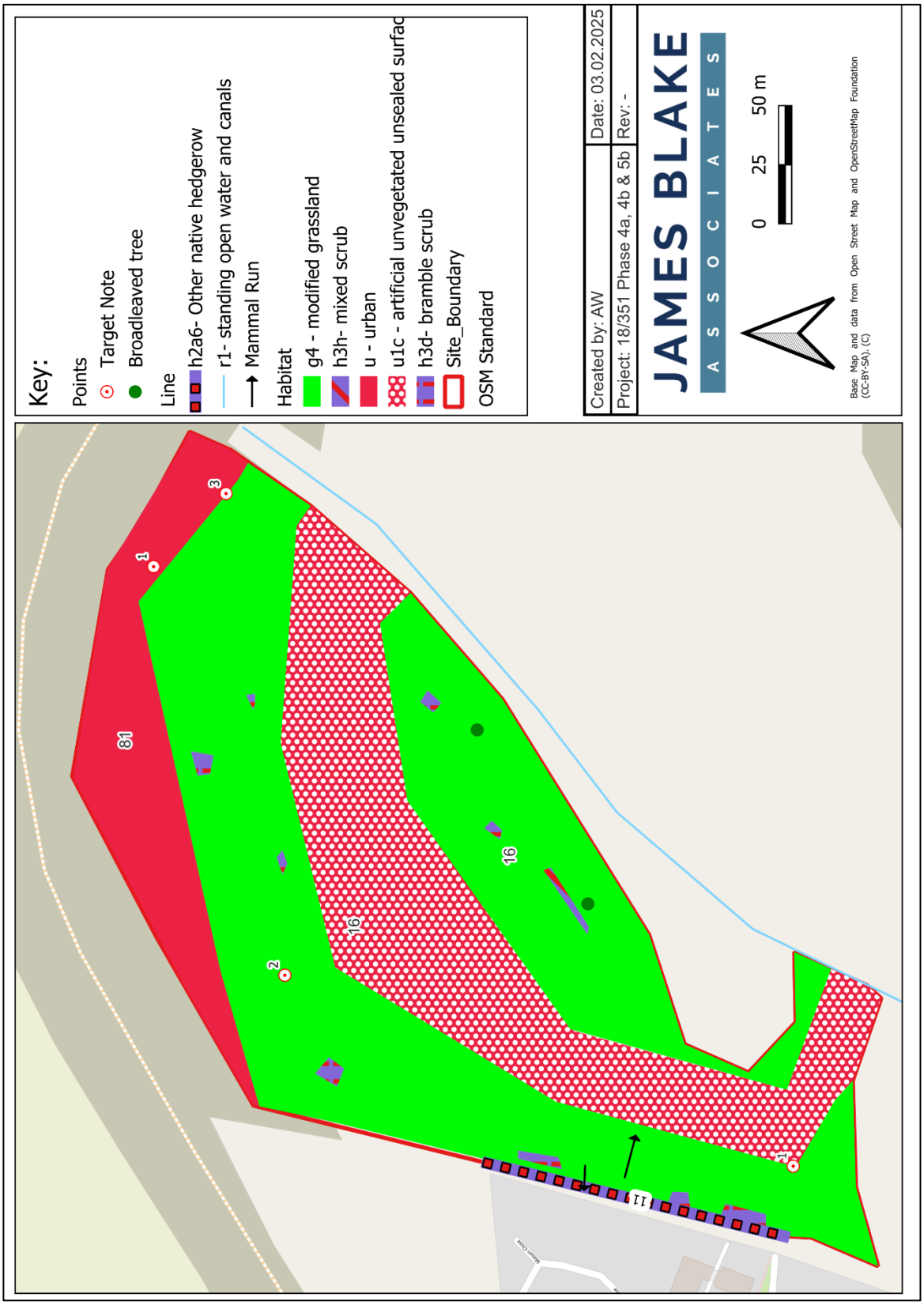
James Blake Associates (2020b) *Wintering Bird Survey of Haverhill Phases 2-6, Suffolk.* On behalf of Persimmon Homes (Suffolk).

James Blake Associates (2023a) *Updated Ecological Walkover Survey of Phases 4A, 4B, 5A, 5B, 5C and associated areas of SuDS/LEAP/NEAP/POS at Haverhill, Suffolk*. On behalf of Persimmon Homes (Suffolk)

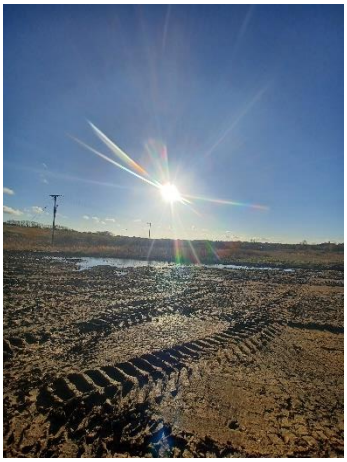
James Blake Associates (2023b) *Ecological Design Strategy for Proposed Infrastructure at Haverhill, Suffolk* Rev C. On behalf of Persimmon Homes (Suffolk)

James Blake Associates (2024) *Updated Ecological Walkover Survey of Phases 5A and 5C and associated areas of SuDS/LEAP/NEAP/POS at Haverhill, Suffolk*. On behalf of Persimmon Homes (Suffolk)

Appendix A. Habitat Map



Appendix B. Photographs of site

Description	Photograph
Modified grassland with ruderal vegetation and patches of bramble scrub	 
Artificial unsealed unvegetated land	 
Sparsely vegetated land	

Description	Photograph
Dense mixed scrub