



12th November 2024

Penny Mills
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Western Way
Bury St Edmunds
Suffolk IP33 3YU

By email only

Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform West Suffolk Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Application: DC/24/1452/RM
Location: Zone D1 Land Ne Haverhill Wilsey Road Little Wratting Suffolk
Proposal: Reserved matters application - a. submission of details under DC/15/2151/OUT for access, appearance, landscaping, layout, and scale of the local community centre (Class F2(b)) within Parcel D1 pursuant to outline permission DC/15/2151/OUT, comprising community space which will also provide cafe, office, retail and nursery space (Class E) with associated internal roads, car and cycle parking, mobility hub, landscaping, play space, public open space and servicing, including detail reserved by conditions 4, 6, 9, 10, 28, 31, 37, 38 and 44 of DC/15/2151OUT

Dear Penny,

Thank you for consulting Place Services on the above Reserved matters application, including the detail required by conditions 4, 6, 9, 10, 28, 31, 37, 38 and 44 of DC/15/2151/OUT. We can only comment on conditions relating to ecology matters.

No objection to DC/24/1452/RM

Condition 4 of DC/15/2151OUT (updated ecology surveys) - Part discharge recommended

"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."



Condition 44 of DC/15/2151OUT (Lighting Strategy for Bats): **Further information required**

“All reserved matters applications shall be supported by a lighting strategy for bats based on appendix 4.3 of the ES and the mitigation measures in the relevant sections of the ES and additional supporting reports. The lighting strategy must include: Plan of the phase of development being considered showing the lighting strategy and how it relates to the overall lighting strategy in figure 30 in the ES Location of features to be protected including existing and new linear features and associated unlit dark corridors or buffer Location and design of bat boxes, bricks and/or tubes to new buildings, woodland edges and suitable trees.”

Summary

We have reviewed the documents listed below, supplied by the applicant, relating to the likely impacts of development on protected & Priority species and habitats and identification of proportionate mitigation not already secured at outline stage.

- Letter from FPCR dated 15th February 2024 (ref: 5055E/SAJH) and entitled ‘5055 – UNIT D1, GREAT WILSEY PARK, HAVERHILL - CONDITION 4 OF DC/15/2151/OUT’;
- Environmental Impact Assessment (EIA) Statement of Conformity (SoC) (Bidwells, September 2024);
- Design and Access Statement Part 7. Landscape Strategy (Pollard Thomas Edwards);
- Lighting Impact Assessment ref: 25595-R-01 (HDS, June 2024);
- Outdoor Lighting Report (HDS, 3rd June 2024);
- Proposed Lighting and Installation Design Layout Drwg No: 25595-D-01 Rev. A (HDS).

We are satisfied that there is sufficient ecological information available to support determination of this application. As the outline application for this development was submitted prior to 12th February 2024, this reserved matters application is not subject to mandatory biodiversity net gain requirements.

This provides certainty for the LPA of the likely impacts on protected and Priority species & habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

This part of the site was initially recorded as a part of an arable field and is now clear of vegetation, except for some ruderal vegetation. The above reference letter from FPCR has advised that “the findings, conclusions, recommendations and mitigation as outlined within the reports produced by FPCR to accompany the outline application (reference: DC/15/2151/OUT) remain valid, and further protected faunal species surveys are not considered necessary”.

The application includes the submission of details for Condition 4 (updated ecology surveys), Condition 9 (Ground Levels, Services, & Hard Surfacing), Condition 6 (Storage of Refuse), Condition 10 (Noise), Condition 28 (Manoeuvring and Parking of Vehicles), Condition 31 (Workplace Travel Plan), Condition 37 (Foul Water Strategy), Condition 38 (SuDS) and Condition 44 (Lighting Strategy for Bats).

We recommend that **condition 4** of DC/15/2151/OUT can be part discharged with respect to this parcel, providing the vegetation is kept short and the development starts within 1.5 years from the date of the survey (February 2024).



This application does not include details required for condition 42 of DC/15/2151/OUT which requires an ecological implementation strategy for each phase:

“No development shall take place on any phase or reserved matters application (including demolition, archaeological investigation, ground works and vegetation clearance) until an ecological implementation strategy for that particular phase or reserved matters application addressing the mitigation measures set out in Volume 2 Section 9 of the Environmental Statement dated September 2015, relevant appendices and subsequent Addendum document May 2016 has been submitted to and approved in writing by the local planning authority.....”

Therefore, we consider that any ecological mitigation or enhancements for the wider site and the landscaping proposed in this parcel is unclear. We therefore recommend that condition 42 should be submitted (and discharged) prior to- or concurrent with- any granting of approval relating to DC/24/1452/RM.

Notwithstanding this, we have referred to the Habitat Creation Plan (Drwg No: 5055-L-113 Rev B) and note that there is no habitat creation proposed on this plan for the area within the red line boundary.

The DC/24/1452/RM site is not adjacent to an identified dark corridor route, but is located between two and is between the woodland to the north west and the central open space, creating a potential opportunity for habitat connectivity between the two for the movement of wildlife e.g. bats.

A community orchard, and some swathes of wildflower planting are proposed and the Planning Statement (para 3.27) advises that, *“The strategy seeks to integrate the Site into the wider green infrastructure provision, particularly the Linear Park located to the east of Parcel D1, whilst also providing a mixture of spaces which will seek to enhance biodiversity”*. However, we would advise that, while the community orchard and wildflowers will no doubt provide human-related and ecological benefits, they would be more ecologically beneficial if there was a continuous habitat link to the linear park to the east, or at least to other areas of habitat.

We also recommend that bird boxes and hedgehog homes, and additional bat boxes, and are provided for Parcel D1.

Condition 44 - Further information required.

We have reviewed the lighting documents including:

- Lighting Impact Assessment ref: 25595-R-01 (HDS, June 2024);
- Outdoor Lighting Report (HDS, 3rd June 2024);
- Proposed Lighting and Installation Design Layout Drwg No: 25595-D-01 Rev. A (HDS).

The report advises that *“Two Ibstock Bat Boxes (design B or C) will be integrated into the south-facing aspect of the Nursery close to the wall top...”* Their locations should be shown clearly on a plan, as required by condition 44 (*“Location of features to be protected...”*).



While lux levels are adequately low on the plans provided, the ILP Guidance Note 8/23 recommends that lighting for bats should be less than 2700K, rather than 3000K proposed. Furthermore, bollards are no longer recommended by this Guidance, unless as a last resort with sufficient justification.

The lighting reports do not explicitly refer to the Bat Lighting Mitigation Strategy (Figure 30) or how they relate to the overall lighting strategy. It is not clear how the proposed new habitats overlay with low level lighting in order to help provide a connection to identified dark corridor routes for nocturnal wildlife (e.g. bats and Badger), e.g. the central open space or woodland to the northwest. Having said that, the location is not actually on or adjacent to an identified dark corridor route.

We therefore recommend that additional information is required as set out above, in relation to lighting required for condition 44 prior to discharge of this condition for Parcel D1.

Other conditions of DC/15/2151/OUT

Condition 12

As advised in para 7.21 of the Environmental Impact Assessment Statement of Conformity, Condition 12 of DC/15/2151/OUT requires a Construction Method Statement, including biodiversity measures, ie:

"No development shall take place within any phase or reserved matters application, including any works of demolition, until a Construction Method Statement for that particular phase or reserved matters application has been submitted to, and approved in writing by, the Local Planning Authority....."

Condition 7

We draw your attention to Condition 7 of DC/15/2151/OUT which requires a Landscape and Ecological Management Plan:

"No development shall commence within any phase or reserved matters application until a Landscape and Ecological Management Plan (LEMP) for that phase or reserved matters application has been submitted to and approved in writing by the local planning authority...."

We anticipate that these documents will be still be provided for part discharge prior to commencement, as required for DC/15/2151/OUT.

With the measures in place, including those for condition 7 and 12, this will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006 (as amended).

Impacts will be minimised such that the proposal is acceptable, subject to the conditions below based on BS42020:2013. We recommend that submission for approval and implementation of the details above.

Please contact us with any queries.



Yours sincerely,

Emma Simmonds MCIEEM BSc (Hons)

Ecological Consultant

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Place Services provide ecological advice on behalf of West Suffolk Council

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.