



Our Ref: JBA 18/351 ECO20 SM

4<sup>th</sup> November 2021

Isaac Jolly  
On behalf of Persimmon Homes (Suffolk)

Dear Isaac,

**RE: Ecology walkover survey report for Phases 6 at Haverhill, Suffolk.**

James Blake Associates Ltd was commissioned by Persimmon Homes Suffolk to undertake an updated ecology walkover survey to assess the potential for protected species and invasive & non-native species and provide a letter report to summarise the findings of the walkover survey, noting any changes since the previous walkover and highlighting any significant constraints for phase 6 at land at Haverhill, Suffolk.

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, 2019 (NPPF).

**Introduction and Background**

The site is located on the edge of the town, to the north east of Haverhill, Suffolk. There are residential areas bordering the site to the south, and further to the east and west. The land to the north is largely former agricultural land (Phase 3A), with the A143 to the south-east and the A10307 to the south-west. The upper reaches of the River Stour lie to the east and the wider landscape is dominated by residential, industrial and arable land, with some semi-improved grassland, mixed and broadleaved woodland (see Figure 1).

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**Figure 1: Site location**

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An ecological walkover survey was conducted on the 29<sup>th</sup> October 2021 by Sean Minns BA (Hons), to note any changes since the previous Preliminary Ecological Appraisal (PEA) undertaken by James Blake Associates (JBA) in 2019 and the further phase 2 surveys of 2019 and 2020.

Previous phase 2 surveys were undertaken on the site in 2019 and 2020, which included bat (activity), [REDACTED] breeding bird, wintering bird, reptile, hazel dormouse (*Muscardinus avellanarius*) and botanical surveys. This report should be read in conjunction with the PEA and specific species surveys.

The baseline conditions reported and assessed in this document represent those identified at the time of the walkover survey on the 29<sup>th</sup> October 2021. Although a reasonable assessment of habitats present can be made during a single walkover survey, seasonal variations are not observed. The walkover survey was conducted in October, which is outside the optimal season for Phase 1 habitat surveys, however this is not considered a significant constraint. All areas were accessible during the time of the survey and at times were viewed externally.

The validation period for this letter is 2 years from the date of the survey 29<sup>th</sup> October 2021.

## Results and Evaluation

The site itself has not changed significantly since the previous PEA (JBA, 2019) and ecological surveys of 2019 and 2020. The site is a former agricultural field bordered by a ditch to the south

and hedgerows on three sides (except for the eastern boundary) which have begun to return to nature and is essentially scrub and semi-improved grassland with tall ruderal encroachment.

As stated in the previous preliminary ecological report (JBA 2019) the site is considered suitable for [REDACTED], wintering birds, foraging bats, amphibians, hedgehog (*Erinaceus europaeus*) and reptiles. No changes to these species were observed from the reports provided (JBA 2019 and 2020) 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 survey may be required.

[REDACTED]

Several scarce species of flora previously recorded on the botanical survey, were also identified on the walkover survey. This included the leaflets of sulphur clover (*Trifolium ochroleucum*) and the withered stems of pyramidal orchid (*Anacamptis pyramidalis*) and bee orchid (*Ophrys apifera*). A translocation strategy for sulphur clover will be produced (where stands cannot be retained in situ), detailing the methods for translocation and works, monitoring and appropriate management; this strategy could also incorporate the translocation of orchid. Where the habitat for these species is to be retained as part of the proposed development, the habitat will be managed to preserve and potentially enhance.

Invasive plant species, such as Japanese knotweed (*Fallopia japonica*), were not identified at the site during the walkover survey.

Although no reptiles were recorded during the walkover survey or the reptile survey in 2019, a grass snake (*Natrix natrix*) was recorded during clearance work on Phase 2b in August 2021, under ecological supervision. It is therefore recommended that a reptile method statement detailing reasonable avoidance measures and precautionary methods of working should be produced to ensure that any risk of harm to reptiles is minimised. Precautionary measures will include vegetation clearance and ground strip to be carried out when reptiles are more active (March to October) under ecological supervision.

A nesting bird check will also be required immediately prior to works between the months of March and September to ensure no active nests are damaged during works. If active nests are located, a ~5m 'no works' buffer (depending on species) will be erected around the nest and works will be stopped in this location until the young have fledged.

Lighting should be designed to reduce shine directly into any boundary hedgerows with respect to potential bat habitat, particularly the northern boundary of Phase 6. 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.

### **Enhancements**

The recommendations and enhancements within the species-specific reports 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.

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 and reptile hibernacula should also be included within POS areas to provide hibernacula for species such as hedgehogs, reptiles and invertebrates on site.

### **Conclusion**

No significant change to the site was observed since the previous PEA and ecological surveys (JBA, 2019/2020).

The habitat was still considered suitable for badger and therefore a pre-commencement badger survey should be undertaken six months prior to the commencement of works to ensure no badger sett is present.

A reptile method statement should be produced prior to works commencing on site, to safeguard reptile which may be using the site.

If works do not begin within 2 years of this survey another walkover survey will be required to note any changes in the interim and updated species-specific surveys may be required.

It is considered that with a sensitive landscape scheme, and by including some or all the additional enhancements given within this report and those within the species-specific reports, the site could be improved for local wildlife post development.

Yours sincerely,

**Sean Minns**

Ecologist

James Blake Associates Ltd.

## References

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