



Rosalynn Claxton
Planning Department
Ipswich Borough Council
Grafton House
15-17 Russell Road
Ipswich, IP1 2DE

17th April 2024

Dear Rosalynn,

RE: IP/24/00172/OUT | Hybrid Application - Full Planning Permission for the means of vehicle, cycle and pedestrian access to and from the site. Outline planning application (all matters reserved) for a mixed use development for up to 660 dwellings (Use Class C3), up to 400 sq m (net) of non-residential floorspace falling within Use Class E and/or Use Class F2(b), an Early Years facility, and associated vehicular access and highway works, formal and informal open spaces, play areas, provision of infrastructure (including internal highways, parking, servicing, cycle and pedestrian routes, utilities and sustainable drainage systems), and all associated landscaping and engineering works. (CROSS-BOUNDARY APPLICATION LOCATED IN BOTH IPSWICH BOROUGH COUNCIL AND EAST SUFFOLK COUNCIL). | Land Between Humber Doucy Lane And Tuddenham Lane Humber Doucy Lane | East Suffolk Council Ref: DC/24/0771/OUT.

Thank you for sending Suffolk Wildlife Trust details of this application, we have the following comments which we share with both East Suffolk Council regarding DC/24/0771/OUT and Ipswich Borough Council regarding IP/24/00172/OUT.

Suffolk Wildlife Trust welcome the broad scope of ecological reporting and look forward to seeing a finalised version of an Ecological Impact Assessment which includes a full suite of survey results.

Ecological Impact Assessment¹

Bats

Within sections of the EclA methodology used refers to the third edition of the publication, Bat Surveys for Professional Ecologists². This publication was superseded in 2023 by the 4th edition³. This reference should be updated, and all work undertaken should follow the most recently published guidelines.

Suffolk Wildlife Trust query the value attributed to onsite hedgerows. Guidance published by Wray *et al.*,⁴ implies that recording barbastelle is highly likely to result in a value of at least *County* level. We look forward to further detail of this being provided within an updated EclA once surveys have been completed.

Current proposals show seven hedgerows will have sections removed, to ensure connecting dark corridors are retained for important bat species, notably barbastelle, the mitigation hierarchy should be followed and

¹ CSA Environmental, 2024, Ecological Impact Assessment, *Land North-east of Humber Doucy Lane, Ipswich*, Revision B.

² Collins, J. (ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (3rd edn). The Bat Conservation Trust, London. ISBN-13 978-1-872745-96-1

³ 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

⁴ Wray, S., Wells, D., Long, E., and Mitchell-Jones, T., 2010, Valuing Bats in Ecological Impact Assessment, *In Practice*, **70**, 23-25.

wherever possible hedgerows used by barbostelle should be retained. Where this is not possible sections removed should be kept to a minimum and careful design used to retain connectivity; such design should consider; lighting type, temperature, lumen, and lux levels; and use of “hop-overs” or similar to create near-continuous connectivity of vegetation where hedgerows are severed.

County Wildlife Sites

The EclA states that there will be no impacts to County Wildlife Sites. Rationale behind this is provided, however Suffolk Wildlife Trust note that the proposed circular walking routes put forward within the HRA⁵ include a route running adjacent to Pumping Station Meadow CWS. While no public access is available at this site, it may be prudent to consider whether increased recreational pressure around the perimeter could impact the site.

Bat & Bird Boxes

The proposals relate to development of 660 dwellings in addition to non-residential development, with a total number of bat and bird boxes of 330 (165 bird and 165 bat boxes). The Royal Institute of British Architects (RIBA) in their book *Designing for Biodiversity* (2nd Edition)⁶ recommends, “as a guideline, the number of built-in provisions of nest or roost sites per development should be approximately the same as the number of residential units.” We therefore expect that the number of bird and bat boxes installed to be significantly higher; this notably would meet the need to “provide a biodiversity net gain that is proportionate to the scale and nature of the proposal”, required under Policy SCLP10 of the Suffolk Coastal Local Plan⁷ (considered relevant as this is a cross-boundary application).

Only swift boxes are noted for birds; Suffolk Wildlife Trust support the use of swift boxes and push the installer to consider The Gold Medal System of swift box installation⁸ to increase uptake rates of the new boxes. It is also reasonable to include other boxes, such as house sparrow, starling, or general-purpose boxes. Regardless, all bird boxes integrated into buildings should follow BS 42021:2022 Integral nest boxes⁹.

Biodiversity Net Gain Assessment¹⁰

The Biodiversity Net Gain assessment shows that while a net gain is likely to be possible for hedgerow units, it is unlikely that habitat units can deliver the minimum level of net gain onsite, and that offsetting is likely to be required. New hedgerow planting onsite should be targeted to compensate for any losses of, and seek to increase, landscape connectivity; this is key for many species, including bats.

The Net Gain assessment shows that more than 10% of post-development units are likely to be delivered through vegetated gardens; a habitat considered non-significant which cannot be secured for more than 30-years¹¹. It is therefore logical that, to ensure a genuine gain is delivered and secured over a 30-year period, the Units delivered by vegetated gardens should not be considered within the final calculation which delivers a gain of 10% above the original baseline value.

We also believe that the Habitat Management and Monitoring Plan (HMMP) should be secured through a S.106 agreement, rather than as a planning condition. This should include provision for remedial actions to be triggered if the required monitoring shows that post-development habitats fail to meet target condition. If onsite remedial measures are unable to deliver net gain, then further off-setting may be required.

⁵ CSA Environmental, 2024, Information to Inform Habitat Regulations Assessment, *Land North-east of Humber Doucy Lane, Ipswich*, Revision A.

⁶ Murphy, B., Gunnell, K. and Williams, C. (2012) *Designing for Biodiversity: A technical guide for new and existing buildings* RIBA, London.

⁷ <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Suffolk-Coastal-Local-Plan/Adopted-Suffolk-Coastal-Local-Plan/East-Suffolk-Council-Suffolk-Coastal-Local-Plan.pdf>

⁸ https://www.suffolkwildlifetrust.org/sites/default/files/2018-07/sos_swifts_information_sheet_9.pdf

⁹ <https://knowledge.bsigroup.com/products/integral-nest-boxes-selection-and-installation-for-new-developments-specification-1?version=standard>

¹⁰ CSA Environmental, 2024, Biodiversity Net Gain Assessment, Design Stage, *Land North-east of Humber Doucy Lane, Ipswich*, Revision A.

¹¹ <https://www.gov.uk/guidance/make-on-site-biodiversity-gains-as-a-developer>

Overall, Suffolk Wildlife Trust encourage the applicant to, at reserved matters stage, ensure that nature is placed at the heart of this development, enabling future residents to connect with the wildlife around them. We welcome the opportunity to discuss this further. Please inform us of the outcome of this planning application and do not hesitate to contact us should you require anything further.

Yours sincerely,

Alex Jessop
Planning & Advocacy Officer
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