1. **Bat Activity Report**
   1. The original 2015 Bat activity Report was identified by an ecologist as sub optimal and errors were identified in the equipment and subsequently contradictions between the equipment recordings and visual observations were found.
   2. Also in the 2015 survey having identified quite a significant amount of bat activity no survey was completed to identify the roosts of these bats which change during the year as the bats change activities. The protection of Bat roosts is the most important element of Bat conservation.
   3. This 2018 report submitted with this new application completed a survey with listening equipment and visual observations surrounding the Phase 1a area of the wider site which clearly indicates the survey was for that area of the site. There was no equivalent surveys along hedgerow H4 and H5 located in the Phase 1b site which were identified as significant in the 2015 Bat Survey for the whole site.
   4. Also still no survey has been conducted to identify the location of the various Bat roosts.
   5. Please also note that Hedgerow H4 (Hedge H20 in the tree survey) was quite recklessly pulled out by the roots by contractors after planning approval in 2018 (we believe this 2018 Bat survey was conducted around the same time).
   6. If this report was intended for the Phase 1b application then the focus of any technical surveys should have been on the Phase 1b area of the site, and this report doesn’t.
   7. The 2018 report seems to suggest a reduction in bat activity in a positive light, as if this means there are less bats for the development to impact on. It completely ignores what I assumed was the purpose of the report to assess if there had been any adverse impact, which it apparently shows there is.
   8. The 2015 report was conducted in September over 4 days, the 2018 report in June and September each over 9 days. The 2015 report proved that activity was spasmodic with some days recording no activity in September. However overall they average out broadly similar and any deduction that there is a reduction in activity would appear to be selective and unreliable.
   9. The 2018 survey also draws attention to the absence of Brown Long Eared bat detections. These are extremely rare and there was only a handful of detections in 2015 with none on some nights and half those recordings were along Hedgerow H4 which was not surveyed in 2018 if it still existed then.
   10. It is quite feasible that the long hedge lines of H4 and H5 were the navigation route into the area for the Brown Long Eared Bats and if the hedge had still existed in September 2018 it is quite probable a survey of it might have detected them. But this hedge and the rest of the Phase 1b plot was not bat surveyed for this 2018 report.
2. **Tree Survey**
   1. This is also the survey completed for DC/20/00700  a request by the applicant to vary the trees / hedgerows etc approved for removal. Predominantly like Hedgerow H20 (H4 in Bat Survey) these trees and Hedgerows had already been removed at the time of the report.
   2. Planning Condition 39 for the initial outline planning application approved in 2018 *“to ensure matters of tree and hedgerow protection are secured early to ensure avoidance of damage or lost due to the development and/or its construction and as any construction process, including site preparation, has the potential to disturb protected species and their habitat. If agreement was sought at any later stage there is an unacceptable risk of lost and damage to important trees and hedgerow that would result in harm to amenity.*”
   3. The removal of these hedgerows and Trees was in contravention of the above condition but rather than offering any apology the applicant appears to be seeking retrospective legality to cover up this indiscretion.
3. **LEMP Report**
   1. A new hedgerow is proposed to be planted along Poplar Lane to reinstate the removed Hedgerow (H20). This under any other circumstances would be commendatory but with no acceptance that this removal was wrong in the first place and that the damage that has occurred to the biodiversity could take decades to recover, if ever, it appears rather hollow.
   2. The woodland in the middle of the site beside Poplar farm has been ripped out by the new owner, a matter that BMSDC seams to take no interest in though it is being investigated by others. The Applicant likewise seems to be unaware of its removal as this report fails to acknowledge the removal of this woodland that they otherwise recognise as a Wildlife and Bat Habitat. Its relevance was acknowledged in the earlier reports and its removal is a significant ecological change.
   3. All the wildlife mitigation measures that rely on its presence are now unworkable as the mitigation proposes that hedgerows etc should be removed an such an order to encourage the wildlife into this now removed woodland area.
   4. An issue that seems to be ignored in all large planning applications is the impact of introducing large numbers of domestic cats into a wildlife system. There are approx. 10 million cats in the UK with about 30 million homes. That’s an average of one cat for every three houses and so on a development of 475 homes that’s approximately 150 predatory cats let loose. There is absolutely no consideration given to this at all in the provision of wildlife corridors within the development. Unless these are designed with some form of protection from cats the provision of wildlife corridors is pointless ecological spin.
   5. The report gives guidance on Hedgerow maintenance but fails to provide guidance on wildlife protection during such maintenance.
4. **Reptile Survey Report.**
   1. The 2014 report recommended the retention of hedgerows as reptile corridors, However this is not mentioned in the 2018 report.
   2. The 2014 Reptile report was shown by an ecologist to be sub optimal and it only discovered a couple of grass snakes and it is disappointing that this opportunity for new survey was not taken. Instead just like the bat survey a visual walk through of the Phase 1b area to validate the already inadequate 2014 survey was used as evidence for this Phase 1b application.
5. **Reptile Mitigation Strategy**
   1. As previously pointed out the wildlife mitigation strategies are already obsolete.
   2. One of the main hedgerow involved has already been removed, and not with any consideration for the wildlife.
   3. The mitigation depends on the woodland in the centre of the site that no longer exists as that has also been removed apparently without appropriate authority.
6. **Public Footpath Provision**
   1. The application appears to have ignored the footpaths across the site and not agreed and proper remedy to mitigate, re-route or maintain the provision.
7. **The Flood Risk Assessment**
   1. SUDS (Sustainable Urban Drainage Systems) of a site are designed and calculated so that surface water discharge is managed or soaked away via SUDS Ponds in a manner that matches the natural drainage qualities of the site. This is to provide the same water absorption into the ground for natural water resource reserves and prevents further impact on existing man made surface water drainage systems.
   2. SUDS calculations are based on a once in a hundred year severe storm event followed by a another half event. This ensures the development is protected against flash floods from such events. However, the storms considered are short violent rain storm events not the sort of extended heavy rain that is typical of consecutive Atlantic storms that the UK sufferers during the winter typically over several weeks.
   3. Previously predicted once in a hundred year flood levels are now being exceeded but not from SUDS type storm events. This is now happening nearly every year with devastating effects as our weather patterns change with global warming. Thousands in established communities along river valleys were still recovering from such storms this winter as Covid19 struck the UK and have become easily forgotten in this new national disaster. And we soon forget that the same has happened nearly every previous winter now for several years.
   4. This is not flooding in new developments, their SUDS systems ensure they are OK, but as their systems become saturated after weeks of heavy rain and overflow they add to the surface water run of into the rivers and add to the increasing threat to established innocent communities downstream.
   5. This flood risk assessment doesn’t even recognise that its overflow will be down the Chantry Vale Valley under and past the grade 2 listed Red House and no attempt is made to quantify the impact of weeks of consecutive winter storms on the established community downstream.
   6. It is the responsibility of an LPA to protect its communities and public against unreasonable development and I can’t think of anything more unreasonable than being flooded.
8. **Skylark Mitigation Policy**
   1. This Policy is dependent on a Taylor Wimpey application in Mid Suffolk District Council.
   2. Mitigation measures were previously agreed for Sproughton by MSDC with part of the SnOasis housing application. They never materialised due to cross border issues between BDC and MSDC which does pose questions about this policy.
   3. The proposed field to be allocated for mitigation is also part of the anticipated Wolsey Grange 2 application. An application that the planning department have insisted should be separate from Wolsey Grange 1.
   4. So how can mitigation for a development in MSDC and Wolsey Grange 1 be enforceable on an as yet not submitted Wolsey Grange 2.
   5. The Ecology review by Place Services as well as apparently being unaware of the removed woodland and Hedgerow also recommends review of the Skylark Mitigation Policy after ten years.
   6. As part of the 25 year housing provision for Babergh in the emerging Joint Local Plan there is good reason to suppose that Wolsey Grange 2 will not be completed in ten years. It is unlikely that Skylarks from Stowmarket will have migrated from their nesting sites to Chantry Vale in that time and unlikely that any would nest in the proposed field until the developer has ceased building near the field. Proposing a review of this mitigation measure in ten years is almost certainly going to provide evidence that skylarks have not migrated into the field by that time and provide the developer with an excuse to extend development into the proposed mitigation field.
9. **Gateway Character Housing**
   1. Higher visual impact and elevation Gateway character Houses are proposed facing the Hadleigh Road A1071 junction. This was originally identified as a proposed entry road into the site but is now just a pedestrian stairway. These are the tallest and most visually intrusive on the development which may be appropriate at the main entrance to the site. However there is only a pedestrian access at this point now and Landscaping and Nature seams more appropriate a theme for pedestrians. These homes will intrude visually into the surrounding landscape which is designated Special Landscape area. The Landscape character assessment reports produced for SCC and BDC identified Plateau Farmland Character areas like the development site as suitable for housing because it is easier to hide the developments from the surrounding countryside however what is happening here is the reverse and they sit right on the edge of the Rolling Valley Farmland character type area. It seems appropriate by BDC own guidance documents that these should be homes with the lowest profile or be screened with trees from the surrounding landscape.