

**Preliminary Ecological Appraisal**  
of  
**Stable at Lower Farm, Barrow Rd,  
Great Saxham**



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*The findings detailed in this report are based on evidence from thorough survey, where every effort has been taken to provide an accurate assessment of the site at the time of the survey. No liability can be assumed for omissions or changes after the survey has taken place.*

*This report was instructed by Phil Cobbold on behalf of their client Mr W Phizacklea, and following the brief agreed. Aspen Ecology has made every effort to meet the client's brief.*

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## **1 Executive Summary**

Aspen Ecology was instructed by Phil Cobbold Planning Ltd. on behalf of their client Mr W Phizacklea to carry out a Preliminary Ecological Appraisal (PEA) of a Barn at Lower Farm, Great Saxham hereafter referred to as 'the Site'. The central grid reference for the Site is TL 78054 63141. The site survey was undertaken on the 28<sup>th</sup> April 2021.

The site is an existing barn currently in use as stables and surrounding small area of grassland and hedgerow.

No statutory sites are present within 2km and two European Sites are located within 13km of the site, with nine non-statutory County Wildlife Sites within 2km, however no impacts to these sites are predicted due to the location and scale of the proposals.

The development proposes conversion of the barn into holiday lets.

The site is generally of low ecological value, however the barn may be used by birds during the nesting season and by roosting bats. Further surveys should be undertaken to assess the presence or likely absence of roosting bats and it is recommended that the conversion works start outside the nesting season or following a nesting bird survey. Precautionary working methods are included in this report to minimise the risk of creating habitat that could be used by protected species that may be present in the wider area and enhancement suggestions are also provided, that if included may improve the site for wildlife post development.

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## 2 Introduction

### 2.1 Background

Aspen Ecology was commissioned by Phil Cobbold Planning Ltd. on behalf of their client Mr W Phizacklea to undertake a Preliminary Ecological Appraisal of a stable block at Lower Farm, Barrow Road, Great Saxham, Suffolk. The National Grid co-ordinates for the centre of the site are TL 78054 63141.

The assessment was required to inform an application for planning permission to convert the stables to holiday lets. This report presents the findings of the Preliminary Ecological Appraisal carried out by Aspen Ecology in April 2021.

### 2.2 Aims and Scope of Report

This report is a Preliminary Ecological Appraisal. According to CIEEM guidelines<sup>1</sup>, a Preliminary Ecological Appraisal “*can be used as a scoping report (for non-Environmental Impact Assessment (EIA) projects), but should not be submitted as part of a planning application unless it can be determined that the project would have no significant ecological effects, no mitigation is required and no further surveys are necessary.*”

This report is based on an extended Phase 1 habitat survey and desktop study aimed at assessing the suitability of the site to support protected species and notable habitats. This information allows an initial assessment of the biodiversity value of the site to be made, potential constraints to the proposed development to be identified and mitigation, compensation and enhancement measures to be developed.

The report assesses the compliance of the scheme with relevant local and national planning policy and addresses any potential impacts on legally protected species and habitats. Where potential for notable or protected species is identified, further surveys may be required to determine presence or likely absence and assess the conservation status of populations or assemblages present. The results of such work are required to fully assess the potential ecological impacts of the scheme.

### 2.3 Site Description

The site is located to within the main farmyard of Lower Farm with residential dwellings to the south and west and agricultural building to the north, the Suffolk Pet Crematorium is located to the east. The site itself is a block of stables within a brick and flint barn.

The surrounding area is dominated arable farmland with boundary hedgerows and areas of mature woodland.

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<sup>1</sup> CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester

## 2.4 Planning Policy and Legislation

For the purposes of this report, protected species are taken to be those which are protected under UK legislation (The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019<sup>2</sup>, [REDACTED])

Protected species, and Species of Principle Importance for conservation of biodiversity in England (SPIE species – formally Biodiversity Action Plan species), are a material consideration for individual planning consents under the National Planning Policy Framework<sup>5</sup> (NPPF), which places responsibility on LPAs to aim to conserve and enhance biodiversity in and around developments, promote the enhancement of natural and local environments through planning, and achieve net gains for biodiversity where possible.

### 2.4.1 Planning Policy

#### 2.4.1.1 National Policy

The National Planning Policy Framework (NPPF) sets out the government's requirements for the planning system in England. A number of sections of the NPPF are relevant when taking into account development proposals and the environment. As set out within Paragraph 11 of the NPPF "*So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development*". However, Paragraph 177 goes on to state that "*The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site*".

The general impetus of the NPPF in relation to ecology and biodiversity is for development proposals to not only minimise the impacts on biodiversity but also to provide enhancement. Paragraph 170 states that the planning system should contribute to and enhance the natural environment by "*...minimising impacts on and providing net gains for biodiversity...*"

Paragraph 175 states that "*development whose primary objective is to conserve or enhance biodiversity should be supported*". A number of principles are set out in Paragraphs 175 and 176 including the principle that where harm cannot be adequately avoided then it should be mitigated for, or as a last resort, compensated for. Where impacts occur on nationally designated sites, the benefits must clearly outweigh any adverse impact and incorporating biodiversity in and around developments should be encouraged. Protection of irreplaceable habitats, such as ancient woodlands and those sites proposed as SPAs, SACs and Ramsar sites or acting as compensation for SPAs, SACs and Ramsar sites, should receive the same protection as Habitats Sites.

In addition to the NPPF, Circular 06/05 provides guidance on the application of the law relating to planning and nature conservation as it applies in England. Paragraph 98 states "*the*

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<sup>2</sup> HMSO (2019) The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations. HMSO, London.

<sup>3</sup> HMSO (1981) Wildlife and Countryside Act (as amended). HMSO, London.

<sup>4</sup> [REDACTED]

<sup>5</sup> National Planning Policy Framework (Feb 2019)

*presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat". Whilst paragraph 99 states "it is essential that the presence or otherwise of a protected species, and the extent that they may be affected by the proposed development, is established before planning permission is granted".*

#### **2.4.1.2 Local Policy**

The site is covered by West Suffolk District Council (formally part of the St Edmundsbury Borough Council area). The Adopted local plans covering the former St Edmundsbury and Forest Heath areas (and all related policy documents, including guidance and SPD's) will continue to apply to those parts of the West Suffolk Council area until a new Local Plan for West Suffolk is adopted. This is currently scheduled for mid-2023.

Local planning policy within the former St Edmundsbury Borough Council is provided by the Core Strategy 2010. A single overarching policy within the Core Strategy makes specific reference to ecology and biodiversity:

- **Policy CS2: Sustainable Development**

A high quality, sustainable environment will be achieved by designing and incorporating measures appropriate to the nature and scale of development, including:

The protection and enhancement of natural resources:

A) making the most resource efficient use of land and infrastructure;

B) protecting and enhancing biodiversity, wildlife and geodiversity, and avoiding impact on areas of nature conservation interest in both rural and built up areas;

C) identifying, protecting and conserving: a network of designated sites including the Breckland Special Protection Area (SPA)\* and other sites of national and local importance; Biodiversity Action Plan (BAP) habitat and species; wildlife or green corridors, ecological networks; and other green spaces will be identified, protected and habitats created as appropriate;

D) conserving and, wherever possible, enhancing the character and quality of local landscapes and the wider countryside and public access to them, in a way that recognises and protects the fragility of these resources;

E) conserving and, wherever possible, enhancing other natural resources including, air quality and the quality and local distinctiveness of soils;

F) protecting the quality and availability of water resources;

G) maximising the efficient use of water including recycling of used water and rain water harvesting;

H) maximising the potential of existing and new sources of energy from biomass including timber and other energy crops; and Sustainable design of the built environment:

I) providing the infrastructure and services necessary to serve the development;

J) incorporating the principles of sustainable design and construction in accordance with recognised appropriate national standards and codes of practice to cover the following themes:-

- Energy and CO2 Emissions – seeking, where feasible and viable, carbon neutral development, low carbon sources and decentralised energy generation;
- Water – ensuring water efficiency by managing water demand and using such waste water reuse methods as rainwater harvesting and grey water recycling;



- Materials - minimising the use of resources and making use of local materials;
- Surface Water Run-off – incorporating flood prevention and risk management measures, such as sustainable urban drainage;
- Waste – adhering to the waste hierarchy during construction and following development to prevent waste generation and ensure reuse, recovery and recycling;
- Pollution – remedying existing pollution or contamination and preventing further pollution arising from development proposals;
- Transport – minimising the need for travel and ensuring a balance between transport infrastructure and pedestrians;
- Health and Wellbeing – ensuring that the development enhances the quality of life of future occupants and users;
- Ecology – valuing and enhancing the ecological features of the development site, where appropriate.

K) ensuring that developments and their occupants are capable of managing the impact of heat stress and other extreme weather events;

L) making a positive contribution towards the vitality of the area through an appropriate mix of uses. In areas of strategic growth this will include employment, community, retail, social, health and recreation facilities (including the protection and provision of informal and formal recreation, parks, open spaces and allotments);

M) creating a safe environment which enhances the quality of the public realm;

N) making a positive contribution to local distinctiveness, character, townscape and the setting of settlements;

O) conserving or enhancing the historic environment including archaeological resources.

Where appropriate, site specific and area targets, along with detail of viability, to meet national standards and codes, will be set out in the Development Management document, Area Action Plans and the Rural Site Allocations document.

\* Only development that will not adversely affect the integrity of the SPA will be permitted. In applying this policy a buffer zone has been defined that extends 1,500m from the edge of those parts of the SPA that support or are capable of supporting [REDACTED] within which:- a) Permission may be granted for the re-use of existing buildings and for development which will be completely masked from the SPA by existing development; alternatively b) Permission may be granted for other development not mentioned in sub paragraph (a) provided it is demonstrated by an appropriate assessment that the development will not adversely affect the integrity of the SPA.

A further 1,500m buffer zone has been defined which extends around those areas (shown on the Proposals Map) outside of the SPA which have supported 5 or more nesting attempts by [REDACTED] since 1995 and as such act as supporting [REDACTED] within which permission may be granted in accordance with a) and b) above. Additionally within this zone, where it can be shown that proposals to mitigate the effects of development would avoid or overcome an adverse impact on the integrity of the SPA or qualifying features, planning permission may be granted provided the Local Planning Authority is satisfied that those proposals will be implemented. In these areas development may also be acceptable providing alternative land outside the SPA can be secured to mitigate any potential effects.

Development at Risby (which lies partly within the 1,500m [REDACTED] will be possible if it is fully screened from the Breckland SPA by existing development. A project level appropriate assessment should be undertaken to ensure no adverse effect upon the integrity of the SPA.

A 400m buffer zone has been defined around those parts of the SPA that support or are capable of supporting nightjar and woodlark. Any development proposal within this zone will need to clearly demonstrate that it will not adversely affect the integrity of the SPA.

### 3 Methodology

#### 3.1 Site Survey

The site survey was undertaken by Mary Power BSc (Hons) MSc MCIEEM, a full member of the Chartered Institute of Ecology & Environmental Management, subject to the CIEEM Professional Code of Conduct and licensed by Natural England to survey for [REDACTED] and bats (WML-CL18; Level 2).

During the survey on 28<sup>th</sup> April 2021 the temperature was 13°C; the wind was Beaufort scale 0-1, 30% cloud cover and good visibility.

The survey was undertaken in accordance with Guidelines for Preliminary Ecology Appraisal<sup>6</sup> and the broad methodology and principles of the Joint Nature Conservation Committee (JNCC) Phase 1 Habitat Survey<sup>7</sup>, which included mapping habitat types and identifying plant species observed on the site, including Wildlife and Countryside Act Schedule 9 invasive plant species.

The Phase 1 Habitat Map in Appendix B shows main habitat types, and features of interest identified as target notes.

The potential for presence of protected, Species of Principal Importance in England (SPIE) and rare species was assessed as follows:

**Amphibians** - Known ponds within the site were addressed for potential to support breeding amphibians where accessible. Habitat on the site, was surveyed for potential to support amphibians during their terrestrial or aquatic phase. 250m is a standardised search radius to assist in the assessment of the potential of a site and its surrounding habitat to support great [REDACTED], based on current Natural England guidance<sup>8</sup>.

**Bats** – Habitat within, and adjacent to, the site boundary was assessed for potential to support roosting, foraging and commuting bats, aided by aerial photographs of the surrounding landscape. The survey conformed to current Bat Conservation Trust guidelines<sup>9</sup>.

**Dormice** – the site was assessed for potential to support dormice: Wooded/scrub areas or hedges with good under-storey/shrub layer and a diversity of foraging opportunities covering the active dormouse season.

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<sup>6</sup> CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester

<sup>7</sup> JNCC (2010) Handbook for Phase 1 habitat survey: a technique for environmental audit (revised reprint) JNCC: Peterborough.


<sup>9</sup> Collins, J. (Ed.) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (Third Edition). The Bat Conservation Trust, London.

**Reptiles** – Habitats were assessed for potential to support foraging or breeding reptiles and hibernation or refuge opportunities<sup>1011</sup>.

**Invertebrates** - The site was surveyed for high quality aquatic, deadwood or other habitats which could be used by significant assemblages of invertebrates, or by invertebrates identified in the data search. During the Phase 1 survey there was no attempt made to identify species present and where a site supports features that may be of importance to invertebrates then further Phase 2 surveys may be required to assess the importance of the site.

**Flora and habitats** - A walkover survey identified broad vegetation types, which were then classified against Phase 1 habitat types, where appropriate. Any invasive species<sup>12</sup> encountered as an incidental result of the survey are noted.

**Water voles and otters** – Water bodies within impact distance of the site were assessed for potential to support water voles and otters.



**Birds** - The assessment of breeding birds and wintering birds on the site was based on the suitability of habitat present, evidence of nesting such as old or currently active nests and the presence of bird species that may potentially nest within the available habitat.

**Adjacent habitat** - Aerial photographs, available maps and survey of the area outside the site boundary (where access was available) was used to identify any habitat in the wider landscape which could be impacted by proposed works.

### 3.2 Desk Study and Biodiversity Information Consultation

A 2km radius search for statutory designated sites was conducted using “MAGIC”, the Multi-Agency Geographic Information system for the Countryside<sup>13</sup>. The search radius was extended to 13km for sites previously designated under European Legislation: Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites, where the potential risk of impact to the qualifying features (species or habitats) of these sites may extend over a wider area.

Suffolk Biodiversity Information Service (SBIS) was consulted for records of protected and locally rare species within a 2km radius of the site (data provided on 23<sup>rd</sup> April 2021). The site is covered by the Local BAP for Suffolk.

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<sup>10</sup> Froglife (1999) Reptile Survey. An Introduction to Planning, Conducting and Interpreting Surveys for Snake and Lizard Conservation.

<sup>11</sup> Gent, A.H. and Gibson, S.D., eds. (1998) Herpetofauna Workers' Manual. Peterborough, Joint Nature Conservation Committee.

<sup>12</sup> Plant species included on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

<sup>13</sup> <http://defra.magic.gov.uk>

## 4 Results and Discussion

### 4.1 Desk Study

MAGIC<sup>14</sup>, was accessed (10<sup>th</sup> May 2021), to identify the presence of statutory designated sites and habitats.

The site lies within an Impact Risk Zone (IRZ), requiring assessment of planning applications for likely impacts on SSSIs/ SACs/ SPAs & Ramsar sites. Consultation with Natural England is required for:

- *Airports, helipads and other aviation proposals.*
- *Wind turbines.*
- *Residential development of 100 units or more.*
- *Any residential development of 100 or more houses outside existing settlements/urban areas.*
- *Any industrial/agricultural development that could cause AIR POLLUTION (incl: industrial processes, livestock & poultry units with floorspace > 500m<sup>2</sup>, slurry lagoons > 750m<sup>2</sup> & manure stores > 3500t).*
- *General combustion processes >50MW energy input. Incl: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/ combustion.*
- *Landfill. Incl: inert landfill, non-hazardous landfill, hazardous landfill.*
- *Any discharge of water or liquid waste of more than 20m<sup>3</sup>/day to ground (ie to seep away) or to surface water, such as a beck or stream.*

As the proposals are for conversion of agricultural buildings to holiday lets, consultation with Natural England will not be necessary.

No Statutory site are located within 2km; two European sites, Breckland SAC & SPA and Rex Graham Reserve SAC are present within 13km of the site (Table 4.1). Nine non-statutory County Wildlife Sites were located within 2km of the site (Table 4.2).

No sites have been granted European Protected Species Licences (as recorded on MAGIC – accessed 10<sup>th</sup> May 2021) within 5km of the site boundary.

**Table 4.1:** European Sites within 13km.

Site Name	Designation	Approx. distance from Site	Description
Rex Graham Reserve	SAC	12.1km NW	This site hosts the priority habitat type "orchid rich sites". This is a disused chalk pit with developing dry grassland characterised by false oat-grass. The site has been selected as it supports the largest population of military orchid in the UK, comprising more than 95% of the current total population.
[REDACTED]			

<sup>14</sup> <http://defra.magic.gov.uk>

Site Name	Designation	Approx. distance from Site	Description
			<ul style="list-style-type: none"> <li>Nightjar 12.2% of the GB breeding population</li> <li>Woodlark 28.7% of the GB breeding population</li> </ul> <p>SAC: Annex I habitats that are a primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>Inland dunes with open <i>Corynephorus</i> and <i>Agrostis</i> grasslands</li> <li>Natural eutrophic lakes with <i>Magnopotamion</i> or <i>Hydrocharition</i> - type vegetation</li> <li>European dry heaths</li> <li>Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (*important orchid sites)</li> </ul> <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site: Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i></p> <p>Annex II species present as a qualifying feature, but not a primary reason for site selection: [REDACTED]</p>

**Table 4.2:** Non-statutory County Wildlife Sites within 2km.

Site Name	Designation	Approx. distance from Site	Description
Little Papley Woods	CWS	1km N	This is an ash, field maple, hazel wood with occasional oak standards and with willow, hawthorn and blackthorn forming the understorey. Field maple, hazel, willow and oak have all been coppiced here at some time.
Great Papley Woods	CWS	1.1km NE	The present day Papeley Wood is a remnant of a much larger wood, the rest of which was grubbed out after World War Two. The southern boundary ditch and bank is a former internal woodland boundary and the banks at each end are fragments of external medieval wood banks. Great Papeley Wood is an ash/field maple woodland with the occasional English oak and some planted beech as standards. Field maple and hazel have been coppiced here but the wood appears little managed with standing dead trees and many fallen branches on the ground.
The Park	CWS	400m E	The Park is bordered by a ditch and bank along three sides; a characteristic feature of ancient woodlands. According to local information, this woodland once formed part of the parkland area part of which still exists, surrounding Great Saxham Hall.
Larner's Wood	CWS	1.5km E	Larner's Wood is an ancient woodland situated in the parish of Little Saxham. In addition to the medieval wood banks which surround the wood, there are numerous old internal wood banks. It is a typical boulder clay woodland consisting of ash, field maple and hazel in a coppice with standards structure. Parts of the wood have recently been coppiced which has resulted in a dense re-growth of the hazel understorey.

Site Name	Designation	Approx. distance from Site	Description
Willsummer Wood	CWS	340m SW	Willsummer Wood is a large ancient woodland which still retains part of its old ditch and bank system, marking the south and west boundaries. It has been extensively managed in the past producing typical standard with coppice woodland. This consists of oak and ash standards with field maple, ash and predominantly hazel coppice, providing good habitat for birds and invertebrates
Barnfield Hill Wood	CWS	700m SW	Barnfield Hill Wood is one of a number of ancient woodlands which are situated south west of Bury St Edmunds between the parishes of Great Saxham, Barrow and Denham. The eastern half of the wood which consists predominantly of ash, field maple and hazel has been managed by coppicing and has in the past, supplied the Barrow hurdle factory with ash and hazel poles. The western half has been less intensively managed and consequently casts a dense shade over this part of the wood.
Denham Thicks	CWS	1.9km SW	Denham Thicks consists of three small individual woods which are considered to be the remnants of a much larger ancient woodland. Historical features include a medieval ditch and bank which encloses part of the wood and numerous mounds which are thought to originate from the woodland clearance. Large ash, hornbeam and lime stools of great antiquity are also present in the three woods.
Hearse Wood	CWS	830m S	Hearse Wood is a large, unusual and extremely ancient wood dating back to Anglo Saxon times. Its name is probably derived from the old English "hyrst", meaning a grove on a hill, an apt description of this wood. The margin of the wood is irregular and has the features of a medieval ditch and bank system. The wood itself has numerous rides. Hearse Wood consists of wet areas of neglected coppice of ash, hazel and field maple with small areas of small-leaved lime, hornbeam and elm.
RNR 207	CWS	1.8km W	Chalk flora - Bee Orchid. This site is also a Roadside Nature Reserve.

## 4.2 Biodiversity Information Consultation

A full list of SPIE (formally UK BAP) protected mammals, amphibians, invertebrates and plants is shown below in Table 4.3. A reduced list of UK BAP and protected birds and plants is shown; these have been selected based on their likelihood of being recorded at the site, given the habitat types present.

**Table 4.3:** Protected, SPIE and locally scarce species records (SBIS, 23<sup>rd</sup> April 2021).

Species	Protection	Records: Date and distance to the site
<b>Bats</b>		
Common pipistrelle <i>Pipistrellus pipistrellus</i>	CHS(EU Exit)R 2019; WCA; SBAP	Single record (2017) 1km SE.
Serotine <i>Eptesicus serotinus</i>	CHS(EU Exit)R 2019; WCA; SBAP	Single record (2004). Closest record 830m NE.
Brown long eared bat <i>Plecotus auritus</i>	CHS(EU Exit)R 2019; WCA; SBAP	Five records (2001-2017). Closest records 800m SE.
<b>Other Mammals</b>		
Hedgehog <i>Erinaceus europaeus</i>	SPIE, SBAP	32 records (2014-2020). Closest record 1km NW.
<b>Amphibians</b>		
[REDACTED]		
<b>Reptiles</b>		
No reptile records were provided		
<b>Nesting and protected, WCA, SPIE birds</b>		
A number of birds were identified in the desk study, many of which would not use habitats at the site. The following SPIE/EBAP species have been recorded within 2km, and could use habitats within the site for nesting or foraging:		
<b>SPIE/BAP and Red-listed Birds of Conservation Concern (BoCC):</b> Turtle dove, song thrush, yellowhammer, spotted flycatcher, house sparrow, tree sparrow, starling.		
<b>SPIE/BAP and Amber-listed Birds of Conservation Concern (BoCC):</b> dunnock, bullfinch		
<b>Protected and SPIE plants</b>		
The following plants listed as vulnerable on the Red list of Great Britain & England have been recorded within 2km of the site: Dwarf spurge <i>Euphorbia exigua</i>		
<b>Protected and SPIE invertebrates</b>		
Invertebrates	SPIE	Lepidoptera species include white admiral butterfly and forty moths.

SBAP = Suffolk Biodiversity Action Plan; SPIE = Species of Principal Importance in England; CHS(EU Exit)R = Conservation of Habitats and Species (Amendment) (EU Exit) Regulations; WCA = Wildlife and Countryside Act.

### 4.3 Potential for Protected Species and Habitats

The site was assessed to identify whether the proposals could potentially impact on protected or locally rare species or habitats, either during the construction, or operational phase.

#### **4.3.1 Habitats and Flora**

The survey was undertaken in April, which is within the optimum botanical survey season although late flowering species may not have been evident. No rare or priority plant species were recorded during the survey.

The site comprised a brick and flint barn currently used as stables surrounded by short mown grassland and hard standing.

##### **4.3.1.1 Improved grassland**

The barn was surrounded by a small area of managed/trampled improved grassland with a sward height of <5cm. Species were dominated by grasses including perennial rye-grass *Lolium perenne* and annual meadow grass *Poa annua*, frequent forbs included daisy *Bellis perennis*, dandelion *Taraxacum agg.* Ribwort plantain *Plantago lanceolata* and red dead-nettle *Lamium purpureum*.

##### **4.3.1.2 Hedgerows**

A short section (5m) of privet *Ligustrum ovalifolium* hedgerow was present to the west of the barn.

##### **4.3.1.3 Invasive Flora and WCA Schedule 9 Species**

No invasive species or species listed on Schedule 9 of the Wildlife and Countryside Act (1981 as amended) were recorded at the site.

#### **4.3.2 Bats**

All UK species of bats are protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Common pipistrelles, serotine and brown long-eared bats have been recorded in the local area.

##### **4.3.2.1 Roosting Bats - structures**

The barn is single storey, of brick and flint construction with a pitched slate roof, which was generally in a state of good repair with occasional lifted spates and gaps under ridge tiles. A single storey lean-to is present to the west, of block and timber construction with an unlined corrugated tin roof. Timber weatherboarding was present to the gable ends which was unlined internally.

Internally the barn is open to the roof, which is supported on moderate sized timbers; the roof is lined with traditional sarking felt with some gaps in the felt. The ridge beam was well cobwebbed with no evidence of roosting bats found internally, however the stables are cleaned regularly. The internal walls are rendered with concrete to 1.5m.

Brick and flint work was generally well sealed internally and externally, with some shallow holes around the brickwork, which were considered unsuitable for hibernating bats.

The barn is considered to provide low to moderate quality roosting potential and as such further surveys should be undertaken to assess the presence or likely absence of roosting bats.

##### **4.3.2.2 Roosting Bats – trees**

No trees are present within the site boundary, or surrounding the site that may be impacted by the proposals.



#### 4.3.2.3 Foraging and Commuting Bats

The site itself provides poor quality foraging habitat with very little vegetation, however mature trees and lake surrounding the residential properties and Pet Crematorium to the south east provide good quality habitat and are linked via sparse tree lines to woodland to the east. No impacts to any good quality foraging habitat are predicted.

#### 4.3.3 Reptiles

All UK reptile species are protected under the Wildlife and Countryside Act 1981, with two species afforded higher levels of protection under the European Habitat Regulations.

The site provides poor quality habitat for reptiles, with minimal vegetation cover and no opportunities for shelter or hibernation.

There are no records of reptiles locally and given the location of the site, surrounded by arable fields with minimal margins it is considered unlikely that they would be present or impacted by the proposals. No further surveys are necessary.

#### 4.3.4 Amphibians

There are no waterbodies within the site, however two ponds are present within 250m, to the east and south east.

Habitats within the site are of poor quality for amphibians including [REDACTED] with minimal vegetation cover and no opportunities for shelter or hibernation.

A Natural England Rapid Risk Assessment suggests that the proposals are highly unlikely to result in any impact to [REDACTED]

Component	Likely effect (select one for each component; select the most harmful option if more than one is likely; lists are in order of harm, top to bottom)	Notional offence probability score
[REDACTED]	No effect	0
Land within 100m of any breeding pond(s)	No effect	0
Land 100-250m from any breeding pond(s)	0.01 - 0.1 ha lost or damaged	0.01
Land >250m from any breeding pond(s)	No effect	0
	Maximum:	0.01
Rapid risk assessment result:	<b>GREEN: OFFENCE HIGHLY UNLIKELY</b>	

Given the lack of suitable habitat within the site, the distance to the nearest suitable ponds (over 100m) and the small scale of the proposals, it is considered unlikely that even if amphibians including [REDACTED] are present in the local area that they would be significantly impacted by the proposals. No further surveys are considered necessary, however precautionary working methods are recommended to prevent creation of potential shelter/hibernation habitat during the construction/conversion phase.

#### 4.3.5 Birds

##### 4.3.5.1 BAP/SPIE/Red-list Birds

A number of local BAP, national SPIE, and Schedule 1 bird records were provided by SBIS from the local area. The site provided poor quality foraging habitat, with minimal vegetation cover.

#### **4.3.5.2 Nesting Birds**

All nesting birds and their eggs are protected under the Wildlife & Countryside Act 1981. The barn provides potential nesting opportunities for species such as wood pigeon and swallow, and old nests (likely wood pigeon and swallow) were recorded internally.

Building demolition should be undertaken outside of the bird nesting season (March-August), if this is not possible a nesting bird survey should be undertaken prior to the start of conversion works.

#### **4.3.6 Other Mammals**

##### **4.3.6.2 Hedgehogs**

Numerous records of hedgehogs were provided by SBIS, habitats at the site were of limited quality for hedgehogs due to limited vegetative cover and lack of shelter and hibernation opportunities.

No further surveys are necessary, however precautionary methods (Section 5), should be followed during the construction/conversion phase to minimise the risk of causing harm to this (and other nocturnal) species.

##### **4.3.6.3 Hares**

Brown hares (SBAP and SPIE species) generally use arable land and long grassland, and are unlikely to use habitats at the site. No further survey is necessary.

##### **4.3.6.4 Dormice**

There are no records of dormice within the local area and habitats within the site were not suitable to support dormice.

The site is not connected to any other suitable habitat in the local area, therefore no further surveys or precautions are considered necessary.

##### **4.3.6.5 Otter/Water Vole**

The site does not contain any suitable habitat for otter or water vole. There are no significant watercourses in the local area.

Otter and water vole will not be impacted by the proposals and no further survey or precautions are necessary.

#### **4.3.7 Invertebrates**

The site provided poor quality habitat for invertebrates with limited vegetation cover or area of suitable bare ground. It is considered unlikely that any protected or rare invertebrates are present or would be significantly impacted by the proposals. No further surveys are necessary.

#### **4.3.8 Impact on Local Wildlife Sites & European Protected Sites**

The proposed development will not directly impact on any local wildlife sites due to the location and scale of the proposals.

The Breckland SPA and SAC and the Rex Graham Reserve SAC lie within 13km of the site, however, due to the locations and access limitations to these areas no impacts to these European sites are predicted.

#### **4.4 Limitations and Assumptions**

The baseline conditions reported and assessed in this document represent those identified during a single site survey, on the 28<sup>th</sup> April 2021. A reasonable assessment of habitats can be made during a single survey; however, seasonal variations cannot be observed. The survey provides an overview of the likelihood of protected species occurring on the site: Where no evidence is found, this does not mean that species are not present, or using the site. Further surveys are only recommended if there is a significant likelihood that protected species may be present and impacted by the proposed development, based on the suitability of the habitat and any direct evidence.

The desk study used records and historical data provided by SBIS, which depend on the availability of recorders and survey effort in the area, and do not list all species likely to be present. Data supplement the site visit, but absence of records does not confirm absence of species.

All areas of the site were accessible on the day of survey.

## 5 Recommendations

### 5.1 Further Surveys

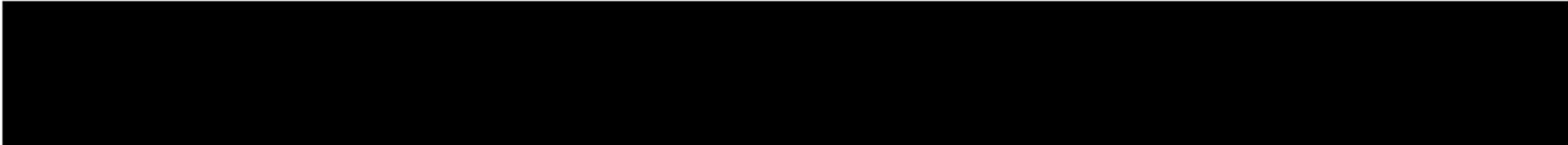
#### 5.1.1 Roosting Bats

Further surveys should be undertaken of the barn to assess the presence or likely absence of roosting bats. As the buildings is considered to provide low to moderate bat roost potential it is recommended that at least two activity surveys are carried out during the active season for bats (May to September). Surveys should comprise at least one dusk emergence and one separate dawn re-entry survey with at least one of the surveys carried out between May and August.

### 5.2 Precautionary Methods

#### 5.2.1 Nesting birds

The start of conversion works at barn should be undertaken outside the nesting bird season (March-August). If this is not feasible, a precautionary survey of the site prior to start of works, should be carried out, to check for active bird nests, and avoid infringing legislation which protects all nesting birds (WCA 1981). If an active nest is recorded, works will be postponed until all young birds have fledged and left the area.



Any loose rubble/debris should be taken off site or stored securely in skips to prevent creating new shelter or hibernation opportunities.

#### 5.2.3 Nocturnal Animals

Any deep holes or foundations left uncovered overnight should have an escape ramp (secured scaffold board), to enable any nocturnal animals that become trapped to escape.

#### 5.2.4 Sensitive Lighting

To minimise risk of disturbance to roosting bats potentially using adjacent buildings to the south east (both during and post development), external lighting should be minimised as follows:

- Any task lighting (during construction) should not be directed at the existing buildings.
- Any necessary security lighting should be set on short timers and be sensitive to large moving objects only.
- Lighting should be low-level, bollard-type, or directed downward and shielded to minimise light spillage.
- Hoods, cowls or directional lighting should be used to avoid light directed at the sky or towards mature trees.
- Lighting times should be limited, to provide dark periods.
- If the new access or parking areas will be lit, low-level, bollard-style lighting should be considered.

- Low pressure sodium security lights with glass glazing are recommended, as these produce the least amount of UV light. Avoid white and blue wavelengths of the light spectrum. The brightness of the lamps should be kept as low as feasibly possible for security and safety only<sup>1516</sup>.

### 5.3 Enhancement Recommendations

These additional recommendations are not legal requirements but would enhance the value of the site for wildlife, as encouraged through the NPPF, and to help achieve Suffolk BAP targets.

#### 5.3.1 Wildlife Attracting Planting

Additional tree and hedge planting surrounding the barn would provide foraging opportunities for birds, bats and invertebrates.

The following native fruit and berry bearing species could be used: hazel *Corylus avellana*, crab apple *Malus sylvestris*, dog rose *Rosa canina*, guelder rose *Viburnum opulus*, blackthorn *Prunus spinosa*, hawthorn *Crataegus monogyna* and spindle *Euonymus europaeus*.

#### 5.3.2 Bird Boxes

Bird boxes could be installed on suitable retained trees or on other suitable buildings within the wider farm. These should be installed at least 3m above the ground and should avoid direct sunlight (not directly south-facing), prevailing wind and be out of reach of cats and other predators:

- Smaller, open-fronted box, made to BTO dimensions (for spotted flycatcher and song thrush – Suffolk BAP species).
- Nest boxes with 32mm holes for house sparrow (SPIE species) could be added to the outbuildings. These should be located close together for this colonial nesting species, in a sheltered, minimally disturbed area (on the western aspect).
- Swallow nest cups situated in an open barn or cart lodge. A minimum distance of 1m between nest cups is suggested. To ensure the swallows have sufficient room in the nest cup and when arriving and leaving there should be at least 6cm free space above the nestcup. When choosing a suitable spot for the nest it is essential that birds have constant access throughout the breeding season.

#### 5.3.3 Bat Boxes

A bat box could be installed on suitable mature trees adjacent to the site or on the exterior wall of the converted barn. Woodcrete boxes such as the Vivara pro Woodstone box are suitable for crevice roosting species and would be suitable for installing on trees at the site. Bat boxes should ideally be erected at least 3m above the ground in a southerly direction (south-east to south-west).

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<sup>15</sup> BCT (2014) Artificial lighting and wildlife: Interim Guidance: Recommendations to help minimise the impact artificial lighting.

<sup>16</sup> Institution of Lighting Professionals (2011) Guidance Notes for the Reduction of Obtrusive Light GN01:2011.

## **6 Conclusion**

The site is generally of low ecological value, however the building may be used by nesting birds and roosting bats, further surveys for roosting bats should be undertaken to assess the presence or likely absence of bats at the site and careful timing of works or a pre-works nesting bird survey will prevent an offence to nesting birds. If any recommendations following further surveys are followed, it is considered unlikely that any protected or rare wildlife would be significantly impacted by the proposals and the site could be enhanced for local wildlife through inclusion of some or all of the enhancement suggestions.

## **7 Appendix A – Legislation**

### **7.1 Habitat Regulations**

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 transpose EU Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (Habitats Directive) and the Council Directive 79/409/EEC on the Conservation of Wild Birds (Birds Directive) into domestic law, making it an offence to deliberately capture, kill or disturb wild animals listed under Schedule 2 of the Regulations. It is also an offence to damage or destroy a breeding site or resting place of such an animal (even if the animal is not present at the time).

### **7.2 Wildlife & Countryside Act**

The Wildlife and Countryside Act 1981, as amended by the Countryside and Rights of Way Act (CROW) 2000 and the Natural Environment and Rural Communities Act (NERC) 2006, consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council Directive 79/409/EEC on the Conservation of Wild Birds (Birds Directive), making it an offence to:

- Intentionally kill, injure or take any wild bird or their eggs or nests (with certain exceptions) and disturb any bird species listed under Schedule 1 to the Act, or its dependent young while it is nesting;
- Intentionally kill, injure or take any wild animal listed under Schedule 5 to the Act; intentionally or recklessly damage, destroy or obstruct any place used for shelter or protection by any wild animal listed under Schedule 5 to the Act; intentionally or recklessly disturb certain Schedule 5 animal species while they occupy a place used for shelter or protection;
- Pick or uproot any wild plant listed under Schedule 8 of the Act.

Sites of Special Scientific Interest (SSSI) are designated under this Act.

Special Protection Areas (SPA) are strictly protected sites, designated under the Birds Directive, for rare and vulnerable birds and for regularly occurring migratory species.

### **7.3 Natural Environment & Rural Communities Act**

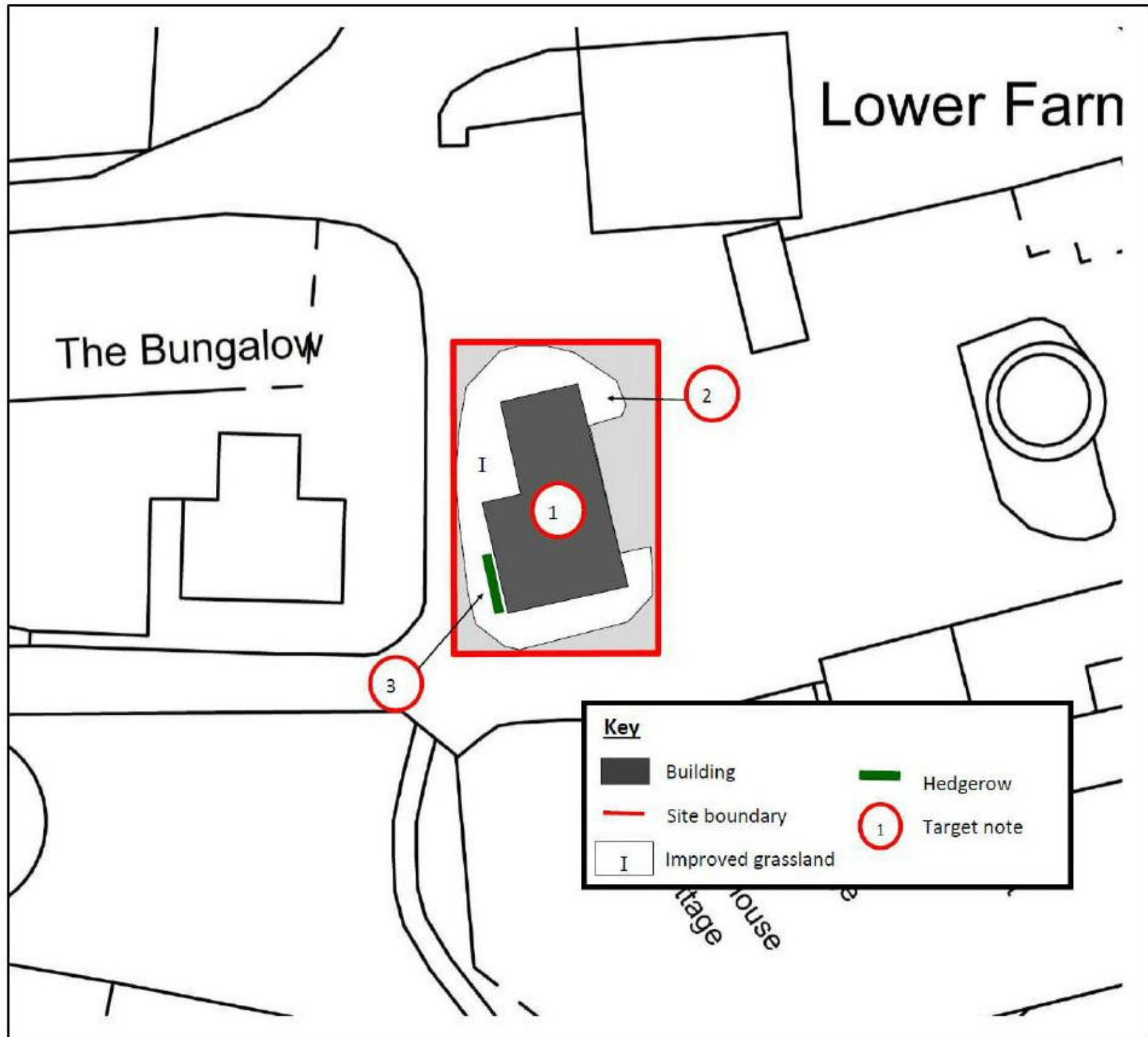
The NERC 2006 places a duty on authorities to have due regard for biodiversity and nature conservation during the course of their operations.

### **7.4 Biodiversity Action Plans**

The UK Biodiversity Action Plan (UKBAP) was organised to fulfil the Rio Convention on Biological Diversity in 1992, to which the UK is a signatory.




There is no longer a UK Biodiversity Action Plan; this has been replaced by the UK Post-2010 Biodiversity Framework (2012). The England Biodiversity Strategy has been replaced by Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011). As a result, the BAP process has been devolved to local level with each county deciding its own way forward.

## 8 Appendix B - Phase 1 Habitat Survey Plan





## Target Notes

Target note	Habitat Description	Photo
1	<p>The brick and flint barn is currently used as stables. The pitched slate roof is lined internally with traditional bitumen sarking felt creating potential crevice roosting opportunities for bats.</p>	
1a	<p>Internal view of the barn</p>	
2	<p>Improved grassland at the site is heavily disturbed and as such the sward height is &lt;5cm. Species dominated by grasses: perennial ryegrass &amp; annual meadow grass, with occasional forbs.</p>	

3

A short (5m) section of privet hedge.

