Adonis Ecology

Preliminary Bat Roost and Owl Assessment of Timber Mill at Jewsons, Stowmarket to Support a Planning Application

Project Ref: 1534

Prepared on behalf of:

Saint-Gobain Professional Services UK & Ireland
Development Department
The Elland Hub
100 Dewsbury Road
Elland
West Yorkshire
HX59BG

By:

Adonis Ecology Ltd.
Unit 11 Lavenham Studios
Brent Eleigh Road
Lavenham, Sudbury
Suffolk, CO10 9PE
Tel: 01787 249 160
E-mail: askus@adonisecology.co.uk
www.adonisecology.co.uk
Registered in England and Wales No: 6208092
Registered Office: Crane Court, 302 London Road, Ipswich, IP2 0AJ.

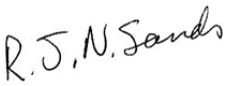
Quality Assurance

The findings outlined within this report and the data we have provided are to our knowledge true, and express our bona fide professional opinions. This report has been prepared and provided in accordance with the Chartered Institute for Ecology and Environmental Management (CIEEM) Code of Professional Conduct and the British Standard BS 42020:2013 (BSI, 2013) which provides a code of practice for biodiversity in planning and development. This standard in turn recommends compliance with CIEEM Guidelines for Preliminary Ecological Appraisals (CIEEM, 2013) and Guidelines for Ecological Report Writing (CIEEM, 2017) which includes model formats for Preliminary Ecological Appraisal and Ecological Impact Assessment.

As far as the author and report checker are aware, the only differences that occur in this report from the recommended layouts are:

- to enable greater clarity and reduce repetition (e.g. the report author is listed once on the quality assurance page in this report rather than on the front page, quality assurance page and introduction as in the CIEEM model formats);
- where there are inconsistencies in the guideline documents (e.g. the list of what should be included in the summary of an ecological report highlighted in the CIEEM Guidelines for Ecological Report Writing is different to that shown in the model formats in the same document); and
- to retain a proportionate approach in accordance with BS 42020:2013.

No method of assessment can completely remove the possibility of obtaining partially imprecise or incomplete information. Therefore, we cannot guarantee that this assessment completely defines the degree or extent of the occurrence of various species or habitats on the site, or the effectiveness of recommended actions as described in the report. In addition, as the ecological situation of a site is dynamic, this assessment pertains only to the conditions noted during the site visit. Therefore, to achieve the objectives of assessment as stated in this report, the conclusions are based on the information that was available during the time of the assessment and within the limits prescribed by our client in the agreement.

	Name	**Signature**
Report prepared by:	Marguerite Ravn BA (Hons) MPhil	
Report checked by:	Richard Sands MA MSc CIEEM CEnv	
Survey conducted by:	Marguerite Ravn and Richard Sands. Details of relevant training and experience available on request.	
Date of survey:	24th September 2021	

Contents

TABLES

PHOTOGRAPHS

0 SUMMARY

0.1 Adonis Ecology Ltd. was commissioned Saint-Gobain Professional Services to undertake a Preliminary Bat Roost and Owl Assessment of the timber mill at Jewsons, Newton Road, Stowmarket, Suffolk, IP14 5AE, Grid Reference TM 050 591. It is understood that it is proposed to do re-cladding and re-roofing works of the timber mill on site. The Local Planning Authority require a bat and owl assessment to validate the planning application for the site.

0.2 Assessment consisted of a site survey conducted on the 24th September 2021 by a licensed bat surveyor. The survey included a thorough internal and external check of the timber mill for signs and evidence of bats, in accordance with Natural England (English Nature, 2004) and Bat Conservation Trust (BCT) (Collins, 2016) guidelines. At the same time, the timber mill was assessed for potential to support barn owls *Tyto alba*.

0.3 No bats or owls, or signs or evidence of roosting bats or nesting owls, were found. It was therefore considered that the works would pose a negligible risk of impact to roosting bats or nesting owls.

0.4 It was considered that the proposed development could proceed in accordance with wildlife legislation and with negligible risk of harm to bats or owls.

1 INTRODUCTION

1.1 Background

1.1.1 Adonis Ecology Ltd. was commissioned Saint-Gobain Professional Services UK & Ireland to undertake a Preliminary Bat Roost and Owl Assessment of the timber mill at Jewsons, Newton Road, Stowmarket, Suffolk, IP14 5AE, Grid Reference TM 050 591.

1.1.2 It is understood that it is proposed to do re-cladding and re-roofing works of the timber mill on site. The Local Planning Authority require a bat and owl assessment to validate the planning application for the site.

1.2 Aim and Objectives

1.2.1 The aim of this report is to determine the likely impact of the planned works to the building on site on bats and owls.

1.2.2 To achieve this aim, the report has the following objectives:

- to identify and describe any potentially significant impact risks to bats and owls associated with the planned works to the building on site;
- to identify ways in which any significant risk of deleterious impacts could be avoided, wherever reasonably possible;
- for any significant bat or owl risks that could not reasonably be avoided, to describe surveys that would be required to confirm presence/absence and severity of impact, and outline likely mitigation options.

1.3 Planning Policy and Legislation

1.3.1 Planning policy and guidance considered for this report included:

- National Planning Policy Framework (NPPF);
- National Planning Practice Guidance (NPPG) – Natural Environment.

1.3.2 Legislation considered for this report included:

- Wildlife and Countryside Act 1981, as amended;
- Countryside and Rights of Way Act 2000;
- Natural Environment and Rural Communities (NERC) Act 2006;
- Conservation of Habitat and species Regulations 2017, as amended.

1.3.3 Key considerations from the NPPF and NPPG related to ecology and development include that impacts on legally protected species and habitats, as well as NERC Act (2006) Section 41 species and habitats are a material consideration for individual planning consents (MHCLG, 2019).

1.3.4 The NPPF also promotes the enhancement of natural and local environments through planning, and encourages a move towards securing measurable net gains for biodiversity (MHCLG, 2019).

2 METHODOLOGY

2.1 Desk Study

2.1.1 The surrounding habitat was assessed using a combination of maps (Google Earth and Ordnance Survey) and observations of the surrounding landscape from the site, to enable the site to be put into its local habitat context. These maps were also used to locate key habitats within a 500m radius of the site.

2.1.2 In addition, the Multi-Agency Geographic Information for the Countryside (MAGIC) interactive map was accessed to locate statutory designated sites within 2km of the site and to determine whether the site falls within the Impact Risk Zone of any Sites of Special Scientific Interest (SSSI) cited for bats.

2.2 Bats

2.2.1 The site visit was undertaken on the 24th of September 2021 by an ecologist who holds a Natural England Level 2 Class licence for bats (2015-11578-CLS-CLS) accompanied by an assistant. The survey was undertaken in daylight, using high-powered torches, to survey the building both externally and internally.

2.2.2 The bat assessment methods followed Natural England Bat Mitigation Guidelines (Natural England, 2004) and Bat Conservation Trust (BCT) Good Practice Guidelines (Collins, 2016) and therefore considerations were:

- the availability of access points of a size large enough to allow entry of bats to roosts;
- the presence and suitability as roosts of cracks, crevices, holes, dense ivy *Hedera helix* covering and other places;
- signs of bat activity or presence.

2.2.3 Definite signs of bat activity were taken to be:

- the bats themselves;
- droppings;
- dead bats;
- audible bat squeaks;
- scratch marks;
- urine splatter.

2.2.4 Signs of possible bat presence were taken to be:

- grease marks;
- moth and butterfly wings.

2.2.5 The outside of the building was checked for gaps, cavities, access points and crevices, and any signs of bats, in accordance with Natural England guidelines (Natural England, 2004).

2.2.6 The inside of the building was then checked for signs and evidence of bat activity and opportunities for roosts. As many crevices as could be safely accessed were checked for suitability and signs of bats.

2.2.7 The suitability of places to roost was assessed based upon potential for access and lack of cobwebs and dirt.

2.2.8 Building inspection survey is a suitable method at any time of year for determining presence or absence of bats in buildings, according to Natural England guidelines (Natural England, 2004).

2.2.9 To determine the likelihood of different status bat roosts to be present within the building, a calculation of the risk level has been undertaken. This calculation uses information on features known from published research to influence bat roost occurrence, to calculate the probability of major/maternity roosts or minor roosts of both crevice and void dwelling species occurring on site. Features used in the calculation include within site variables, such as potential roosting opportunities and the presence or absence of bat signs, as well as off-site variables such as the abundance and availability of foraging habitat, habitat connections, the level of urbanisation around the site and the distance of the site to water.

2.2.10 The probability level at which each feature may influence the likelihood of a bat roost occurring has been determined using past bat emergence/re-entry surveys of buildings carried out in England and Wales by Adonis Ecology in accordance with Bat Conservation Trust guidelines (Hundt, 2012), where the presence or absence of a bat roost has been proven beyond reasonable doubt.

2.2.11 It should be noted that, because the survey data used to derive the probability levels for each feature were all from buildings considered to present at least a low risk of supporting a bat roost, the calculated probability for bats to occur on any proposed development site is likely to overstate, rather than understate, the probability of a bat roost occurring.

2.3 Barn Owls

2.3.1 Signs of barn owl presence would include sightings of the birds themselves, feathers, dropping splashes and pellets.

2.3.2 Definite signs of nesting owl activity were taken to be:

- the nesting owl themselves;
- “nests”, old or new;
- eggshells.

2.3.3 The availability of access to the building was assessed based upon the presence of holes large enough to allow the entry of barn owls.

2.3.4 The inside of the building (where access allowed) was checked for signs of barn owl activity and opportunities for barn owls to nest.

Survey Constraints

2.3.5 The roof and walls were unlined, giving unhindered access for visual inspection for bat and bird signs. However, as the site bordered a railway line and a boundary/security fence was blocking access to the western side of the timber mill, only three sides of the building were surveyed from the outside. There would be a possibility of features on this wall, however it was considered that this possibility was very slight and would not impact upon the conclusions of this report.

3 RESULTS AND EVALUATION

3.1 Site Location and Description

3.1.1 The site consisted of a timber mill within an industrial complex with one other building (not surveyed) with associated access and yard with several shelves and other storage areas. The site was located in the north-eastern outskirts of Stowmarket, roughly 285m from the train station (Google Earth, 2021),

3.2 The Surroundings

3.2.1 The site was bordered on the western side by a busy railway line and immediately to the south was an industrial complex, with the town of Stowmarket beyond. To the north was residential area, to the east an area of allotments and some residential houses, with farmland and small wooded areas beyond (Google Earth, 2021).

3.2.2 Key features of the surrounding landscape are summarised as follows:

Table 1: Key Features of the Site Surroundings

Feature	Value
Percentage deciduous tree cover within 500m of site	7%
Percentage non-illuminated tree/tall shrub cover (over 4m) within 50m of the site	10%
Number of non-illuminated tree/tall shrub lines within 50m of the site	3
Distance to nearest medium-large pond, lake, river or open stream	17m to the River Gipping
Percentage of rough grassland within 500m of the site	2%
Degree to which surrounding 500m is built up (rural, suburban, urban)	Suburban

Waterbodies within 500m

3.2.3 Only three waterbodies were shown on OS maps within 500m of the site:

- a drain starting 10m north of the site, which at the time of the site survey was very overgrown with vegetation;
- River Gipping and associated drains and cuts running north to south, closest point was 17m from the site; and
- A pond approximately 385m north (Promap, 2021).

Woodlands within 500m

3.2.4 There was a wooded area alongside the River Gipping and the railway line, starting some 70m north of the site (Google Earth, 2021).

Statutory Designated Wildlife Sites

3.2.5 There was one Local Nature Reserve (LNR) within 2km of the site, the Church Meadow LNR, approximately 1.97km south of the site. This site is however not cited specifically for bats or barn owls and therefore is not considered further in this report (MAGIC, 2021).

3.2.6 The site falls within an Impact Risk Zone for Sites of Special Scientific interest (SSSIs), however there was no requirement for the Local Planning Authority (LPA) to consult Natural England on the type of works proposed for this site (MAGIC, 2021).

3.3 Description and Key Species Findings

3.3.1 The surveyed building had double walls with breeze blocks internally and bricks externally, and an unlined, pitched roof of asbestos sheet and glass windows along the ridge, supported by a metal girders. There were large doors at either ends of the building, the southern was made of metal while the northern was wooden. Attached to the eastern side of the building was a covered area with no walls, the roof made of metal supported by metal girders and columns (see Photograph 1 in Appendix 2).

3.3.2 Internally, the building was very bright in the daylight with no dark crevices or holes, and the roof was generally very cobwebbed. The building was divided in two by a cement block wall partly covered by wood (see Photograph 2 in Appendix 2).

3.3.3 Externally, above the doorways were rows of holes where two corrugated asbestos sheets met. These were inspected by torch but no bats or bats signs were observed in these. Some damaged bricks were found on the eastern and southern side of the building with a few holes, however most of the holes were not deep enough for bats to roost in, and of those that did appear deep enough, inspection by torch revealed them to be very cobwebbed and no signs of bats were present (see Photograph 3 in Appendix 2).

3.3.4 One potential bat dropping was found inside the surveyed building, however as no other evidence or signs of bats were found and as the doorways were wide open it was considered likely that this one dropping came from a bat doing a quick flythrough, not a regular roosting bat.

3.3.5 There were no ledges or other potential nesting places for barn owls, and no signs or evidence of barn owls were found at site. Once the doorways at either side of the

surveyed building would be closed at night, there would be no possible access points for barn owls.

3.4 Evaluation - Bats

3.4.1 The results of the evaluation calculation and the final likelihood level for bat roosts occurring, taking into account any modifying factors, are shown in Table 2 below.

Table 2: Likelihood of Bat Roosts Occurring

Building	Roost Type	Roost size	Calculated Probability of Roost Occurring	Comments and Potential Modifying Factors	Likelihood of Roost Occurring
Timber Mill	Crevice dwelling	Major	0.02	Only one old dropping found. Very few potentially suitable crevices for crevice-dwelling bats to roost in, none with any signs of bat activity.	Negligible
		Minor	0.28		Negligible
	Void dwelling	Major	0.01	Only one old dropping found. The mill had no quiet, dark loft space, but was an open, very bright work space, which is highly unsuitable for void-dwelling bats.	Negligible
		Minor	0.15		Negligible
	Hibernating	Major	N/A	Mill building very draughty with the large open doorways as well as being very bright with no dark crevices.	Negligible
		Minor	N/A		Negligible

3.4.2 The evaluation of likelihood as outlined in Table 2 shows that despite one old bat dropping was found, the site is highly unsuitable for both crevice and void dwelling bats. It is considered most likely that the single bat dropping was left by a bat who did a quick flythrough of the site but decided not to roost there.

4 LEGISLATION AND IMPACT RISK

4.1 Bats

Summary of Relevant Legislation

4.1.1 Bats are protected under the Conservation of Habitats and Species Regulations 2017 (as amended), as well as the Wildlife and Countryside Act 1981 as amended by the Countryside Rights of Way Act 2000. Offences likely to be relevant to development are to:

- deliberately capture, injure or kill a bat;
- deliberately disturb a bat in a way that would affect its ability to survive, breed, rear young, hibernate or migrate or significantly affect the local distribution or abundance of the species;
- damage or destroy a roost;

- intentionally or recklessly disturb a bat at a roost;
- intentionally or recklessly obstruct access to a roost.

Impact Assessment

4.1.2 The metric used to calculate the probability level of a bat roost on site, taking into account the surrounding area, the distance to open water and the connectivity of the site to other suitable habitats, gave the timber mill a maximum score of 0.28 for a minor roost of crevice dwelling bats. However, the metric is conservative in its estimate and cannot take into account the roost suitability below "low", the number of bat droppings present, nor that all potential roost sites can be searched.

4.1.3 Given that no signs or evidence of roosting bats were found on site and given the cobwebbed state of the roof of the building as well as the high light levels inside the building during daylight, it was considered highly unlikely that the building was in current or recent use by roosting bats. One potential bat dropping was found inside the surveyed building, however given the general unsuitability of the site for roosting bats, it was considered likely that this one dropping came from a bat doing a quick flythrough. It was considered that the proposed works could be undertaken with negligible risk of harm to roosting bats.

4.2 Barn Owls

Summary of Relevant Legislation

4.2.1 Wild birds are protected under the Wildlife and Countryside Act 1981 and, with certain exceptions (e.g. pest species), it is an offence to intentionally:

- kill or injure any wild bird;
- take, damage or destroy the nest of any wild bird while it is in use or being built;
- take or destroy the egg of any wild bird.

4.2.2 Furthermore, for Schedule 1 bird species of which the barn owl *Tyto alba* is one, it is an offence under the Wildlife and Countryside Act 1981 as amended by the Countryside and Rights of Way Act 2000 to intentionally or recklessly;

- disturb a wild bird while it is building a nest or is in, on or near a nest containing eggs or young;
- disturb dependent young of such a bird.

4.2.3 Many bird species are also NERC Act 2006 Section 41 species.

Impact Assessment

4.2.4 Given the lack of nesting potential for barn owls and absence of any signs of barn owl activity within the timber mill, the risk of impact on barn owls was considered to be negligible.

5 CONCLUSION

6.1 The proposed works to the building were considered to present a negligible risk of impact to roosting bats and nesting barn owls and it was considered that the proposed works could proceed with negligible risk of impact to protected species.

6.2 If the works do not proceed for more than 18 months from the date of this preliminary bat roost and owl assessment, the assessment should be repeated in case the situation has changed.

6 REFERENCES

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7 APPENDICES

7.1 Appendix 1: Photographs

Photograph 1: External view of the surveyed building from north

Photograph 2: Internal view of the surveyed building

Photograph 3: Cobwebbed hole in brick, external southern wall