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Ref: 1687

Date: 3<sup>rd</sup> February 2022

Mr A Benn  
Peter Wells Architects  
Office Farm  
Letheringham  
Woodbridge  
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**BY EMAIL**

Dear Ashley,

**RE: Elm Farm, Somersham Rd, Little Blakenham, Suffolk IP8 4NF**

Further to the holding objection raised by Place Services in their letter dated 14<sup>th</sup> January 2022, please find below the results of an updated building inspection and site walkover carried out at the above site to determine the potential for protected species – most notably bats and nesting birds – to be present and affected by the proposals to convert two existing agricultural buildings into five residential dwellings.

This addendum should be read in conjunction with the report entitled Bat Activity Survey - Elm Farm, Little Blakenham by Elite Ecology dated July 2020. This addendum refers to the buildings labelled Building 3 and Building 4 in the 2020 Bat Activity Survey report and the immediately surrounding marginal land, as per the proposed Class Q development boundaries (shown in Appendix 1).

**Surveyors**

A site survey was carried out on 1<sup>st</sup> February 2022 by Liz Lord. Liz has been a professional ecologist since 2005, and holds current Natural England licences to survey bats - Class Licence Reg. No. 2015-13305-CLS-CLS; great crested newts - Class Licence Reg. No. 2020-44816-CLS-CLS; and barn owls – Class Licence Reg. No. CL29/00160. Liz is a full member of the Chartered Institute of Ecology and Environmental Management.

The weather at the time of survey was sunny, with a temperature of 12°C and a strong breeze (BF5-6).

**Methodology & Rationale**

The survey included an assessment of the sites' potential to support any legally protected species; or Species and Habitats of Principal Importance, as identified by Section 41 of the Natural Environment and Rural Communities Act 2006. Where best practice guidelines exist, these have been used to assess the likelihood that individual species will be present, for example Bat Surveys: Good Practice Guidelines (Collins, J. 2016) and Habitat Suitability Index for Great Crested Newt (Oldham *et. al*, 2000).

Using criteria provided in best practice guidelines, habitats have been assessed for their potential to support protected species; notably bats, barn owls *Tyto alba*, badgers *Meles meles*, great crested newts *Triturus cristatus*, reptiles, water voles *Arvicola amphibius*, dormice *Muscardinus avellanarius* and otters *Lutra lutra*. Where methodologies, classification or recommendations deviate from best practice guidelines, this letter provides ecological justification for such changes.

An updated records search with Suffolk Biodiversity Information Service was not carried out since the 2km radius search undertaken by Elite Ecology in 2020 is still considered to be relevant and the likelihood of any significant additional records having been submitted since July 2020 is extremely low. Further, the presence of roosting bats was confirmed on site in 2020, and as such measures will be taken to ensure that updated survey information is obtained prior to the submission of a mitigation licence application to Natural England. An updated records search is considered very unlikely to influence these works, or the mitigation provided and is not a significant constraint to the conclusions drawn in 2022.

An assessment was made against the proposals shown on plan numbers PW1192\_PL201 and PW1192\_PL203 both dated Oct 2021 by Peter Wells Architects, as provided in Appendix 1. Note that in these drawings, Building 3 is referred to as Barn C, and Building 4 is split into Barn A and Barn B.

Aerial photography and Ordnance Survey maps at 1:10,000 scale highlighted the presence of one water body within 250m of the site boundaries, immediately to the south of Building 4, however upon inspection this was found to no longer be present.

The buildings were surveyed and assessed in accordance with criteria outlined in Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, J. 2016). The internal and external inspections of the buildings were carried out – as necessary – using a powerful torch, a ladder, a pair of Nikon 12 x 50 binoculars and an Easyview 8mm digital recording endoscope to inspect gaps and crevices for bats and evidence of bats.

Floors, walls and storage surfaces beneath all possible access points or crevices which may be used for roosting were checked for droppings, scratching and urine or fur staining, and particular attention was paid to the areas beneath tie beams from which bats may hang or rest. The ridge boards, beam joints, barge boards and door / window frames of the buildings were specifically checked for scratching and staining, as well as roosting bats. Particular attention was paid to any gaps in and around timbers, roofs and walls; and the walls, ledges and ground area below.

Floor surfaces generally comprised relatively clean concrete with occasional build-up of vegetation debris, and at the time of the building inspection the floors did not appear to have been recently swept. All buildings were formerly used to house pigs.

## **Results – Habitats**

### Buildings

Building 3 is of modern construction, with closely fitting wooden beams lined internally with plyboard of varying condition, and lined externally with corrugated asbestos roof sheets and plyboard. Holes are present in and around some of the internal and external boards, however the large gap between is filled with fibre glass (or similar) insulation. A large gap (c.250mm) is also present between the unlined corrugated asbestos and the plyboard lining beneath, and is not considered suitable for roosting bats. The remains of one butterfly was found on the floor of Building 3, however it could not categorically be determined whether this was the result of bats or spiders, since no other evidence

of the presence of bats was recorded in or around the building, and no further feeding remains were recorded. Spider webs were present across the internal roof structure.

Building 4 is divided into northern and southern sections, with both sections consisting of a combination of breeze block and plyboard / wooden slat / weatherboarded walls, with modern wooden roof beams supporting a pitched corrugated asbestos roof. Most of the northern roof is lined with spray-on foam insulation, with a small section lined with plyboards. The southern roof is unlined, with some Perspex skylights. The northern section of B4 is openly accessible via missing and / or open window panes to the north and south, whilst the southern section is permanently accessible via open door ways to the east and west, and via overlapping roof sections.

### Habitats

The buildings are surrounded to the south, east and west by concrete hard standing. Immediately to the north of Building 4 is a wide road verge, partially shaded by the building itself, and supporting a mix of sparse ruderal vegetation and scattered small trees. Nettles *Urtica dioica* dominate, with some ground ivy *Glechoma hederacea*, cocksfoot *Dactylis glomerata*, ivy *Hedera helix* and cleavers *Galium aparine*. Small cherry and plum *Prunus sp.* trees grow between the building and the road, with many at least partially covered in ivy. A semi-mature weeping willow *Salix babylonica* stands immediately to the north east of the building. All of the trees were assessed as being of negligible suitability for roosting bats.

### **Protected Species and Species of Principal Importance in England (SPIE)**

The site does not provide suitable habitat for great crested newt, reptiles, water vole, otter or dormouse. No evidence of the presence of badger was found on site or within 30m of the site boundaries, and no evidence of the presence of barn owl was recorded in either of the buildings. Therefore, no adverse impacts to species additional to those highlighted in the 2020 Bat Activity Survey report are likely.

### Nesting birds

Numerous bird nests were recorded inside the buildings, particularly Building 3. The nests were typical of robin *Erithacus rubecula*, blackbird *Turdus merula*, wren *Troglodytes troglodytes* and wood pigeon *Columba palumbus*.

### Bats

The buildings appear to be in a very similar condition to that recorded in 2020, with Building 4 re-assessed as being of low suitability for roosting bats, and Building 3 re-assessed as being of negligible to low suitability for roosting bats.

Building 4 provides a limited number of very small potential roosting features, suitable for use by very small numbers of bats, or most likely by individual bats. These include gaps between some timber ends and posts in the southern section of Building 4, as pictured below, some of which were observed at the eastern end of the building where a single roosting common pipistrelle *Pipistrellus pipistrellus* was recorded in 2020. Limited roosting opportunities are also present on the eastern end of Building 4 (north section), between the asbestos barge board and gable end weatherboarding. No other potential roosting features were recorded.



Photos 1 & 2: Southern section of Building 4, showing small gap between wooden structural beams. A number of these are present along the southern length of Building 4



Photos 3 & 4: South eastern corner of Building 4, showing split in wooden structural beams

It is noted that the buildings are covered with corrugated asbestos sheets, and not corrugated metal as originally stated in 2020. There is some limited potential for bats to use gaps beneath lifted asbestos sheets to roost, however the roosting conditions are likely to be suboptimal. Potential roosting features beneath barge boards of most of the buildings are assessed as being of very low suitability for bats due to the wide and shallow nature of the crevice beneath, however the eastern asbestos barge board of Building 4 provides some potential roosting opportunities.

The buildings provide some limited potential nesting opportunities for house sparrow *Passer domesticus*, but generally the site is of little value to Species of Principal Importance in England.

## Conclusions

The proposals are very unlikely to have any adverse effects on great crested newt, reptiles, badger, water vole, otter, dormice or SPIE.

## Nesting birds

There will be some loss of nesting opportunities for common and widespread bird species such as blackbird, robin, wren and pigeon.

## Bats

No evidence of the presence of roosting bats was recorded in either building at the time of survey. Combined with the general lack and low quality of potential roost features, it is reasonable to conclude that the results of the 2020, whilst just over 18 months old, remain valid. The likelihood of more than one or two bats using Building 4 to roost is extremely low, and further survey at this stage is not recommended. No additional impacts i.e. beyond those identified in the Bat Activity Survey report dated July 2020, are considered likely.

Building 3 is considered to be less suitable for roosting bats than originally assessed in 2020, with no ideal potential roosting features noted. This downgrade is supported by the results of the 2020 surveys, when roosting bats were found to be likely absent. Further targeted survey of this building is not recommended, and in order to avoid potential harm to bats precautionary methods of working are deemed to be proportional to the predicted impacts.

## **Recommendations**

Following the confirmed presence of a roosting common pipistrelle in Building 4 in 2020, a mitigation licence is necessary in order to proceed with any works to the building. In order to apply for a mitigation licence to destroy a small, non-breeding summer roost of a common species, updated survey information will need to be gathered in spring / summer 2022. At least two dusk / dawn surveys with at least four surveyors or infra-red cameras, carried out at least two weeks apart during May to September inclusive will be necessary to accompany the existing data set from 2020. At least one of these surveys must be undertaken between May and August inclusive.

Where at least three dusk / dawn surveys carried out in optimum weather conditions with an appropriate number of surveyor / infra-red camera positions and suitably spread over the optimum bat survey period of May – August suggest that bats are no longer using the building to roost, it would be deemed reasonable and proportionate for works to proceed following a non-licensed, supervised precautionary method statement.

Regardless of the updated survey results, it is recommended that two built-in bat boxes are provided on the eastern and southern facades of Building 4 to provide replacement roosting opportunities for crevice dwelling bats such as pipistrelle in a location very close to the roost recorded in 2020. With two purposes built boxes provided on two different aspects, this will also result in an overall enhancement of the site for roosting bats.

Neither building appears to provide suitable conditions for hibernating bats, and as such no specific mitigation for hibernating bats is recommended, contrary to the recommendations of the 2020 report. However, as a precaution and generally accepted best practice, no demolition / removal of materials from the buildings will take place between December and mid-March inclusive.

Three open fronted nest boxes suitable for use by robin, wren and blackbird should be provided in shrubs / trees immediately offsite to the east, to provide replacement nesting habitat for these species.

## Enhancement

Given the existing building footprint and limited surrounding land area, there is very limited scope to enhance the site for wildlife. The recommended two built in bat boxes will enhance the site for roosting bats, and the provision of at least two double or four single nest boxes for house sparrow on

the northern elevations of the buildings would enhance the site for nesting house sparrow. Such boxes should have a hole size of 32mm.

## **Summary**

Subject to a bat mitigation licence being granted prior to the commencement of works, the proposals are very unlikely to have any significant adverse effects on protected species or Species of Principal Importance in England. If the above recommendations are followed, the proposals could have a significant positive effect upon roosting bats, and a minor positive effect on nesting house sparrow.

If you have any queries regarding the above, please do not hesitate to contact me. Photographs of the site are provided in Appendix 2.

Yours sincerely



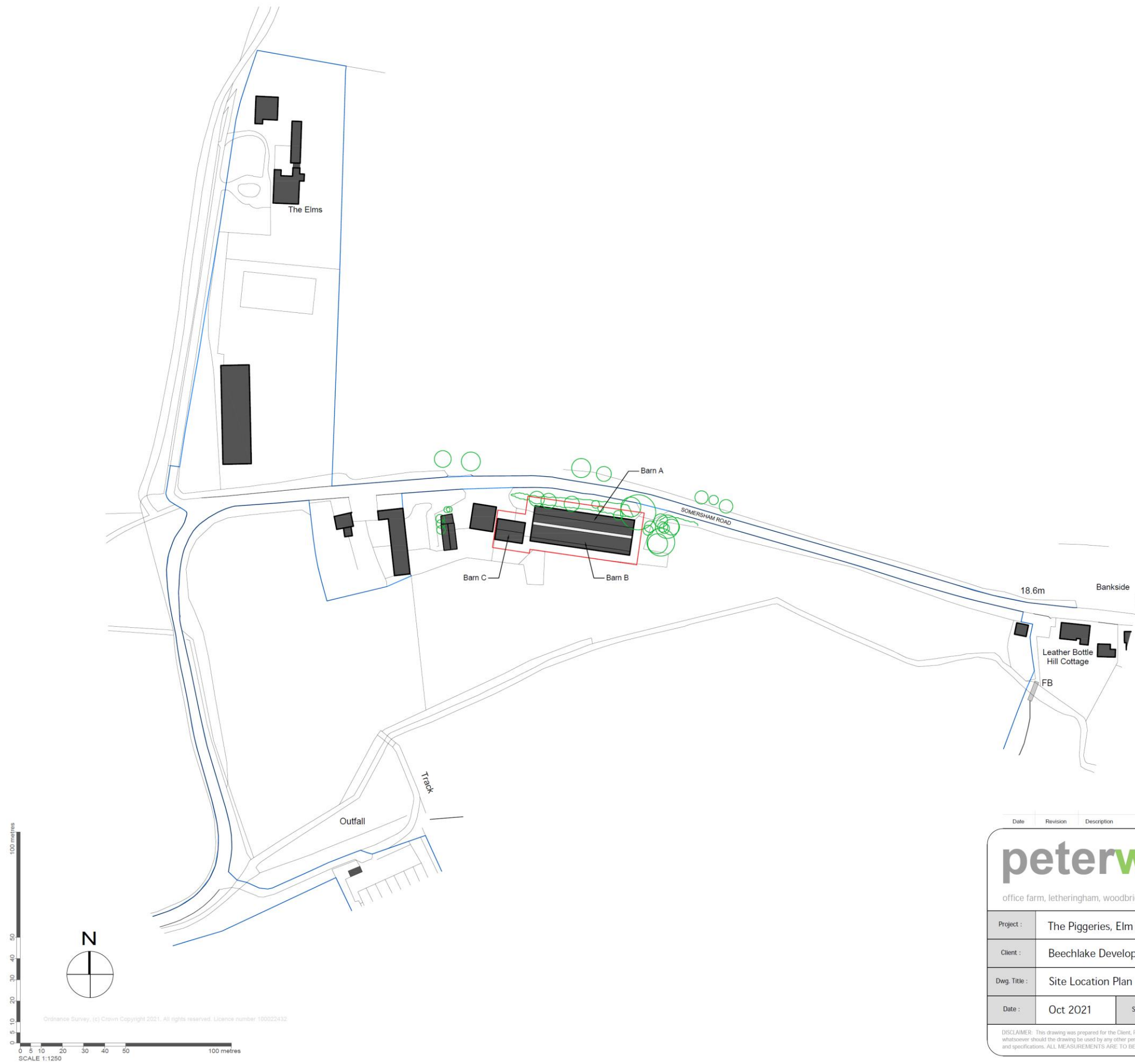
Liz Lord BSc (Hons) MCIEEM  
Consultant Ecologist

## **References**

Collins, J. (ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn)*  
The Bat Conservation Trust, London.

Oldham, R.S., Keeble, J., Swan, M.J.S. & Jeffcote, M., (2000). Evaluating the suitability of habitat for the great crested newt (*Triturus cristatus*). *Herpetological Journal*, 10, pp. 143-155.

**Appendix 1:  
Proposed Layout Plans**



Date	Revision	Description	Drawn	Checked
<b>peterwellsarchitects</b>				
office farm, letheringham, woodbridge, suffolk, IP13 7RA - 01728 745356 - info@peterwellsarchitects.co.uk				
Project :	The Piggeries, Elm Farm, Somersham Road, Little Blakenham, IP8 4NF			
Client :	Beechlake Developments			
Dwg. Title :	Site Location Plan	Dwg. Status :	PLANNING	Drawn by : AB
Date :	Oct 2021	Scale :	1:1250 @ A2	Dwg. No. : PW1192_PL201 Revision : /
<small>DISCLAIMER: This drawing was prepared for the Client, Project &amp; Site stated below and for the purposes set out in the Project Particulars. Peter Wells Architects accepts no responsibility whatsoever should the drawing be used by any other person, on any other site or for any other purpose than those stated. This drawing is to be read in conjunction with all relevant drawings and specifications. ALL MEASUREMENTS ARE TO BE CHECKED ON SITE AND ANY DISCREPANCIES REPORTED TO PETER WELLS ARCHITECTS.</small>				

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Proposed Plans and Elevations of Barns A & B - 1:100



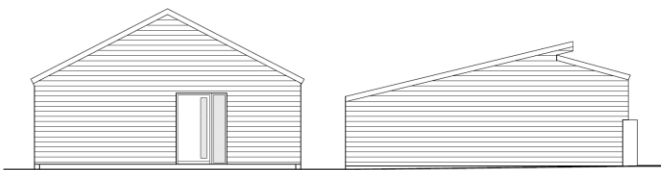
Barns A & B - Proposed Floor Plans - 1:100



Barns A & B - Proposed South Elevation - 1:100



Barns A & B - Proposed North Elevation - 1:100



Barns A & B - Proposed West Elevation - 1:100



Barns A & B - Proposed East Elevation - 1:100

**Notes on Materials:**  
 Roof: Zinc standing seam roof - Colour, Grey  
 Walls: Timber cladding  
 Windows and Doors: PPC Aluminium double glazed units - Colour, Grey

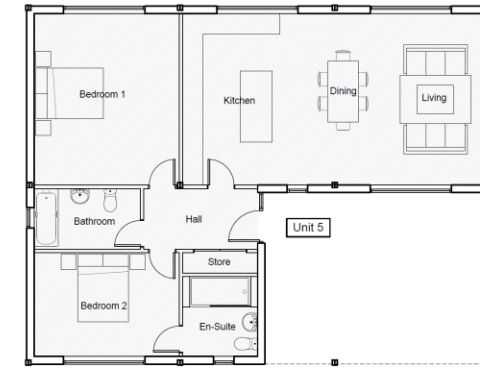


SCALE 1:100

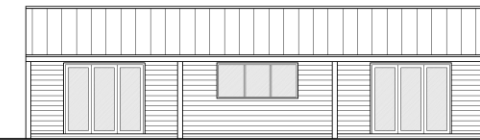
Schedule of Accommodation:

Unit 1 = 100 sqm  
 Unit 2 = 100 sqm  
 Unit 3 = 100 sqm  
 Unit 4 = 380 sqm  
 Unit 5 = 100 sqm  
 Total g.i.f.a = 780 sqm

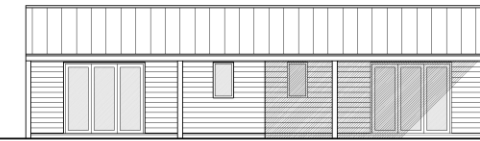
Proposed Plans and Elevations of Barn C - 1:100



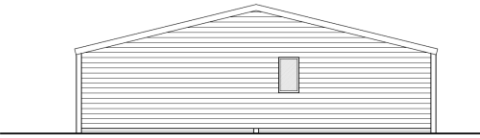
Barn C - Proposed Floor Plan - 1:100



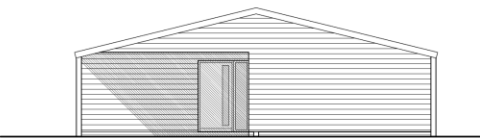
Barn C - Proposed South Elevation - 1:100



Barn C - Proposed North Elevation - 1:100



Barn C - Proposed East Elevation - 1:100



Barn C - Proposed West Elevation - 1:100

Date	Revision	Description	Drawn	Checked	
<b>peterwellsarchitects</b>					
office farm, litheringham, woodbridge, suffolk, IP13 7RA - 01728 745356 - info@peterwellsarchitects.co.uk					
Project :	The Piggeries, Elm Farm, Somersham Road, Little Blakenham, IP8 4NF				
Client :	Beechlake Developments				
Dwg Title :	Proposed Floor Plans and Elevations	Dwg Status :	PLANNING	Drawn by :	AB
Date :	Oct 2021	Scale :	1:100 @ A1	Dwg No. :	PW1192_PL203
		Revision :	/		
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**Appendix 2:  
Site Photographs**



Photo 3: Northern elevation of Building 3



Photo 4: Internal view of Building 3



Photo 5: Western elevations of Building 4, showing the two adjoining sections



Photo 6: Southern elevation of Building 4, with adjoining concrete



Photo 7: Internal view of Building 4, southern section

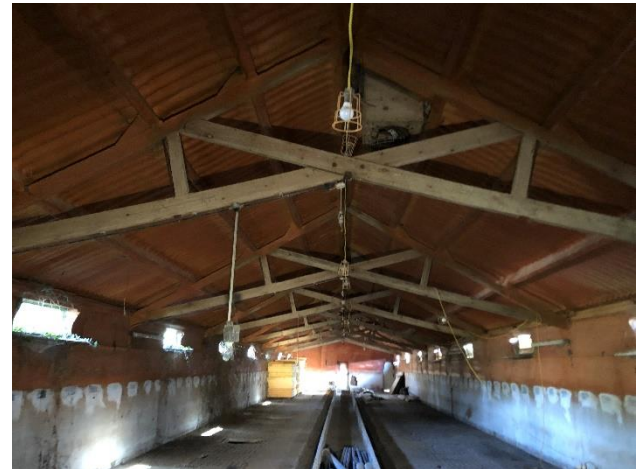


Photo 8: Internal view of Building 4, northern section



Liz Lord Ecology

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