

# Precautionary Work Method Statement for GCNs

## Land adjacent The Cedars Wetherden

PREPARED FOR: Mr P. Riley  
PREPARED BY: Christian Whiting (MHE Consulting Ltd)  
DATE: 7 August 2022  
ISSUE/VERSION: 1.1

*By submitting this document to the LPA the proposer and their agents confirm they are in agreement with and will work to the recommendations made within it. This document should be read in conjunction with, and has been designed to complement, the Ecology Report (MHE Consulting Ltd, 2019<sup>1</sup>) produced for the scheme; for the avoidance of doubt and on a precautionary basis all recommendations made in this report and the ER must be followed in full. No deviations will be made without the prior and written agreement of an MHE Consulting ecologist; to do otherwise may result in a criminal offence being committed.*

### 1. Proposed development

This document relates to the construction of a single dwelling on land adjacent to Cedar Lodge, Kates Lane, Wetherden, Suffolk (TM 03232 67458, Figure 1). Works will comprise the stripping of lawn, the felling of some trees and shrubs, and the excavation of foundations and service runs (e.g. sewerage, electricity, surface water drainage etc.). New hedgerows and tree planting is proposed as part of the site landscaping.

Planning approval (Ref: DC/19/05446) was granted by Mid Suffolk District Council on the 15 January 2020 and condition 6 relates to ecology as follows:

*6. ACTION REQUIRED: MITIGATION TO BE AGREED Prior to the commencement of works to construct the hereby approved dwelling, a scheme of appropriate protected species mitigation measures (including precise details of the timing, any translocation measures deemed necessary and method of protection) shall be submitted to and approved, in writing, by the Local Planning Authority.*

*No development shall be undertaken except in accordance with the approved scheme of mitigation and timings as may be agreed in writing. Reason - In order to safeguard protected wildlife species and their habitats and because the site is adjacent to a pond which with the surrounding habitat is likely to support great crested newts.*

The document will enable the discharge of Condition 3 and has been produced by Christian Whiting BSc (Hons) MSc MCIEEM, an experienced ecologist with over 20 years' experience and holder of the relevant NE GCN survey licence (Class A licence 2015-17633-CLS-CLS). Christian has undertaken numerous impact assessments and regularly provides mitigation guidance for GCNs, as well as acting as an Accredited Agent on full European Protected Species Mitigation (EPSM) licences for the species.

#### *Legal protection*

In England, GCN are afforded full legal protection under Schedule 2 of the Conservation of Habitats and Species Regulations 2010 and under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). A mitigation licence is required if works will have impacts on great crested newts (GCN) which result in:

- capturing, killing, disturbing, or injuring them (on purpose or by not taking enough care);
- damaging or destroying their breeding or resting places (even accidentally); and/or
- obstructing access to their resting or sheltering places (on purpose or by not taking enough care) form of disturbed, dry, mainly short grassland (though animals may pass or forage over it e.g. on wet, mild evenings).

---

<sup>1</sup>MHE Consulting Ltd (2019) Ecology Report: Proposed Residential Developments Land South of Cedar Lodge, Wetherden, Suffolk. October 2019

This document therefore proposes measures to be implemented to ensure offences will not occur during the development, and that an EPSM licence is not required. It has been prepared with reference to the Rapid Risk Assessment tool within the Natural England (NE) Method Statement template<sup>2</sup> as well as recent CIEEM guidance<sup>3</sup>.

## 2. Ecological sensitivity

### Habitats on site

The proposed development site comprises an area of lawn with mature trees, shrubs and some hedgerows (Photos 1 to 6, Figure 2) with 2 ponds located within 250m of the site (Photos 7 and 8, Figure 3).

### GCN distribution

Pond P1 (Photo 7) was visually assessed in 2019 and was dry and a further inspection in 2022 found the pond to be dry again. A small ornamental pond P2 (Photo 8) exists in the garden of Cedars Lodge and permission was granted by the new owners to sample the pond for GCN eDNA survey which was undertaken by MHE Consulting in June 2022. The results for pond P1 were negative (Appendix A2); pond P1 is likely to provide habitat for common species such as smooth newts (*Lissotriton vulgaris*) and other species such as common toad.

Given the limited extent of the proposed works, which will be restricted to the footprint of the new dwelling within an area of lawn no significant habitat losses are predicted. There is, however, potential for common amphibians to pass through and potentially seek refuge within the application site.

## 3. Ecological objectives

The objective of this method statement is to ensure no GCNs are harmed during the construction phase of the development and therefore to avoid any offences under The Conservation of Habitats and Species Regulations (Amendment) (EU Exit) Regulations 2019 and the Wildlife and Countryside Act 1981 (as amended). In addition, the proposed avoidance measures will ensure other wildlife such as common amphibians, small mammals and reptiles are not impacted, and landscaping proposals once established will deliver biodiversity enhancements for GCNs and other wildlife.

## 4. Impact assessment

### a) *Proposed works*

Construction phase impacts could occur as a result of vegetation clearance such as the removal of shrubs, trees and any ruderal vegetation which GCNs might seek refuge. GCNs could also fall into open excavations with steep sides or containing wet concrete, which would prevent their escape. In addition, animals could potentially seek refuge in building materials brought to site which are subsequently moved.

Landscaping includes some new hedgerows and some tree planting, which once established would be considered an enhancement.

Upon scheme completion surface water drainage systems (e.g. gully pots connected to soakaways) have the potential to trap and kill amphibians as GCNs and common amphibians can fall in and not be able to climb out. The use of closed systems whereby downpipes and driveway drainage discharge into Aquacell or similar soakaway designs can trap animals.

In combination and based on the largely sub-optimal habitats present, the above impacts could result in negative ecological effects upon small numbers of individuals. Although, when the scheme is considered in isolation, such impacts are unlikely to have a significant effect upon the conservation status of the wider meta-population, such impacts would result in offences under the relevant wildlife legislation and are therefore considered significant in the context of Ecological Impact Assessment<sup>4</sup>.

Once established, the proposed landscaping will not result in a reduction in functional habitat, with the additional hedgerows proposed likely to result in increased dispersal corridors, whilst lawn areas and flower beds would provide terrestrial foraging habitat.

---

<sup>2</sup> <https://www.gov.uk/government/publications/great-crested-newts-apply-for-a-mitigation-licence>

<sup>3</sup> CIEEM (2020). Guidance on Ecological Survey and Assessment in the UK During the Covid-19 Outbreak. Version 3. Published 29 June 2020. Chartered Institute of Ecology and Environmental Management, Winchester, UK.

<sup>4</sup> CIEEM. (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management, Winchester.

## 5. Mitigation, compensation and enhancement strategy

The following good practice measures will be implemented for the scheme:

- All boundary habitats such as hedgerows, trees must be protected with temporary fencing (e.g. Heras fencing);
- A copy of this PWMS should be provided to the building contractor and any sub-contractors ahead of their commencing work on the scheme. Staff will be required to complete the declaration included at the end of this document;
- A poster to help aid identification of GCNs encountered (Appendix A3) must be erected in the welfare facilities on site. All staff must be briefed to stop works immediately if they encounter a GCN;
- Where localised ruderal vegetation/tall grass requires removal it must be cut (and subsequently maintained) close to ground level, either during November to February inclusive or using a two-stage cut during the period amphibians are active. The first cut should be to a height of no less than 150mm followed by the second cut to near ground level with a minimum of one hour (and a visual check) between cuts to allow wildlife to displace into retained cover;
- Removal of any items which may act as refuge habitat must be undertaken by hand prior to works commencing; dismantling must occur outside of the period November to February inclusive to minimise harm to animals.
- Pond P1 (adjacent) should specifically be protected by:
  - ❖ Locating the site compound (including any fuel storage) away from the pond and any ditches or drains which may discharge into ponds or water;
  - ❖ Limiting topsoil removal as required and covering topsoil if stockpiled;
  - ❖ Cleaning machinery in designated areas, away from the pond, with a sump and re-using wastewater where possible;
  - ❖ Mixing concrete, cement, or grout in designated areas on an impermeable surface away from the pond;
  - ❖ Storing chemical and fuels securely within double-bunded bowsers or chemical stores (with a 110% capacity to contain any spillage) away from the pond;
  - ❖ Using water-based, non-toxic chemicals and wood preservatives/paints, and biodegradable hydraulic and fuel oils where possible;
  - ❖ Mixing and washing chemicals and associated equipment in designated areas with wastewater safely disposed of via mains sewerage or tanker as appropriate;
  - ❖ Having adequate site security in place; and
  - ❖ Regularly checking equipment for failures and/or leaks.
- During the construction phase, any excavations (e.g. concrete slabs and trenches) must be filled on the same day as excavation where possible to prevent animals falling in. Where this is not possible the trenches should be covered overnight with ply/OSB sheets and damp sand used to fill any gaps. Larger excavations should have mammal ladders (e.g. rough planks securely placed at an angle to allow safe egress) installed;
- Open excavations will be inspected for the presence of amphibians, reptiles, and small mammals immediately prior to filling with any aggregates or concrete;
- Concrete pours will be undertaken in the morning to allow them to harden prior to the evening when amphibians become active, or must be covered overnight;
- Excess cement/concrete must be disposed of in such a way as to prevent contact with animals, e.g., poured into a concrete skip and covered;
- Any caustic materials (e.g. concrete) to be hand mixed must be on ply boarding over a tarpaulin which is folded over the boarding at the end of each day's use to prevent animals coming into contact;
- All building materials will be stored on areas of hardstanding or stored off the ground on pallets, and not on areas of vegetated ground;
- All building waste must be removed from site as promptly as possible. Any waste that must be stored on site temporarily will be stored within skips which must rest on areas of hard standing to prevent animals from seeking refuge; waste should be removed as promptly as possible to prevent animals seeking refuge; and
- As it is proposed for surface water from the roofs to be discharge into an existing surface water drainage pipe which crosses the site, to prevent amphibians entering the proposed surface water drainage, any gutters and downpipes must discharge via a sealed leaf and debris hopper at ground level<sup>5</sup>.
- Any driveway gully pots must have an amphibian ladder installed<sup>6</sup> to allow amphibians to climb out and the gully pots must be regularly checked (annually or sooner as necessary) to make sure the ladders are still attached properly.

<sup>5</sup> <https://www.wickes.co.uk/FloPlast-Leaf-Debris-Interceptor-Gully---Black/p/158828>

<sup>6</sup> <https://www.thebhs.org/the-bhs-amphibian-gully-pot-ladder>

In addition to the above, concrete and trenching works should preferentially be undertaken during November to February inclusive (unless there are earlier frosts) when GCNs are not active unless they pass through potential overwintering habitat which has not been cleared prior to November. Alternative, trenching works could be done during a period of extended hot dry weather in June – August when amphibians will seek refuge in shaded areas of the gardens for the farmhouse.

Proposed site landscaping includes hedgerow and tree planting will provide suitable refuge habitat. **Any trees cut down should be used to create log/brush piles to create refuge area for amphibians and other wildlife.**

## 6. Emergency provisions

If GCNs are encountered by construction operatives, there is a significant risk that proceeding with works unchecked may result in a criminal offence being committed (as described in *Background information* above). Therefore, if at any stage during vegetation clearance or construction GCN (Appendix A3) are observed by any member of staff, work must immediately cease and a suitably experienced ECoW be contacted.

## 7. Monitoring during works

Regular ECoW check can be used to confirm the following measures have been implemented and actions taken:

- To confirm temporary fencing has been erected to protect retained habitats, prior to wider site vegetation clearance commencing;
- To confirm all trenching and concreting works are completed during November to February inclusive (unless there are earlier frosts in October) or a hot dry period in the summer; and
- To confirm site landscaping and re-instatement is completed as per the approved Site Layout drawing (Appendix A2).

Checks can be undertaken by a suitably experienced ECoW as described above or evidence (e.g., Photos) kept by the people building the home to live in (referred to hereafter as the 'developer') which can then be provided to the developer upon scheme completion. Any issues or deviations from the PWMS identified will be reported in the first instance to the developer and their contractor for resolution. If issues remain unresolved, a report will be made to the LPA accordingly. Any wildlife offences must be reported to the police.

## 8. Management

The developer/proposer is responsible for ensuring all pre-construction, construction and operational phase elements of the proposal are successfully implemented by their staff and contractors. The developer/proposer is responsible for the timely instruction and funding of works and associated ECoW costs (if required) if an ECoW provides site supervision.

## 9. Timetable

An indicative timetable of actions is given below (N.B. 'works' include vegetation/debris clearance and associated site management in addition to construction works):

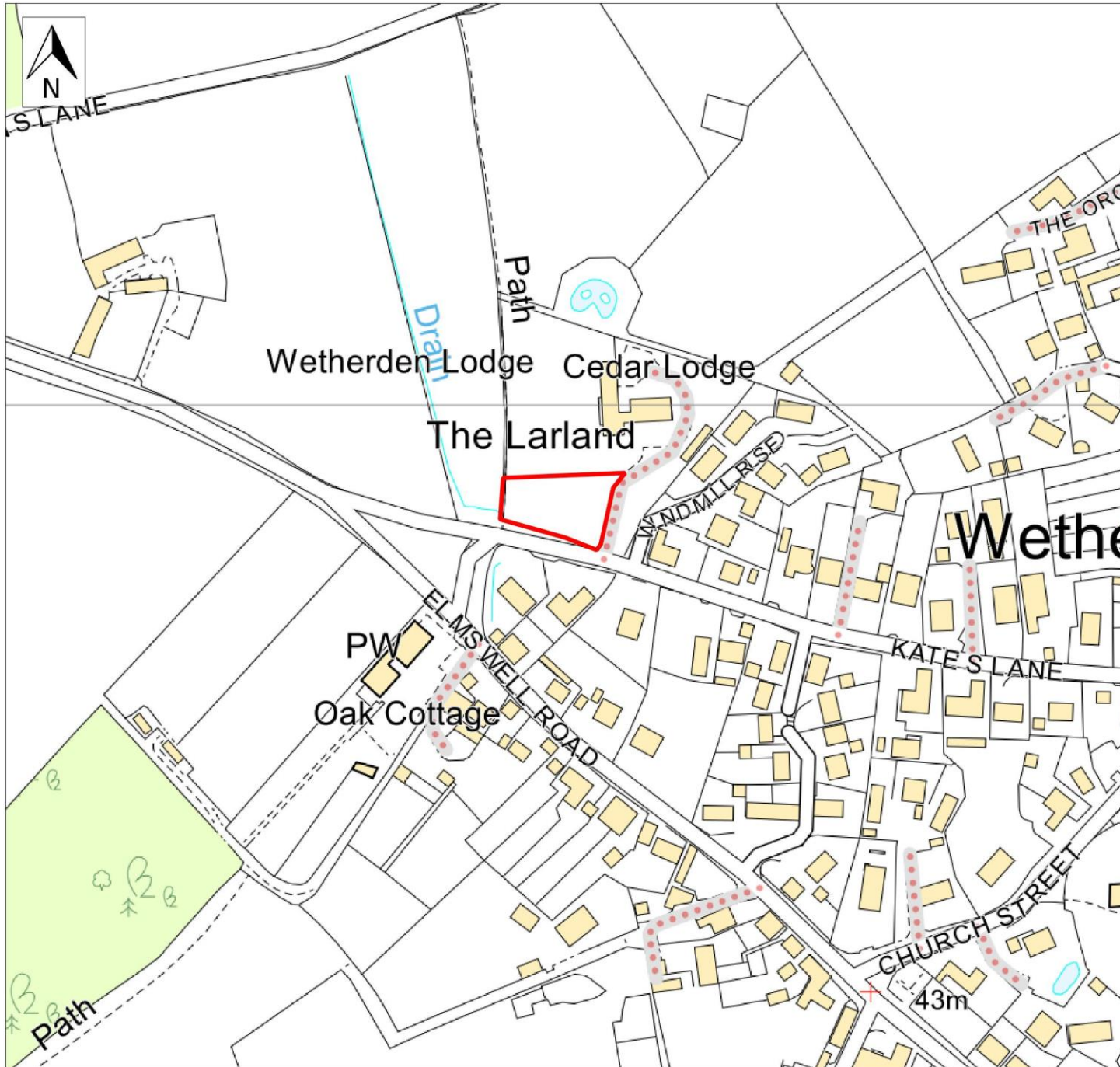
Action	Programme timescale	Timing constraints	Responsibility
Erect temporary protective fencing	Prior to works commencement	N/A	Developer/contractor
Monitoring visit to confirm fencing erected	Prior to works commencement	N/A	Developer/contractor.
Provide TBT to all operatives	Prior to works commencement and as required for new staff	N/A	As above
Dismantle any potential refugia and relocate on site	Prior to works commencement.	Before the end of October or delayed until spring.	As above
Vegetation cutting and maintenance of habitats as unsuitable within works footprint	Prior to works commencement and ongoing as required.	Two stage cut required if completed during March to October inclusive.	Developer/contractor
Trenching/concreting works.	Main construction phase.	To be completed during:	Developer/contractor.

		<ul style="list-style-type: none"> <li>• November to February inclusive (earlier if frosts are early); or</li> <li>• June to August inclusive during a period of hot weather.</li> </ul>	
Monitoring visit to confirm trenching and concreting works completed in specified window	As above	As above	Developer/contractor.
Site landscaping/habitat reinstatement	Upon completion of works and prior to commercial operation.	N/A	Developer/contractor



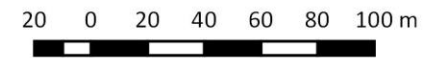
## Figures





### Legend

Application site boundary

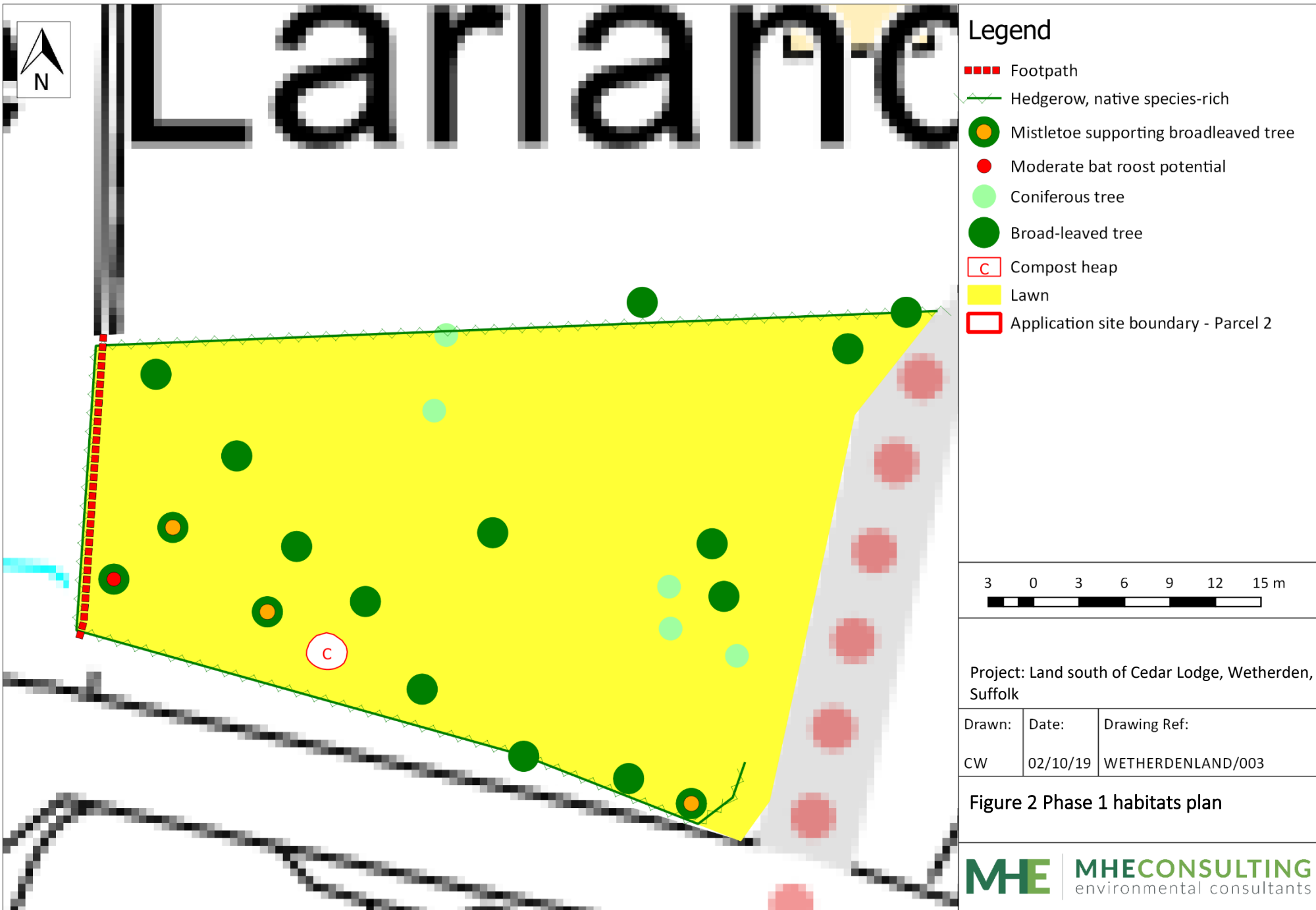


Project: Land south of Cedar Lodge, Wetherden, Suffolk

Drawn:	Date:	Drawing Ref:
DS	07/10/19	CEDARLODGE/001

**Figure 1 Application site location plan**

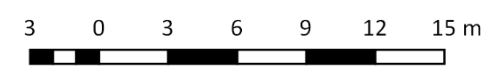




# Larriano

## Legend

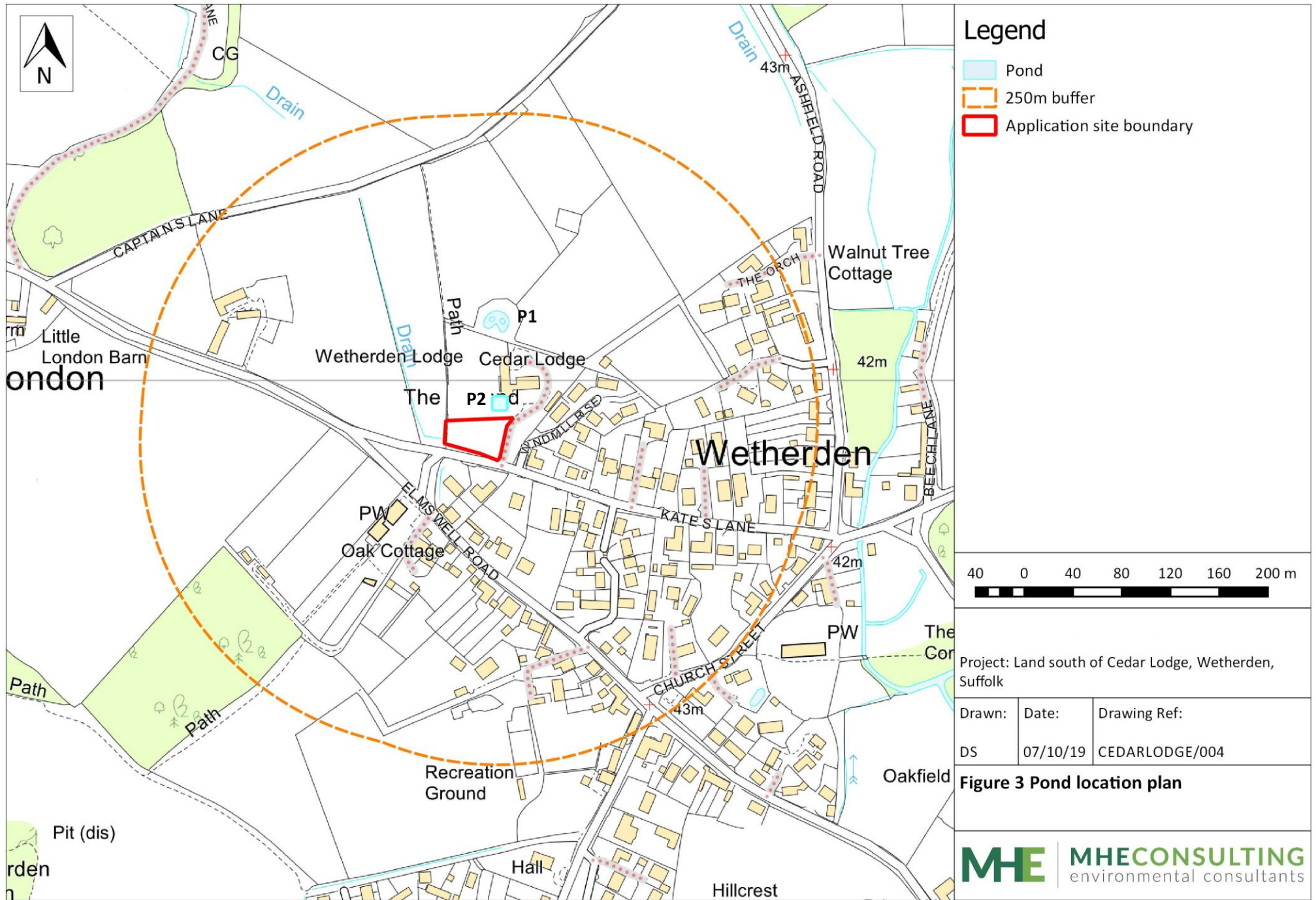
- - - Footpath
- - - Hedgerow, native species-rich
- Mistletoe supporting broadleaved tree
- Moderate bat roost potential
- Coniferous tree
- Broad-leaved tree
- C Compost heap
- Lawn
- Application site boundary - Parcel 2



Project: Land south of Cedar Lodge, Wetherden, Suffolk

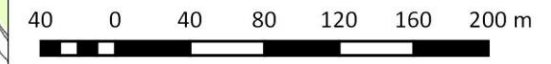
Drawn:	Date:	Drawing Ref:
CW	02/10/19	WETHERDENLAND/003

Figure 2 Phase 1 habitats plan



### Legend

- Pond
- 250m buffer
- Application site boundary



Project: Land south of Cedar Lodge, Wetherden, Suffolk

Drawn:	Date:	Drawing Ref:
DS	07/10/19	CEDARLODGE/004

**Figure 3 Pond location plan**

**Appendix A1    Photos**





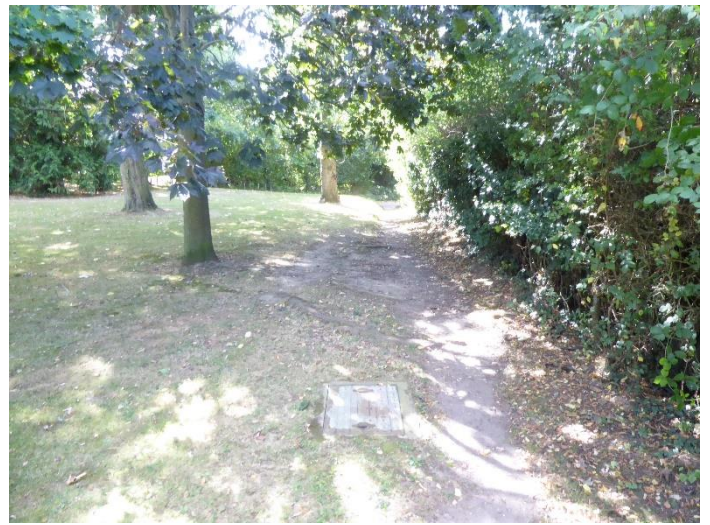
**Photo 1** View of site from west



**Photo 2** View of the site from west boundary



**Photo 3** Hedgerow H1 along road frontage with trees



**Photo 4** Hedgerow H2 along west site boundary where a footpath exists



**Photo 5** Hedgerow H3



**Photo 6** Hybrid black poplar with mistletoe





**Photo 7** Pond P1 that was dry in 2019 and 2022



**Photo 8** Pond P2

**Appendix A2      GCN eDNA survey results**





Folio No: E14371  
Report No: 1  
Purchase Order: Wetherden  
Client: MHE CONSULTING LTD.  
Contact: Christian Whiting

## TECHNICAL REPORT

### ANALYSIS OF ENVIRONMENTAL DNA IN POND WATER FOR THE DETECTION OF GREAT CRESTED NEWTS (*TRITURUS CRISTATUS*)

#### SUMMARY

When great crested newts (GCN), *Triturus cristatus*, inhabit a pond, they continuously release small amounts of their DNA into the environment. By collecting and analysing water samples, we can detect these small traces of environmental DNA (eDNA) to confirm GCN habitation or establish GCN absence.

#### RESULTS

**Date sample received at Laboratory:** 22/06/2022  
**Date Reported:** 01/07/2022  
**Matters Affecting Results:** None

Lab Sample No.	Site Name	O/S Reference	SIC	DC	IC	Result	Positive Replicates
2675	Pond 1 Wetherden	TM 00597 62982	Pass	Pass	Pass	Negative	0

If you have any questions regarding results, please contact us: [ForensicEcology@surescreen.com](mailto:ForensicEcology@surescreen.com)

**Reported by:** Esther Strafford

**Approved by:** Gabriela Danickova

## **Appendix A3    GCN poster**

# Great Crested Newt

**If seen by any employee, works must cease immediately and an ecologist be contacted for advice**

It is an offence to intentionally or recklessly disturb, injure or kill great crested newts

Further information can be found at [www.arguk.org](http://www.arguk.org)

