



## Jackdaws Ford, Chelsworth, Suffolk

### Preliminary Ecological Appraisal

**Client:** Mrs J Smith

**Author:** Liz Lord BSc (Hons) MCIEEM

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Pond House  
Earls Hall Drive  
Clacton  
CO16 8BP

T: 07434 672196

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E: [brooks.liz@gmail.com](mailto:brooks.liz@gmail.com)

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Appendix 1: Proposed Layout Plans

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Figure 1A: Site Location Plan

Figure 1B: Aerial Plan

Figure 2: Loft Inspection Results Plan



## 1.0 SUMMARY

- 1.1 The site (located at NGR: TL 98217 48033) was found to comprise an L-shaped, two storey, Grade II listed house with a pitched, tiled roof surrounded by gravel driveways, paving, small flower beds and amenity grassland. Planning permission and listed building consent is being sought to remove and replace sections of external render; remove two existing roof lights and install three new roof lights; re-roof a small slate extension; re-align a small section of roof and construct a new porch; install a wood burner and flue; convert existing loft spaces into a new kitchen dining area, a bedroom and a bathroom; and construct a small single storey extension.
- 1.2 The house was assessed as being of high suitability for roosting bats, with past evidence of the presence of bats recorded in the roof space. The building was re-roofed around 6 years ago, when new fibreglass insulation was laid in the northern half of the roof. Beneath the new insulation were up to 50 brown long-eared bat droppings, and together with small piles of very dull, crumbly and dusty bat droppings on surfaces that had remained insitu during the re-roofing works (e.g. the water tank cover, beam surfaces, beneath crumbled lathe and plaster) the results of the building inspection indicate that brown long-eared bats were likely to have been using the roof spaces to varying degrees prior to re-roofing. A lack of fresh droppings suggests that bats may no longer use the loft spaces, however due to a large number of crevices beneath tiles on all elevations of the roof, further detailed surveys will be undertaken in May and June 2023.
- 1.3 Note that with the exception of the removal of two skylights, the installation of three skylights, the installation of a stove flue, and the re-alignment of a small area of curved roof above a doorway, the existing roof will remain entirely intact, with works limited to the building internals. No works will take place to any parts of the southern roof, and whilst most of this area will likely be viewed indirectly during the May / June emergence surveys, this roof section will not be a focus of the surveys.
- 1.4 The building does not appear to provide opportunities for nesting birds, with no evidence of any nests recorded during the survey. No measures are necessary with respect to nesting birds.
- 1.5 The site is not deemed suitable for any other protected species.
- 1.6 The enhancement measures detailed in section 6.0 can be secured via a planning condition, and should result in a minor overall enhancement at the site level for nesting house sparrow.



## 2.0 INTRODUCTION

### Instruction

- 2.1 This report has been prepared by Liz Lord following instruction by Mrs J Smith to carry out an ecological appraisal of Jackdaws Ford, The Street, Chelsworth, Suffolk IP7 7HU.

### Site Proposals

- 2.2 Planning permission and listed building consent is being sought to remove and replace sections of external render; remove two existing roof lights and install three new roof lights; re-roof a small slate extension; re-align a small section of roof and construct a new porch; install a wood burner and flue; convert existing loft spaces into a new kitchen dining area, a bedroom and a bathroom; and construct a small single storey extension.

### Site Description

- 2.3 The site lies close to the centre of the village of Chelsworth, in mid-Suffolk, approximately 6km to the north west of Hadleigh. It is situated immediately to the north of The Street, with existing residential properties present to the east and west, and a large garden extending to the north. The River Brett runs c.45m to the south of the site, through an area of woodland and pasture which generally follows the river both to the east and west. The immediately surrounding landscape is very rural in nature, being dominated by arable fields surrounded by hedgerows and trees, with scattered pasture, parkland pasture and small areas of woodland; with the latter habitats generally associated with the River Brett corridor.

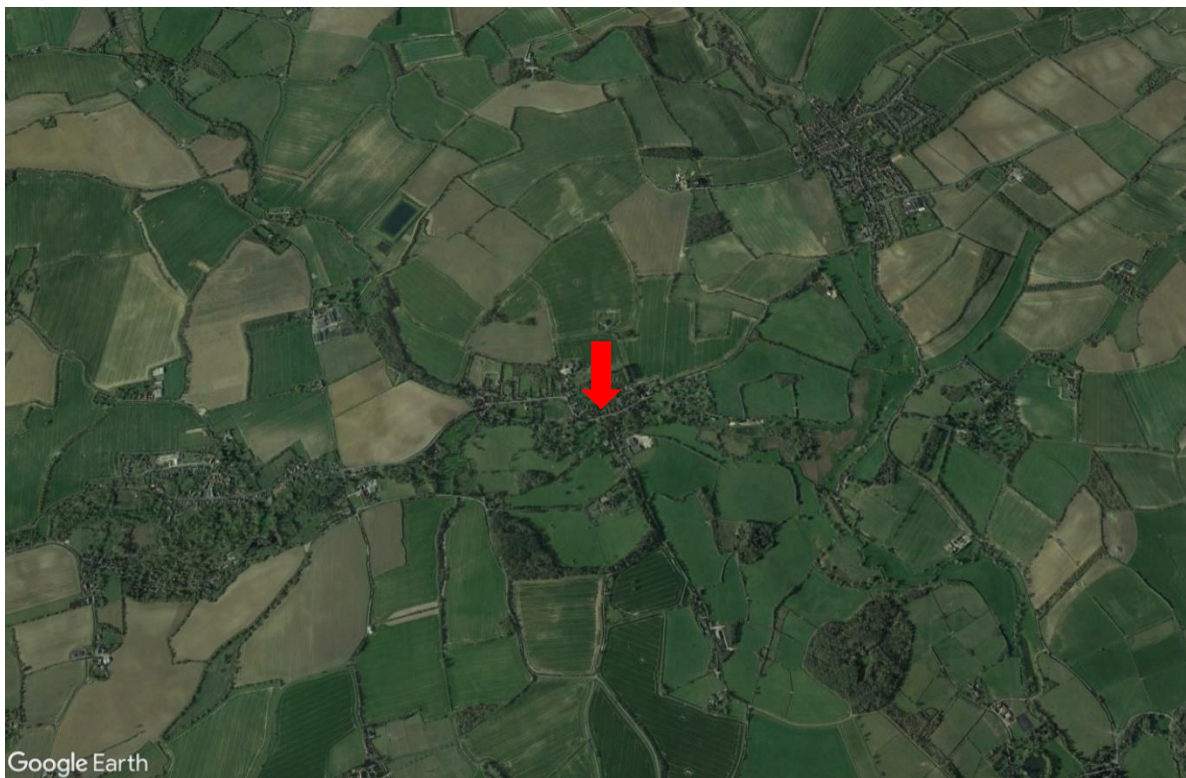


Fig 1A: Site location, with site indicated beneath red arrow. Aerial photograph sourced from Google Earth Pro



Fig 1B: Aerial plan, with building outlined in red. Aerial photograph sourced from Google Earth Pro

## Objectives

- 2.4 This report has been written broadly in accordance with the report writing guidelines produced by the Chartered Institute of Ecology and Environmental Management (CIEEM) (CIEEM 2018, 2017a, 2017b). In accordance with the client brief, this survey and report aims to:
- 2.4.1 Identify and describe all potentially significant ecological effects on protected and notable species / sites associated with the proposals;
  - 2.4.2 Set out the mitigation measures required to ensure compliance with nature conservation legislation and address any potentially significant ecological effects;
  - 2.4.3 Identify how mitigation measures will / could be secured;
  - 2.4.4 Provide an assessment of the significance of any residual effects;
  - 2.4.5 Identify appropriate enhancement measures; and
  - 2.4.6 Where deemed necessary, set out the requirements for post construction monitoring.
- 2.5 This survey and report is intended to inform, as necessary, the layout and design of the proposals, future landscape design and management on site, and where required the methodology and timing of development works.



### **Timescales**

- 2.6 The total works period is expected to be around 6-12 months following the granting of relevant permissions.
- 2.7 This report is valid for a period of 12 months from the date of survey. Beyond this time, changes to the building and / or use of the building may have occurred which could require re-assessment and potentially further survey to re-determine the presence / likely absence of protected species.

### **Relevant Documents**

- 2.8 The site assessment was based upon drawing numbers 210.PL09 and 210.PL08 dated by Hoare Ridge and Morris, as shown in Appendices 1 and 2.
- 2.9 Recommendations included within this report are the professional opinion of an experienced ecologist based on the client's proposals for the site, the site surveys, the results of the desk study, and features present in the surrounding environment.



## 3.0 METHODOLOGY

### Desk Study

- 3.1 The Multi Agency Geographic Information for the Countryside (MAGIC) website was consulted on 18<sup>th</sup> April 2023 to determine the presence of any nationally and internationally designated sites such as Sites of Special Scientific Interest (SSSI), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites within influencing distance of the proposals.
- 3.2 The MAGIC website was also used to search for any records of European Protected Species Mitigation (EPSM) licences that have been approved by Natural England within a 5km radius of the application site since late 2008 (last updated January 2022). The website was checked for any data from Natural England's great crested newt eDNA Habitat Suitability Index pond surveys for District Level Licensing 2017-2019 (last updated August 2022); and data from Natural England great crested newt Class Survey Licence returns within a 5km radius of the site (last updated August 2022).
- 3.3 Due to the small scale of the proposals, a detailed desk top records search for protected and priority species was not carried out. Due to the recommendations to undertake further detailed bat surveys at the site, this is not considered to be a significant constraint to the conclusions and recommendations of this report. The site is surrounded by gardens and driveways, and the proposed works are very small scale; it is therefore very unlikely that any adverse impacts upon County Wildlife Sites will result.

### Site Survey

- 3.4 An initial daytime building inspection and site survey was carried out on 14<sup>th</sup> April 2022. The survey was based upon the standard methodology for Extended Phase 1 Habitat Surveys (JNCC 2010), with habitats classified according to the abundance of plant species present. Any evidence of invasive species such as Japanese knotweed was noted.
- 3.5 The survey area was limited to the building and immediately surrounding land as highlighted in Figure 1B and Appendix 1, plus land within the potential Zone of Influence.
- 3.6 The survey also included an assessment of the site's 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).



- 3.7 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*.
- 3.8 Where methodologies, classification or recommendations deviate from best practice guidelines, this report provides ecological justification for such changes.

### **Building Inspection**

- 3.9 The building was surveyed and assessed in accordance with criteria outlined in Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, J. 2016).
- 3.10 The internal and external inspection of the building was carried out using a powerful torch, a pair of Nikon 12 x 50 binoculars and where necessary an Easyview 8mm digital recording endoscope to inspect gaps and crevices for bats and evidence of bats.
- 3.11 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 beams from which bats may hang or rest.
- 3.12 The ridge beams and soffit boxes 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.
- 3.13 None of the loft spaces had been recently cleaned or swept at the time of survey, and all showed evidence of not having been disturbed since the house was re-roofed around six years ago.

### **Surveyors**

- 3.14 The building inspection and site survey was carried out 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 CIEEM.
- 3.15 The weather at the time of the initial building inspection was overcast followed by heavy rain, with a light breeze (BF0-1) and a temperature of 7°C.





## **Zone of Influence**

- 3.16 The potential impacts of a development are not always limited to the boundaries of the site concerned, such as where there are ecological or hydrological links beyond the site boundaries. In order for the proposed works to have an impact on habitats and species outside of the site boundaries, there needs to be a source of impact, a pathway and a receptor for that impact.
- 3.17 The Zone of Influence will vary for different habitats and species depending on their sensitivity to predicted impacts, the distribution and status of the relevant species, whether a species is mobile, migratory, and whether its presence and activity varies according to the seasons.
- 3.18 An assessment of the Zone of Influence has been made based on the site layout shown in Appendix 1, and where necessary recommendations to avoid any significant adverse impacts beyond the site boundaries have been provided in section 5.0.

## **Limitations**

- 3.19 The conclusions in this report are based on the best information available during the reported period of survey.
- 3.20 Ecological surveys provide only a 'snapshot' of the site in time, and many species, such as bats and badgers, are capable of colonising a site in a very short space of time. Lack of evidence of a species at the time of survey can only allow conclusion of the *likely* absence of this species, since no level of survey effort is capable of proving absence beyond doubt.
- 3.21 Whilst best efforts have been made to identify all water bodies within 250m of the site, it is not always possible to record all garden ponds using Ordnance Survey maps and aerial photography. Additional search effort with respect to garden ponds is likely to be disproportionate, as many garden ponds have limited suitability for great crested newts, and it is a common constraint associated with all Ecological Assessments.

## **Geographic Context**

- 3.22 Where applicable, the importance of each ecological feature has been considered in a geographic context as follows:
- International and European
  - National
  - Regional
  - Metropolitan, County, vice-county or other local authority-wide area
  - River Basin District



- Estuarine system/Coastal cell
- Local (further categorized into District, Borough or Parish)
- Site

### **Assessment of Impacts and Effects**

3.23 The following definitions are used for the terms 'impact' and 'effect' in accordance with CIEEM (2018) guidelines:

- Impact – actions resulting in changes to an ecological feature
- Effect – outcome to an ecological feature from an impact

3.24 The importance of any ecological feature has been determined via the site surveys detailed in this report. Note that species and habitats afforded legal protection are, by default, always considered within the EclA assessment process to be 'important'.

3.25 Potential impacts of the proposals on any such features have been assessed based on the client proposals for the site, and following a review of all phases of the project. Impacts are assessed through consideration of the extent, magnitude, duration, reversibility, timing and frequency of works which may result in likely 'significant' impacts to any ecological features present. The route through which impacts may occur (direct, indirect, secondary or cumulative) has also been considered. Positive impacts are assessed as well as negative.

3.26 The results of the surveys have been used to identify any potentially significant impacts in the absence of any avoidance, mitigation or compensation measures. Any such appropriate measures have then been proposed where necessary.

### **Characterisation of Ecological Impacts**

3.27 When considering ecological impacts and effects, the following characteristics have been considered:

- positive or negative
- extent
- magnitude
- duration
- frequency and timing
- reversibility

3.28 Where various characteristics have not been specifically referred to in this report, they have been considered insignificant or irrelevant to that specific feature.



- 3.29 A 'significant effect' is defined within the current CIEEM guidelines (2018) as: *"an effect that either supports or undermines biodiversity conservation objectives for 'important ecological features' or for biodiversity in general. Conservation objectives may be specific (e.g. for a designated site) or broad (e.g. national/local nature conservation policy) or more wide-ranging (enhancement of biodiversity). Effects can be considered significant at a wide range of scales from international to local."*
- 3.30 Where a significant effect is predicted, this requires assessment and reporting in order to provide the decision maker with sufficient information to determine the environmental consequences of a project. A significant effect can be either positive or negative, and its extent will determine the requirement of conditions, restrictions or monitoring works.
- 3.31 The current CIEEM guidelines (2018) also state that: *"After assessing the impacts of the proposal, all attempts should be made to avoid and mitigate ecological impacts. Once measures to avoid and mitigate ecological impacts have been finalised, assessment of the residual impacts should be undertaken to determine the significance of their effects on ecological features. Any residual impacts that will result in effects that are significant, and the proposed compensatory measures, will be the factors considered against ecological objectives (legislation and policy) in determining the outcome of the application."*
- 3.32 This report has taken into account the factors detailed above for each important ecological feature in the absence of mitigation. Recommendations have then been made with respect to avoidance / mitigation / compensation / enhancement as necessary, and an assessment of the residual impacts after such measures has been made.

### **Mitigation Hierarchy**

- 3.33 In order to minimise the likelihood of any significant negative residual effects on environmental features, this assessment has followed the mitigation hierarchy (listed below in order of preference):
- Avoidance – measures that avoid harm to ecological features, both spatially and temporally;
  - Mitigation – avoidance or minimisation of negative effects through appropriate timing of works, or the provision of mitigation measures within the scheme design which can be guaranteed by condition or similar;
  - Compensation – measures taken to offset residual effects which result in the loss of, or permanent damage to, ecological features despite mitigation;
  - Enhancement – measures to provide net benefits for biodiversity, either by improved management of existing features, or the provision of new features, and over and above that which is required to mitigate / compensate for an impact. Delivery should be secured via planning condition or similar.



## **Legislation and Policy**

- 3.34 Specific reference has been made to the individual legal protection of the species detailed within this report, however additional information with respect to other relevant legislation and planning policy is provided in section 8.0.
- 3.35 The legislation of particular relevance within the body of this report is the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended). The former confers legal protection to 'European' Protected Species against both disturbance and harm, and extends to the full protection of their habitats. This legislation also provides legal protection for a number of internationally designated sites within the UK, and remains in place following Brexit.
- 3.36 The Wildlife and Countryside Act 1981 (as amended) is UK specific, and generally only provides protection against direct harm to individuals of a species.



## 4.0 RESULTS (Baseline Conditions)

### Site Summary

- 4.1 The site comprises an L-shaped, two storey listed house with a pitched, tiled roof surrounded by gravel driveways, small flower beds and amenity grassland.

### Desk Study: Statutory Designated Sites

- 4.2 Natural England's MAGIC website indicates that the site is not located within potential influencing distance of any nationally or internationally designated sites. There will be no change to the number of dwellings or residents on site, and therefore no associated increase in recreational pressures on any designated sites.

### Desk Study: Non-Statutory Designated Sites

- 4.3 The proposals are very unlikely to have an adverse impact upon any County Wildlife Sites.

### Habitats

#### Water bodies

- 4.4 No water bodies are present on site. Aerial photography and Ordnance Survey maps at 1:10,000 scale highlighted the presence of four ponds within 180-240m to the north and north west of the site. Given the lack of potential great crested newt habitat immediately surrounding the building and due to be affected by the proposals, and the large areas of moderate and high quality terrestrial habitats surrounding the ponds, the presence of these water bodies is unlikely to be of significant relevance to the proposals. None were therefore accessed for further assessment.

#### Invasive species

- 4.5 No aerial evidence of Japanese knotweed *Fallopia japonica* was recorded within the site or the immediately adjacent areas at the time of survey.

#### Hard standing

- 4.6 The house is surrounded by a mix of paved surfaces, gravel surfaces and small flower beds. It is understood that none of the flower beds will be lost as part of the proposals.

#### Building - external

- 4.7 One large, two storey L-shaped house is present on the site, with the southern half supporting a pitched roof aligned east-west, and the northern half a pitched roof aligned north-south. The loft spaces of the northern half of the building are proposed for conversion into a bedroom, bathroom and vaulted ceiling above a new kitchen-dining area.



- 4.8 The building is a mix of construction types, having been present on the site since the 15<sup>th</sup> century, with various sections added or amended into the 20<sup>th</sup> century. The southern half of the building has a timber frame with external render, small parts of which have begun to fail and allow water ingress (NB. not suitable for roosting bats due to the upward facing nature of the crevices, allowing water collection). The northern half is entirely rendered, with no timber framing apparent and the render in good condition.
- 4.9 A small single storey extension on the south eastern corner of the house supports a shallow slate covered roof. The slates are closely fitted, with no potential bat access points noted, however they leak and are proposed for re-fitting and / or replacement at a slightly steeper pitch.
- 4.10 Both southern and northern sections of the roof were replaced around six years ago, with most of the original peg tiles re-laid and the roof lined with a breathable membrane to replace what appears to have been traditional bitumen felt in some parts, and lathe and plaster in others. The ridge tiles are well cemented with no gaps noted, however the handmade and poor fitting nature of the peg tiles creates numerous crevices beneath the tiles which provide potential access for bats. A curved section of roof is present on the western elevation of the northern roof space, above a doorway, which is due to be realigned with a new porch as part of the proposals.
- 4.11 Two existing sky lights are present on the eastern façade of the northern roof space, to be removed as part of the proposals. No apparent gaps which could provide potential roosting opportunities for bats were noted around the skylights. No potential access points for bats were observed around any of the eaves of the building.

#### Building - internal

- 4.12 The loft space in the southern half of the roof supports a variety of timber shapes, sizes and ages, creating many potential roosting crevices but also creating a very cluttered loft space. A central ridge beam is present, and the tiles are lined with a breathable membrane. The floor of the loft space is covered in a dense, dusty layer of old fibreglass insulation, wood offcuts and the remains of lathe and plaster which may have been present prior to the re-roofing works.
- 4.13 A small number (<50) of likely brown long-eared bat droppings were recorded scattered throughout the southern roof space, however all were dull and dusty, and appear to have been insitu since significant dust was created during re-roofing works. All droppings were covered in varying degrees with a thick layer of dust from what appeared to be lathe and plaster debris. No works are proposed to the southern half of the roof.



- 4.14 The northern half of the roof is divided into three separate sections. The first is lined between the modern wooden rafters with fibreglass insulation, held in place with large gauge chicken wire. The space measures c.5m in width by 4.5m in length, and is split into two levels – one of around 3m height, and the other of around 1.5m – similar to the southern loft space it adjoins, with a water tank positioned between the two.
- 4.15 The top of the water tank was found to support around 100 old, dry and very dusty – to the extent that the droppings were grey – likely brown long-eared droppings. See Photo 7, provided later in this report. The droppings were interspersed with dirt and fine rubble debris which is likely to have been created during re-roofing works. A further c.30-40 droppings were recorded on the top of a tie beam, also very dull, grey and dusty – see Photo 8. No bat droppings were recorded across the floor of the loft space, which consists of wooden boards and is used to store suitcases, and no fresh i.e. dark and shiny droppings were recorded. Occasional mouse droppings were present.
- 4.16 The central roof section is separated from the northern loft space with a breeze block internal wall, and the southern roof space with a timber stud wall; with modern wooden rafters supporting the peg tiles and lined with breathable membrane. It is approximately 3m wide, by 5m long and almost 2m high. Thick fibreglass insulation is present across the floor of the loft, with up to 50 likely old (dull, dusty and crumbly) brown long-eared bat droppings recorded at the southern end when the insulation was lifted in an attempt to locate beams on which to stand. No fresh droppings were found on top of the apparently new insulation, suggesting that bats may have been present prior to re-roofing work.
- 4.17 The northern most roof section is a very short (c.3.5m x c.4m), but tall (c.2.5-3m) roof space with a breeze block end wall and a brick end wall, modern wooden beams and a breathable membrane. A small number (20-30) of old likely brown long-eared bat droppings were also found beneath new insulation in this section of the roof, and up to 10 potentially fresher droppings around the loft hatch, however it is not known whether these were disturbed during entry.
- 4.18 A plan showing the location of the droppings and various loft spaces is provided in Figure 2, overleaf.



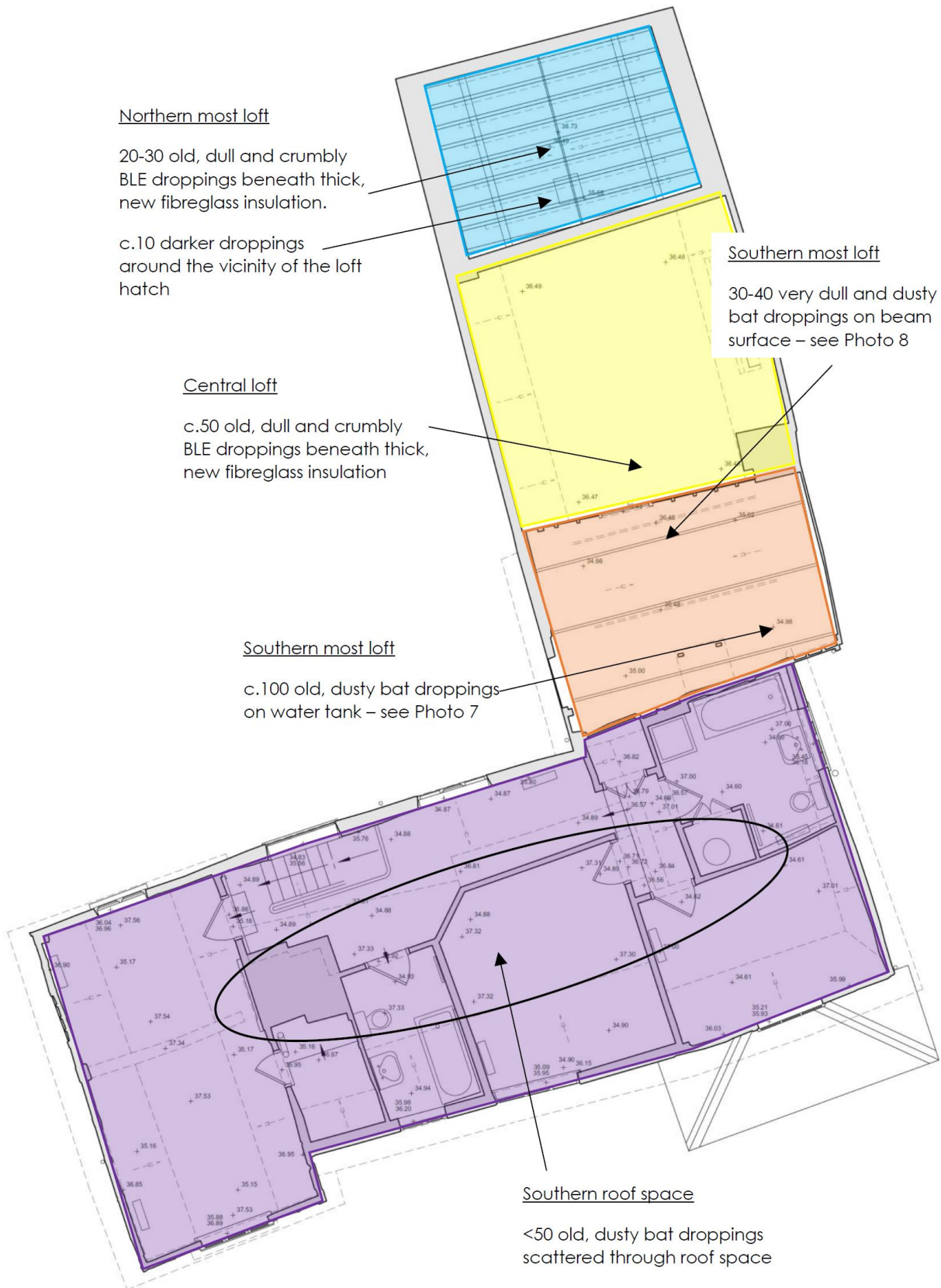


Fig 2: Plan showing separate loft spaces and the location and numbers of droppings recorded. Excerpt from drawing number 210.PL04 by Hoare Ridge and Morris





## Site Photographs



Photo 1: South eastern façade of house, with small single storey, slate tiled extension – to be re-roofed



Photo 2: Western façade of northern half of building, showing arched roof over a doorway. To be realigned to match remainder of roof



Photo 3: Roof lights on eastern façade of northern half of building – to be removed



Photo 4: Roof space across southern section of the building – to remain entirely undisturbed



Photo 5: Lime plaster, wood offcuts, general debris and dust typical of floor space in southern loft



Photo 6: Water tank and insulation between rafters in northern roof space





Photo 7: Collection of c.100 dry and dusty bat droppings on top of water tank cover, along with rubble and debris likely produced during re-roofing work



Photo 8: 30-40 dry and very dusty likely BLE droppings on an undisturbed roof beam in northern roof space



Photo 9: Internal view of central northern roof section, with new insulation laid across old bat droppings



Photo 10: Northern gable wall, inside northern most loft of northern roof section. (Loft too short and tall to obtain full field of view with camera)

## Bats

- 4.19 The desk study identified three bat EPSM licences within 5km of the site – at 1.8km south west for a non-breeding roost of common pipistrelle *Pipistrellus pipistrellus* and brown long-eared bat *Plecotus auritus*; at 2.5km south for a non-breeding roost of common pipistrelle, soprano pipistrelle *P. pygmaeus* and brown long-eared bat; and at 4.2km south east for a breeding roost of common and soprano pipistrelle, brown long-eared bat, daubenton's bat *Myotis daubentonii* and natterer's bat *M nattereri*. In the event of bat presence being recorded during the additional surveys, a records search for bats within 2km of the site will be undertaken.

### **Bats - roosting**

- 4.20 The southern half of the roof of the house will not be affected by the works, and despite the past evidence of bat presence in this loft space, no further survey of this section of the building is deemed necessary.



4.21 The northern half of the building will be subject to major internal renovations. Whilst the recorded evidence of bats within the loft spaces appears to indicate that bats were once using the roof space but may no longer be doing so (likely following re-roofing works around 6 years ago), the gaps beneath peg tiles provide numerous opportunities for roosting bats. The building is therefore assessed as being of 'high' suitability for roosting bats, and further survey will be necessary to determine the presence / likely absence of roosting bats.

#### **Bats – foraging and commuting**

4.22 The site is dominated by hard standing and a building, and provides very low quality potential foraging or commuting habitat. No additional lighting features are proposed on site.

#### Invertebrates

4.23 The site is considered likely to support common and widespread invertebrate species typical of the habitats present.

#### Amphibians

4.24 The MAGIC search highlighted nine records of great crested newt (GCN) within 2-5km of the site, with the closest just over 2km to the east of the site.

4.25 Whilst there are a number of ponds within 180-240m of the site, the proposals will not result in the disturbance, damage or loss of any potential GCN habitat, as the building is surrounded by gravel, paving and some small flower beds – with the latter not within the proposed footprint of the works.

4.26 The site does not provide any potential terrestrial habitat for amphibians, and is very unlikely to be used by GCN for the purposes of shelter, foraging or commuting. There is negligible potential for any adverse impacts upon GCN, and there will be no adverse impacts upon the Favourable Conservation Status of any GCN population.

#### Reptiles

4.27 The site does not provide any potential habitat for reptiles, and is not connected to areas of potential offsite reptile habitat.

#### Birds

4.28 The building does not appear to provide any potential nesting opportunities for birds, with no access points noted, and no externally constructed nests observed.



#### Badger

- 4.29 No evidence of badger was recorded on or within 30m of the site. No setts, footprints, hairs, latrines, snuffle holes or scratching indicative of the presence of badgers was recorded.

#### Otter and water vole

- 4.30 There are no waterbodies on, adjacent or connected to the site which have potential to support otters or water voles.

#### Dormice

- 4.31 The site does not provide any potential habitat for dormice and is not connected to any such habitats.

#### Other Legally Protected Species

- 4.32 Due to a lack of suitable habitats the site is not considered likely to support any other legally protected species.

#### Species of Principal Importance

- 4.33 The site has very limited potential to support Species of Principal Importance in England (SPIE). The areas surrounding the house could potentially be used by commuting hedgehog *Erinaceus europaeus* and toad *Bufo bufo*, both of which are SPIE.



## 5.0 CONCLUSIONS AND RECOMMENDATIONS

### Statutory Designated Sites

- 5.1 The proposals are not considered to be detrimental to any sites of national or international importance. No further survey or mitigation is recommended.

### Non-Statutory Designated Sites

- 5.2 The proposals are not considered to be detrimental to any CWS. No further survey or mitigation is recommended.

### Bats

- 5.3 All species of bat are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and by the Wildlife and Countryside Act 1981 (as amended). In summary, this makes it an offence to harm or disturb a bat; damage or destroy a roost; and obstruct access to a roost (whether or not bats are present at the time).
- 5.4 Potential effects on roosting bats: currently unknown. In the absence of avoidance measures and precautionary methods of working, it is possible that the proposals could result in disturbance, injury or death of bats of unknown numbers and species, but including brown long-eared bat.
- 5.5 Three dusk emergence surveys will therefore be undertaken in May / June 2023, to determine the presence / likely absence of roosting bats. The surveys will be carried out using bat detectors accompanied by infra-red cameras, and will follow standard survey methodology recommended by the Bat Conservation Trust (BCT) in Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, J. 2016) and the Interim Guidance Note issued by BCT in May 2022 on the 'Use of night vision aids for bat emergence surveys and further comment on dawn surveys'.
- 5.6 The southern half of the building will not be specifically surveyed for bats, as there are no works proposed to this part of the building which have potential to disturb or harm roosting bats. However, any bat activity noted in this area during the surveys will be recorded.
- 5.7 Mitigation measures for roosting bats: currently unknown. Any necessary mitigation measures will be informed by the results of the dusk emergence surveys. This may entail licensing of the works, replacement and / or enhancement of roosts, ecologist supervision, and / or timing of works to avoid the most sensitive times of year for roosting bats.
- 5.8 Potential effects on commuting / foraging bats: in the absence of mitigation negligible impacts are predicted as the site does not provide any such habitat and no new external lighting features are proposed in the short or long term.



5.9 Mitigation measures for commuting / foraging bats: none required.

5.10 Residual effects: currently unknown.

### **Birds**

5.11 Breeding birds and their nests are protected under the Wildlife and Countryside Act 1981 (as amended).

5.12 Potential effects: negligible.

5.13 Mitigation measures: none.

5.14 Residual effects: the provision of three new nest boxes for house sparrow on a nearby building will result in a minor overall enhancement for this species – refer to Section 6.0.

### **Amphibians**

5.15 Great crested newts (GCNs) and their habitats are fully protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and by the Wildlife and Countryside Act 1981 (as amended).

5.16 Potential effects: negligible.

5.17 Mitigation measures: none.

5.18 Residual effects: negligible.

### **Reptiles**

5.19 All Suffolk reptile species are protected against harm under the Wildlife and Countryside Act 1981 (as amended).

5.20 Potential effects: negligible.

5.21 Mitigation measures: none.

5.22 Residual effects: negligible.

### **Badger**

5.23 Badgers and their setts are afforded protection under the Protection of Badgers Act 1992 (as amended). This legislation includes protection against damage to badger setts and against interference and disturbance of badgers whilst they are occupying a sett.

5.24 Potential effects: negligible. No evidence of badgers was found on site or immediately adjacent, and there is no indication that badgers are likely to colonise the site in the near future.



5.25 Mitigation measures: none.

5.26 Residual effects: negligible.

### **Otters**

5.27 Otters and their habitats are fully protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and by the Wildlife and Countryside Act 1981 (as amended).

5.28 Potential effects: negligible.

5.29 Mitigation measures: none.

5.30 Residual effects: negligible.

### **Water Voles**

5.31 Water voles and their habitats are fully protected by the Wildlife and Countryside Act 1981 (as amended).

5.32 Potential effects: negligible.

5.33 Mitigation measures: none.

5.34 Residual effects: negligible.

### **Dormice**

5.35 Dormice and their habitats are fully protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and by the Wildlife and Countryside Act 1981 (as amended).

5.36 Potential effects: negligible.

5.37 Mitigation measures: none.

5.38 Residual effects: negligible.

### **Invertebrates**

5.39 Potential effects: negligible.

5.40 Mitigation measures: none.

5.41 Residual effects: negligible.



### **Other Legally Protected or Notable Species**

- 5.42 The proposed development is not anticipated to impact on any other legally protected species, therefore no mitigation measures are recommended. To avoid accidental entrapment and harm of hedgehogs and toads, any open trenches should be covered at night or left with an escape ramp to prevent wildlife falling in and becoming trapped.
- 5.43 Enhancement measures will provide artificial nesting and roosting features suitable for house sparrows (a SPIE).





## 6.0 ENHANCEMENT MEASURES

- 6.1 **3 no. bird boxes suitable for house sparrows** will be fixed to the northern or eastern elevation of the garage located 20m to the north west of the house.

The boxes will each have a 32mm diameter access hole (suitable for use by house sparrows). The boxes will be positioned as close as possible (at least within 300mm) of one another, and at least 2m high or immediately beneath the eaves of the building.

Bird boxes with 32mm wide entrance holes such as that pictured below are widely available online or from garden centres.



'Travis' style wooden nest box with 32mm diameter hole and predator-proof metal plate.

Available from CJ Wildlife



## 7.0 REFERENCES

Bat Conservation Trust (May 2022). Interim Guidance Note: *Use of night vision aids for bat emergence surveys and further comment on dawn surveys*

CIEEM (2018) *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine Version 1.1*. Chartered Institute for Ecology and Environmental Management, Winchester.

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

Joint Nature Conservation Committee (2010) *Handbook for Phase 1 Habitat Survey - a Technique for Environmental Audit*. Revised print, JNCC, Peterborough.

Miles et al. (2018) *Bats and Artificial Lighting in the UK*. Institution of Lighting Professionals and Bat Conservation Trust.

Mitchell-Jones, A.J (2004) *Bat Mitigation Guidelines*, English Nature, Peterborough.

Multi-agency Geographic Information for the Countryside (MAGIC) Interactive Map. Department for Environment, Food and Rural Affairs.

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.



## 8.0 LEGISLATION

### **The Conservation of Habitats and Species Regulations 2017 (as amended)**

- 8.1 The Conservation of Habitats and Species Regulations 2017 (as amended) continue to provide safeguards for European Protected Sites and Species as listed in the Habitats Directive. As a result, the same provisions remain in place for European protected species, licensing requirements and protected areas after Brexit.
- 8.2 Species protected by the former European legislation includes great crested newt, all UK bat species, dormice and otter. A number of other plant and animal species are also included such as sand lizard, smooth snake and natterjack toad, however these additional species are rare, with restricted geographical ranges and specific habitat types.
- 8.3 Under The Conservation of Habitats and Species Regulations 2017 (as amended) it is an offence to:
- Damage, destroy or obstruct access to an EPS breeding or resting place;
  - Deliberately capture, injure or kill an EPS (including their eggs);
  - Deliberately disturb an EPS, in particular any actions which may impair an animals ability to survive, breed or nurture their young; or their ability to hibernate or migrate; or which may significantly affect the local distribution or abundance of the species to which they belong.
- 8.4 The legislation applies to all stages of amphibian life cycles (eggs, larvae and adult), and to active bat roosts even when they are not occupied at that particular time of year.
- 8.5 Natural England can, under certain circumstances, grant a licence to permit actions which would otherwise be unlawful, subject to the species concerned being maintained at a Favourable Conservation Status and there being a true need for the proposed works to take place.
- 8.6 Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) are also afforded protection under the Conservation of Habitats and Species Regulations 2017 (as amended). Ramsar sites, which are designated under the Convention on Wetlands of International Importance (1971), are afforded the same level of protection as SPAs and SACs via national planning policy.



### **The Wildlife and Countryside Act 1981 (as amended)**

- 8.7 The Wildlife and Countryside Act 1981 (as amended) provides varied levels of protection for a range of species including those already listed above. Water vole are one of the species not listed under the Conservation of Habitats and Species Regulations 2017 (as amended), but are afforded the highest level of protection under the Wildlife and Countryside Act 1981 (as amended).
- 8.8 It is an offence to intentionally kill, injure or take a water vole, to intentionally or recklessly damage or destroy a structure or place used for shelter and/or protection, to disturb a water vole whilst occupying a structure and/or place used for shelter and protection, or to obstruct access to any structure and/or place used for shelter or protection.
- 8.9 Other species, such as common lizard, slow worm, adder and grass snake, are afforded less protection. For these species it is an offence to intentionally or recklessly kill or injure animals.
- 8.10 All active bird nests, eggs and young are protected against intentional destruction. Schedule 1 listed birds e.g. barn owls, kingfishers, are further protected from intentional and reckless disturbance whilst breeding.
- 8.11 Schedule 9 of The Wildlife and Countryside Act lists plant species for which it is an offence for a person to plant, or otherwise cause to grow in the wild. This includes Japanese Knotweed which, under the Environment Protection Act 1990 (as amended) is classed as 'controlled waste'. If any parts of the plant including stems, leaves and rhizomes are taken off-site they must be disposed of safely at a landfill site licensed to deal with such contaminated waste.
- 8.12 Sites of Species Scientific Interest (SSSI) are afforded protection by the Wildlife and Countryside Act 1981 (as amended).

### **The Protection of Badgers Act 1992 (as amended)**

- 8.13 The Protection of Badgers Act (1992) makes it an offence to wilfully kill, injure, take, possess or cruelly ill-treat a badger, or to attempt to do so, and to intentionally or recklessly interfere with a sett.

### **The Protection of Mammals Act 1996 (as amended)**

- 8.14 The Act protects all wild mammals against actions which have the intention of causing unnecessary suffering, including crushing and asphyxiation.



### **The Natural Environment and Rural Communities Act 2006 (as amended)**

- 8.15 Under sections 40 and 41 of the Natural Environment and Rural Communities Act (NERC) 2006 local authorities have an obligation to have regard to the purpose of conserving biodiversity in carrying out their duties. The majority of UK legally protected species are listed under Section 41 the NERC Act.
- 8.16 Section 41 (S41) of the Natural Environment and Rural Communities (NERC) Act (2006) also requires the Secretary of State to publish a list of habitats and species which are of 'principal importance for the conservation of biodiversity' in England (Species of Principal Importance in England – SPIE). The S41 list is used to guide decision-makers, including local and regional authorities, in implementing their duty under Section 40 of the act to have regard to the conservation of biodiversity in England when carrying out their normal functions.

### **Statutory Designated Sites**

- 8.17 Under the National Parks and Access to the Countryside Act 1949 (as amended), statutory conservation agencies were able to establish National Nature Reserves (NNRs), with provisions for these areas strengthened by the Wildlife and Countryside Act 1981 (as amended). They are managed to conserve their habitats or to provide special opportunities for scientific study of the habitats communities and species represented within them.
- 8.18 Local Nature Reserves (LNRs) can be declared by local authorities after consultation with the relevant statutory nature conservation agency under the National Parks and Access to the Countryside Act 1949 (as amended). LNRs are not subject to legal protection, but are afforded protection against damaging operations via byelaws, and against development via local planning policies.

### **Non-Statutory Designated Sites**

- 8.19 Local Wildlife Sites (LWS), Sites of Importance for Nature Conservation (SINCs), Sites of Nature Conservation Importance (SNCIs) and County Wildlife Sites (CWS) are often designated by the local Wildlife Trust. They are not usually afforded any legal protection, but are recognised in the planning system and given some protection through planning policy.

### **National Planning Policy Framework (NPPF)**

- 8.20 The National Planning Policy Framework (2019) sets out the Government's planning policies for England and how these should be applied. The NPPF must be taken into account when preparing a Local Authority's development plan, and is also a material consideration in planning decisions.



8.21 As well as highlighting the importance of protecting ecologically valuable sites and habitats, the NPPF highlights the duty of local planning authorities (LPA's) to deliver net gains for biodiversity within the planning system. Planning policies and decisions should, as per Paragraph 170d, contribute to and enhance the natural and local environment by:

*d) 'minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures'*

8.22 To protect and enhance biodiversity, policies and plans should, as per Paragraph 174b:

*b) 'promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.'*

8.23 When determining planning applications, LPA's should apply principles which avoid an adverse effect on natural environments and notable species:

*d) 'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;'*



**Appendix 1:**  
**Proposed Layout Plans**



DO NOT SCALE FROM THIS DRAWING EXCEPT FOR PLANNING PURPOSES. ANY DISCREPANCIES ARE TO BE REPORTED TO THE ARCHITECT. THE CONTRACTOR IS TO CHECK ALL BUILDING AND SITE DIMENSIONS PRIOR TO ORDERING MATERIALS OR CONSTRUCTION. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ENGINEERS' AND OTHER SPECIALISTS' DRAWINGS. COPYRIGHT REMAINS WITH THE ARCHITECT.

REVISIONS  
29.03.2023 JE PLANNING / LBC

EXISTING STRUCTURE  
NEW BUILDING / ALTERATION

ROOF NOTES:

- R1. Butcher's Roof  
E.g. slate roof at approximately 12° pitch with concrete hips is leaking. To be re-roofed with slate with lead roll hips at approximately 24° pitch. Painted cast iron half-round gutters to be added.
- R2. Main Roof  
On cast slope above Bath 2, remove soil vent pipe from exterior stack and replace with soil vent pipe on internal stack. Reinstall flue/chimney pot for Bedroom 1 woodburning stove.
- R3. West Gable Roof  
No changes.
- R4. Back Porch Roof (New)  
New Flat Lead Roof with cast-iron half-round gutters.
- R5. North Wing Roof  
Remove existing 20th century "eyebrow door arch" and 2no rooflights. Install 3no new conservation rooflights, black flue for wood burning stove, and bathroom extract. Modern softwood roof structure typically retained, but some modifications required including new queen post truss in place of blockwork walls, replacement of steel tie bars at eaves level with timber ties at purlin level. Repair/replacement of some gutters with painted cast-iron gutters.
- R6. North Lean-To Roof  
New slate roof with black plastic gutter and boiler and kitchen extracts.

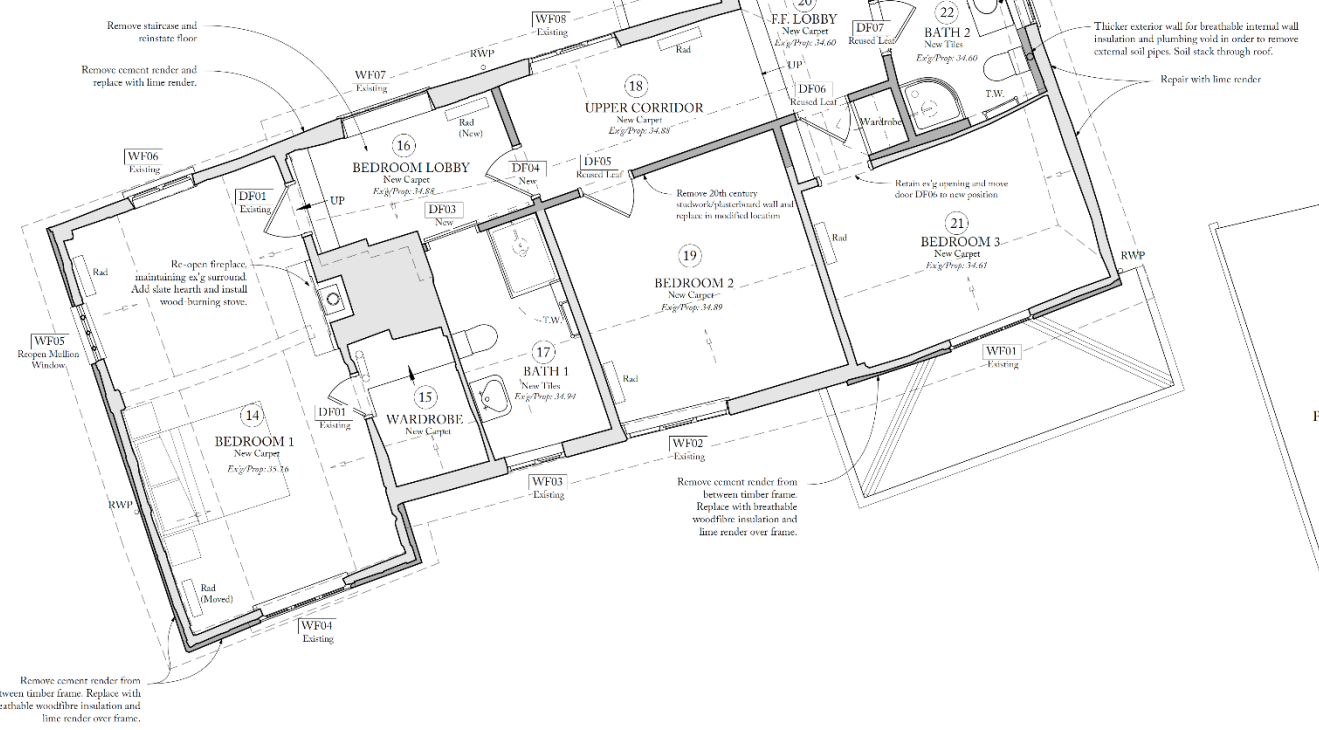
Hoare, Ridge & Morris  
Architects

PROJECT	JACKDAWS FORD Chelworth, Suffolk
DRAWING TITLE	PROPOSED First Floor Plan and Roof Plan
SCALE	1:50 @ A1, 1:100 @ A3
STATUS	PLANNING / LBC
DRAWING NO.	210.PL08

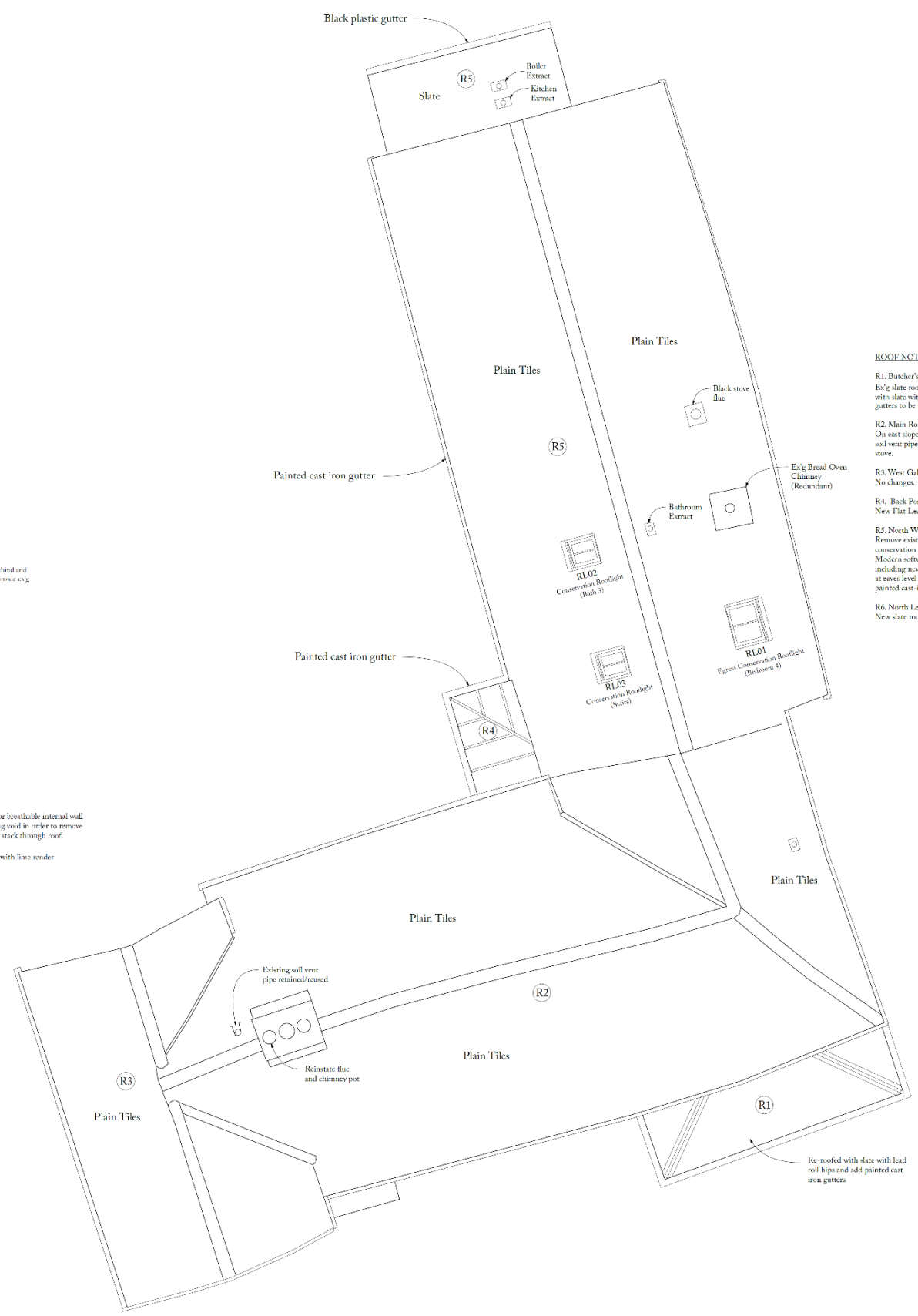
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North, IP17 1SP  
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henal@hrrm.co.uk  
www.hrrm.co.uk

FIRST FLOOR NOTES:

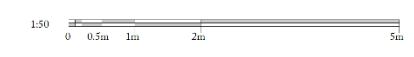
- 14. Bedroom 1  
Reopen mullion window WF05. Reopen fireplace, retaining existing surround and install slate hearth and wood-burning stove. Move radiator. Replace carpet. Add internal secondary glazing to existing north and south elevation windows.
- 15. Wardrobe  
Some adjustments to plumbing runs for Bath 1, reusing existing cast iron soil stack. Replace carpet.
- 16. Bedroom Lobby  
New floor where stairs removed with new carpet, and extend steps up to Bedroom 1 to improve safety. Remove 20th century partition wall and build new partition as shown. Add new radiator. Add internal doors DF03 and DF04. Add internal secondary glazing to existing window.
- 17. Bath 1  
Replace sanitaryware, including removal of bath and installation of shower. Add boarded sliding door DF03, installed within new partition wall. Replace vinyl sheet flooring with tiles. Add internal secondary glazing to existing window.
- 18. Upper Corridor  
Remove 20th century partition wall and build new partition as shown. Remove dropped ceiling to allow taller, sloping ceiling. Replace carpet. Add internal secondary glazing to existing window.
- 19. Bedroom 2  
Remove 20th century partition wall and build new partition as shown. Door leaf DF05 resited, but installed within new wall. Replace carpet. Add internal secondary glazing to existing window.
- 20. F.F. Lobby  
Former cupboard removed and lobby and steps extended. Remove 20th century partition walls and extend Lobby into former bathroom space. Reopen blocked opening to new Stair Landing. Replace carpet.
- 21. Bedroom 3  
Move door leaf DF06 to new opening in new partition wall to create small Lobby space and wardrobe area for Bedroom 3, while retaining existing door opening. Add fitted joinery for wardrobe and shelves. Replace carpet. Add internal secondary glazing to existing window.
- 22. Bath 2  
Remove 20th century cylinder cupboard and 20th century partition wall on west side of bathroom. Build new partition as shown, and install resited door leaf DF07. Add studwork framing to exterior wall with breathable insulation between studs and space for plumbing runs. Remove previous external plumbing stacks/pipes and relocate to new drops. Install new shower. (Good drop to be between existing joists to new drop location). Replace sanitaryware. Replace vinyl sheet flooring with tile. Add internal secondary glazing to existing window.
- 23. Bedroom 4  
Retain existing floor structure and floorboards. (Note that additional plywood structure within floor build-up may be necessary to stiffen floor as noted in engineer's comments to be confirmed by engineer). Install carpet. Add breathable insulation between studs of exterior walls, build new ashlar wall, add new egress conservation rooflight (trimming modern softwood rafters). Install new partition walls and door. Add small window WF09 and background vent with cast iron airbrick below window.
- 24. Bath 3 - Wardrobe  
Add new room including floor joists, sanitaryware, partition walls, doors, and conservation rooflight.
- 25. Stair Landing  
New staircase to be formed, as described with Ground Floor.



1 FIRST FLOOR PLAN as Proposed, 1:50



2 ROOF PLAN as Proposed, 1:50



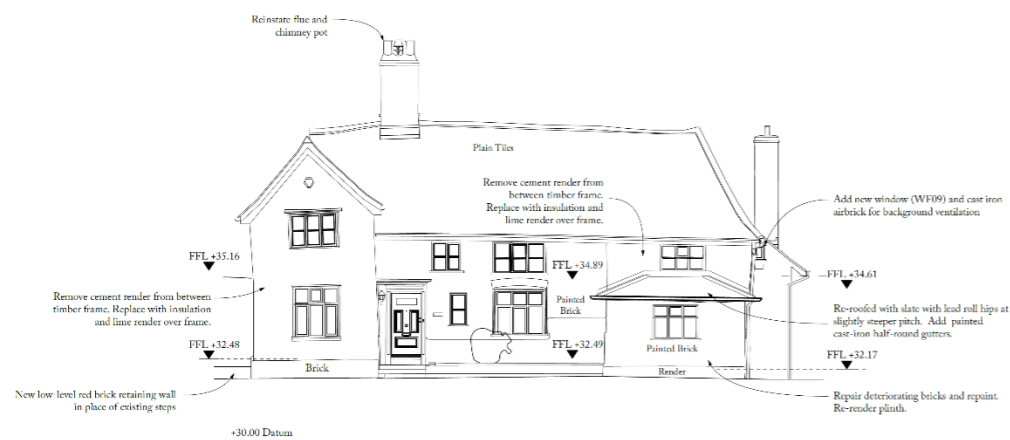


**Appendix 2:  
Proposed Elevations**

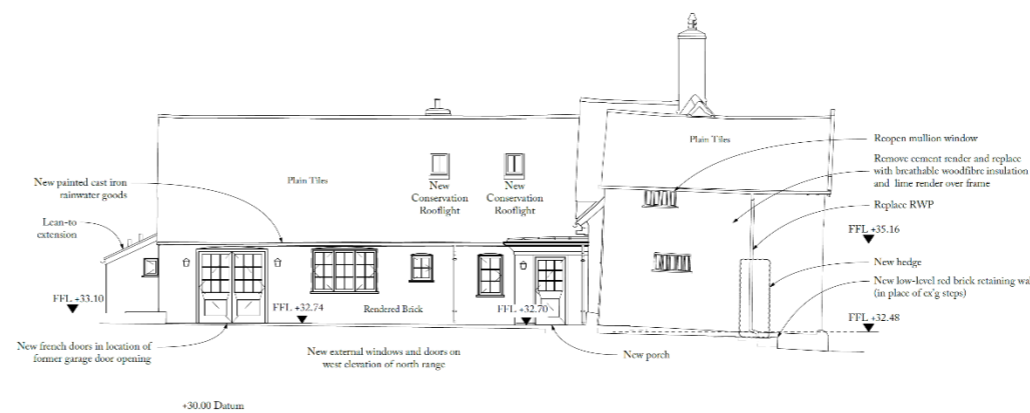


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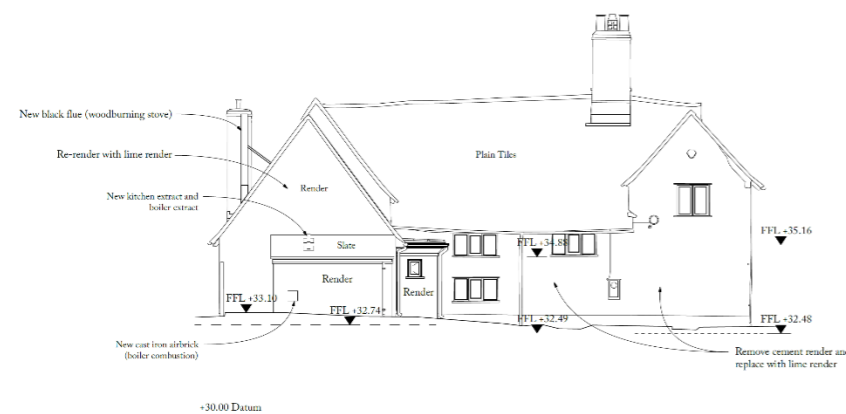
REVISIONS  
- 29.03.2023 JE PLANNING / LBC



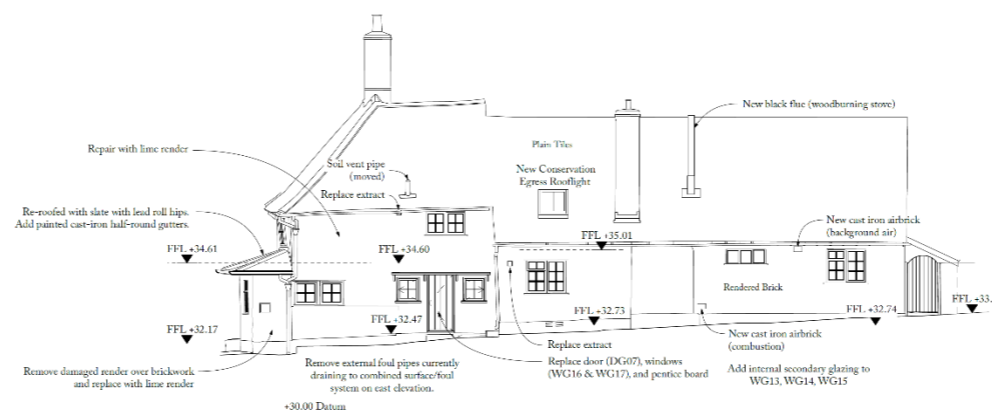
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As Proposed, 1:100



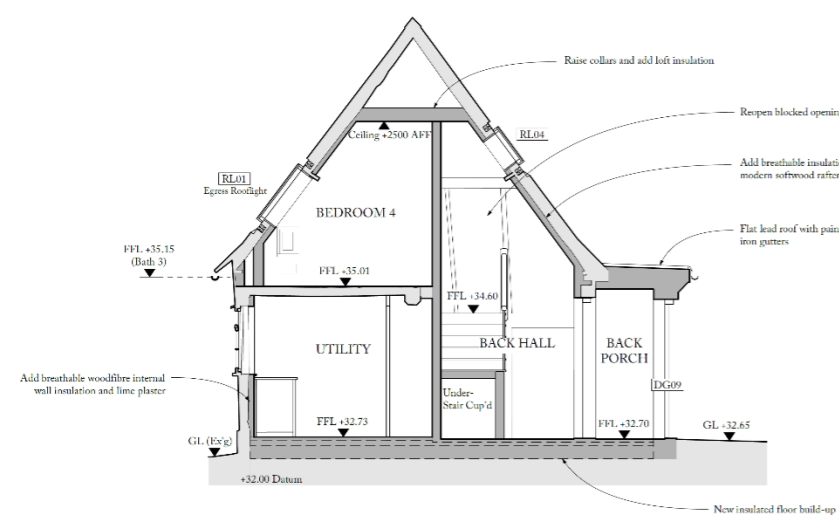
2 WEST ELEVATION  
As Proposed, 1:100



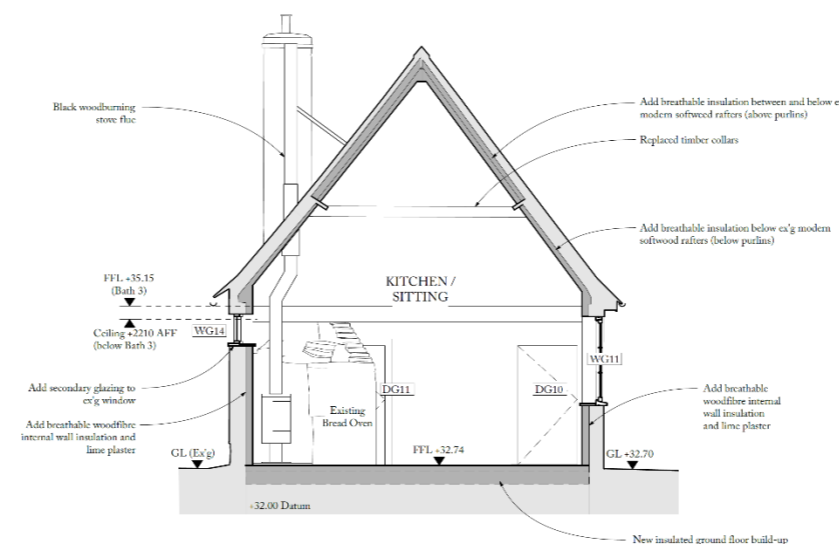
3 NORTH ELEVATION  
As Proposed, 1:100



4 EAST ELEVATION  
As Proposed, 1:100



5 SECTION A-A  
As Proposed, 1:50



6 SECTION B-B  
As Proposed, 1:50  
Note: Refer to separate drawing for internal door details



SECTION KEY PLAN

EXISTING STRUCTURE  
NEW BUILDING / ALTERATION



Hoare,  
Ridge &  
Morris  
Architects

PROJECT JACKDAWS FORD  
Chelsworth, Suffolk

DRAWING TITLE PROPOSED  
Elevations and Sections

SCALE 1:50/1:100 @ A1, 1:100/1:200 @ A3

STATUS PLANNING / LBC

DRAWING NO. 210.PL09

Hoare, Ridge & Morris LLP  
Building 19  
Scrape Milling  
Sage  
Suffolk, IP17 1SP  
www.hrm.co.uk

01228 688047  
01228 688047  
www.hrm.co.uk

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Liz Lord Ecology

