

Preliminary Ecological Assessment

Bat Roost Survey

10 Feering Road
Coggeshall
Essex

Prelim' Eco Assess
Bat Survey
10 Feering Road
Coggeshall - Essex
Ref 0122/21

Preliminary Ecological Assessment

Bat Roost Survey

10 Feering Road
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Report Approved
9th August 2021



Patrick K McKenna BSc (Hons), M.C.I.E.E.M
Company Director

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1. Summary

- 1.1 Eco-Planning UK Ltd received instruction to complete a Preliminary Ecological Assessment and relevant bat roost surveys at 10 Feering Road, Coggeshall, Essex.
- 1.2 The Preliminary Ecological Assessment, bat roost surveys and this associated report will be part of a planning application that will be submitted to the Local Planning Authority, seeking planning consent for development on the survey site.
- 1.3 The Assessments were completed on Wednesday 4th August 2021 during suitable rain free dry bright survey conditions. Access was available to all areas/buildings o/on the site.
- 1.4 From the on-site Ecological Assessment and desk top study it was determined that:
 - No part of the proposed development site has any type of statutory or non-statutory conservation designation. However, the site is within a “zone of influence” for Chalkney Woods and Marks Tey Brick Pits Sites of Special Scientific Interest. The proposed development will not reduce the size or conservation status of these S.S.S.I sites nor affect their management regimes or future ecological potential or create any new access to the woods.
 - There are no registered Priority Habitats on any part of the proposed development area. However, there are Priority Habitat Deciduous Woodland areas to the south-west. The proposed development will not reduce the size or conservation status of this Priority Habitat nor affect its management regimes or future ecological potential, neither does it create new access to this site.
 - The proposed development site has very limited conservation/biodiversity value:
 - It contains no sett or badger field sign
 - It has no invertebrate value.
 - It is not a suitable habitat for a viable reptile population.
 - No amphibian potential.
 - Over 200 metres to the west of the site is the River Blackwater. There is no access from the proposed development site to the river - the proposed

development will not impact upon the river – its management, ecological value or any potential fauna it may contain. There is no pond within a relevant distance that the proposed development could impact upon.

- There are no Potential Roost Features (P.R.F.'s) within those trees identified for removal on site that have moderate or high suitability values that would require further bat roost survey efforts.
- There is no evidence of any existing or past bat roost in any of the buildings on this site. No further bat roost survey efforts are required

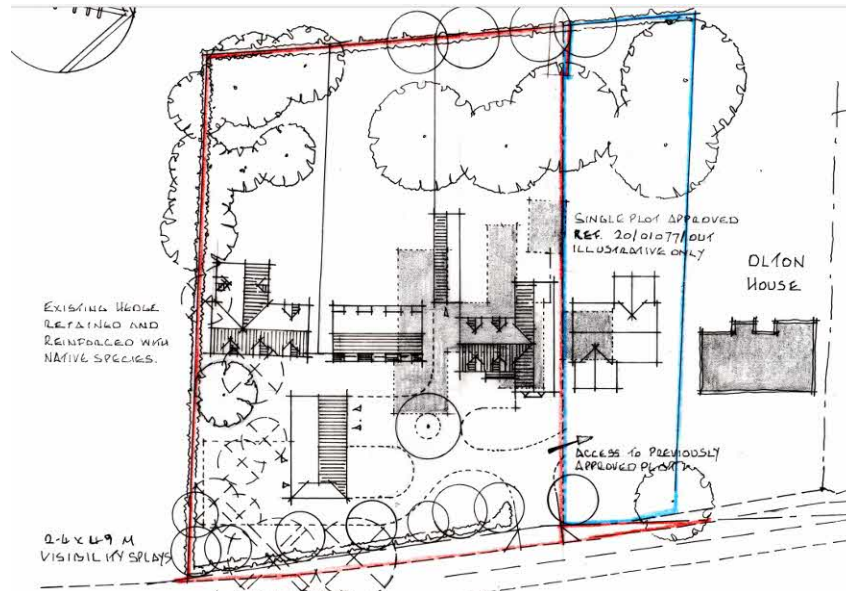
1.5 The Preliminary Ecological Assessment, bat survey efforts and this associated report address all relevant ecological/conservation related issues as part of the planning application process for this site.

2. Introduction

- 2.1 The National Planning Policy Framework requires that on-site biodiversity/conservation is given full consideration at the time of a planning development application submission.
- 2.2 For any planning application for this site the Local Planning Authority would be acting in a reasonable and responsible manner under the legislation by requesting that the planning applicant completes a suitable ecological assessment and prepares/submits a subsequent report, if the Authority believes a habitat or species could be threatened by the proposed development.
- 2.3 The Preliminary Ecological Assessment, bat survey efforts along with this report address all relevant biodiversity concerns the local planning authority may have in relation to the proposed development.

3. Site Assessment

3.1. The proposed development/survey site is the buildings/wider garden at 10 Feering Road, Coggeshall in Essex (Drawing 1 – red line boundary).



Drawing 1



Photograph 1

3.2 To the west south and east (across main road) is grazing/hay pasture, to the north existing residential development.

- 3.3 The detached main building and garages are located towards the front of the plot with a hard standing gravel drive (Photographs 2 and 3).



Photograph 2



Photograph 3

- 3.4 To all boundaries is a mixed planting of maturing ornamental trees and shrubs that provide a continuous screen to the site (Photograph 4).



Photograph 4

- 3.5 To the left flank of the property is a wide open amenity lawned area that extends to the rear. It is a managed short sward with little floristic diversity or conservation value (Photograph 5).
- 3.6 To the right flank to the rear of the garages is a patio area with a small amenity lawn and shrub borders. The amenity lawn has not been mown/managd to the same extent as that to the left flank (Photograph 6). Although a longer sward has grown there is no successional development that would at the moment increase the sites biodiversity value.



Photograph 5



Photograph 6



Drawing 2

- 3.7 Over 200 metres to the west of the site is the River Blackwater (Drawing 2). There is no access from the proposed development site to the river - the proposed development will not impact upon the river – its management ecological value or any potential fauna it may contain. There is no pond within a relevant distance that the proposed development could impact upon.
- 3.9 The proposed development site has very limited conservation/biodiversity value:
- It contains no sett or badger field sign
 - It has no invertebrate value.
 - It is not a suitable habitat for a viable reptile population.
 - No amphibian potential.
- 3.10 The buildings and a number of mature trees on site are to be removed as part of the proposed development – their use/potential as bat roost sites requires further survey efforts.

4. Planning Policy and Site Status

- 4.1 The direction to protect sites with a designated conservation status including Local Wildlife Sites has continued in the revised National Planning Policy Framework July 2018/19. Local Planning Authorities are still required to set criteria-based policies against which proposals for any development, on or affecting protected wildlife or geodiversity sites or landscape areas, will be judged. Planning policies should identify and map components of local ecological networks including the hierarchy of international, national, and locally designated sites of importance for biodiversity.
- 4.2 With such extensive legislative/planning policy protection of biodiversity and designated conservation sites against development, it is essential to first establish the status of any site where any ecological related assessment is being made if it is, as in this case, in relation to a feasibility study or subsequent planning application.
- 4.3 No part of the proposed development site has any type of statutory or non-statutory conservation designation (Appendix 1 and 2). However, the site is within a “zone of influence” for Chalkney Woods and Marks Tey Brick Pits Sites of Special Scientific Interest. The proposed development will not reduce the size or conservation status of these S.S.S.I sites nor affect their management regimes or future ecological potential or create any new access to the woods.
- 4.4 There are no registered Priority Habitats on any part of the proposed development area. However, there are Priority Habitat Deciduous Woodland areas to the south-west (Appendix 3). The proposed development will not reduce the size or conservation status of this Priority Habitat nor affect its management regimes or future ecological potential, neither does it create new access to this site.

5. Planning Policy and Wildlife Legislation

- 5.1 Regardless of any planning policy or guideline change certain species are legally protected and any type of development that would injure, kill, ill-treat or intentionally damage or destroy any protected species or place of shelter would be a criminal act.
- 5.2 However some species that do not receive statutory full protection under existing ranges of legislation continue to be identified as requiring conservation action as species of principal importance in the revised (2018 and 2019) National Planning Policy Framework:
- Promote the preservation, restoration and re-creation of priority habitats and the protection of priority species populations.... linked to national and local targets.
 - When determining planning applications local planning authorities should aim to conserve and enhance biodiversity.
 - To achieve this conservation action/protection planning authorities are instructed to refuse planning applications that cause harm to these species or their habitats if no suitable mitigation has been identified.
- 5.3 With legal responsibilities and new planning framework implications it remains essential that any ecological assessment of any feasibility/development site, including the area of this report, must determine the possible presence or absence of any protected species as part of the development process.
- 5.4 Without this assessment the potential developer would be unable to demonstrate due diligence in his legal wildlife responsibilities.
- 5.5 Furthermore the local planning officer will not have been provided with the required information to be able to determine if the ecological based requirements of their relevant planning application for the site are being met in full.
- 5.6 It would however be unreasonable to survey for every protected floral/faunal species. The likelihood of a protected species being present is based on the habitat type/condition and when appropriate any existing record of the species being present within a relevant distance. Existing protected species data within a 1 - kilometre distance has been provided by the Essex Field Club – Appendix 4.

5.7 The Site Assessment identified that the proposed wider site has low existing conservation and biodiversity value:

- It contains no sett or badger field sign
- It has no invertebrate value.
- It is not a suitable habitat for a viable reptile population.
- No amphibian potential.

5.8 However, the Site Assessment confirms that a number of mature trees along with all the sites buildings require removal to facilitate the proposed development.

5.9 The species data search (Appendix 4) contains 20 bat records across 5 species within a 1 kilometre radius of the survey site.

5.10 All bat species in Britain are protected under the Wildlife and Countryside Act 1981 through inclusion on Schedule 5. They are also protected under the Conservation (Natural Habitats &c.) Regulations 1994 (which were issued under the European Communities Act 1972), through inclusion on Schedule 2. From January 31st, 2020, these Regulations were consolidated into the Conservation of Habitats and Species (Amendment) (EU exit) Regulations 2019.

5.11 European protected animal species and their breeding sites or resting places are protected under Regulation 39. It is an offence for anyone to deliberately capture, injure or kill any such animal or to deliberately take or destroy their eggs. It is an offence to damage or destroy a breeding or resting place of such an animal. It is also an offence to have in one's possession or control, any live or dead European protected species.

5.12 The threshold above which a person will commit the offence of deliberately disturbing a wild animal of a European protected species has been raised. Now, a person will commit an offence only if he deliberately disturbs such animals in a way as to be likely significantly to affect (a) the ability of any significant groups of animals of that species to survive, breed, or rear or nurture their young, or (b) the local distribution of abundance of that species. However, please note that the existing offences under the Wildlife and Countryside Act (1981) as amended which cover obstruction of places used for shelter or protection (for example, a bat roost), disturbance and sale still apply to European protected species.

5.14 This legislation provides defences so that necessary operations may be carried out in places used by bats, provided the appropriate Statutory Nature Conservation Organisation (in England this is Natural England) is notified and

allowed a reasonable time to advise on whether the proposed operation should be carried out and, if so, the approach to be used. The UK is a signatory to the Agreement on the Conservation of Bats in Europe, set up under the Bonn Convention. The Fundamental Obligations of Article III of this Agreement require the protection of all bats and their habitats, including the identification and protection from damage or disturbance of important feeding areas for bats.

- 5.15 Paragraph 98 of Circular 06/2005 states that 'the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat'.
- 5.16 Section 15 of the National Planning Policy Framework 2018 (NPPF) states that 'the planning system should contribute to and enhance the natural and local environment byminimising impacts on and providing net gains for biodiversity...'
- 5.17 Since August 2007, building development that affects bats or their roosts needs a Protected Species Licence under The Conservation (Natural Habitats &c.) (Amendment) Regulations 2007 administered in England by Natural England.
- 5.18 With such a high conservation value it is necessary to complete all relevant bat roost survey efforts for all the on-site buildings and trees that require removal to allow the proposed development to be achieved.

6. Bat Roost Survey – On site Trees

6.1 All of the bat survey efforts were completed by suitably qualified experienced licensed (2015- 15258-CLS-CLS) bat ecologist John Dobson, assisted by Patrick Mckenna.

6.2 The subsequent report sections have been compiled in accordance with the Bat Conservation Trust's Bat Survey Guidelines for Professional Ecologists: Good Practice Guidelines.

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

6.3 However, it must be noted that the first page of all three editions includes the following: The guidelines should be interpreted and adapted on a case-by-case basis according to site-specific factors and the professional judgement of an experienced ecologist. Where examples are used in the guidelines, they are descriptive rather than prescriptive.

6.4 Individual trees/tree groups/buildings identified for removal as part of the wider site development are identified in the tree survey - Drawing 1.



Drawing 1

- 6.5 Only those trees identified for removal (see Drawing 1 above) to facilitate the proposed development were assessed in relation to any Potential Roost Feature (P.R.F.) they could contain.
- 6.6 All of the relevant trees were inspected from ground level – using binoculars where appropriate to identify any Potential Roost Feature (P.R.F.) that could be used as a bat roost site.
- 6.7 These features, as per the various bat guidelines, include:
- woodpecker holes;
 - rot holes;
 - hazard beams;
 - other vertical or horizontal cracks and splits (such as frost-cracks) in stems or branches;
 - partially detached platey bark;
 - knot holes arising from naturally shed branches, or branches previously pruned back to the branch collar;
 - man-made holes (e.g. cavities that have developed from flush cuts) or cavities created by branches tearing out from parent stems;
 - cankers (caused by localised bark death) in which cavities have developed:
 - other hollows or cavities, including butt-rots;
 - double-leaders forming compression forks with included bark and potential cavities;
 - gaps between overlapping stems or branches;
 - partially detached ivy with stem diameters in excess of 50mm;
 - bat, bird or dormouse boxes.
- 6.8 For any possible Roost Feature its suitability or likelihood as being a possible bat roost was categorised as being low, medium, or high as per the suitability guidelines (Table 1).
- 6.9 At the same time as the visual assessment of the feature, observations were made (where possible) to determine if there were any bat activity field signs - droppings, staining, scratch marks – or indeed any obvious bat presence that did not require invasive techniques to determine.
- 6.10 As part of the individual tree evaluation its location and associated habitats were assessed in relation to bat provision/suitability:

- Is the tree a stand-alone feature – does it have good connectivity with potential bat foraging areas.
- Are the trees part of a possible bat dispersal route.
- Are the trees illuminated or disturbed at night?

6.11 For features identified as having a moderate to high roost suitability a subsequent, emergence survey of the roost feature was to be subsequently completed by a suitably licenced experienced bat ecologist.

Suitability	Description Roosting habitats	Commuting and foraging habitats
Negligible	Negligible habitat features on site likely to be used by roosting bats.	Negligible habitat features on site likely to be used by commuting or foraging bats.
Low	<p>A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions^a and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation^b).</p> <p>A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential.^c</p>	<p>Habitat that could be used by small numbers of commuting bats such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat.</p> <p>Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.</p>
Moderate	A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions ^a and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only – the assessments in this table are made irrespective of species conservation status, which is established after presence is confirmed).	<p>Continuous habitat connected to the wider landscape that could be used by bats for commuting such as lines of trees and scrub or linked back gardens.</p> <p>Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.</p>
High	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions ^a and surrounding habitat.	<p>Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting bats such as river valleys, streams, hedgerows, lines of trees and woodland edge.</p> <p>High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland.</p> <p>Site is close to and connected to known roosts.</p>

Table 1

Survey Results

6.12 Those trees identified for removal are:

- Group 1 and Group 2
- Individual trees T14--24, T26-T28 inclusive

6.13 Groups 1 and 2 are mature ornamental conifers to the front of the site, they are healthy vigorous trees (Photographs 1 and 2), with no PRF's.



Photograph 1



Photograph 2

6.14 Only T19 (Photograph 3) of the individual tree identified for removal had any P.R. F's. There are 3 x woodpecker holes (Photographs 4 and 5) in the main bole, all had no field sign of any past or existing bat use, all 3 x were wet internally and at present not suitable features for a bat roost.

6.15 There was a single callousing wound/branch loss point (Photograph 6) in the canopy of tree T 19, the wound had no depth and no P.R.F. potential.



Photograph 3



Photograph 4



Photograph 5



Photograph 6

6.16 There are no P.R.F.'s of moderate or high value that require further bat roost survey efforts.

7. Bat Roost Survey - On site Buildings

Survey Methods

- 7.1 The exterior surfaces of the building on site were examined for any signs of use as bat roosts, such as the presence of droppings on walls, windows or staining around roost entrances. The use of a crevice by a colony of bats produces droppings on brickwork and adjacent surfaces close to the crevice, together with an accumulation of droppings beneath the roost entrance. However, upon examination, many surfaces will have one or two droppings, randomly placed, caused by bats seeking out new roost sites.
- 7.2 The internal survey was conducted using a powerful torch. The roof of the buildings was searched for evidence of roosting, the floor areas for droppings and the beams for crevices and staining indicative of the presence of roosting bats. An Xtend & Climb Pro Ladder and a ProVision 300 endoscope were available to inspect crevices in brickwork and around beams.

Survey Results

- 7.3 The survey building is a detached property with a tile and felted roof and pale, rendered walls. The building is aligned N-S with 'wings' at the northern and southern ends. The survey found that much of the roof volume was taken up by living accommodation, with five dormers to the south and one to the north, east and west. The remaining roof void had a shallow pitch with a floor to ridge height of c. 1.2m, dimensions that are usually unsuitable for roof-dwelling species of bats that prefer a large, open volume in which to fly prior to emergence. No evidence of their presence was found on the floor of the loft, along the internal eaves of the building or on items stored in the loft. Externally, there was a tight seal to the eaves and gables, and also to the roof tiles. Two dormers had a small area of tile cladding that had a tight seal, whereas the others had tongue and groove cladding that had no cavities that might be occupied by bats. There was also no evidence such as staining or droppings on the pale walls where the presence of bats would have been readily apparent.



Southern elevation. Note dormers



Northern elevation



Southern elevation



Note lack of evidence of bats on floor of loft



Note lack of evidence of bats on floor of loft



Note lack of evidence of bats on floor of loft



Note lack of evidence of bats on floor of loft



Note lack of evidence of bats in eaves cupboard



Note lack of evidence of bats on floor of loft



Note lack of evidence of bats on floor of loft



Note lack of evidence of bats on floor of loft



Note lack of evidence of bats on floor of loft



Note tight seal to gable



Note tight seal to roof tiles



Note tight seal to roof tiles



Note tight seal to tongue and groove cladding

- 7.4 There is no evidence of any existing or past bat roost in any of the buildings on this site.

Discussion

- 7.5 Bats are inquisitive, highly mobile animals, which constantly investigate their surroundings, evaluating good feeding areas and potential roosting opportunities. Where suitable habitat such as woodland, woodland edge or sheltered pasture occurs, bats will travel up to several kilometers to take advantage of this resource. To reach favoured sites, small bats will follow linear landscape features such as hedgerows, streams and lanes etc. The absence of such features can make an otherwise suitable site inaccessible to bats. In addition, new roosts will become established in such areas - examples being the rapid colonisation of artificial roost boxes placed in conifer forests or the occupation of new houses by nursery colonies of pipistrelle bats within a year or two of their completion.
- 7.6 Since there was no evidence of bats at the site, a European Protected Species Licence will not be required for this project.
- 7.7 Although no evidence of bats was found, it is probable that bats from nearby roosts will forage across the site and in the gardens of adjacent properties. This behaviour would be expected to continue after any building work has been completed and therefore it is considered that the planning proposal for this site will not have a detrimental effect on the local bat population.

8. Conclusions

- 8.1 No part of the proposed development site has any type of statutory or non-statutory conservation designation. However, the site is within a “zone of influence” for Chalkney Woods and Marks Tey Brick Pits Sites of Special Scientific Interest. The proposed development will not reduce the size or conservation status of these S.S.S.I sites nor affect their management regimes or future ecological potential or create any new access to the woods.
- 8.2 There are no registered Priority Habitats on any part of the proposed development area. However, there are Priority Habitat Deciduous Woodland areas to the south-west. The proposed development will not reduce the size or conservation status of this Priority Habitat nor affect its management regimes or future ecological potential, neither does it create new access to this site.
- 8.3 The proposed development site has very limited conservation/biodiversity value:
- It contains no sett or badger field sign
 - It has no invertebrate value.
 - It is not a suitable habitat for a viable reptile population.
 - No amphibian potential.
- 8.4 Over 200 metres to the west of the site is the River Blackwater. There is no access from the proposed development site to the river - the proposed development will not impact upon the river – its management ecological value or any potential fauna it may contain. There is no pond within a relevant distance that the proposed development could impact upon.
- 8.5 There are no Potential Roost Features (P.R.F.'s) within those trees identified for removal on site that have moderate or high suitability values that would require further bat roost survey efforts.
- 8.6 There is no evidence of any existing or past bat roost in any of the buildings on this site. No further bat roost survey efforts are required
- 8.7 The Preliminary Ecological Assessment, bat survey efforts and this associated report address all relevant ecological/conservation related issues as part of the planning application process for this site.

Appendix 1

Statutory Conservation Designated Sites



Sites of Special Scientific Interest (England)

Name	Chalkney Wood SSSI
Reference	1001685
Natural England Contact	West Anglia
Natural England Phone Number	0845 600 3078
Hectares	73.72
Citation	1002204

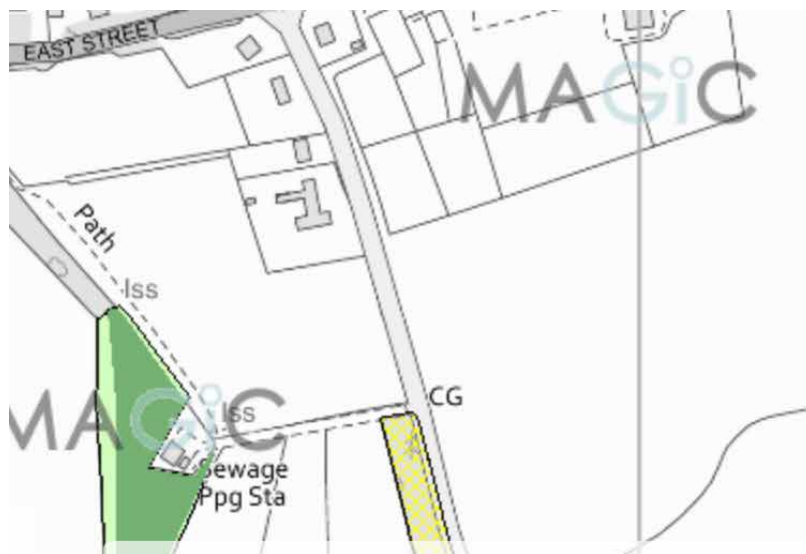
25 Nayland Road, Bures, Suffolk CO8 5BX
 Tel: 01787 227432; mobile: 07770 690899
 Email: info@eco-planning.co.uk
 Company no: 5553720 VAT Reg. No: 980 8484 75

Sites of Special Scientific Interest Units (England)	
Name	MARKS TEY BRICKPIT
Reference	1064479
Site Unit Condition	FAVOURABLE
Citation	1005070
Hectares	29.82

Appendix 2 Non-Statutory Designated Sites



Appendix 3 Habitat Inventory



25 Nayland Road, Bures, Suffolk CO8 5BX
Tel: 01787 227432; mobile: 07770 690899
Email: info@eco-planning.co.uk
Company no: 5553720 VAT Reg. No: 980 8484 75

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Priority Habitat Inventory - Deciduous Woodland (England)

Main Habitat Present	Deciduous woodland
Confidence in Main Habitat Classification	Low

National Forest Inventory (GB)

Category	Woodland
Interpreted Forest Type	Young trees
Area (hectares)	0.97