

Bats & GCN Survey for The Granary Unit Creeping St Mary

On behalf of:

**Hollins Architects
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Appendix 1: Great Crested Newt Habitat Suitability Index

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1) Summary

As part of a planning proposal (DC/23/03734) to extend a residential property at Granary Cottage, Upper Langdales Farmhouse, Mill Lane, Creeting St Mary, Ipswich, Suffolk IP6 8QF, a site visit was conducted on 23rd August 2023 to determine whether the site had the potential to be occupied by protected species, in particular, bats and great crested newts, which would be affected if any proposed development were to go ahead.



Photo 1: Eastern elevation. The southern gable wall of Granary Cottage is shown.

The survey building is a detached shed with an unlined, corrugated tin roof and vertically clad wooden walls. A lean-to building with a sloping corrugated tin roof is attached to the southern side of the building. The building is aligned approximately E-W. The survey found that the shed was open to the roof and received daylight illumination via four windows in the northern wall. In such conditions, bats seek out dark areas or crevices in which to roost and the lack of such features in the machine cut rafters meant that the building was less suitable as a roosting place for bats. In addition, the interior receives regular disturbance and is equipped as a games room. The lean-to building was in a dilapidated condition and had no features that might be occupied by bats. There was also no evidence such as staining or droppings on the pale, rendered southern wall of Granary Cottage where the presence of bats would have been readily apparent.

There is no vegetation affected by the project that has crevices, loose bark or woodpecker holes that might be colonised by bats. **No** evidence of their presence was found at this site.

The lack of potential roosting places and the absence of any evidence of the presence of bats mean that **no** further surveys are required for this building. The building was considered to have **negligible potential** as a roosting place for bats.

Since there was no evidence of bats at the site, a European Protected Species Licence will **not** be required for this project.

Please note that this survey records the status of the building at the time of the survey. However, if more than a year were to elapse before the start of the building work, it is considered unlikely that bats would colonise the site during the intervening period.

The site is bordered to the north and west by residential properties with maintained gardens; to the south by an arable field in active production, and to the east by a paddock. A pond to the west is in a neighbouring property, occasionally dries up and is visited by wildfowl. It scored 0.4 on the Great Crested Newt Habitat Suitability Index indicating poor suitability for the species. The gravel hardstanding to the north for vehicles, arable field and maintained gardens would act as a barrier to dispersal by great crested newts and would not offer suitable terrestrial dispersal habitat for this species.

2) Introduction

Essex Mammal Surveys was requested to carry out a survey of a property at Upper Langdales Farmhouse, Creeting St Mary to investigate for signs indicating the presence of protected species. The identification of protected species is vital in the proposed development of a site to comply with existing legislation and also allows any work that may otherwise be detrimental to these species to be appropriately scheduled.

The objectives of the survey were to:

- assess the general habitats on the site including the potential of the site to support protected species (bats, reptiles, water voles, great crested newts and badgers) or any other species that may act as a constraint on development
- determine any impact of development on any wildlife of conservation concern within the area
- produce a strategy for avoiding, mitigating and compensating for any potential impacts identified

John Dobson, a bat worker and trainer licensed by Natural England (Licence No. 2015-15258-CLS-CLS), and author of *Mammals of Essex* (Essex Field Club, 2014) carried out the survey on 23rd August 2023. John Dobson has been elected a Fellow of the British Naturalists' Association and received the David Bellamy Award for natural history in 2015. The site is located at Grid Reference: TM091580.

This report has 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.

However, 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.*

3) Legislation and planning policy relating to bats and Great Crested Newts in the UK

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.

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.

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.

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.

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'*.

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 by ...minimising impacts on and providing net gains for biodiversity....*’

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.

The Great Crested Newt is protected under the Wildlife and Countryside Act 1981, (as amended) listed on Schedule 5. The Great Crested Newt is also included in Schedule 2 of the Conservation (Natural Habitats &c.) Regulations 2010 (commonly referred to as the Habitat Regulations) and therefore is considered a European Protected Species and consequently receives stringent protection.

The Act and Regulations include provisions making it an offence to:

- Intentionally or deliberately kill, injure or capture (take) a Great Crested Newt.
- Possess or control any live or dead specimen or anything derived from a Great Crested Newt or deliberately take or destroy the eggs of a Great Crested Newt.
- Damage or destroy a breeding site or resting place of a Great Crested Newt.
- Intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by a Great Crested Newt.
- Intentionally, deliberately or recklessly disturb a Great Crested Newt whilst it is occupying a structure or place which it uses for that purpose.

Since 21 August 2007, the Conservation Regulations 1994 (Habitat Regulations) have been amended. As a result of these amendments the majority of the defences originally put into the Regulations have been removed. This includes the “incidental result defence” which applies to acts which could constitute an offence but were the incidental result of an otherwise lawful activity and could not reasonably have been avoided. Those carrying out activities that may affect European Protected Species will now have to give even more careful consideration to their presence and also their breeding and resting places.

4) Methods

4.1 Bats

The exterior surfaces of the building 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.

4.2 Great Crested Newts

The pond is in a neighbouring property and access wasn’t obtained. The surface was watched from an arable field to the south for surfacing by newts or fish. A Habitat Suitability Index was calculated for the pond – see Appendix 1.

5) Results

5.1 Bats

The survey building is a detached shed with an unlined, corrugated tin roof and vertically clad wooden walls. A lean-to building with a sloping corrugated tin roof is attached to the southern side of the building. The building is aligned approximately E-W. The survey found that the shed was open to the roof and received daylight illumination via four windows in the northern wall. In such conditions, bats seek out dark areas or crevices in which to roost and the lack of such features in the machine cut rafters meant that the building was less suitable as a roosting place for bats. In addition, the interior receives regular disturbance and is equipped as a games room. The lean-to building was in a dilapidated condition and had no features that might be occupied by bats. There was also no evidence such as staining or droppings on the pale, rendered southern wall of Granary Cottage where the presence of bats would have been readily apparent.



Photo 2: Southern elevation



Photo 3: Western elevation



Photo 4: Northern elevation



Photo 5: Granary Cottage with survey building to right



Photo 6: Looking eastwards in building



Photo 7: Looking westwards



Photo 8: Showing windows in north wall



Photo 9: The roof had no features that might be occupied by bats



Photo 10: The attached shed had no features that might be occupied by bats



Photo 11: There was a tight seal to the gable of Granary Cottage

There is no vegetation affected by the project that has crevices, loose bark or woodpecker holes that might be colonised by bats.

No evidence of the presence of bats was found at this site.

5.2 Great Crested Newts

The site is bordered to the north and west by residential properties with maintained gardens; to the south by an arable field in active production, and to the east by a paddock. A pond to the west is in a neighbouring property, occasionally dries up and is visited by wildfowl. It scored 0.4 on the Great Crested Newt Habitat Suitability Survey Index indicating poor suitability for the species. The gravel hardstanding to the north for vehicles, arable field and maintained gardens would act as a barrier to dispersal by great crested newts and would not offer suitable terrestrial dispersal habitat for this species.



Photo 12: The pond in a neighbouring garden



Photo 13: Showing extent of gravel hardstanding to north



Photo 14: Maintained lawn bordering the survey building



Photo 15: Showing maintained lawn to south



Photo 16: The northern side with building to right

6) Discussion

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 kilometres 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.

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, or on other protected species.

The proposed extension is on the southern side of the house, and the pond is to the west, separated from the construction area by mown grass, residential properties and an arable field in active production. No ponds would be lost to or affected by the proposals. In addition, given that the majority of the site is subject to some form of mowing management, it is unlikely that the site presents as terrestrial dispersal habitat.

Given that mowing management is undertaken across most of the site, and that the extension development is concentrated in a small area of the site and that boundary features would be fully retained, it is not considered that presence/absence surveys would be an appropriate course of action for this site.

However, in light of the above, it is advised that a reasonable precautionary action be undertaken. Therefore, in line with the existing and established management regimes on site, the grass areas should be maintained as at present until the commencement of construction to prevent potential dispersal habitat encroaching into the development area through neglect of the grounds.

7) Recommendations for reasonable biodiversity enhancements

1: It is recommended that any gaps beneath existing boundaries are retained to allow hedgehogs and common toads to forage across the site as, potentially, at present (see below).

Hedgehogs travel around **one mile** every night through our parks and gardens in their quest to find enough food and a mate. If you have an enclosed garden this can prevent hedgehogs from dispersing throughout their territory. It is now known that one of the main reasons why hedgehogs are declining in Britain is because our fences and walls are becoming more and more secure, reducing the amount of land available to them. Developers can make their life a little easier by removing the barriers within their control – for example, by making holes in or under our garden fences and walls for them to pass through.

A gap 13cm by 13cm is sufficient for any hedgehog to pass through. This will be too small for nearly all pets.

Alternatively:

- Remove a brick from the bottom of the wall
- Cut a small hole in your fence if there are no gaps
- Dig a channel underneath your wall, fence or gate



Photo 17: Hedgehog pathway at base of fence

- 2:** Two bird nesting boxes to be sited on trees at the site.
- 3:** Two solitary bee hives to be erected on developed site.
- 4:** A Hedgehog nesting box to be sited at base of boundary hedge.

ARGUK GCN HSI CALCULATOR

	Pond Name	1
	Grid reference	TM0918258090
SI Number	SI Description	SI Value
1	Geographic location	1
2	Pond area	1
3	Pond permanence	0.5
4	Water quality	0.33
5	Shade	0.7
6	Water fowl effect	0.01
7	Fish presence	1
8	Pond Density	0.95
9	Terrestrial habitat	0.33
10	Macrophyte cover	0.3
	HSI SCORE	0.40
	Pond suitability	Poor

Categorisation of HSI Score by Lee Brady

HSI Score	Pond Suitability
< 0.50	Poor
0.50 - 0.59	Below average
0.60 - 0.69	Average
0.70 - 0.79	Good
> 0.80	Excellent

Based on ARGUK advice note 5 - Great Crested Newt Habitat Suitability Index

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