



Preliminary Roost Assessment

Eastwick Farm, Clay Lane, Stoke Ash, Eye, Suffolk, IP23 7DZ

Clive and Suzanne Stevens

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Industry Guidelines and Standards

This report has been written with due consideration to:

- Chartered Institute of Ecology and Environmental Management (2017). Guidelines for Preliminary Ecological Appraisal. 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Version 1.1. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2017). Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2020). Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK. 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- British Standard 42020 (2013). Biodiversity – Code of Practice for Planning and Development.
- British Standard 8683:2021 (2021). Process for Designing and Implementing Biodiversity Net Gain.

Proportionality

The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, the decision-maker should only request supporting information and conservation measures that are relevant, necessary and material to the application in question. Similarly, the decision-maker and their consultees should ensure that any comments and advice made over an application are also proportionate.

The desk studies and field surveys undertaken to provide a Preliminary Ecological Appraisal (PEA) might in some cases be all that is necessary.

(BS 42020, 2013)

Executive Summary

Arbtech Consulting Limited was instructed by Clive and Suzanne Stevens to undertake a Preliminary Roost Assessment (PRA) at Eastwick Farm, Clay Lane, Stoke Ash, Eye, Suffolk, IP23 7DZ (hereafter referred to as “the site”). The survey was required to inform a planning application for the refurbishment of an existing agricultural building on site (The Old Cow Shed) which is currently supported by scaffolding due to storm damage (planning reference - DC/23/02414; hereafter referred to as “the proposed development”).

The following is work you will need to commission or implement to comply with planning policy and legislation. Further information, along with opportunities for biodiversity enhancement, are outlined in Table 4 of this report.

Feature	Survey Results Summary	Impact Assessment	Recommendations
Roosting bats (B1)	<p>Building B1 has a confirmed roost, as identified by the presence of bat droppings below the wall cavity between the paper lining and wooden cladding at the south-east corner. A urine mark which appeared during the survey visit indicates that the roost is active.</p> <p>Based on the nature of the roost and the adjacent habitats which provide an excellent resource for foraging and commuting, the building is assessed to have high roost value. The possibility of the building to support a roost of high conservation value such as maternity or hibernation roosts cannot be ruled out.</p>	<p>The proposed demolition of this building could result in the destruction of any bat roosts present and could cause disturbance, death or injury to bats.</p> <p>If works do not progress quickly to safely demolish the building, it is likely to fall by itself and destroy the bat roosts, potentially killing or injuring any bats present at the time.</p>	<p>Three bat emergence or re-entry surveys are required during the active bat season (optimal May to August, suboptimal September) to confirm presence or likely-absence of a bat roost in the building. An EPSL application to Natural England may also be required.</p> <p>Due to the urgent nature of the works, and the fact that the building may collapse by itself very soon, a different approach to any survey and licensing approach should be considered and agreed with the LPA. Please refer to Table 4.</p>
Foraging and commuting bats	<p>The trees, ponds and hedgerows on site could be used by local bat populations for foraging and commuting. These could also be used by bats dispersing from nearby roosts outside of the site.</p>	<p>The proposed development will include the use of lighting which could spill on to bat foraging or commuting habitat and deter bats from using these areas.</p>	<p>A low impact lighting strategy will be adopted for the site during and post-development, please refer to Table 4.</p>
Nesting birds (B1)	<p>The building contains evidence of nesting birds in the form of three bird's nests internally within the roof structure and wall. No bird activity was observed around these nests during the survey visit.</p>	<p>The proposed demolition could result in the destruction or the disturbance and subsequent abandonment of active bird nests.</p>	<p>Works should be undertaken outside the period 1st March to 31st August. If this timeframe cannot be avoided, a close inspection of the building should be undertaken immediately, by qualified ecologist, prior to the commencement of work. All active nests will need to be retained until the young have fledged.</p>

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed by Clive and Suzanne Stevens to undertake a Preliminary Roost Assessment (PRA) at Eastwick Farm, Clay Lane, Stoke Ash, Eye, Suffolk, IP23 7DZ (hereafter referred to as “the site”). The survey was required to inform a planning application for the refurbishment of an existing agricultural building on site (The Old Cow Shed) which is currently supported by scaffolding due to storm damage (planning reference - DC/23/02414; hereafter referred to as “the proposed development”). A plan showing the proposed development is provided in Appendix 1.

The aim of the PRA was to determine the presence or evaluate the likelihood of the presence of roosting bats, and to gain an understanding of how bats could use the site for roosting, foraging or commuting. This has been undertaken with due consideration to the “Bat Surveys for Professional Ecologists—Good Practice Guidelines” publication (Collins, 2016). No previous ecology reports have been produced for this site by Arbtech Consulting Ltd or, to the author’s knowledge, by any other consultancy.

1.2 Site Location and Landscape Context

The site is located at National Grid Reference TM 12156 70996 and has an area of approximately 0.66ha comprising several buildings and agricultural outbuildings, areas of hardstanding, grassland, ponds, hedgerows and scattered trees. It is set in a rural context on the outskirts of the village of Stoke Ash, Suffolk. It is surrounded by arable fields on all sides, with a residential property and large garden with good tree cover directly to the west and a small pocket of woodland/scrub to the east. A minor road (Clay Lane) runs adjacent to the southern boundary. The wider landscape comprises further arable land and scattered residential and agricultural infrastructure, including several ponds. The River Dove runs approximately 400m south of the site. UK BAP priority habitats within 2km include lowland meadows, coastal and floodplain grazing marsh, deciduous woodland and wood pasture and parkland, the closest of which is woodpasture and parkland approx. 250m east. There is a strong network of hedgerows and tree lines within 2km of the site which coalesce in places with woodland pockets and the River Dove to form linear features providing connectivity for bats through the landscape and good opportunities for foraging. The nearby woodland pockets may also provide bat roosting value. The scattered trees and ponds on site and within the adjacent gardens will provide further opportunities for foraging and commuting bats in the locality. A site location plan is provided in Appendix 2.

1.3 Scope of the Report

This report provides a description of all features suitable for roosting, foraging and commuting bats and evaluates those features in the context of the site and wider environment. It further documents any physical evidence collected or recorded during the site survey that establishes the presence of roosting bats. It provides information on possible constraints to the proposed development as a result of bats and summarises the requirements for any further surveys to inform subsequent mitigation proposals, achieve planning or other statutory consent and to comply with wildlife legislation. To achieve this, the following steps have been taken:

- A desk study has been carried out.

- A field survey has been undertaken, including an inspection of built structures, to determine the presence or the suitability of any features which bats could use for roosting and to assess the suitability of the site's bat foraging and commuting habitat.
- An outline of potential impacts on any confirmed or unidentified roosts has been provided, based on the proposed development.
- Recommendations for further surveys and mitigation have been made, along with advice on the requirements for a European Protected Species Licence (EPSL) application if appropriate.
- Opportunities for the enhancement of the site for roosting, foraging and commuting bats have been set out.

2.0 Methodology

2.1 Desk Study

The desk study included a 2km radius review of statutory designated sites with bat qualifying interests and granted EPSL records for bats held on magic.gov.uk database. An assessment of the surrounding landscape structure was also completed using aerial images from Google Earth and OS maps.

Existing bat records relating to the site and a surrounding 2km radius will be obtained from Suffolk Biodiversity Information Service (SBIS). These records were not available at the time of writing this report. The data search is confidential information that is not suitable for public release and will be analysed and summarised at a later date and the report updated.

2.2 Field Survey

The survey was undertaken by Georgia Arnold (BSc, MSc, Accredited Agent under Natural England Bat Licence Number: 2018-33540-CLS-CLS) on 19/07/2023.

The PRA focussed on one built structure which will be affected by the proposed development as well as providing an overview of the wider site and the surrounding landscape for bat roosting, foraging and commuting habitat.

For any surveyed buildings:

A non-intrusive visual appraisal was undertaken from the ground, using binoculars to inspect the external features of the building for features which bats could use for roosting, including access or egress points and for signs of bat use including droppings, scratch marks, insect remains and urine smear marks. An internal inspection of the building was also made, including the living areas and any accessible roof spaces, using a torch and ladders. The surveyor paid particular attention to the floor and flat surfaces, window shutters and frames, lintels above doors and windows, and carried out a detailed search of numerous features within the roof space.

2.3 Breeding Birds and Other Incidental Observations

The surveyor also made note of any other ecological constraints observed during the survey, notably the likelihood of presence or signs of breeding birds, and the suitability of the site for barn owls.

2.4 Suitability Assessment

Built structures were categorised according to the likelihood of bats being present and the types of roost that the identified features could support. This is summarised in Table 1 below. Roost suitability is classified as high, moderate, low and negligible and dictates any further surveys required before works can proceed.

Table 1: Features of a building that are correlated with use by bats

Classification	Feature of building and its context
High	Buildings or structures with features of particular significance for larger numbers of roosting bats e.g. mines, caves, tunnels, icehouses and cellars. Habitat on site and surrounding landscape of high quality for foraging bats e.g. broadleaved woodland, tree-lined watercourses and grazed parkland. Site is connected with the wider landscape by strong linear features that would be used by commuting bats e.g. river and or stream valleys and hedgerows. Site is proximate to known or likely roosts (based on historical data). Buildings with high suitability could support roosts of high conservation value such as maternity or hibernation roosts.
Moderate	Buildings or structures with one or more features suitable for more regular roosting due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation value such as maternity or hibernation roosts. Continuous habitat connected to the wider landscape which could be used by bats for commuting such as lines of trees, linked gardens. Foraging habitat in the surrounding area such as trees, scrub, grassland or water.
Low	Buildings or structures with one or more features suitable for use sporadically by individual or small numbers of bats. Potential roost features may be suboptimal for reasons such as shallow depth, poor thermal qualities or upwards orientation with exposure to inclement weather or predators. Habitat suitable for foraging in close proximity, but largely isolated in the landscape. Or an isolated site not connected by prominent linear features.
Negligible	Unsuitable for use by bats.

2.5 Limitations

It should be noted that whilst every effort has been made to describe the features on site in the context of their suitability for roosting bats, this does not provide a complete characterisation of the site. This survey provides a preliminary view of the likelihood of bats being present. This is based on suitability of the habitats on site and in the local area, the ecology and biology of bats as currently understood, and the known distribution of bats as recovered during the desk study. Bats are highly mobile creatures that switch roosts regularly and therefore the usage of a site by bats can change over a short period of time.

There were no specific limitations to the survey.

No biological records data was available at the time of writing this report. This will be obtained and the report updated to enable a robust ecological impact assessment to be completed.

3.0 Results and Evaluation

3.1 Designated Sites

No statutory designated sites with bat qualifying interests were identified within 2km of the site.

3.2 Historical Records

Bat records by Suffolk Biodiversity Information Service (SBIS) within 2km of the site will be added when available.

A search of the magic.gov.uk database for granted EPSLs within a 2km radius of the site has been completed. Displaced bats from licensed sites <2km away from the survey site will find alternative habitat either within the mitigation measures implemented as part of the licence or will relocate to other known roosts sites in close proximity to the licensed site. No EPSL records for bats have been returned within 2km of the site. The nearest EPSL record for bats is located approximately 3km north-west of the site, allowing the destruction of a resting place for common pipistrelle and brown long eared bats.

3.3 Field Survey Results


The weather conditions recorded at the time of the survey are shown in Table 2.



Table 2: Weather conditions during the survey

Date:	19/07/2023
Temperature	19°C
Humidity	83%
Cloud Cover	100%
Wind	7mph
Rain	None


The results of the field survey are detailed in Table 3 below and illustrated in Appendix 3.


Table 3: PRA Results

Feature	Description	Photographs
<p>Bat foraging and commuting habitat</p>	<p>The site is set within in a rural context with moderate tree cover for foraging and a network of linear features in the wider landscape with good opportunities for foraging and commuting bats. The scattered trees and pond on site and in the surrounding area, as well as the adjacent small pocket of woodland to the east, will provide foraging and commuting opportunities in the locality. The small woodland pocket may also provide bat roosting value. The wider landscape predominantly comprises arable land with pockets of UK BAP deciduous woodland and a strong network of hedgerows and tree lines within 2km, as well as the River Dove. The hedgerow/tree network, river and scattered tree cover coalesce in places with the woodland pockets to form linear features providing connectivity for bats through the landscape. Other woodland pockets within 2km may also provide bat roosting value. Given the type and extent of habitats recorded on site and the extent of good foraging and commuting habitat in the wider landscape, the site itself is not assessed to represent a significant resource for foraging and commuting bats in the context of the wider landscape.</p> <p>Map reproduced from Google imagery (2023).</p>	
<p>B1 - overview</p>	<p>B1 is a two-storey, disused, dilapidated barn and former cow shed which is leaning over and supported by scaffolding on the northern elevation, following storm damage which has compromised the structural integrity of the building, causing deterioration with potential to collapse in further bad weather. The building comprises a brick and timber structure over concrete foundations with a pitched, gable ended roof clad in corrugated metal roofing. The brickwork appears in poor condition and the timber cladding is damaged and warped in places. The cladding has also separated from the brick foundations in some places and an additional support beam has been put in place internally to help support the structure. There are several openings/former doors and windows around the walls which provide access points into the barn. There are no loft spaces within the barn as the main room extends into the roof void.</p>	<p>No photo (see elevation photos below).</p>

<p>B1 – southern elevation</p>	<p>There are suitable roost features on the southern elevation in the form of gaps in the timber cladding which could be used as a roost feature by crevice dwelling bats. There are also gaps where the cladding adjoins the timber structure at the south-east corner of the building. These gaps are a suspected roost access point for the cavity between the paper lining and cladding under which bat evidence was found. A close-up is provided below. There are also several access points into the barn/roof void on this elevation, including through open doors and windows and below the roofline.</p>	 A photograph of the southern elevation of a weathered wooden barn. The building has a steep, gabled roof covered in dark, mossy shingles. The walls are made of horizontal wooden planks. There are several openings, including a large doorway and a window. Red lines are drawn on the image to highlight specific areas: a vertical line along the right edge, a horizontal line under a window, and another horizontal line under a doorway. In the foreground, there is a brick foundation, two large wooden wheels, and a wooden bucket.
<p>B1 – southern elevation – close up</p>	<p>This photo shows a close-up of the gaps at the end of the cladding on the south-east corner of the building. These gaps lead into the wall cavity between the paper lining and the timber cladding and may be used as a potential roost access point (outlined red).</p>	 A close-up photograph of the wooden cladding on the south-east corner of the barn. The image shows the texture of the weathered wood and the gaps between the planks. A red line is drawn around one of these gaps, indicating it as a potential roost access point. The background shows the interior of the barn and some trees under a cloudy sky.

<p>B1 – eastern elevation</p>	<p>There are suitable roost features on the eastern elevation in the form of gaps in the timber cladding which could be used as a roost feature by crevice dwelling bats, in addition to the gaps in the cladding on the south-east corner which may provide a roost access points (see above) There are also several access points into the barn/roof void on this elevation, including through open doors and windows and below the roofline.</p>	
<p>B1 – northern elevation</p>	<p>There is no bat evidence on the northern elevation. The timber cladding on this elevation appears tight and without gaps suitable for crevice dwelling bats. There are several access points into the barn/roof void on this elevation, including through open doors and windows and below the roofline.</p>	

<p>B1 – western elevation</p>	<p>There are suitable roost features on the western elevation in the form of gaps in the timber cladding which could be used as a roost feature by crevice dwelling bats. There are also some access points into the barn/roof void on this elevation, including through gaps and damage in the cladding and below the roofline.</p>	
<p>B1 – interior</p>	<p>There is no loft space within the barn as the main room extends into the roof void. The interior of B1 comprises a brick and timber beam structure over concrete foundations. The roof comprises corrugated metal roofing which is single-skinned/unlined. Due to the presence of openings from former windows and door around the structure, the internal space is subject to significant light and temperature disturbance, which may deter void dwelling bats from using the roof void. The interior of B1 was searched for evidence of bats and a pile of droppings was found below the wall cavity between the paper lining and wooden cladding at the south-east corner of the building. A close-up photo is provided below.</p> <p>Internal temperature: 20°C Internal humidity: 64%</p>	

<p>B1 – interior – close up</p>	<p>This photo shows a close-up of the pile of bat droppings found below the wall cavity at the south-east corner of the building. The number of visible droppings was estimated to be around 30. A sample of the droppings was collected for DNA analysis.</p>	 <p>A close-up photograph showing a pile of dark, irregular bat droppings. The droppings are situated in a cavity between a piece of white paper lining and a wooden plank. The wood grain is clearly visible, and the paper is partially torn and peeling away, revealing the droppings underneath.</p>
<p>B1 – suitability assessment</p>	<p>B1 is a confirmed roost due to the presence of bat droppings below the wall cavity between the paper lining and wooden cladding at the south-east corner of the building. Dropping samples were collected for DNA analysis. There was also an incidental observation of a urine mark appearing on the paper lining during the survey visit, which is indicative that the roost is currently active, though it was not possible to see bats behind the lining during the survey. Further suitable roost features include gaps in the timber cladding around the building which may provide additional roosting opportunities for crevice dwelling bats.</p>	<p>N/A</p>

B1 - breeding birds and other incidental observations

Three bird's nests were visible within the internal roof and wall structure during the survey visit. The size and structure of the two larger bird's nests (pictured, circled red) could indicate jackdaw. One smaller nest along the ridge beam is thought to be that of barn swallow. No bird activity or vocalisations were observed/heard around the nests during the survey visit.



4.0 Conclusions, Impacts and Recommendations

Taking the desk study and field survey results into account, Table 4 presents an evaluation of the value of the site for bats and also details any other ecological constraints identified such as nesting birds in relation to the proposed development which will comprise the refurbishment of an existing agricultural building on site (The Old Cow Shed) which is currently supported by scaffolding due to storm damage.

Table 4: Evaluation of the site for bats and any other ecological constraints

Building	Survey Results Summary	Impact Assessment	Recommendations	Biodiversity Enhancement Opportunities ¹
Roosting bats (B1)	<p>There are a total of eight structures on site, including one main residential property and seven outbuildings. One outbuilding (B1) will be impacted by the proposed development. The remaining buildings will not be impacted and were therefore not subject to survey.</p> <p>Building B1 has a confirmed roost, as identified by bat droppings below the wall cavity between the paper lining and wooden cladding at the south-east corner of the building. Dropping samples were collected for DNA analysis.</p>	<p>The proposed development will result in the demolition of this building. This could result in the destruction of any bat roosts present and could cause disturbance, death or injury to bats.</p> <p>If works do not progress quickly to safely demolish the building, it is likely to fall by itself and destroy the bat roosts, potentially killing or injuring any bats present at the time.</p>	<p>Dropping samples will need to be sent for DNA analysis and bat records will be obtained to establish current and historic bat use.</p> <p>Due to the urgent nature of the works, and the fact that the building will collapse by itself very soon, a different approach to any survey and licensing approach should be considered. As planning consent is required, the LPA will need to fulfil their duties and will require bat emergence and/or re-entry surveys to be done to establish bat use and licensing requirements. Generally, these would need to be spaced at least 2 weeks apart following best practice guidelines. However, as it will not be of any benefit to draw out the survey process this long, and any delays could lead to the injury or death of bats resulting from a building collapse, a condensed survey effort is the best way forward, with 2 dusk or dawn surveys closely spaced to establish species and roost type (along with the DNA results and bat records). These will need to be done as soon as possible and before the end of August. This approach should be agreed with the LPA.</p>	To be confirmed upon completion of the surveys.

¹ The Local Planning Authority has a duty to ask for enhancements under the NPPF (2021).

	<p>There are further suitable roost features for crevice dwelling bats around the building in gaps in the timber cladding. There are also several open access points into the barn/rood void around the building. However, the roof void is considered unsuitable for void-dwelling bats due to the extent of light and weather disturbance that the internal space is subject to.</p> <p>Based on the nature of the roost and the adjacent habitats which provide an excellent resource for foraging and commuting, the building is assessed to have high roost value. The possibility of the building to support a roost of high conservation value such as maternity or hibernation roosts cannot be ruled out at this stage.</p>		<p>Three bat emergence and re-entry surveys are required during the active bat season (optimal May to August, suboptimal September) to characterise the roosts present. At least two of the surveys should be completed during the optimal survey period mid-May to August inclusive. Infra-red cameras should be used as an aid. Two surveyors are required to provide full coverage of the building.</p> <p>An EPSL application to Natural England will be required. The EPSL application requires that surveys have been undertaken within the most recent active bat season and planning permission must have been granted and all relevant wildlife-related conditions have been discharged prior to submission.</p> <p>A Material Changes Check will be required within three months of the EPSL submission, if no survey work has been undertaken within that period. If bat droppings were found during the PRA, a sample will need to be sent off for DNA analysis to confirm the bat species present, to inform the EPSL application. Biological records data will also need to be obtained to inform the application.</p>	
<p>Foraging and commuting bats</p>	<p>The scattered trees, ponds and hedgerows on site could be used by local bat populations for</p>	<p>The proposed development will not result in the removal of any habitats which could be used by foraging or commuting bats. However, it will include the use of lighting</p>	<p>A low impact lighting strategy will be adopted for the site during and post-development, which will include the following measures:</p>	<p>The following habitat creation and enhancement opportunities could be incorporated into the</p>

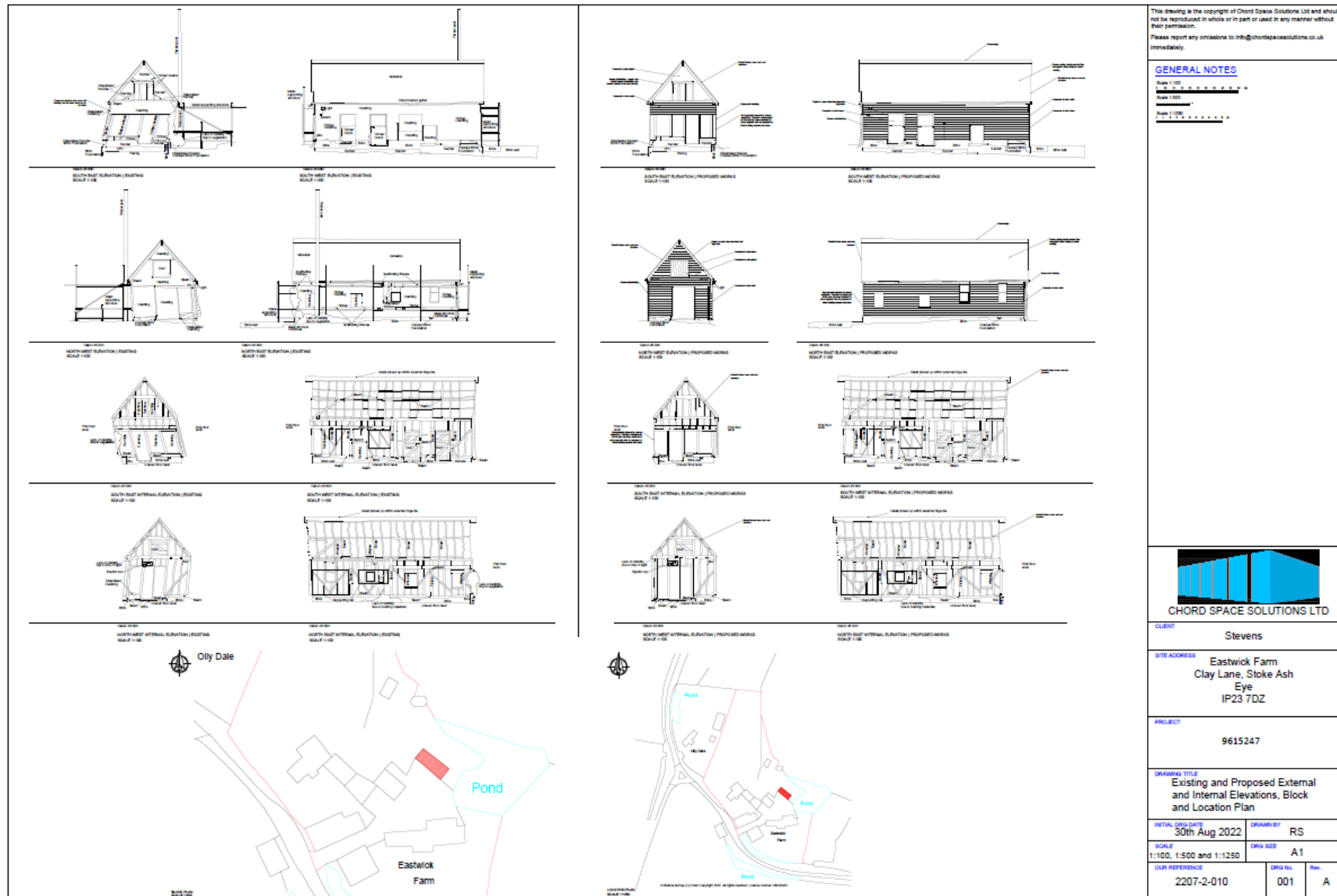
	<p>foraging and commuting. These could also be used by bats dispersing from nearby roosts outside of the site.</p>	<p>which could spill on to bat roosting, foraging or commuting habitat and deter bats from using these areas.</p>	<ul style="list-style-type: none"> • Light spill on to nearby trees and ponds should be avoided. • Use narrow spectrum light sources to lower the range of species affected by lighting. • Use light sources that emit minimal ultra-violet light. • Avoid white and blue wavelengths of the light spectrum to reduce insect attraction and where white light sources are required in order to manage the blue shortwave length content they should be of a warm / neutral colour temperature <4,200 kelvin. • Not use bare bulbs and any light pointing upwards. The spread of light will be kept in line with or below the horizontal. • Light spill will be reduced via the use of low-level lighting used in conjunction with hoods, cowls, louvers and shields. Lights will also be directional to ensure that light is directed to the intended areas only. • External lighting will be on PIR sensors that are sensitive to large objects only (so that they are not triggered by passing bats) and will be set to the shortest time duration to reduce the amount of time the lights are on. • Wall lights and security lights will be 'dimmable' and set to the lowest light intensity settings. There are several products on the market that allow the control of the light intensity and the duration that the lights are on. All lighting on the developed site will make use of the most up to date technology available. 	<p>proposed development which would be beneficial for foraging bats:</p> <ul style="list-style-type: none"> • The enhancement of existing ponds for wildlife. • Planting of native tree, shrub and hedgerows to increase foraging opportunities.
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Nesting birds (B1)	<p>The building contains evidence of nesting birds in the form of three bird's nests internally within the roof structure and wall. No bird activity was observed around these nests during the survey visit.</p> <p>No evidence of roosting or nesting barn owls was found during the survey visit.</p>	The proposed demolition of the building could result in the destruction or the disturbance and subsequent abandonment of active bird nests.	Works should be undertaken outside the period 1st March to 31st August. If this timeframe cannot be avoided, a close inspection of the building should be undertaken immediately, by qualified ecologist, prior to the commencement of work. All active nests will need to be retained until the young have fledged.	<p>The installation of a minimum of two bird boxes on mature trees around the site boundaries or on retained or new buildings will provide additional nesting habitat for birds e.g. Woodstone nest box Vivara Pro woodstone oval nest box Vivara Pro woodstone swift box Woodstone sparrow nest box Or a similar alternative brand.</p> <p>Tree boxes should be positioned approximately 3m above ground level where they will be sheltered from prevailing wind, rain and strong sunlight. Small-hole boxes are best placed approximately 1-3m above ground on an area of the tree trunk where foliage will not obscure the entrance hole. Swift and sparrow boxes should be positioned at the eaves of a building and can be incorporated into the fabric of the building during construction.</p>
Other ecological constraints	None identified.	N/A	N/A	N/A

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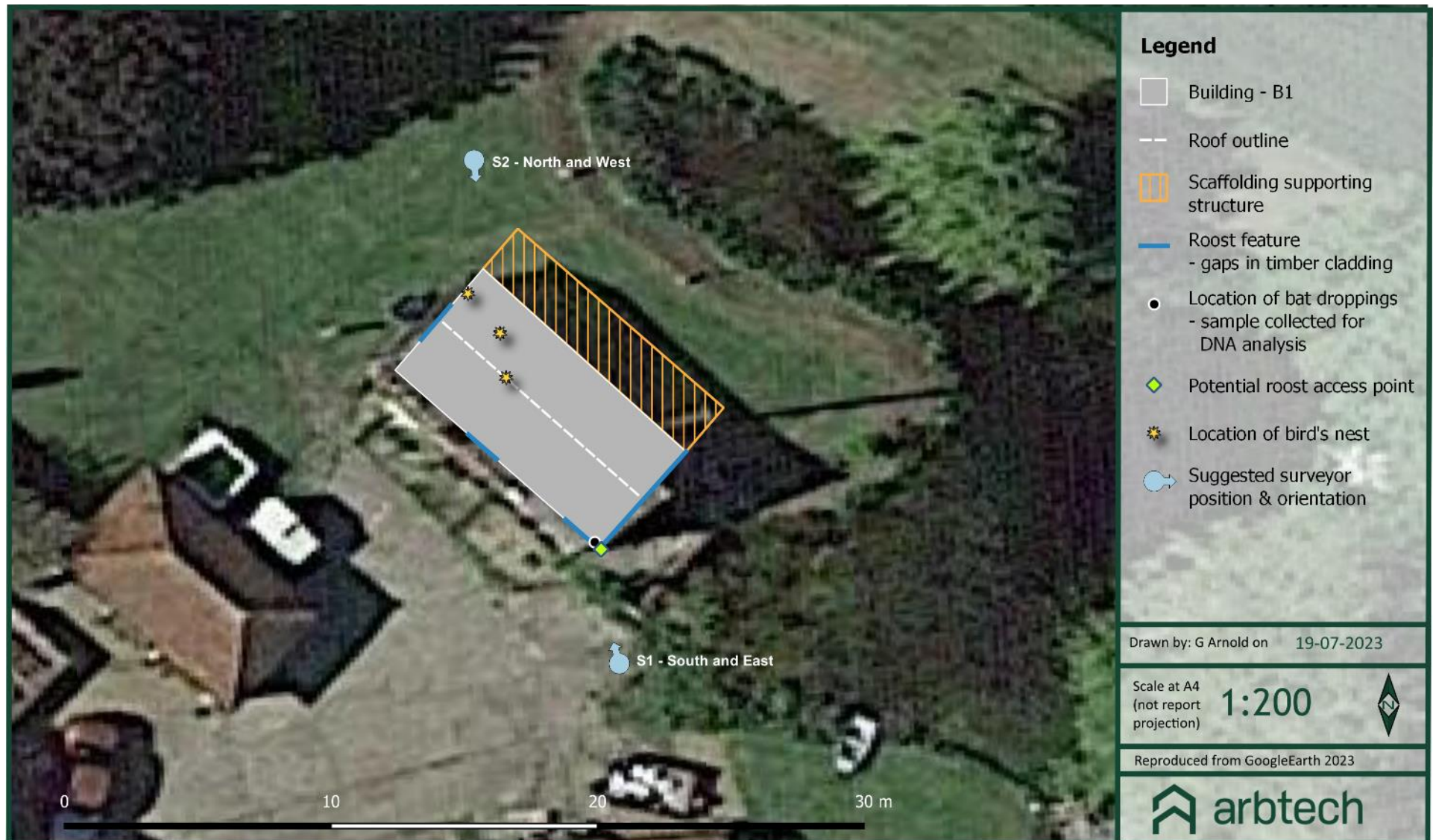
Appendix 1: Proposed Development Plan



Appendix 2: Site Location Plan



Appendix 3: PRA and Proposed BERS Plan



Appendix 4: Legislation and Planning Policy Related to Bats

LEGAL PROTECTION

All species of bat are fully protected under *The Conservation of Habitats and Species Regulations 2017* (as amended) through their inclusion on Schedule 2.

Regulation 43: Protection of certain wild animals - offences

(1) A person is guilty of an offence if they:

- (a) Deliberately captures, injures or kills any wild animal of a European protected species,
- (b) Deliberately disturbs wild animals of any such species,
- (c) Deliberately takes or destroys the eggs of such an animal, or
- (d) Damages or destroys a breeding site or resting place of such an animal,

(2) For the purposes of paragraph (1) (b), disturbance of animals includes in particular any disturbance which is likely—

- (a) To impair their ability:
 - (i) To survive, to breed or reproduce, or to rear or nurture their young; or
 - (ii) In the case of animals of a hibernating or migratory species, to hibernate or migrate; or
- (b) To affect significantly the local distribution or abundance of the species to which they belong.

Bats are also protected under the *Wildlife and Countryside Act 1981* (as amended) through their inclusion on Schedule 5. Under this Act, they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection
- Selling, offering or exposing for sale, possession or transporting for purpose of sale

NATIONAL PLANNING POLICY

National Planning Policy Framework 2021

The National Planning Policy Framework promotes sustainable development. The Framework specifies the need for protection of designated sites and priority habitats and species. An emphasis is also made on the need for ecological infrastructure through protection, restoration and re-creation. The protection and recovery of priority species (considered likely to be those listed as species of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006) is also listed as a requirement of planning policy.

In determining a planning application, planning authorities should aim to conserve and enhance biodiversity by ensuring that: designated sites are protected from harm; there is appropriate mitigation or compensation where significant harm cannot be avoided; measurable gains in biodiversity in and around developments are incorporated; and planning permission is refused for development resulting in the loss or deterioration of irreplaceable habitats including aged or veteran trees and also ancient woodland.

The Natural Environment and Rural Communities Act 2006 and the Biodiversity Duty

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'.

Section 41 of the Act requires the Secretary of State to publish a list of habitats and species which are of 'principal importance for the conservation of biodiversity'. This list is intended to assist decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications. A developer must show that their protection has been adequately addressed within a development proposal.

LOCAL PLANNING POLICY

Babergh and Mid Suffolk Joint Local Plan (2020)

The Babergh and Mid Suffolk Joint Local Plan (2020) can be viewed here: <https://www.babergh.gov.uk/planning/planning-policy/new-joint-local-plan/>

The following planning policies have implications for developers in relation to bats:

- Policy SP09 – Enhancement and Management of the Environment:
 - The Council will require development to support the enhancement and management of the natural and local environment and networks of green infrastructure, including: landscape; biodiversity, geodiversity and the historic environment and historic landscapes through detailed development management policies set out in the Plan, including environmental protection measures, such as biodiversity net gain and sustainable urban drainage systems.
- Policy LP03 - Residential Extensions and Conversions:
 - Proposals for development within the curtilage of existing dwellings, extensions to existing dwellings or conversions within residential dwelling curtilage may be permitted providing they:
 - Would not cause the felling of or any damage to any significant trees and hedgerows that contribute to the environmental quality and visual amenity benefits of the locality. Ecology/biodiversity may be a material consideration as part of the assessment
- Policy LP18 - Biodiversity & Geodiversity:
 - All development should follow a hierarchy of seeking firstly to; enhance habitats, avoid impacts, mitigate against harmful impacts, or as a last resort compensate for losses that cannot be avoided or mitigated for. Adherence to the hierarchy should be demonstrated. Development should:

- Conserve, restore and contribute to the enhancement of biodiversity and geological conservation interests including priority habitats and species. Enhancement for biodiversity should be commensurate with the scale of development.
- Plan positively for the creation, protection, enhancement and management of local networks of biodiversity with wildlife corridors that connect areas. Where possible, link to existing green infrastructure networks and areas identified by local partnerships for habitat restoration or creation so that these ecological networks will be more resilient to current and future pressures.
- Identify and pursue opportunities for securing measurable net gains, equivalent of a minimum 10% increase, for biodiversity. Where biodiversity assets cannot be retained or enhanced on site, the Councils will support 'biodiversity offsetting' to deliver a net gain in biodiversity off-site in accordance with adopted protocols.
- Apply additional measures to assist with the recovery of species listed on S41 of the NERC Act 2006.
- Development which would have an adverse impact on species protected by legislation, or subsequent legislation, will not be permitted unless there is no alternative and the local planning authority is satisfied that suitable measures have been taken to:
 - Reduce disturbance to a minimum.
 - Maintain the population identified on site.
 - Provide adequate alternative habitats to sustain at least the current levels of population.
- Where appropriate, the local planning authority will use planning obligations and/or planning conditions to achieve appropriate mitigation and/or compensatory measures and to ensure that any potential harm is kept to a minimum.

Suffolk Local Biodiversity Action Plan

The Suffolk Local Biodiversity Action Plan (Grouped plan for bats) can be viewed here: <https://www.suffolkbis.org.uk/species/mammals-bats>

The following bat species are included in the plan:

- Barbastelle
- Brandts
- Brown long-eared
- Common Pipistrelle
- Daubentons
- Leislars
- Lesser horseshoe

- Nathusius' pipistrelle
- Natterer's
- Noctule
- Serotine
- Soprano pipistrelle
- Whiskered

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

A European Protected Species Licence (EPSL) issued by Natural England will be required for works likely to affect a bat roost or for operations likely to result in a level of disturbance which might impair their ability to undertake those activities mentioned above (e.g. survive, breed, rear young and hibernate). The licence is to allow derogation from the relevant legislation but also to enable appropriate mitigation measures to be put in place and their efficiency/success to be monitored. The legislation may also be interpreted such that, in certain circumstances, important foraging areas and/or commuting routes can be regarded as being afforded *de facto* protection, for example, where it can be proven that the continued usage of such areas is crucial to maintaining the integrity and long-term viability of a bat roost (Garland & Markham, 2008).

There are 17 species of bat breeding in England and Natural England issues licences under Regulation 55 of the Habitats Regulations to allow you to work within the law.

Licences are issued for specific purposes stated in the Regulations, if the following three tests are met:

- The purpose of the work meets one of those listed in the Habitats Regulations (see below);
- That there is no satisfactory alternative;
- That the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range

The Habitats Regulations permits licences to be issued for a specific set of purposes including:

1. include preserving public health or public safety or other imperative reasons of over-riding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment;
2. scientific and educational purposes;
3. ringing or marking; and,
4. conserving wild animals.

Development works fall under the first purpose and Natural England issues bat mitigation licences for developments.

EUROPEAN PROTECTED SPECIES POLICIES

In December 2016 Natural England officially introduced the four licensing policies throughout England. The four policies seek to achieve better outcomes for European Protected Species (EPS) and reduce unnecessary costs, delays and uncertainty that can be inherent in the current standard EPS licensing system. The policies are summarised as follows:

- Policy 1; provides greater flexibility in exclusion and relocation activities, where there is investment in habitat provision;
- Policy 2; provides greater flexibility in the location of compensatory habitat;
- Policy 3; provides greater flexibility on exclusion measures where this will allow EPS to use temporary habitat; and,
- Policy 4; provides a reduced survey effort in circumstances where the impacts of development can be confidently predicted.

The four policies have been designed to have a net benefit for EPS by improving populations overall and not just protecting individuals within development sites. Most notably Natural England now recognises that the Habitats Regulations legal framework now applies to 'local populations' of EPS and not individuals/site populations.