

# Preliminary Ecological Appraisal

of

Land to the rear of Three Gables, Great Finborough,  
Suffolk

**Carried out for:**

Stuart Mcnamara Developments

1<sup>st</sup>

**Prepared by:**

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# CONTENTS

<i>CONTENTS</i> .....	2
1. <i>Background to Commission</i> .....	3
2. <i>Methods</i> .....	6
3. <i>Results</i> .....	7
4. <i>Protected and Priority Species Within the Site &amp; Potential Impacts and Recommendations</i> .....	9
5. <i>Conclusions</i> .....	12
6. <i>References</i> .....	13
<i>Appendix I: Site Photos</i> .....	14
<i>Appendix II: Species Lists</i> .....	15
<i>Appendix III: Figures</i> .....	16

# 1. Background to Commission

- 1.1 Abrehart Ecology Ltd was commissioned by Stuart Macnamara Developments to carry out a Preliminary Ecological Appraisal (PEA) of the two garage buildings with associated hardstanding and grassland at Three Gables, off High Road in Great Finborough, Suffolk (central grid reference TM 01307 57183; Fig. 1; hereafter referred to as the Site).
- 1.2 The survey was required to inform a planning application at the Site; to include the demolition of the two existing detached garage buildings and erection of new pitched roof detached garage. The proposed works will be developed across an area of 0.2 ha.

## *Aims of Study*

- 1.3 This report provides an ecological appraisal of the Site following the completion of a desk study and site visit. The aim of this study was to:

- Provide a description of existing habitat types;
- To determine the existence and location of any ecologically valuable areas;
- To identify the potential (or actual) presence of protected and/ or notable species;
- To provide the legislative and/ or policy protection afforded to any habitats present or any species assessed as likely to be associated with the site; and
- To recommend any further ecological surveys considered necessary to inform mitigation requirements for the planning application within the Site.
- To provide an assessment of potential impacts to protected species, habitats, or protected sites.

## Site Description

- 1.4 The survey area is located on High Road within the village of Gt Finborough, Suffolk. The proposed site area is approximately 0.2 hectares, with the works area consisting of the existing garage buildings (detailed within section 4.11) with associated hard standing and grassland. The two garage buildings were situated within the area of hard standing used for vehicle access and parking. To the east of the hard standing was an area of heavily managed grassland. The grass had a consistent sward of less than 5cm at the time of survey. The grass was dominated by ryegrass (*Lolium sp.*) with moderate numbers of common forbs recorded throughout, this included; daisy (*Bellis perennis*), dandelion (*Taraxacum officinale agg.*), and white clover (*Trifolium repens*). The grassland was considered to fit the description for 'other neutral grassland g3c' under the 2023 UK habitat classification (UKHab).

The northern boundary line of the site consisted of a closed board fence with concrete posts, this was well sealed and would act as a dispersal barrier to many terrestrial species. To the south of the works area was the main dwelling, this is not being impacted throughout proposed works and was surrounded by further areas of hard standing. A map showing the habitat types on Site can be seen in Appendix II.

- 1.5 Habitats surrounding the Site included residential dwellings with associated hard standing and gardens to the north and south. Immediately adjacent the site to the west was the well-used roadway and further areas of managed grassland to the east. Beyond the village boundaries were large expanses of arable land with associated ditches, hedgerows and mature trees. (see Figure 1).

# MAGiC Site Location

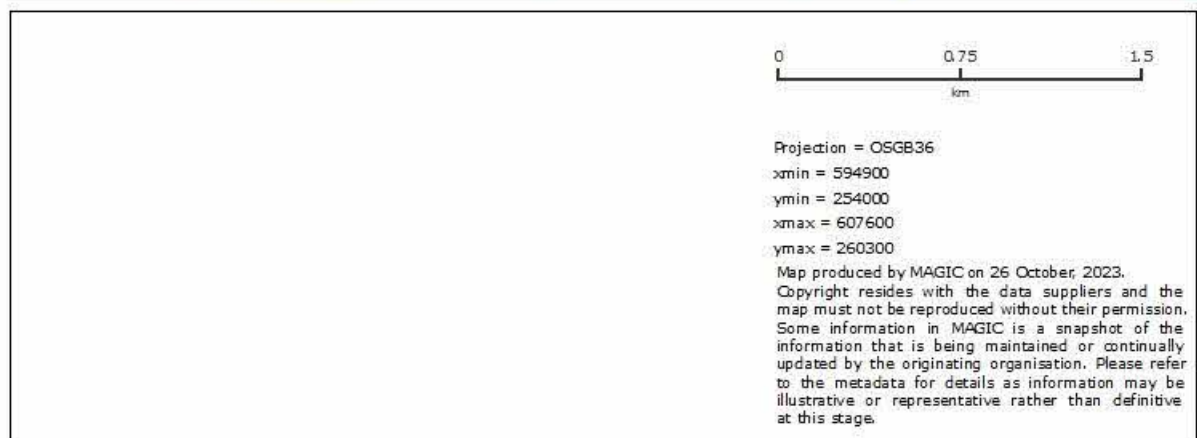
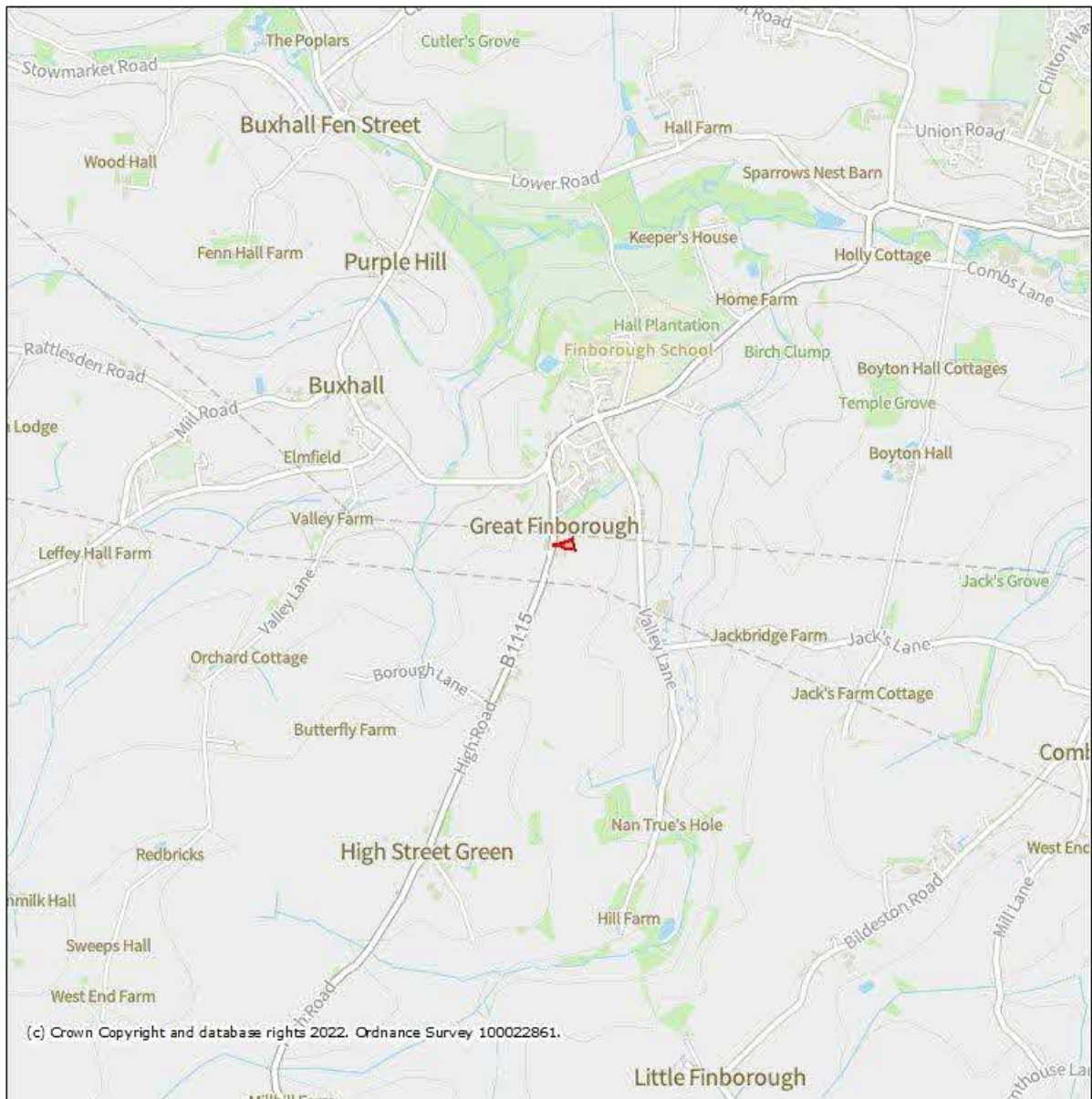


Figure 1. Site location

### ***Relevant Legislation***

- 1.6 Protected species, as referred to within this report, are taken to be those protected under European Legislation (Conservation of Habitats and Species Regulations 2010, as amended) and UK legislation (Wildlife and Countryside Act 1981; Protection of Badgers Act 1992).
- 1.7 Public bodies have a duty of responsibility to consider species of principle importance in England as listed in Section 41 of the NERC Act (2006).
- 1.8 The National Planning Policy Framework (NPPF) 2021 places responsibility on Local Planning Authorities (LPAs) to aim to conserve and enhance biodiversity in and around developments. Section 40 of the NERC Act requires every public body to “have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”. Biodiversity, as covered by the Section 40 duty, is not confined to habitats and species of principal importance but refers to all species and habitats. However, the expectation is that public bodies would refer to the Section 41 list (of species and habitats) through compliance with the Section 40 duty.
- 1.9 “The Local Plan seeks to protect, retain, and enhance the high quality natural environment and designated landscapes and sites found across the Local Plan area which contribute to the overall success of the area and provides economic and social benefits for all. The Local Plan will seek to foster in new developments and to protect, retain, and enhance in existing developments.”
- 1.10 “Development proposals should be accompanied by sufficient information to assess the effects of development on priority habitats and species, protected sites, protected species, biodiversity or geology, together with any proposed prevention, mitigation, or compensation measures..”
- 1.11 Appendix V details legislation which protects species and groups relevant to the Site (bats, reptiles, birds, and badgers).

## 2. Methods

### Desk Study

- 2.1 Data obtained from the Suffolk Biodiversity Information Service (SBIS) were used to conduct standard data search<sup>1</sup> for any information regarding statutory and non-statutory sites and records of protected and priority species within a 2km radius of the Site. The data were received on the 11<sup>th</sup> of October 2023.
- 2.2 A 7km radius search for conservation areas part of the National Site Network, including Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsars was undertaken using MAGIC (<http://www.natureonthemap.naturalengland.org.uk/>).

### Field Survey

- 2.3 A Preliminary Ecological Appraisal was carried out by Thomas Jordan BSc (Hons) (Natural England Great Crested Newt Class Survey Licence WML-CL08) on the 24<sup>th</sup> of October 2023 in accordance with standard best practice methodology for Phase 1 Habitat Surveys set out by the JNCC (JNCC 2010). Weather conditions during the survey were 100% cloud cover, a light/ gentle breeze (Beaufort Scale 2-3), a temperature of 11°C, and good visibility. The Site was traversed slowly by the surveyor, mapping habitats, and making notes on dominant flora and fauna. The survey was extended to identify the presence of invasive species and included an assessment of the potential for the habitats in and around the Site to support protected species.

### Survey Limitations

- 2.4 There were no limitations to the survey.

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<sup>1</sup> The standard data search identifies designated sites including: - Ramsar; Special Areas of Conservation; Special Protection Areas; Sites of Special Scientific Interest; National Nature Reserves; Local Nature Reserves; County Wildlife Sites; Regionally Important Geological Sites; Ancient Woodland; and protected and priority species identified by the: - Wildlife & Countryside Act 1981 Schedules 1, 5 & 8; Conservation of Habitats & Species Regulations 2010 Schedules 2 & 5; Protection of Badgers Act 1992; Bonn Convention Appendix 1 & 2; Bern Convention Annex 1 & 2; Birds Directive Annex 1; Habitats Directive Annex 2, 4 & 5; NERC Act 2006 Section 41; UKBAP (both local and national); IUCN Red List species Red & Amber Bird List; Nationally Scarce / Rare; Locally Scarce / Rare; and Veteran trees.

## 3. Results

- 3.1 The following section details the results of the desk study and field survey. Consideration has been given to species likely to be found in the habitats recorded on site and potential impacts to designated sites within the local area.

### *Data Search (for maps see Appendix II)*

- 3.2 The following section details the results of the desk study and field survey. Consideration has been given to species likely to be found in the habitats recorded on site and potential impacts to designated sites within the local area. Several protected species have been 'scoped out' of the report, as the Site was not considered suitable to support them. Species scoped out were dormice, water voles, and otters.

### *Data Search*

- 3.3 There were no statutory designated sites within 2 km of the Site however, the site does lie within the impact risk zone for Combs Wood SSSI, detailed below.

Combs Wood SSSI (approximately 3.9km east) – Situated just to the south of Stowmarket, Combs Wood is an ancient woodland with a well-developed coppice with standards structure, on boulder clay overlain with variable amounts of sand and loess. The consequent range of soil types has led to the development of a variety of woodland types. Pedunculate oak-hornbeam woodland is predominant, with areas of typical ash-maple woodland, this grading into the heavy soil form of pedunculate oak-hazel-ash woodland where the soils are more acid.

- 3.4 There are four County Wildlife Sites within 2km of the Site. These are:

Buxhall Fen – Buxhall Fen is located in the Rattlesden River valley, to the north of the villages of Buxhall and Great Finborough. The site consists of an extensive mosaic of wetland habitats. Wet alder carr at the southern end grades into tall fen vegetation dominated by reed with patches of encroaching willow carr in the centre of the fen. There are additional areas of dense blackthorn scrub. A number of old drainage ditches run across the fen from west to east. The mosaic of woodland, reed and scrub provides an immensely valuable habitat for a wide range of breeding birds. Blackcap, whitethroat, marsh tit, and nightingale are among the many birds which have been recorded on this site. Buxhall Fen is of particular importance for wildlife as it is one of only a few wetland sites in this part of Suffolk.

Dales Wood – Dales Wood is located to the south-west of Stowmarket. The boundary between the parishes of Combs and Stowmarket runs along the eastern border. Dales Wood, which is included in the Suffolk Ancient Woodland Inventory, has a number of features which are characteristic of ancient woods. In addition to large coppice stools of ash which occur along the woodland boundary, Dales Wood also supports a good number of ancient woodland indicator plants for example Wood millet, abundant oxlip, nettle-leaved bellflower and small-leaved lime. The semi-natural structure of oak and ash trees with an understorey of hazel coppice has largely been retained. Some areas which have recently been recoppiced are regenerating well. The canopy elsewhere in the wood is variable and in areas where it is least dense, a diverse ground flora has become established. Small quantities of fallen branches and neglected coppice provide valuable habitat for dead wood invertebrates.

Hill Farm Wood – This fragment of ancient woodland is situated in an intensively-farmed landscape south of Great Finborough village. A prominent woodbank and ditch, a characteristic feature of medieval woods encloses the wood on all sides. The ditch is bordered on three sides by a dense species-rich hedge which provides valuable habitat for breeding birds. Hill Farm Wood is a coppice with standards woodland consisting of ash, field maple and hazel coppice. There are a number of oak standards scattered throughout and also several old crab apple coppice stools. The northern part of the woodland where elm is abundant in the understorey, shows the affect of Dutch elm disease with many diseased trees and fallen branches. Some clearing has taken place in this area. Elsewhere the woodland remains largely unmanaged. The ground flora is reasonably varied and contains a number of uncommon plants. Herb-Paris, sanicle and early-purple orchid occur in small quantities. The wood is used extensively for shooting of game birds.

Temple Grove – Temple Grove is listed in the Inventory of Ancient Woodland compiled by English Nature. Situated to the west of Stowmarket and close to Dales Wood, another ancient wood, it is skirted by a public footpath which links Combs with Stowmarket. The sinuous outline and ditch and bank which enclose the wood are typical features of ancient woodland. Temple Grove consists of tall ash and field maple coppice with an understorey of hazel coppice. In addition, sycamore is frequent in places. A large proportion of the wood is overgrown with bramble and nettle, however other areas are more open and are colonised with dog's mercury, early-purple orchid and cowslip. Wood anemone, an indicator of ancient woodland also occurs frequently. At the time of survey, Temple Grove had not been managed for some time.

- 3.5 There are no National Site Network conservation areas (Ramsar, SAC, or SPA) within 7km of the Site.
- 3.6 The database showed records of protected species in the area, which could potentially occur on the Site. These are detailed within the relevant sections below.



## 4. Protected and Priority Species Within the Site & Potential Impacts and Recommendations

### *Statutory Designated Areas*

- 4.1 The Site is within the Impact Risk Zone for the SSSI site; however, it does not contain the species or habitats for which they are designated (ancient woodland) and will not significantly increase footfall or disturbance through the conservation areas.
- 4.2 Given the small size of the development and screening provided by surrounding residential dwellings, hedgerows and arable land, it was not considered necessary to carry out a Habitats Regulation Assessment for the development. As with the SSSIs, the proposed construction area does not contain the habitat for which any of the protected sites are designated or the potential to support features of interest. The areas contain extensive footpath networks, and the proposed construction will not significantly increase visitor footfall along these.

### *Flora*

- 4.3 No species of interest were recorded during the survey and heavily mown grasslands were considered unlikely to support a rich flora. The desk study highlighted several species of rare plant have been previously recorded within 2km of the Site, this included bluebell (*Hyacinthoides* sp) listed on Schedule 8 of the Wildlife and Countryside Act 1981. Also recorded were stinking chamomile (*Anthemis cotula*), chicory (*Cichorium intybus*), dwarf spurge (*Euphorbia exigua*), and lesser spearwort (*Ranunculus flammula*) all classified as 'Vulnerable' on the England Red List. Almost all the rare and protected species highlighted within the data search are associated with marshland, arable land, heathland, and species-rich meadows.
- 4.4 The site extent area covers an area of species-poor managed grassland, buildings, and hard standing; this will result in the loss or change of use of these habitats. The lost habitat is not listed within the Section 41 of the NERC Act 2006 as being of principal importance to the conservation of biodiversity within the UK and was not considered suitable to provide opportunities for protected species.
- 4.5 **No further botanical surveys are required.**

## Bats

- 4.11 There were two buildings within the Site boundary; the garage (Building 1) and storage building (Building 2) associated with the main dwelling.

Building 1 was of brick construction with a flat, corrugated sheet metal roof. The brickwork was well sealed and there were no gaps along eaves, there were also no features recorded within the building's interior. The metal roof is considered unsuitable for maintaining a suitable temperature for roosting bats. The building was considered to have **negligible bat roost potential**.

Building 2 consisted of a small open-fronted storage building. The structure was of timber frame with overlapping wooden board exterior and single skin corrugated sheet metal roof. The building was cold, draughty and light. No bat features were recorded and the building was considered to have **negligible bat roost potential**.

- 4.12 The Site offered very limited foraging potential as the overall extent of the grassland is small and the habitats on Site were very unlikely to support assemblages of invertebrates (prey species), the boundary features could be used by commuting bat species.
- 4.13 The data search returned twenty-one bat records of at least four different species of bat within 2km of the Site; these were Natterer's (*Myotis nattereri*), common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*), and brown long-eared (*Plecotus auritus*) bats within 2km of the Site.
- 4.14 **No further bat surveys will be required.**
- 4.15 **The proposed development will also incorporate sensitive lighting – ensuring the boundaries are not illuminated as they could be an important commuting corridor for nocturnal species.** This will follow guidance provided by the Bat Conservation Trust and Institution of Lighting Professionals (Bats and artificial lighting at night, 2023), to ensure foraging and commuting bats using adjacent habitats are not negatively impacted. Lighting measures should also be applied to temporary security lighting used during the construction phase. This will include low pressure sodium lamps, with hoods, cowls, or shields, to prevent light spillage.

## Birds

- 4.16 There was no dense vegetation or hedgerows within the site boundary. A number of starlings were recorded foraging over the grass to the east of the site. The grassland lacked a suitable structure for ground nesting species and appeared regularly disturbed and was in very close proximity to the adjacent dwellings.
- 4.17 The data search returned a high number of records of common and protected species that have been observed in the local landscape. The dense scrub at the boundaries and along fence lines offered nesting and foraging habitat for BoCC red listed and NERC S41 species such as dunnock (*Prunella modularis*) and linnet (*Linaria cannabina*).
- 4.18 **Due to the minimal amount of vegetation lost from the construction zone, no further survey is necessary.**

## Great Crested Newts & Reptiles

- 4.19 Habitats recorded throughout the Site were considered unsuitable for herptiles. The short, mown grassland did not have structure for either foraging or sheltering amphibians, and the site lacked suitable refugia for sheltering/hibernating herptiles. None of the habitats on site offered suitable habitat for reptiles or amphibians. There were three ponds highlighted on OS maps within 500m

of the Site boundary, all of these were on opposing sides of well-used roadways and were considered disconnected from the Site.

- 4.20 There were six records of GCN returned in the data search from 2010-2020 with all of the records being from over 1.2km away from the site boundary. The only other amphibian species recorded in the area was smooth newt (*Lissotriton vulgaris*). No records of any reptile species were returned from within 2km of the Site boundary.
- 4.21 **No further survey is necessary due to the overall extent of the site and lack of suitable habitat within the works area.**

### *Hedgehogs*

- 4.22 Grassland habitats within the Site offered potential foraging habitat for hedgehogs; the short grassland provided good access to potential prey items. The adjacent gardens offered an extension of this foraging habitat and could also be utilised as a potential commuting corridor, and cover for sheltering and hibernating animals.
- 4.23 Although no evidence of hedgehogs was recorded during the survey, the data search returned thirty-six records of hedgehog within 2km of the Site from 2005 to 2017. The nearest of these records was from approximately 180m south of the boundary.
- 4.24 **No further survey is necessary; however, as the Site provides suitable foraging habitat for foraging mammals, and hedgehogs and badgers have been recorded in the local area, construction works will implement several precautionary measures, including the following:**
- Covering excavations overnight to prevent animals falling in, or the provision of an escape ramp;
  - Safe storage of materials that may harm animals; and
  - Security lighting to be set on short timers to avoid disturbing nocturnal animals using the Site and immediate surrounding area – it will be directional to avoid boundary features (trees and hedgerows).

### *Invertebrates*

- 4.25 The short and frequently disturbed and mown grassland areas were unsuitable for supporting assemblages of common and rare/protected terrestrial invertebrates. Much of the habitat was disturbed, and there was limited forb, ruderal, or scrubby/woody species.
- 4.26 The data search included records of several S41/UKBAP moths, beetles, and rare butterflies – such as white admiral butterfly (*Limenitis camilla*) which are listed as ‘Vulnerable’ on the England Red List. However all habitats within the site boundary were unsuitable for supporting the rare or protected species returned in the data search.
- 4.27 **No further survey is necessary.**

## 5. Conclusions

- 5.1 The preliminary ecological appraisal found the Site contained habitats suitable for supporting protected species – foraging bats and other terrestrial mammals. Hedgehogs are listed as a Species of Principal Importance in England (and listed on Schedule 6 of the Wildlife and Countryside Act 1981 – making it illegal to kill or injure through certain methods) and so should also be considered as part of this application. The following measures will be implemented to minimise the risk of harm to individual animals:

Covering of excavations and/ or provision of exit ramps is recommended during works to prevent harm to mammals.

Sensitive lighting measures to prevent disturbance to foraging bats or other nocturnal species. An experienced ecologist will liaise with construction staff to inform these measures.

- 5.2 As detailed in Paragraphs 1.9 and 1.10, the Local Policy requires new developments to have consideration for priority habitats and species, protected sites, protected species, and biodiversity. The proposed development will not cause significant harm or disturbance to such features. The development will follow the mitigation hierarchy and avoid negative impacts to biodiversity wherever possible. Any remaining short-term impacts (such as the removal of very limited areas of grassland) or potential long-term impacts (such as disturbance to ecological corridors) will be adequately mitigated for through the above measures.
- 5.3 In addition to having a negligible impact to biodiversity within the construction boundary, the development will not negatively impact species or habitats within the wider ownership boundary or adjacent land. There will be no impact on SSSIs or National Site Network conservation areas and no requirement for a Habitat Regulations Assessment.

## 6. References

- Collins, J (ed.) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn.). The Bat Conservation Trust, London.
- Cresswell, W.J. Birks, J.D.S, Dean, M., Pacheco, M., Trehwella, W.J., Wells, D. & Wray, S. (2012) UK BAP Mammals Interim Guidance for Survey Methodologies, Impacts and Mitigation. Eds. The Mammal Society, Southampton.
- Froglife (1999) Reptile survey: an introduction to planning, conducting and interpreting surveys for snake and lizard conservation. Froglife Advice Sheet 10. Froglife, Halesworth.
- JNCC (2010) Handbook for Phase 1 habitat survey: a technique for environmental audit (revised reprint) JNCC: Peterborough.
- 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 (4), 143-155.
- Stace, C. (1997). New Flora of the British Isles (2nd Edition). Cambridge University Press, Cambridge.

### Web references

- [http://www.bats.org.uk/data/files/bats\\_and\\_lighting\\_in\\_the\\_uk\\_final\\_version\\_version\\_3\\_may\\_09.pdf](http://www.bats.org.uk/data/files/bats_and_lighting_in_the_uk_final_version_version_3_may_09.pdf)
- <http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx>

## Appendix I: Site Photos



Garage building to be demolished.



Storage building to be demolished.



Heavily mown grassland within the works area.



Photo of entire works area.



Hard standing and dwelling to be retained.



Interior of the main garage building.

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## Appendix II: Species Lists

### Plants

<i>Cirsium arvense</i>
<i>Chamaemelum nobile</i>
<i>Geranium sp.</i>
<i>Heiminoineca ecniox</i>
<i>Lolium sp.</i>
<i>Medicago arabica</i>
<i>Plantago lanceolata</i>
<i>Plantago major</i>
<i>Ritotium repens</i>
<i>Urtica dioica</i>
<i>Vronica sp.</i>

# Appendix III: Figures

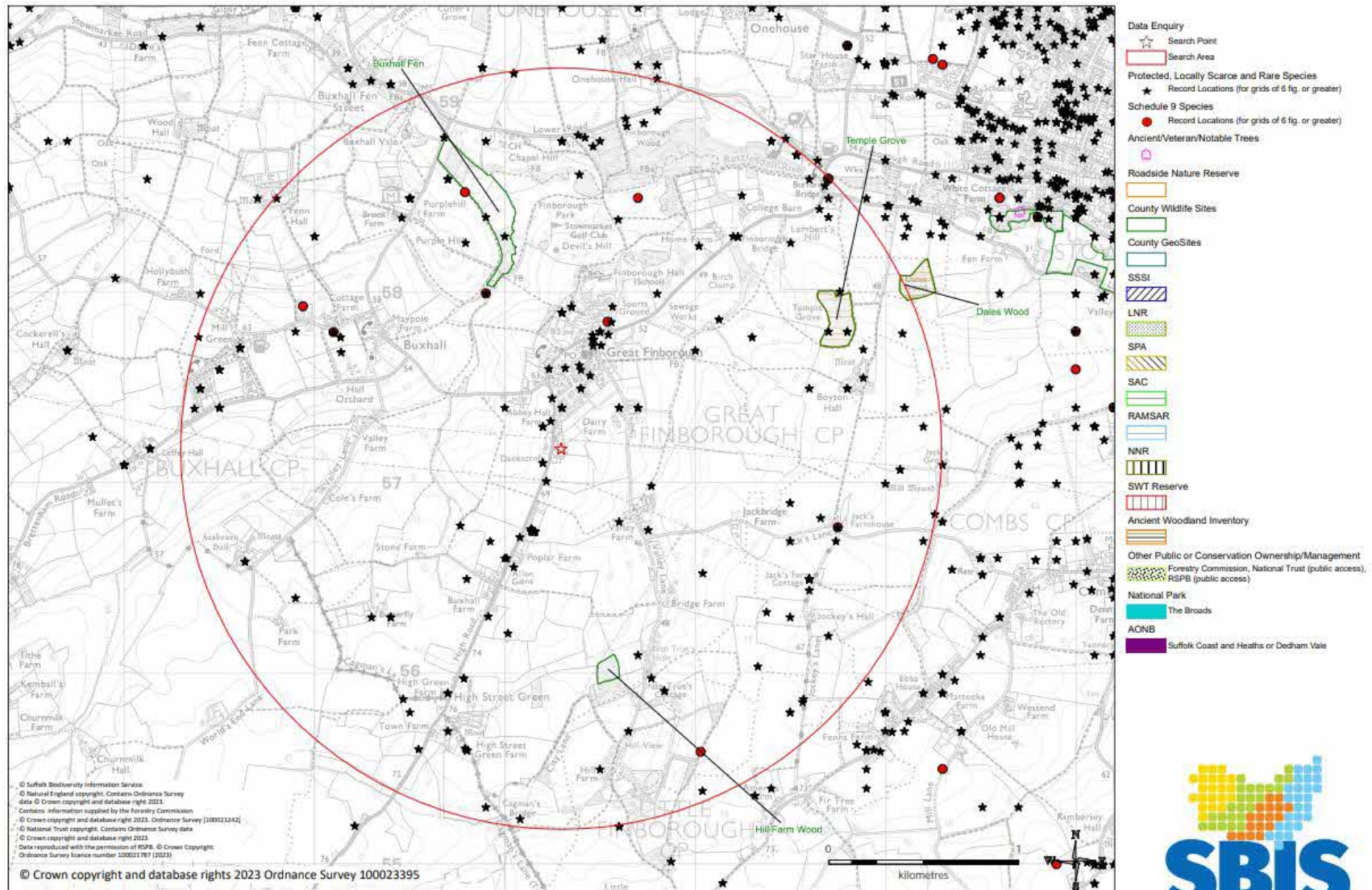
## Phase 1 Habitat Map

TM 01305 57182: Land at Three Gables, Great Finborough, Suffolk





Statutory and Non-Statutory Designated Sites within 2km of the Site



Abrehart Ecology (Three Gables, High Road, Great Finborough TM01296 57183) 2km Data Enquiry



Date: 11/10/2023 | Drawn by: Andy Mercer

## Appendix V: Relevant Protected Species Legislation

Species	Legislation	Protection
<b>Bats</b>	<p>Conservation of Habitats and Species Regulations (2010) (as amended)</p> <p>Wildlife and Countryside Act (WCA) (1981), Schedule 5 (as amended)</p> <p>Wild Mammals Act (1996)</p>	<p>It is an offence to:</p> <p>Intentionally kill, injure or take any bat</p> <p>Intentionally or recklessly disturb a bat</p> <p>Intentionally or recklessly damage, destroy or obstruct access to a bat roost</p>
<b>Great Crested Newts</b>	<p>Conservation of Habitats and Species Regulations (2010) (as amended)</p> <p>Wildlife and Countryside Act (WCA) (1981), Schedule 5 (as amended)</p>	<p>It is an offence to:</p> <p>Intentionally kill, injure or take a great crested newt</p> <p>Intentionally or recklessly disturb a great crested newt</p> <p>Intentionally or recklessly damage, destroy or obstruct access to any place used by a great crested newt for shelter or protection</p>
<b>Widespread Reptiles</b>	<p>Wildlife and Countryside Act (WCA) (1981), Schedule 5 (as amended)</p>	<p>It is an offence to:</p> <p>Intentionally kill or injure a reptile</p> <p>Sell, offer or expose for sale, have in possession or transport for the purpose of sale any live or dead reptile or any part of, or anything derived from, a reptile</p>
<b>Birds</b>	<p>Wildlife and Countryside Act (WCA) (1981) (as amended)</p>	<p>It is an offence to:</p> <p>Intentionally kill, injure or take any wild bird</p> <p>Intentionally take, damage or destroy nests in use or being built</p> <p>Intentionally take, damage or destroy eggs</p> <p>Species listed on Schedule 1 of the WCA (1981) are afforded additional protection, making it an offence to intentionally or recklessly disturb such species at, on or near an active nest</p>