

**Great Crested Newt (*Triturus
crystatus*) Reasonable Avoidance
Measures (RAMs)
Method Statement**

at

White House Farm

The Street

Thorndon

IP23 7JN

For

Keith and Jane Saunderson

March 2024



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The authors and surveyors used to undertake the work are appropriately qualified for the tasks undertaken. The work undertaken while preparing this report has been carried out with due care, skill, and diligence.

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1. Introduction

1.1 Background

DCS Ecology Ltd. was commissioned by Keith and Jane Saunderson to produce a great crested newt (*Triturus cristatus*, commonly abbreviated to GCN) Reasonable Avoidance Measures (RAMs) Method Statement for a planning application at White House Farm, The Street, Thorndon, IP23 7JN (central grid reference TM 13646 69909, hereafter referred to as the Site).

The proposed development entails the conversion of the north wing of a dwelling into habitable accommodation from its previous use as a log store and workshop. Included in the plans is the removal of Laurel trees and a strip of shrub less than 5m in length. Essential structural repair work was recommended in addition to this during a previous structural survey of site (J P Chick & Partners Ltd, 2023). Planning has been granted as full planning permission under the application reference DC/23/01147, with recommendations for the installation of bat boxes, use of wildlife sensitive lighting and wildflower meadow planting which can be found in the Biodiversity Enhancement Strategy (DCS Ecology Ltd, 2024).

The Reasonable Avoidance Measures detailed within this report will be followed before and throughout the construction process. This will reduce the likelihood of harming animals (including great crested newts) to a negligible level. Should newts be encountered during works, then a licensed ecologist will be contacted to discuss future methods – including the possibility of applying for a Natural England European Protected Species Mitigation License.

1.2 Site Description

The site, a northern wing (approx. 6m x 8m) of White House Farm, is a Grade II listed dwelling located in Thorndon, Suffolk, IP23 7JN (central grid reference TM 13646 69909). It lies approximately 4.0km south of Eye and 14.1km north-east of Stowmarket town centre. The river Dove runs 650m west of site. This building is a single storey extension bordered by ornamental vegetation, amenity grassland, a pond, scattered trees and shrub, as well as areas of hardstanding and buildings.

The surrounding habitats consist of residential housing with rural gardens leading east and west along The Street, surrounded by arable fields with scattered sections of deciduous woodland. Features to note within these adjacent habitats include:

- Over a dozen water bodies exist in the wider area (within 500m of site), including a pond onsite providing habitat for amphibians during their aquatic phases.
- A dense network of linear features (primarily trees lines and hedgerows) surrounding Thorndon, that act as habitat connectivity between surrounding habitats and the site. In particular, a mature hedgerow leading west then northward from the boundary of White House Farm, directly to an area of both dense and open deciduous woodland containing local and veteran trees.

The wider landscape is predominately arable fields with pockets of deciduous woodland and mixed species hedgerow (both of which are BAP priority habitat). A search radius for priority habitats within a 2km radius of Site, identified coastal and floodplain grazing marsh, good quality semi-

improved grassland, lowland deciduous woodland, traditional orchards, wood pasture and parkland.

Although the risk of harm or disturbance to GCN is low based on the nature of the works, the site is situated with a GCN amber zone and contributes to the matrix of ponds within the surrounding area. Therefore, a Reasonable Avoidance Measures (RAMs) method statement was recommended as a precautionary measure (DCS Ecology 2023).

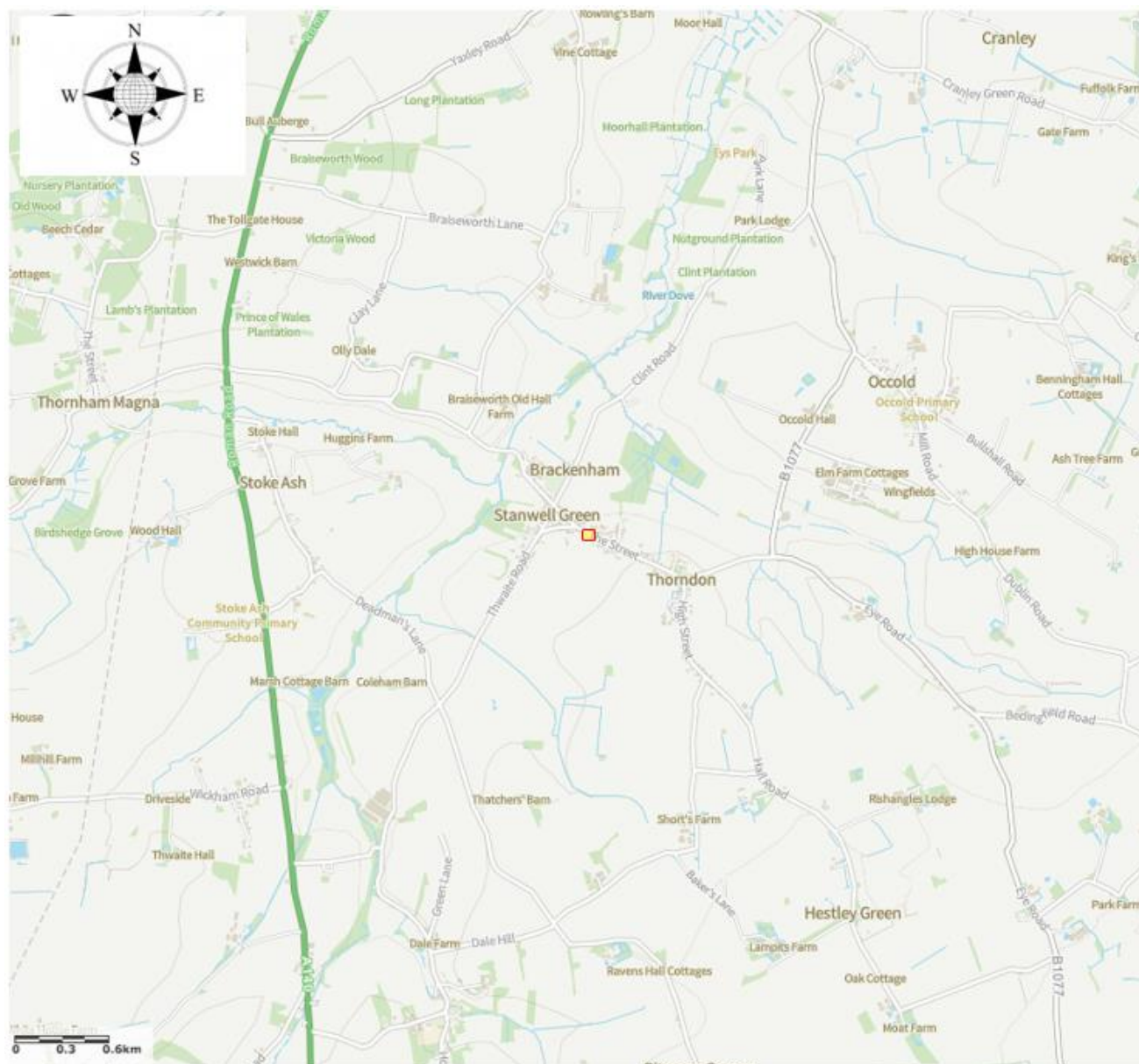


Figure 1. Site location (outlined in red) © Crown copyright and database rights 2022. Ordnance Survey 100022861. Data used under licence 10006461.

1.3 Legislative Context

Great crested newts are a European Protected Species and a Species of Principle Importance in England under Section 41 of the NERC Act (2006). They are fully protected under UK and European legislation, making it an offence to intentionally or recklessly:

- Kill, injure, or take great crested newts (or their eggs);
- Possess, sell, transport or control alive or dead great crested newt or any part of them;
- Damage or destroy any breeding or resting place;
- Obstruct access to a resting or shelter place.

Great crested newts are also listed on the Local Biodiversity Action Plan, as Suffolk is believed to be a stronghold for this species.

1.4 Great Crested Newt Ecology

Great crested newts are distributed throughout the UK but are absent from Ireland. Despite a wide distribution, populations have reduced or disappeared from sites across Europe as a result of habitat loss and changes in farming practices (Froglife, 2017).

The great crested newt is the largest newt in the UK, reaching a length of up to 17cm. Male great crested newts develop a jagged crest along their backs during breeding season with a break at the base of the abdomen and a silvery flash along the center of the tail. Both males and females have dark skin, with a ‘warty’ appearance, and orange underside with irregular black markings and white speckling. During their terrestrial phase the male loses his crest, however the female retains her orange tail stripe (Froglife, 2017; Inns, 2009).

Like other UK amphibian species, great crested newts use suitable waterbodies for breeding (often between March and June). Large ponds, with egg laying substrate (weeds, aquatic plants, grasses etc.) and no fish are favoured sites (Froglife, 2017). Whilst in their aquatic phase, great crested newts feed on invertebrates and tadpoles, relying on smell and vision to find their prey (Beebee, 2013).

Courtship and mating take place at night and female newts lay eggs individually on plant leaves, which are folded to protect the egg. Adults leave breeding ponds in July, with young newts remaining within ponds until August (Inns, 2009).

During their terrestrial phase (late summer, autumn, and winter) great crested newts feed on invertebrates and spend the majority of winter months sheltering beneath rocks, buried in mud, or within compost heaps (Froglife, 2017). Favoured terrestrial habitats include deciduous woodland, mature hedgerows, and undisturbed grassland (Inns, 2009).

2. Previous Assessment Methods and Results

2.1 Desk Study

Suffolk Biodiversity Information Services (SBIS) were consulted on the 5th April 2023 with regards to obtaining all protected species records and listings of all statutory and non-statutory designated sites within a 2km radius of the site. The closest recording of great crested newts was 5.7km southeast of the site, close to the other three class survey license returns reported in this data (2014-2017) with a peak count of four adults. There was also one result for a medium sized breeding population of smooth newts (*Lissotriton vulgaris*); all of these results were located in and around Aspsall Wood.

A MAGIC data search for European protected Species (EPS) licences and Great Crested Newt Class Survey License Returns was conducted in March 2024 by DCS Ltd. The search returned no EPS licenses or returns within 2km of Site. One result of a GCN pond survey between 2017 and 2019 was located 1.6km southeast of the site, which concluded that although the habitat suitability index score was categorized as 'good', great crested newts were likely absent during the time of this survey.

2.2 Habitat Assessment

Habitats onsite were noted in the Preliminary Roost Assessment on the 31st March 2023 and consisted of building infrastructure (dwellings and garage), hardstanding (driveway and footpath), mature trees, amenity grassland, ornamental hedgerow and scattered shrubs, and a pond. Several hedgerows adjacent to site were suitable to support amphibians, including great crested newts (GCN) (*Triturus cristatus*), during their terrestrial phases but had limited connectivity to any nearby waterbodies. The northern wing was classified as having negligible potential for bats during this survey.

There were eight identified potential breeding ponds within the local area (250m proximity of the Site, see below) during the desk study. This included the pond onsite and nearby pond locations. Access was not permitted to survey ponds, since minimal disturbance to GCN was proposed by the plans (reconstruction of a building that was already in place), henceforth it was considered unnecessary due to the limited impact on these ponds. Given below is a brief description of the ponds within 250m.

Pond 1: Situated within the site, approximately 15m east of the building in question. This was separated by an area of improved short amenity grassland, which is unsuitable habitat for GCN, therefore likelihood of any individuals in the immediate vicinity of this building is highly unlikely.

Pond 2: Situated 113m east of the site, rudimentarily connected via an intermittent hedgerow leading west from the site's northern boundary through gardens and residential areas. The suitability of this pond is unknown, since access is not permitted, although disruption to this pond is not forecasted in any way, and connectivity routes will not be disrupted. No suitable hibernacula are found onsite in regards to amphibians and therefore the use of this site is unlikely; GCN would likely use more suitable areas, closer to the pond if they were present there.

Ponds 3-7: All of these ponds are found within residential areas south of the site and are isolated via the road running across the site's southern boundary. GCN are unlikely to cross boundaries such as roads, particularly when there is no incentive of suitable habitat on the other side.

Pond 8: This is an unsurveyed ditch northeast of the site, which lends to a matrix of ditches within a patch of woodland. Suitability is unknown, however, the surrounding habitat of these ditches is more suitable for GCN than the pond on the proposed site, with further extensions of this habitat via species-rich hedgerows to the south. To travel from this ditch to the site, GCN would have to move through 371m of suitable habitat, only to reach the site of sub-optimal habitat. Disturbance to possible GCN species in this ditch is therefore negligible.

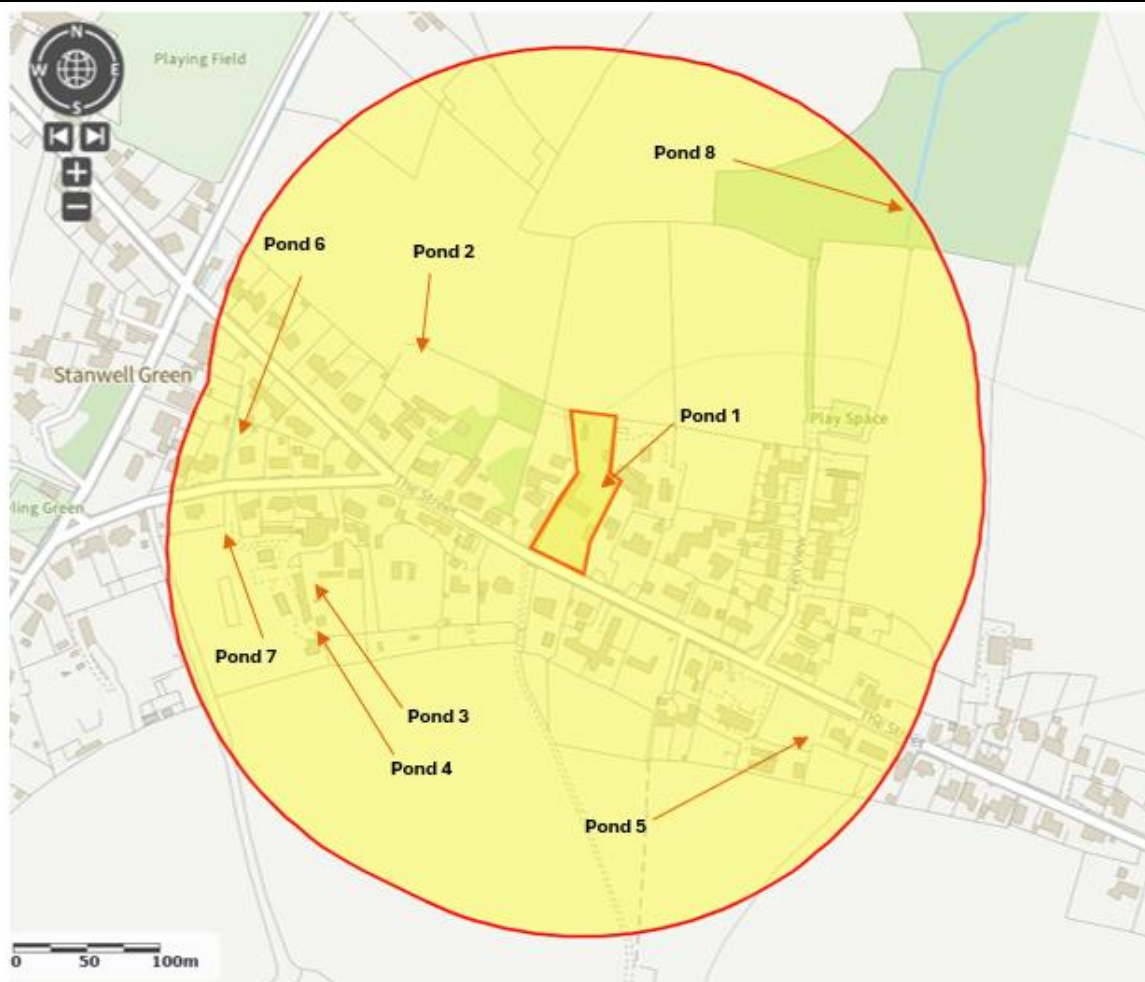


Figure 2. Location of ponds within 250m buffer zone around the site © Crown copyright and database rights 2022. Ordnance Survey 100022861. Data used under licence 10006461.

2.3 Great Crested Newt Rapid Risk Assessment

Natural England's Official Guidance on risk assessment result categories

Maximum score <0.3, "Green: offence highly unlikely" indicates that the development activities are of such a type, scale and location that it is highly unlikely any offence would be committed should the development proceed. Therefore, no licence would be required. However, bearing in mind that this is a generic assessment, you should carefully examine your specific plans to ensure this is a sound conclusion, and take precautions (see Non-licensed avoidance measures tool) to avoid offences if appropriate. It is likely that any residual offences would have negligible impact on conservation status, and enforcement of such breaches is unlikely to be in the public interest.

Maximum score 0.3-0.65, "Amber: offence likely" indicates that the development activities are of such a type, scale and location that an offence is likely. In this case, the best option is to redesign the development (location, layout, methods, duration or timing; see Non-licensed avoidance measures tool) so that the effects are minimised. You can do this and then re-run the risk assessment to test whether the result changes, or preferably run your

own detailed site-specific assessment. Bear in mind that this generic risk assessment will over- or under-estimate some risks because it cannot take into account site-specific details, as mentioned in caveats above. In particular, the exact location of the development in relation to resting places, dispersal areas and barriers should be critically examined. Once you have amended the scheme you will need to decide if a licence is required; this should be done if on balance you believe an offence is reasonably likely.

Maximum score >0.65 "Red: offence highly likely" indicates that the development activities are of such a type, scale and location that an offence is highly likely. In this case, you should attempt to re-design the development location, layout, timing, methods or duration in order to avoid impacts (see non-licensed avoidance measures tool), and re-run the risk assessment. You may also wish to run a site-specific risk assessment to check that this is a valid conclusion. If you cannot avoid the offences, then a licence should be applied for.

For more information, please refer to licencing method statement in references.

Component	Likely effect (select one for each component; select the most harmful option if more than one is likely; lists are in order of harm, top to bottom)	Notional offence probability score
Great crested newt breeding pond(s)	No effect	0
Land within 100m of any breeding pond(s)	No effect	0
Land 100-250m from any breeding pond(s)	No effect	0
Land >250m from any breeding pond(s)	No effect	0
Individual great crested newts	No effect	0
	Maximum:	0
Rapid risk assessment result:	GREEN: OFFENCE HIGHLY UNLIKELY	

Development work at White House Farm has been assessed as highly unlikely to cause offence (green) as the proposed development plans have no impact on any land (works are being carried out on a building that is already there). However, this assessment is only to be used as general guidance only and does not consider factors such as newt population size, pond density, terrestrial habitat types, pre-existing habitat fragmentation levels, duration or type of development work. After a careful examination of the site and adjacent habitats, it was considered unlikely to cause offence. Justification of why it is considered unlikely that proposed development work at White House Farm will cause an offence can be found in Section 3.

3. Reasonable Avoidance Measures

3.1 Habitats to be Impacted by works

The pond on site was far enough away from the proposed works that the likelihood of GCN impacted in this area is deemed negligible, and habitats onsite were vastly considered unsuitable for GCN. The possibility remains that GCN and other amphibian species could use the surrounding habitats and potentially travel from areas north of the site. Nevertheless, impacts on GCN, due to the nature of the works addressed in the granted application, are highly unlikely. The following methodologies would minimise the risk of harm to these species and outline recommended actions, should GCN be recorded on site during the development.

It was deemed unnecessary to apply for a Low Impact Class Licence (LICL) or District Level Licensing (DLL) due to the following reasons:

- Out of eight potential ponds within a 250m radius, five ponds (Ponds 3-7) were isolated from the site via a road.
- Out of the remaining ponds, Ponds 2 and 8 were far enough from the site and set within suitable habitat, that dispersal of any possible populations or individuals was deemed unlikely.
- Suitable habitat was not available between the pond onsite and the proposed works, therefore it is unlikely that GCN would be in the immediate vicinity of the building.

Works are unlikely to impact the population for the reasons stated below:

- The majority of habitats onsite were found to be unsuitable for GCN during a PRA on 31st March 2023. The site was largely compiled of buildings with walls that had limited hibernation potential, hardstanding (namely gravel) and amenity grassland that offered no sheltering or foraging opportunities for GCN during their terrestrial stages.
- The habitats onsite will be vastly unaffected by construction, reducing any potential ecological risk to nearby GCN populations.
- Planning proposals include habitat creation and enhancement such as the planting of wildflower meadows, which have the potential to positively impact local GCN populations (see Section 4).

3.2 Avoidance Measures / Working Practices

3.2.1 Pre-construction

- Sensitive vegetation clearance/maintenance of very short sward height should be carried out prior to the start of works (at a height of <5cm). This will maintain the site as sub-optimal/unsuitable for great crested newts and reduce the risk of harming animals when works commence. The small section of ornamental hedgerow should be cleared after a hand search by a suitably licensed and experienced ecologist (Ecological Clerk of Works/ECoW).
- Immediately prior to the commencement of construction works, the ECoW should provide a Toolbox Talk to all site workers and the landowner. This will cover identification of protected and common amphibian species and work through safe working practices. Any site workers joining mid-project should receive a Toolbox Talk before starting work.

3.2.2 Safe Working Practices

The Site Manager will be responsible for performing a thorough site check each morning to assess the condition of the working practices listed below:

- All materials will be stored on pallets, raised off the ground. This will prevent places of refuge being created within the construction zone.
- Any aggregates delivered to Site should be stored in bulk-bags and placed on pallets. Again, this will prevent places of refuge/hibernacula being created within the construction zone.
- All waste should be stored in skips prior to removal from Site.

4. Habitat Advancement Opportunities Post Construction

As potential commuting and sheltering habitats during terrestrial phases are present in adjacent land, the site should include habitat enhancement for amphibians. These may include:

- The enhancement of the pond onsite by planting at the pond margins with native species such as yellow iris (*Iris pseudacorus*), common water plantain (*Alisma plantago-aquatica*), marsh bedstraw (*Galium palustre*), lesser spearwort (*Ranunculus flammula*), water forget-me-not (*Myosotis scorpioides*), water mint (*Mentha aquatica*), brooklime (*Veronica beccabunga*), meadowsweet (*Filipendula ulmaria*) and marsh marigold (*Caltha palustris*). Occasional drying is not problematic and may be beneficial as it periodically eliminates any fish that may predate amphibians during their larval stages.
- Wild meadow planting such as Emorsgate EM1 (general purpose wildflower seeds) and restrained management of grassland to allow habitats with longer vegetation as shelter opportunities for GCN and other species such as small mammals and invertebrates, but also those that feed on animals within these areas, including grass snakes, barn owls and bats. Low level shrub planting would also provide valuable sheltering, foraging, and commuting habitat for amphibians. Any plants should be native species and of local provenance.
- Hibernacula created, such as log piles, should be situated within one of the wildflower patches near the pond to allow connectivity between breeding opportunities (the pond) and hibernation opportunities for amphibians. These piles should be created using thick c.10cm diameter hardwood logs stacked to a height of 1m, and partially buried with soil. This would also be beneficial for invertebrates and reptiles.

Enhancement opportunities for other species include (but not limited to):

- A bat friendly lighting plan following guidance provided by the Bat Conservation Trust (Bats and Lighting in the UK, 2009), to ensure that roosting, 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 could include low pressure sodium lamps, with hoods, cowls or shields, to prevent light spillage.
- The installation of bird boxes.

5. References

Literature

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<http://www.magic.gov.uk.html> [Accessed 12/03/24].

Appendices

Appendix I: Site maps



Figure 3. Map of proposed plan, with annotated recommendations and onsite pond location. Created using drawing no.07 PROPOSED SITE BLOCK PLAN produced and copyrighted by Beech Architects Ltd. Beech Architects have given full permission for the replication of their work.

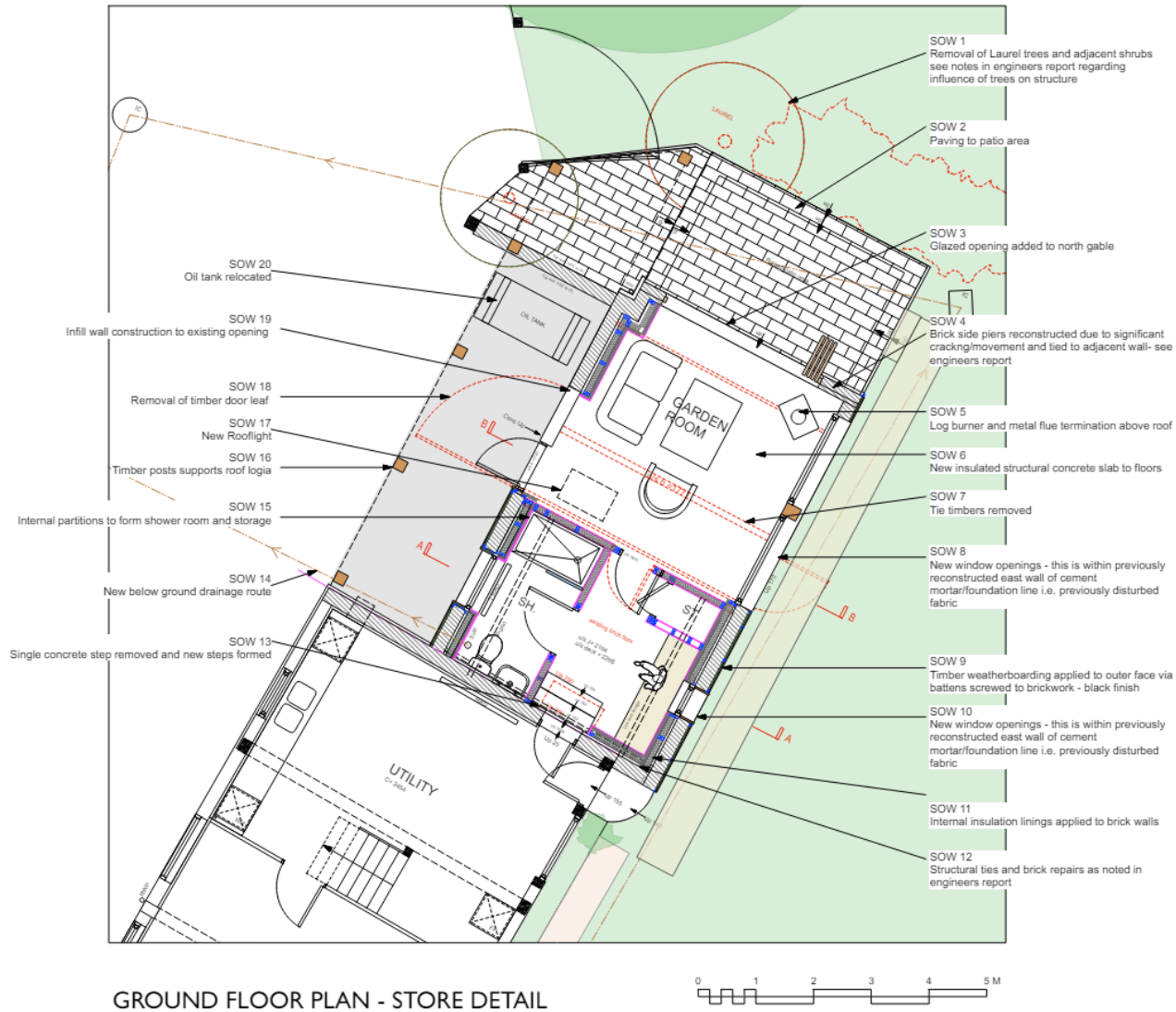


Figure 4. Proposed site plan. Created using drawing no.05 PROPOSED GA PLAN produced and copyrighted by Beech Architects Ltd. Beech Architects have given full permission for the replication of their work.

Appendix II: Photos

Site Photos	
	
<p>Southern elevation of the main dwelling, with the front garden pictured to the left, the gravel driveway in the centre and a garage to the right.</p>	<p>Eastern elevation of the main dwelling, including the garden pictured in the foreground, and the northern wing, pictured to the right, which has been granted planning permission for development.</p>
	
<p>Building to be converted (north wing), with strip of ornamental bush planted on its eastern side.</p>	<p>Area to the north of the north wing, including a mature tree pictured to the right.</p>
	
<p>Gravel driveway located to the west of the site.</p>	

Appendix III: Mitigation Figures

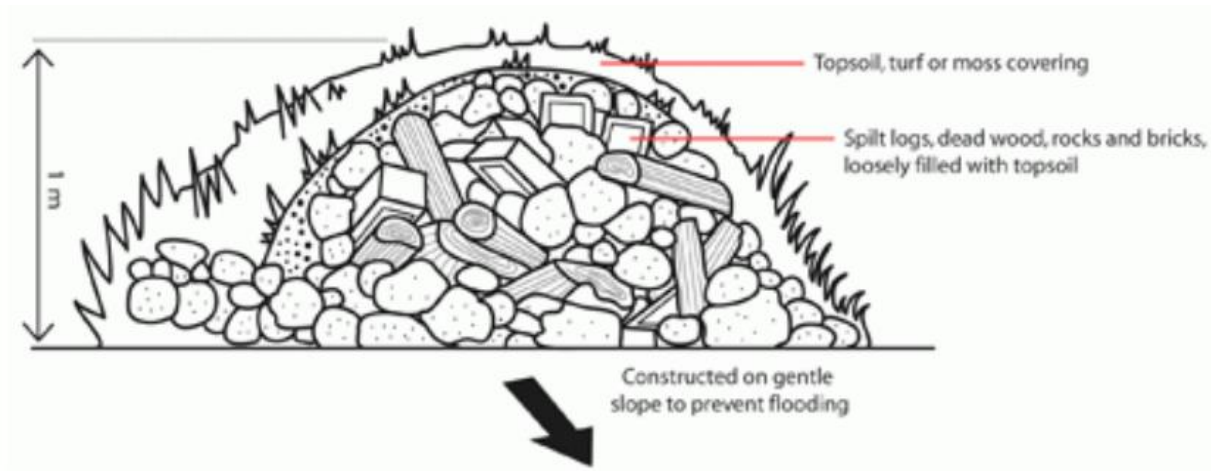


Figure 5. Example of Hibernaculum for enhancement of reptiles, amphibians, and invertebrates.