



Red House Farm, Framsdon, Suffolk

Preliminary Ecological Appraisal

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1.0 SUMMARY

- 1.1 The site (located at NGR: TM 21044 58194) was found to comprise an open area of patchy, closely mown grass / ruderal vegetation and bare earth, with two ponds in the south western corner of the field and surrounded to the north and east by a native hedgerow and seasonally wet ditch. Planning permission is being sought to construct a new storage building on the site, accessed via a new track but using the existing site entrance.
- 1.2 Great crested newts are known to be present within the immediately surrounding landscape, in a pond located 80m to the east of the site. The two ponds located between 10m and 50m to the south west of the proposals are also very likely to support great crested newts. In this case, further detailed survey work was not deemed likely to influence, or necessary to inform, the proposals due to the small scale and very poor quality of the habitats to be lost as part of the proposals. The vast majority of the works will result in the loss of / disturbance to existing areas of patchy bare earth and short grass / ruderal vegetation, with historical Google Earth imagery indicating that this area of land was in arable production until August 2021. The land is therefore unlikely to have been of historical importance to GCN, and does not currently provide habitats suitable for GCN foraging or shelter. In addition, all of the water bodies identified within 250m of the site are surrounded by much higher quality terrestrial habitats. No adverse impacts upon the Favourable Conservation Status of the GCN population are predicted as a result of the proposals. The likelihood of GCN being harmed or disturbed during the works is very low, and it is therefore concluded that the works could reasonably proceed under a Precautionary Method Statement (see Appendix 3) which will further reduce the risk of harm or disturbance to individual GCN.
- 1.3 No trees or shrubs will be affected by the proposals, and the patchy and uniformly short vegetation provides poor quality potential nesting habitat for ground nesting birds. Those species which tend to utilise short grass e.g. skylarks and waders are unlikely to use a site such as this due to the increased perception of predation risk resulting from the presence of tall hedgerows to the north and east, and tall trees and shrubs to the south west.
- 1.4 The site is not deemed suitable for any other protected species.
- 1.5 The mitigation and enhancement measures detailed in section 6.0 can be secured via a planning condition, and should result in a significant enhancement at the site level for a wide range of species, including great crested newts, bats and birds.



2.0 INTRODUCTION

Instruction

- 2.1 This report has been prepared by Liz Lord following instruction by Mr. A Benn of Peter Wells Architects to carry out an ecological appraisal of land immediately adjacent to Red House Farm, Framsdan, Stowmarket, Suffolk IP14 6HU.

Site Proposals

- 2.2 Planning permission is being sought to construct a new storage building on the site, accessed via a new track but using the existing site entrance.

Site Description

- 2.3 The site lies between the villages of Otley and Cretingham, approximately 9km to the west of Wickham Market, Suffolk. The site comprises a mown field corner, which until late summer 2021 was formerly part of the adjoining arable field.
- 2.4 A small number of residential properties with large, mature gardens lie offsite to the south and east, with predominantly arable fields beyond here. Small areas of grazing pasture lie to the north east of the site. The wider landscape is dominated by arable fields of varying size with associated mature hedgerows and tree lines. There is very little woodland cover within 3km of the site, however mature hedgerows and lines of trees provide reasonably good local habitat connectivity. A site location plan is provided below.



Fig 1A: Site location indicated beneath red arrow. Aerial photograph sourced from Google Earth Pro





Fig 1B: Aerial plan, with approximate survey boundary outlined in red. Locations of the six closest ponds are shown labelled blue. Aerial photograph sourced from Google Earth Pro

Objectives

- 2.5 This report has been written broadly in accordance with the report writing guidelines produced by the Chartered Institute of Ecology and Environmental Management (CIEEM) (CIEEM 2018, 2017a, 2017b). In accordance with the client brief, this survey and report aims to:
- 2.5.1 Identify and describe all potentially significant ecological effects on protected and notable species / sites associated with the proposals;
 - 2.5.2 Set out the mitigation measures required to ensure compliance with nature conservation legislation and address any potentially significant ecological effects;
 - 2.5.3 Identify how mitigation measures will / could be secured;
 - 2.5.4 Provide an assessment of the significance of any residual effects;
 - 2.5.5 Identify appropriate enhancement measures; and
 - 2.5.6 Where deemed necessary, set out the requirements for post construction monitoring.
- 2.6 This survey and report is intended to inform, as necessary, the layout and design of the proposals, future landscape design and management on site, and where required the methodology and timing of development works.



Timescales

- 2.7 The total works period is expected to be around 1-2 months following the granting of relevant permissions.
- 2.8 This report is valid for a period of 12 months from the date of survey. Beyond this time, changes to the vegetation may have occurred which could require re-assessment and potentially further survey to re-determine the presence / likely absence of protected species.

Relevant Documents

- 2.9 The site assessment was based upon drawing number PW1394-PL02 dated January 2024 by Peter Wells Architects, as shown in Appendix 1.
- 2.10 Recommendations included within this report are the professional opinion of an experienced ecologist based on the client's proposals for the site, the site surveys, the results of the desk study, and features present in the surrounding environment.



3.0 METHODOLOGY

Desk Study

- 3.1 The Multi Agency Geographic Information for the Countryside (MAGIC) website was consulted on 8th March 2024 to determine the presence of any nationally and internationally designated sites such as Sites of Special Scientific Interest (SSSI), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites within influencing distance of the proposals.
- 3.2 The MAGIC website was also used to search for any records of European Protected Species Mitigation (EPSM) licences that have been approved by Natural England within a 5km radius of the application site since late 2008 (last updated January 2022). The website was checked for any data from Natural England's great crested newt eDNA Habitat Suitability Index pond surveys for District Level Licensing 2017-2019 (last updated December 2023); and data from Natural England great crested newt Class Survey Licence returns within a 5km radius of the site (last updated December 2023).
- 3.3 Due to the small size of the proposals, the low ecological value of the habitats to be affected, the known presence of great crested newts within the immediately surrounding landscape, the very limited potential for any other protected or notable species to be present onsite, and the very limited potential for the proposals to have an adverse effect upon land beyond the red line boundary, a records search with Suffolk Biodiversity Information Service was not undertaken. Since great crested newts are the only species of potential relevance to the proposals, this is not considered to be a limitation to the conclusions and recommendations of this report.

Site Survey

- 3.4 A site survey was carried out on 28th February 2024. The survey was based upon the standard methodology for Extended Phase 1 Habitat Surveys (JNCC 2010) and the UK Habitat Classification system (UKHab Ltd 2023). The relative abundance of individual plant species was recorded, and habitats were classified according to the abundance of plant species present. Any evidence of invasive species such as Japanese knotweed was noted.
- 3.5 The survey area was limited to the site and immediately surrounding land as highlighted in Figure 1B and Appendix 1, plus land within the potential Zone of Influence.



- 3.6 The survey also included an assessment of the site's potential to support any legally protected species; or Species and Habitats of Principal Importance, as identified by Section 41 of the Natural Environment and Rural Communities Act 2006. Where best practice guidelines exist, these have been used to assess the likelihood that individual species will be present, for example Bat Surveys: Good Practice Guidelines (Collins, J. 2023) and Habitat Suitability Index for Great Crested Newt (Oldham *et al*, 2000).
- 3.7 Using criteria provided in best practice guidelines, habitats have been assessed for their potential to support protected species; notably bats, barn owls *Tyto alba*, badgers *Meles meles*, great crested newts *Triturus cristatus*, reptiles, water voles *Arvicola amphibius*, dormice *Muscardinus avellanarius* and otters *Lutra lutra*.
- 3.8 Where methodologies, classification or recommendations deviate from best practice guidelines, this report provides ecological justification for such changes.

Habitat Suitability Index (HSI) assessment

- 3.9 Where relevant, for each water body located within potential influencing distance of the construction zone boundary (100-250m in this case), a Habitat Suitability Index (HSI) assessment was undertaken, following standard methods described in Oldham R.S. *et al*, (2000).
- 3.10 Features such as shading, water quality, terrestrial habitat, fish and fowl presence were noted during the survey. These features were used in the HSI to assess the potential of the ponds to support great crested newts. Following the survey, the HSI field scores are inserted into a table to calculate a score for each pond, with pond suitability for great crested newts assessed on the following scale:

HSI Score	Pond Suitability
< 0.5	Poor
0.5 – 0.59	Below Average
0.6 – 0.69	Average
0.7 – 0.79	Good
>0.8	Excellent

Surveyors

- 3.11 The survey was carried out by Liz Lord. Liz has been a professional ecologist since 2005, and holds current Natural England licences to survey bats - Class Licence Reg. No. 2015-13305-CLS-CLS; great crested newts - Class Licence Reg. No. 2020-44816-CLS-CLS; and barn owls - Class Licence Reg. No. CL29/00160. Liz is a full member of CIEEM.



3.12 The weather at the time of the site survey was overcast, with intermittent light drizzle, a light wind (BF1-2) and a temperature of 7°C.

Zone of Influence

3.13 The potential impacts of a development are not always limited to the boundaries of the site concerned, such as where there are ecological or hydrological links beyond the site boundaries. In order for the proposed works to have an impact on habitats and species outside of the site boundaries, there needs to be a source of impact, a pathway and a receptor for that impact.

3.14 The Zone of Influence will vary for different habitats and species depending on their sensitivity to predicted impacts, the distribution and status of the relevant species, whether a species is mobile, migratory, and whether its presence and activity varies according to the seasons.

3.15 An assessment of the Zone of Influence has been made based on the site layout shown in Appendix 1, and where necessary recommendations to avoid any significant adverse impacts beyond the site boundaries have been provided in section 5.0.

Limitations

3.16 The conclusions in this report are based on the best information available during the reported period of survey.

3.17 The survey was undertaken at a time of year when some plant species are not present above ground, or are simply not easily recorded; however an overall assessment of the flora communities present at the time of survey has been used to assess the likelihood of the unrecorded presence of any plant species of conservation importance. Due to the species recorded to be present at the time of survey and the very recent long term previous use of the site as an intensive arable field, the UKHab categories assigned to the various habitats present are very unlikely to change following survey later in the spring / summer.

3.18 Ecological surveys provide only a 'snapshot' of the site in time, and many species, such as bats and badgers, are capable of colonising a site in a very short space of time. Lack of evidence of a species at the time of survey can only allow conclusion of the *likely* absence of this species, since no level of survey effort is capable of proving absence beyond doubt.

3.19 Whilst best efforts have been made to identify all water bodies within 250m of the site, it is not always possible to record all garden ponds using Ordnance Survey maps and aerial photography. Additional search effort with respect to garden ponds is likely to be disproportionate, as many garden ponds have limited suitability for great crested newts, and it is a common constraint associated with all Ecological Assessments.



Geographic Context

3.20 Where applicable, the importance of each ecological feature has been considered in a geographic context as follows:

- International and European
- National
- Regional
- Metropolitan, County, vice-county or other local authority-wide area
- River Basin District
- Estuarine system/Coastal cell
- Local (further categorized into District, Borough or Parish)
- Site

Assessment of Impacts and Effects

3.21 The following definitions are used for the terms 'impact' and 'effect' in accordance with CIEEM (2018) guidelines:

- Impact – actions resulting in changes to an ecological feature
- Effect – outcome to an ecological feature from an impact

3.22 The importance of any ecological feature has been determined via the site surveys detailed in this report. Note that species and habitats afforded legal protection are, by default, always considered within the EclA assessment process to be 'important'.

3.23 Potential impacts of the proposals on any such features have been assessed based on the client proposals for the site, and following a review of all phases of the project. Impacts are assessed through consideration of the extent, magnitude, duration, reversibility, timing and frequency of works which may result in likely 'significant' impacts to any ecological features present. The route through which impacts may occur (direct, indirect, secondary or cumulative) has also been considered. Positive impacts are assessed as well as negative.

3.24 The results of the surveys have been used to identify any potentially significant impacts in the absence of any avoidance, mitigation or compensation measures. Any such appropriate measures have then been proposed where necessary.

Characterisation of Ecological Impacts

3.25 When considering ecological impacts and effects, the following characteristics have been considered:



- positive or negative
- extent
- magnitude
- duration
- frequency and timing
- reversibility

3.26 Where various characteristics have not been specifically referred to in this report, they have been considered insignificant or irrelevant to that specific feature.

3.27 A 'significant effect' is defined within the current CIEEM guidelines (2018) as: *"an effect that either supports or undermines biodiversity conservation objectives for 'important ecological features' or for biodiversity in general. Conservation objectives may be specific (e.g. for a designated site) or broad (e.g. national/local nature conservation policy) or more wide-ranging (enhancement of biodiversity). Effects can be considered significant at a wide range of scales from international to local."*

3.28 Where a significant effect is predicted, this requires assessment and reporting in order to provide the decision maker with sufficient information to determine the environmental consequences of a project. A significant effect can be either positive or negative, and its extent will determine the requirement of conditions, restrictions or monitoring works.

3.29 The current CIEEM guidelines (2018) also state that: *"After assessing the impacts of the proposal, all attempts should be made to avoid and mitigate ecological impacts. Once measures to avoid and mitigate ecological impacts have been finalised, assessment of the residual impacts should be undertaken to determine the significance of their effects on ecological features. Any residual impacts that will result in effects that are significant, and the proposed compensatory measures, will be the factors considered against ecological objectives (legislation and policy) in determining the outcome of the application."*

3.30 This report has taken into account the factors detailed above for each important ecological feature in the absence of mitigation. Recommendations have then been made with respect to avoidance / mitigation / compensation / enhancement as necessary, and an assessment of the residual impacts after such measures has been made.

Mitigation Hierarchy

3.31 In order to minimise the likelihood of any significant negative residual effects on environmental features, this assessment has followed the mitigation hierarchy (listed below in order of preference):

- Avoidance – measures that avoid harm to ecological features, both spatially and temporally;



- Mitigation – avoidance or minimisation of negative effects through appropriate timing of works, or the provision of mitigation measures within the scheme design which can be guaranteed by condition or similar;
- Compensation – measures taken to offset residual effects which result in the loss of, or permanent damage to, ecological features despite mitigation;
- Enhancement – measures to provide net benefits for biodiversity, either by improved management of existing features, or the provision of new features, and over and above that which is required to mitigate / compensate for an impact. Delivery should be secured via planning condition or similar.

Legislation and Policy

- 3.32 Specific reference has been made to the individual legal protection of the species detailed within this report, however additional information with respect to other relevant legislation and planning policy is provided in section 8.0.
- 3.33 The legislation of particular relevance within the body of this report is the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended). The former confers legal protection to 'European' Protected Species against both disturbance and harm, and extends to the full protection of their habitats. This legislation also provides legal protection for a number of internationally designated sites within the UK, and remains in place following Brexit.
- 3.34 The Wildlife and Countryside Act 1981 (as amended) is UK specific, and generally only provides protection against direct harm to individuals of a species.



4.0 RESULTS (Baseline Conditions)

Site Summary

- 4.1 The site comprises an open area of patchy bare ground and closely mown grass / ruderal vegetation, with two ponds in the south western corner of the field and surrounded to the north and east by a native hedgerow and seasonally wet ditch.

Desk Study: Statutory Designated Sites

- 4.2 Natural England's MAGIC website indicates that there are no UK statutory designated sites located within a 2km radius of the site boundaries, and no statutory designated sites of international importance located within a 5km radius.
- 4.3 The MAGIC data search results indicate that the proposals are located within the Zone of Influence with respect to recreational pressures on internationally designated sites, however this is not of relevance to the proposals, which comprise the erection of a storage shed.

Desk Study: Non-Statutory Designated Sites

- 4.4 No adverse impacts are predicted beyond the construction zone, and due to the very recent use of the site for arable cropping, it is very unlikely that there are any County Wildlife Sites located onsite or within influencing distance of the proposals.

Habitats

Water bodies

- 4.5 Two water bodies are present within the red line boundary, but outside of the proposed construction zone. Site location plans, aerial photography and Ordnance Survey maps at 1:10,000 scale identified a further 12 water bodies within 250m of the site. Of these, five located between 175m and 205m to the east of the site were found to be damp, silted depressions which do not hold water regularly. These have been previously recorded (October 2021) as grassy dry depressions and no recent changes e.g. desilting were observed. Two ponds - located 225m and 280m to the south west of the construction zone - are surrounded by notable areas of moderate and high quality terrestrial habitats and are unlikely to be of significant relevance to the small scale proposals. All of these ponds are therefore scoped out of this assessment.
- 4.6 Of the remaining five offsite water bodies (as highlighted in Fig. 1A), one (WB7) was not visible or accessible and is located in a rear garden with significant areas of moderate to high quality terrestrial habitats, and a number of large buildings obstructing access for GCN in the direction of the site. This pond is also unlikely to be of significant relevance to the proposals.



- 4.7 WB6, located c.80m to the east of the site, holds a positive Pond Survey record for GCN, dating from 2019. No works appear to have been carried out to the pond since 2019, and the entire water body is now filled with dense reeds *Phragmites australis*, with very shallow water depths and no areas of open water.
- 4.8 WB3, WB4 and WB5 were viewed from the road, and are relatively small garden ponds with a varying abundance of aquatic vegetation. All are suitable for GCN.
- 4.9 WB1 is a moderate size pond which showed little evidence of the past recent presence of aquatic vegetation, is heavily shaded by surrounding scrub and appears to be heavily silted, with occasional trees growing in the silt. An HSI assessment returned a provisional (given the time of year) score of 0.64, indicating 'average' suitability for GCN. This pond is located c.10m to the west of the proposed access track, and 45m to the south of the new building.
- 4.10 WB2 is a second moderate size pond with a greater depth of water than WB1, a greater abundance of aquatic vegetation and less shading along the banks. It is possible that this pond has been recently de-silted, with a semi-vegetated spoil pile located immediately to the south. An HSI assessment indicates that WB2 is likely to be of 'excellent' suitability for GCN with a score of 0.81. An egg search for evidence of early breeding activity was undertaken, with no eggs recorded. The full results of both HSI assessments are provided in Appendix 2. WB2 is located c.25m to the west of the proposed access track, and 50m to the south of the new building.

Mixed scrub – (h3h)

- 4.11 Onsite but outside of the proposed construction zone, both WB1 and WB2 are surrounded to varying degrees by native scrub. Blackthorn *Prunus spinosa*, bramble *Rubus fruticosus* agg., hawthorn *Crataegus monogyna* and willow *Salix* sp. are present, in both mature and suckering stages, with some willows developing into semi-mature, multi-stemmed trees. Trees were observed growing within the silt of WB1.

Ruderal or ephemeral vegetation (g81)

- 4.12 The vegetation present across the open areas of the site comprises approximately 20-25% cover of ruderal species such as occasional to frequent nettle *Urtica dioica*, creeping buttercup *Ranunculus repens*, spear thistle *Cirsium vulgare*, rosebay willowherb *Chamaenerion angustifolium* and bristly oxtongue *Helminthotheca echioides*; and rare occurrences of ox-eye daisy *Leucanthemum vulgare*, dock *Rumex* sp. and yarrow *Achillea millefolium*. Grass cover is patchy and variable at 15-50%, with species present including Yorkshire fog *Holcus lanata*, red fescue *Festuca rubra*, false oat grass *Arrhenatherum elatius* and cocksfoot *Dactylis glomerata*.



4.13 The UKHab classification system excludes grasslands on formerly cropped land which are less than two years old from the category 'Other Neutral Grassland'. Historical Google Earth images show that the land was last cropped in August 2021, and appears to have been out of arable production since then. The August 2021 tramlines are clearly visible in spring 2022, indicating that the land was not sown with a grass mix but left to colonise naturally in a manner similar to set-aside. The 2-3m wide grass field verge of the original arable field remains distinctly apparent along the eastern site boundary, and the proposed access route appears to have been historically cropped and then used as the field entrance. Whilst the age of the habitat permits inclusion into a grassland category, the vegetation does not fully reflect grassland due to large patches of bare ground (25-50%) and an abundance of ruderal species.

4.14 Whilst the vegetation appears to have been mown, the low regrowth of grassy tussocks and thistle rosettes indicates that it was not mown immediately preceding the survey. The extent of the lying dead vegetation stems / remains also shows that vegetation cover was patchy prior to mowing, with large patches of bare ground between individual plant remains.

Other native hedgerow – (h2a6)

4.15 Along the northern and eastern site boundaries is an irregularly managed, often leggy, mature native hedgerow. Hawthorn dominates, with some blackthorn, elm *Ulmus sp.* and bramble, and a regular abundance of ivy *Hedera helix* growing through the mature shrubs. A seasonally wet ditch (holding relatively little water given the recent high rainfall) is present at the base of the eastern hedgerow. The understorey is dominated by tussocky grasses and nettles.

Invasive species

4.16 No aerial evidence of Japanese knotweed *Fallopia japonica* was recorded within the site or the immediately adjacent areas at the time of survey.



Site photographs



Photo 1: Eastern side of main site area, viewed from south looking north towards northern and eastern boundary hedges. Former arable field verge visible as greener / denser vegetation along eastern boundary



Photo 2: Western side of main site area, viewed from northern boundary looking south towards existing mature scrub surrounding WB1 and WB2



Photo 3: Typical patchy vegetation cover at ground level



Photo 4: Site entrance located in south eastern corner of site. Looking north



Photo 5: WB2, predominantly open with aquatic vegetation at the margins



Photo 6: WB1, heavily silted, shallow and overgrown



Animals

Bats

- 4.17 The desk study identified three bat EPSM licences within 5km of the site – at 0.9km south east for a non-breeding roost of common pipistrelle *Pipistrellus pipistrellus* and brown long-eared bat *Plecotus auritus*; at 2km north west for a non-breeding roost of common pipistrelle, brown long-eared bat and soprano pipistrelle *P. pygmaeus*; and at 3km north east for a non-breeding roost of all aforementioned species plus natterer's bats *Myotis nattereri*.

Bats - roosting

- 4.18 No features with potential to support roosting bats are present on site.

Bats – commuting / foraging

- 4.19 The red line boundary supports mature hedgerows, scrub and ponds which are very likely to be used by foraging bats. Recent surveys of the buildings located c.100m to the east of the site undertaken by the author identified day roosting brown long-eared bats, common pipistrelle and soprano pipistrelle as well as foraging / commuting natterer's, daubenton's *M. daubentonii* and barbastelle bats *Barbastella barbastellus*.
- 4.20 The proposed construction zone itself provides very little potential habitat for foraging and commuting bats, and it is understood that all hedgerows, scrub and ponds will be retained and will not be adversely affected by the proposals. The long term proposed pond related enhancements will result in a significant enhancement of the site for foraging bats.

Invertebrates

- 4.21 The site is considered likely to support common and widespread invertebrate species typical of the habitats present.

Amphibians

- 4.22 The MAGIC search highlighted positive records for GCN at c.80m east of the site, 620m south west, 935m west, and numerous records of GCN from pond data surveys and the author's own surveys across land 2-5km to the west of the site. A class licence return was identified at 2.4km east, and an EPSM licence at 2.1km north west. GCN are therefore considered to be widespread across the immediately surrounding landscape, and there is very high potential for GCN to be present in at least one of the two ponds located within the red line boundary.
- 4.23 It is understood that both ponds will be retained and unaffected by the proposals, although it was noted during the site survey that WB1 would benefit from the removal of scrub and trees from the banks, and also from the removal of silt and the trees growing within WB1.



4.24 When considering the scale of the proposals and quality of relevant habitats, the potential for GCN to be present within the construction zone and adversely affected by the works is very low due to:

- The small scale of the proposals;
- The short duration of construction works (1-2 months max.);
- The poor quality of the habitats on site with respect to amphibians i.e. very short vegetation and bare earth;
- The historical use of the site as arable land and not as habitat of notable value to GCN; and
- The presence of moderate and high quality terrestrial habitats surrounding WB1 and WB2 (long grass and scrub) which historical aerial photographs show have been present for over 20 years, and which contrast with the surrounding arable land. These areas are likely to support a significant proportion of any GCN present in these ponds during their terrestrial life phase.

4.25 Natural England's rapid risk assessment tool (Natural England, 2020) indicates that for the loss / damage of up to 0.01ha of GCN habitat on land within 100m of a GCN breeding pond, the notional probability of an offence is Green i.e. 'offence highly unlikely'. The proposals will result in the loss of 0.065ha due to the building and hard standing, and 0.033ha due to the hardcore access track. Whilst the total area is significantly greater than 0.01ha, the very short vegetation and bare ground is of negligible value to foraging or sheltering GCN, and is therefore not considered to be typical GCN habitat. The land could potentially be used by commuting GCN, however there are no notable features offsite to the north or north east to which GCN may commute, and GCN movements across the site are most likely to be east-west between ponds, or offsite to the south between ponds. It is also noted that the legislation protecting GCN does not afford protection to GCN commuting habitat, although it is an offence to obstruct GCN.

4.26 The boundary hedges, both of which provide high quality terrestrial habitat for GCN, are to be retained as part of the proposals. The majority of the scrub surrounding WB1 and WB2 will also be retained, with scrub on the southern side of WB1 being removed in the long term to enhance the quality of the aquatic habitats.

4.27 The works are therefore very unlikely to have an adverse effect on the Favourable Conservation Status of the local GCN population. Subject to the vegetation on site being maintained in its current state, the potential for GCN to be disturbed or harmed during the construction of the track and building is also very low, and can be further reduced by following the non-licensed Precautionary Method Statement provided in Appendix 3.



Reptiles

- 4.28 The vast majority of the site is not suitable for reptiles. There is low potential for occasional transient individual slow worm *Anguis fragilis* or common lizard *Zootoca vivipara* to be present in the slightly longer vegetation cover at the base of the boundary hedgerows or in the longer vegetation surrounding the ponds, however these areas are outside of the development footprint.

Birds

- 4.29 No trees or shrubs will be affected by the construction proposals, and the short vegetation provides poor quality potential nesting habitat for ground nesting birds. Those species which tend to utilise short grass e.g. skylarks and waders are unlikely to use a site such as this due to the increased perception of predation risk resulting from the presence of tall hedgerows to the north and east, and tall trees and shrubs to the south west.
- 4.30 There will be some removal of scrub from the southern banks of WB1, however this is to enhance the condition of the ponds, and the loss of a small area of potential nesting habitat is likely to be offset by the resultant enhanced foraging habitat.

Badger

- 4.31 Badgers are a common and widespread species, not of conservation concern.
- 4.32 No evidence of badger was recorded on or within 30m of the site. No setts, footprints, hairs, latrines, snuffle holes or scratching indicative of the presence of badgers was recorded.

Otter and Water Vole

- 4.33 There are no waterbodies on, adjacent or connected to the site which have potential to support otters or water voles. The ponds do not appear to be located within easy access of a watercourse from which water voles may potentially colonise.

Dormice

- 4.34 The northern and eastern hedgerows provide small areas of potential dormouse habitat, but are not connected to any areas of larger scrub or woodland habitats capable of supporting a viable population of dormice. The scrub surrounding the ponds has no connectivity to nearby hedgerows. As a result there is negligible potential for dormice to be present on site or adversely affected by the proposals.

Other Legally Protected Species

- 4.35 Due to a lack of suitable habitats the site is not considered likely to support any other legally protected species.



Species of Principal Importance

- 4.36 The boundary hedgerows may be used by a range of Species of Principal Importance in England (SPIE), but will be unaffected by the proposals. The scrub surrounding the ponds is not particularly dense at ground level but could potentially be used by foraging, sheltering and commuting hedgehog *Erinaceus europaeus* and toad *Bufo bufo*. The remainder of the site contains very little other habitat suitable to support SPIE.



5.0 CONCLUSIONS AND RECOMMENDATIONS

Designated Sites

- 5.1 The proposals are very unlikely to result in any direct or indirect adverse effects upon any nationally or internationally designated sites. No further works are required in this regard.
- 5.2 The proposals are not considered to be detrimental to any CWS. No further survey or mitigation is recommended.

Amphibians

- 5.3 Great crested newts (GCNs) and their habitats are fully protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and by the Wildlife and Countryside Act 1981 (as amended).
- 5.4 Potential effects: there is very little potential GCN habitat within the construction zone, which entirely comprises short vegetation and bare earth. Whilst the proposals do not fall into the threshold of '*offence highly unlikely*' using the areas provided in Natural England's rapid risk assessment tool, it is recognised that the tool has been developed as a general guide only, and has not included factors such as project duration, habitat quality, dispersal barriers, timing and duration of works, and development layout.
- 5.5 Due to the very low quality of the habitats across the majority of the site, which contrast with those surrounding the retained ponds, no GCN are expected to be adversely affected by the proposals, and no GCN habitat i.e. land used by GCN for the purposes of foraging or shelter, will be lost. The wider document in which the risk assessment tool sits states that '*Primarily, there is no legal need, and little benefit to great crested newt conservation, in undertaking mitigation where there are no offences through development*'. It goes on to state that '*Even where there technically is an offence, such as the destruction of a small, distance area of resting place habitat, it is arguable that impacts beyond the core area often have little or no tangible impact on the viability of populations. Mitigation in such circumstances is of questionable value in conservation terms.*'
- 5.6 The creation of a crushed asphalt track, concrete hard standing and a storage building across an area of patchy bare ground and short vegetation – even in the absence of mitigation – is very unlikely to result in harm to individual GCN or have an adverse impact upon the Favourable Conservation Status of the local GCN population. The potential for harm or disturbance can be further reduced with precautionary methods of working.



- 5.7 In the medium to long term, the proposed removal of scrub from the southern banks of WB1, and the desilting and removal of trees from WB1 will result in a significant enhancement for GCN at the site scale. The planting of a native species rich hedgerow along the western site boundary will improve habitat connectivity between the ponds and the northern hedgerow, as well as provide additional habitat for foraging and sheltering GCN.
- 5.8 Mitigation measures: avoidance measures should be taken to further reduce the likelihood of GCN presence within the proposed construction zone. It is recommended that the measures detailed in the Precautionary Method Statement (PMS) provided in Appendix 3 are followed during all stages of works on site.
- 5.9 Restoration / enhancement works: whilst most cases of typical pond management are not considered to require any form of licence (Natural England, 2009) management works must be carried out using sensible precautions to avoid an offence under the relevant legislation. Natural England (2009) envisages that *'carefully planned standard pond management works would be highly unlikely to result in offences [with respect to GCN], and therefore we would not normally expect licence applications'*.
- 5.10 Due to the high potential for GCN to be present in WB1 and WB2, to avoid the need for a licence to cover pond restoration works, scrub clearance and de-silting works should adhere to the following:
- De-silting will avoid the period February to June inclusive, and should ideally be undertaken between 1st November and 31st January. Where this is not possible, due to e.g. excessively wet ground conditions, late summer work could potentially be undertaken under a conservation licence
 - Dredged silt will not be deposited upon any grassland, scrub or similar such habitats which may be used by GCN – silt should be spread thinly across the wider site (patchy bare ground and short vegetation) or a nearby arable field
 - Excessive bank disturbance will be avoided by using a long-reach excavator and, where necessary, creating a ramp down into the pond to access the remaining banks
 - Woody vegetation will be removed from within WB1 and along the southern half of WB1 only, with the resultant logs piled at the side of both ponds to create habitat for GCN shelter and hibernation. Brash can be removed from the site or left in piles. Scrub and trees on the northern side of WB1 and WB2 will be retained
 - Fish will not be introduced to either pond, as they will predate upon newt larvae



5.11 Residual effects: the proposals, which include the restoration of WB1 and the planting of a new species rich native hedge linking the ponds with the existing northern hedgerow, will result in a significant enhancement for GCN at the site level, and a minor positive impact upon the Favourable Conservation Status of the local GCN population is predicted.

Bats

5.12 All species of bat are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and by the Wildlife and Countryside Act 1981 (as amended). In summary, this makes it an offence to harm or disturb a bat; damage or destroy a roost; and obstruct access to a roost (whether or not bats are present at the time).

5.13 Potential effects on roosting bats: negligible.

5.14 Mitigation measures for roosting bats: none required.

5.15 Potential effects on commuting / foraging bats: in the absence of mitigation negligible impacts are predicted with respect to foraging and commuting bats as no such habitats will be directly affected by the proposals, however the effects on commuting bats could be greater where inappropriate lighting is installed on site.

5.16 The removal of southern scrub and de-silting of WB1 will result in a significant enhancement for foraging bats at the site level, as will the planting of a mixed native hedge along the western site boundary.

5.17 Mitigation measures for commuting / foraging bats: a bat friendly lighting scheme will be implemented to avoid lighting the wider site or any habitat features at night. Lighting will be ideally limited to a single light above a doorway; located as close to the ground as possible; be entirely downward facing or use hoods, cowls, louvres and shields to direct light to the ground; and use warm white (<3000K) LED bulbs.

5.18 Residual effects: a significant enhancement for foraging bats at the site level will result following the pond enhancements and hedge planting.

Birds

5.19 Breeding birds and their nests are protected under the Wildlife and Countryside Act 1981 (as amended).

5.20 Potential effects: the development itself will have no adverse effects upon nesting birds, however the trees and scrub within and surrounding the ponds provide good nesting opportunities. The disturbance and destruction of an active nest could have a negative effect on some bird species at the site level.



5.21 Mitigation measures: ideally any works to woody vegetation would commence during October to February inclusive to avoid the bird nesting season. If this is not possible, immediately prior to commencement of works a check for nesting birds should be undertaken by a suitably experienced ecologist. Any active nests will need to be left in situ until the young have left.

5.22 Residual effects: the proposed pond enhancements and new hedge planting will result in a moderate enhancement for both foraging and nesting birds at the site level, for a wide range of species.

Reptiles

5.23 All Suffolk reptile species are protected against harm under the Wildlife and Countryside Act 1981 (as amended).

5.24 Potential effects: negligible.

5.25 Mitigation measures: none required.

5.26 Residual effects: negligible.

Badger

5.27 Badgers and their setts are afforded protection under the Protection of Badgers Act 1992 (as amended). This legislation includes protection against damage to badger setts and against interference and disturbance of badgers whilst they are occupying a sett.

5.28 Potential effects: negligible. No evidence of badgers was found on site or immediately adjacent, and there is no indication that badgers are likely to colonise the site in the near future.

5.29 Mitigation measures: none.

5.30 Residual effects: negligible.

Otters

5.31 Otters and their habitats are fully protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and by the Wildlife and Countryside Act 1981 (as amended).

5.32 Potential effects: none.

5.33 Mitigation measures: none.

5.34 Residual effects: none.



Water Voles

- 5.35 Water voles and their habitats are fully protected by the Wildlife and Countryside Act 1981 (as amended).
- 5.36 Potential effects: negligible.
- 5.37 Mitigation measures: none.
- 5.38 Residual effects: negligible.

Dormice

- 5.39 Dormice and their habitats are fully protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and by the Wildlife and Countryside Act 1981 (as amended).
- 5.40 Potential effects: negligible.
- 5.41 Mitigation measures: none.
- 5.42 Residual effects: negligible.

Invertebrates

- 5.43 Potential effects: negligible.
- 5.44 Mitigation measures: none.
- 5.45 Residual effects: negligible.

Other Legally Protected or Notable Species

- 5.46 The proposed development is not anticipated to impact on any other legally protected species, therefore no mitigation measures are recommended.
- 5.47 Enhancement measures will improve habitats for a wide range for foraging and sheltering amphibians, mammals and birds, including many SPIE such as common toad, yellowhammer *Emberiza citrinella*, linnet *Linaria cannabina*, dunnock *Prunella modularis*, hedgehog and soprano pipistrelle.



6.0 MITIGATION & ENHANCEMENT MEASURES

6.1 As detailed above, the **trees and scrub growing in WB1 and along the southern half of WB1 will be removed, and WB1 will be de-silted.** The following measures will be adhered to:

- De-silting will avoid the period February to June inclusive, and should ideally be undertaken between 1st November and 31st January. Where this is not possible, due to e.g. excessively wet ground conditions, late summer work could potentially be undertaken under a conservation licence
- Dredged silt will not be deposited upon any grassland, scrub or similar such habitats which may be used by GCN – silt should be spread thinly across the wider site (patchy bare ground and short vegetation) or a nearby arable field
- Excessive bank disturbance will be avoided by using a long-reach excavator and, where necessary, creating a ramp down into the pond to access the remaining banks
- Woody vegetation will be removed from within WB1 and along the southern half of WB1 only, with the resultant logs piled at the side of both ponds to create habitat for GCN shelter and hibernation. Brash can be removed from the site or left in piles. Scrub and trees on the northern side of WB1 and WB2 will be retained
- Fish will not be introduced to either pond, as they will predate upon newt larvae

6.2 A **new native hedge will be planted along the entirety of the western site boundary,** and mulched with woodchip. A species rich mix of at least five of the following will be used: hawthorn *Crataegus monogyna*, dogwood *Cornus sanguinea*, field maple *Acer campestre*, hazel *Corylus avellana*, guelder rose *Viburnum opulus*, holly *Ilex aquifolium*, spindle *Euonymus europaeus*, guelder rose *Viburnum opulus* and yew *Taxus baccata*.



7.0 REFERENCES

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8.0 LEGISLATION

The Conservation of Habitats and Species Regulations 2017 (as amended)

- 8.1 The Conservation of Habitats and Species Regulations 2017 (as amended) will soon become the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) Regulations 2019). These regulations will continue to provide safeguards for European Protected Sites and Species as listed in the Habitats Directive. As a result, the same provisions remain in place for European protected species, licensing requirements and protected areas after Brexit.
- 8.2 Species protected by the former European legislation includes great crested newt, all UK bat species, dormice and otter. A number of other plant and animal species are also included such as sand lizard, smooth snake and natterjack toad, however these additional species are rare, with restricted geographical ranges and specific habitat types.
- 8.3 Under The Conservation of Habitats and Species Regulations 2017 (as amended) it is an offence to:
- Damage, destroy or obstruct access to an EPS breeding or resting place;
 - Deliberately capture, injure or kill an EPS (including their eggs);
 - Deliberately disturb an EPS, in particular any actions which may impair an animals ability to survive, breed or nurture their young; or their ability to hibernate or migrate; or which may significantly affect the local distribution or abundance of the species to which they belong.
- 8.4 The legislation applies to all stages of amphibian life cycles (eggs, larvae and adult), and to active bat roosts even when they are not occupied at that particular time of year.
- 8.5 Natural England can, under certain circumstances, grant a licence to permit actions which would otherwise be unlawful, subject to the species concerned being maintained at a Favourable Conservation Status and there being a true need for the proposed works to take place.
- 8.6 Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) are also afforded protection under the Conservation of Habitats and Species Regulations 2017 (as amended). Ramsar sites, which are designated under the Convention on Wetlands of International Importance (1971), are afforded the same level of protection as SPAs and SACs via national planning policy.

The Wildlife and Countryside Act 1981 (as amended)

- 8.7 The Wildlife and Countryside Act 1981 (as amended) provides varied levels of protection for a range of species including those already listed above.



- 8.8 Water voles are one of the species not listed under the Conservation of Habitats and Species Regulations 2017 (as amended), but are afforded the highest level of protection under the Wildlife and Countryside Act 1981 (as amended).
- 8.9 It is an offence to intentionally kill, injure or take a water vole, to intentionally or recklessly damage or destroy a structure or place used for shelter and/or protection, to disturb a water vole whilst occupying a structure and/or place used for shelter and protection, or to obstruct access to any structure and/or place used for shelter or protection.
- 8.10 Other species, such as common lizard, slow worm, adder and grass snake, are afforded less protection. For these species it is an offence to intentionally or recklessly kill or injure animals.
- 8.11 All active bird nests, eggs and young are protected against intentional destruction. Schedule 1 listed birds e.g. barn owls, kingfishers, are further protected from intentional and reckless disturbance whilst breeding.
- 8.12 Schedule 9 of The Wildlife and Countryside Act lists plant species for which it is an offence for a person to plant, or otherwise cause to grow in the wild. This includes Japanese Knotweed which, under the Environment Protection Act 1990 (as amended) is classed as 'controlled waste'. If any parts of the plant including stems, leaves and rhizomes are taken off-site they must be disposed of safely at a landfill site licensed to deal with such contaminated waste.
- 8.13 Sites of Special Scientific Interest (SSSI) are afforded protection by the Wildlife and Countryside Act 1981 (as amended).

The Protection of Badgers Act 1992 (as amended)

- 8.14 The Protection of Badgers Act (1992) makes it an offence to wilfully kill, injure, take, possess or cruelly ill-treat a badger, or to attempt to do so, and to intentionally or recklessly interfere with a sett.

The Protection of Mammals Act 1996 (as amended)

- 8.15 The Act protects all wild mammals against actions which have the intention of causing unnecessary suffering, including crushing and asphyxiation.

The Natural Environment and Rural Communities Act 2006 (as amended)

- 8.16 Under sections 40 and 41 of the Natural Environment and Rural Communities Act (NERC) 2006 local authorities have an obligation to have regard to the purpose of conserving biodiversity in carrying out their duties. The majority of UK legally protected species are listed under Section 41 the NERC Act.



8.17 Section 41 (S41) of the Natural Environment and Rural Communities (NERC) Act (2006) also requires the Secretary of State to publish a list of habitats and species which are of 'principal importance for the conservation of biodiversity' in England (Species of Principal Importance in England – SPIE). The S41 list is used to guide decision-makers, including local and regional authorities, in implementing their duty under Section 40 of the act to have regard to the conservation of biodiversity in England when carrying out their normal functions.

The Environment Act 2021 & National Planning Policy Framework (NPPF)

8.18 The Environment Act 2021 makes provision for biodiversity gain to be a condition of planning permission in England, with a minimum 10% BNG mandatory from January 2024. The 25 Year Environment Plan (DEFRA, 2021) sets out goals for improving the environment and leaving it in a better state for the next generation, and is supported by the National Planning Policy Framework (NPPF) (Department for Levelling Up, Housing and Communities 2023), which makes general provisions for the delivery of BNG.

8.19 The NPPF states that plans should:

- a) *“Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity (as already detailed in Government Circular 06/200520); wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
- b) *promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”*

8.20 Locally specific policies set out what strategies need to be taken into account when delivering BNG, and may include Green Infrastructure Strategies and Local Nature Recovery Strategies in order that BNG may contribute to wider nature recovery plans.

Statutory Designated Sites

8.21 Under the National Parks and Access to the Countryside Act 1949 (as amended), statutory conservation agencies were able to establish National Nature Reserves (NNRs), with provisions for these areas strengthened by the Wildlife and Countryside Act 1981 (as amended). They are managed to conserve their habitats or to provide special opportunities for scientific study of the habitats communities and species represented within them.



8.22 Local Nature Reserves (LNRs) can be declared by local authorities after consultation with the relevant statutory nature conservation agency under the National Parks and Access to the Countryside Act 1949 (as amended). LNRs are not subject to legal protection, but are afforded protection against damaging operations via byelaws, and against development via local planning policies.

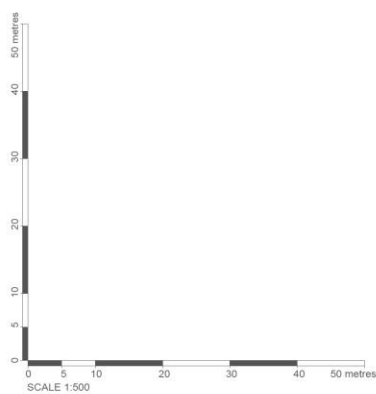
Non-Statutory Designated Sites

8.23 Local Wildlife Sites (LWS), Sites of Importance for Nature Conservation (SINCs), Sites of Nature Conservation Importance (SNCIs) and County Wildlife Sites (CWS) are often designated by the local Wildlife Trust. They are not usually afforded any legal protection, but are recognised in the planning system and given some protection through planning policy.



Appendix 1:
Proposed Layout Plans





Date	Revision	Description	Drawn	Checked
Project: Red House Farm, Otley Rd, Framsdon, Suffolk, IP14 6HU				
Client: Mr & Mrs Chamberlain				
Drawing Title: Existing and Proposed Site Plans				
Drawing Number: PW1394-PL02				
Drawing Status: Planning			Drawn By: AAB	
Scale: 1:500 (at A1)			Date: Jan 2024	

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Appendix 2:
HSI Assessment Results

HSI Assessment results

Table 1: WB1

Habitat Suitability Index			SI value
SI1. Map location	A/B/C	A	1.00
SI2. Surface area	rectangle/ellipse/irregular length (m) width (m) OR estimate (m ²) if irregular	irregular	
		125	
		area (m ²) = 125	0.25
SI3. Dessication rate	never/rarely/sometimes/frequently	sometimes	0.50
SI4. Water quality	good/moderate/poor/bad	good	1.00
SI5. Shade	% of margin shaded 1m from bank	90	0.40
SI6. Waterfowl	absent/major/minor	absent	1.00
SI7. Fish population	absent/possible/minor/major	absent	1.00
SI8. Pond density	number of ponds within 1km	3.5	1.00
SI9. Terrestrial habitat	good/moderate/poor/isolated	moderate	0.67
SI10. Macrophyte cover	%	5	0.36
			HSI = 0.64
<i>Use provisional HSI value if above 0.75</i>			provisional HSI = 0.61
			Date undertaken 28.02.24

Table 2: WB2

Habitat Suitability Index			SI value
SI1. Map location	A/B/C	A	1.00
SI2. Surface area	rectangle/ellipse/irregular length (m) width (m) OR estimate (m ²) if irregular	irregular	
		225	
		area (m ²) = 225	0.45
SI3. Dessication rate	never/rarely/sometimes/frequently	rarely	1.00
SI4. Water quality	good/moderate/poor/bad	good	1.00
SI5. Shade	% of margin shaded 1m from bank	50	1.00
SI6. Waterfowl	absent/major/minor	absent	1.00
SI7. Fish population	absent/possible/minor/major	absent	1.00
SI8. Pond density	number of ponds within 1km	3.5	1.00
SI9. Terrestrial habitat	good/moderate/poor/isolated	moderate	0.67
SI10. Macrophyte cover	%	20	0.51
			HSI = 0.83
<i>Use provisional HSI value if above 0.75</i>			provisional HSI = 0.81
			Date undertaken 28.02.24

Appendix 3:

**Great Crested Newt Non-Licensed
Precautionary Method Statement**

Non-Licensed Precautionary Method Statement

1.0 Timing of Works

Due to a lack of potential great crested newt (GCN) habitat within the construction zone boundary – and subject to this remaining the case i.e. remaining closely mown – there is no benefit to avoiding the amphibian hibernation period, and no seasonal timing restrictions are therefore necessary. No works are to take place at night.

2.0 Toolbox Talk

Every contractor and site worker will be briefed by an experienced ecologist in possession of a Natural England GCN Survey Licence prior to commencement of works. They will be made aware of the legal protection of GCN, the reasons for this Method Statement, how to identify a GCN, and what to do if a GCN is found during works.

All site contractors will be provided with a copy of this Method Statement, which includes an ID sheet for reference purposes.

3.0 Exclusion Fencing

Prior to commencement of works on site, the southern boundary of the construction site will be bordered by amphibian exclusion fencing to separate the main build zone from the nearby ponds and discourage GCN from entering the site. Note that the access track will not be fully fenced to avoid obstructing movement of GCN east-west, however this section of the track will be completed over a very short duration with additional avoidance measures in place (see section 5.0).

Whilst the route of the fencing generally supports very low level vegetation (mown / bare ground), its installation will be supervised by an ecologist who may undertake a fingertip search for GCN where deemed necessary. An ecologist will also supervise the removal of the fencing.

(Note the proposed fencing installation will not obstruct GCN since it is very unlikely that GCN use the proposed building footprint for commuting purposes; and GCN are still able to access the northern and eastern hedgerows to the north east or north west).

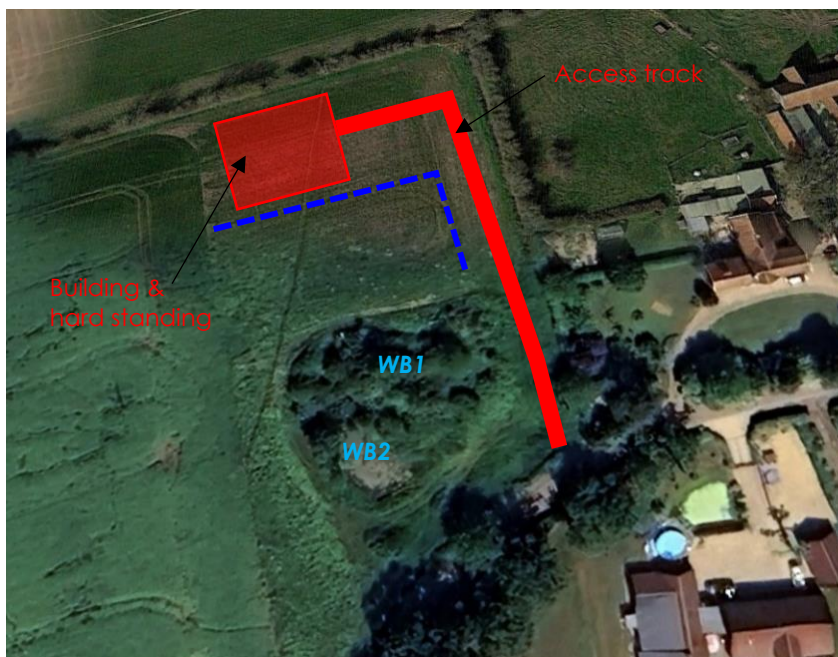


Fig 2: GCN exclusion fencing location (dashed blue line) shown in relation to WB1, WB2, proposed building / hard standing, and access track

Exclusion fencing must be installed according to the specification detailed in Figure 3, below, with the lip facing outwards to discourage GCN from climbing over the fence.

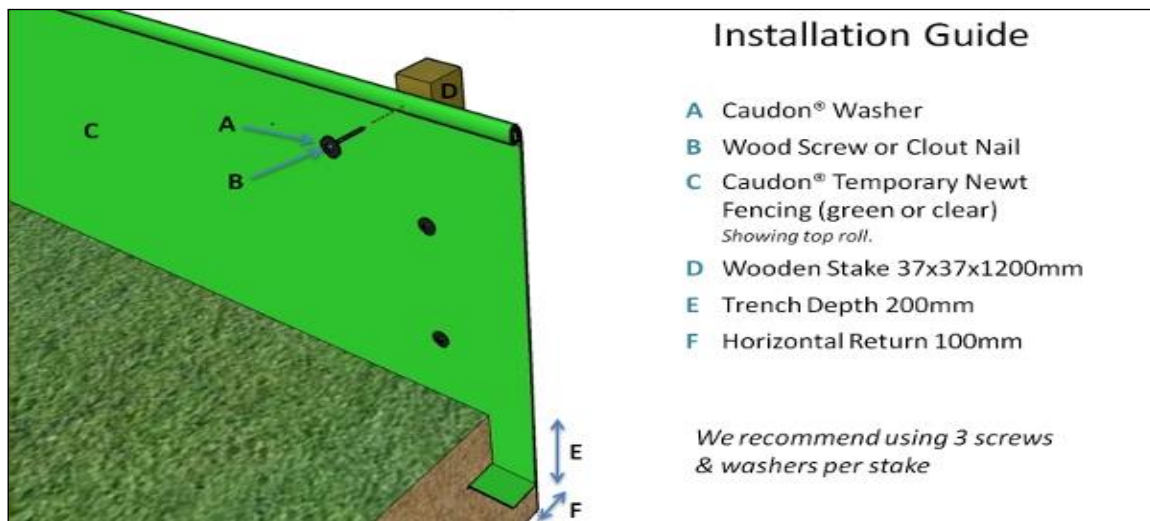


Fig 3: Installation Guide Specification taken from <https://www.wildlifefencing.co.uk>

4.0 Vegetation and Top Soil Removal

Any remaining low vegetation, leaf litter or accumulated plant debris will be subject to a staged fingertip search by the licensed ecologist. Upon completion of each stage, all vegetation, debris and topsoil will be slowly and carefully stripped where necessary - either mechanically or using hand tools. Arisings will be removed from the working area or stored in skips.

5.0 Construction Methodology

During works the following measures will be followed at all times:

- No building materials (rubble, wood, steel etc) or excavated material (unconsolidated spoil) will be stored on site unless entirely inaccessible to GCN, to avoid use of the piles by sheltering GCN. All such materials will be removed from site, stored in skips or stored on raised pallets;
- Wherever possible trenches or similar will not be left open overnight. Any trenches which are left open overnight will contain an angled plank of wood to ensure GCN do not fall in at night and become trapped. Trenches will always be checked the following morning for GCN;
- The southern (unfenced) half of the access track will be excavated and filled with hardcore / asphalt over a period of no more than 1 week, ideally less. The excavated track will be left at night with an angled plank of wood OR sloping sides to allow GCN to exit, and hardcore / asphalt will be laid and compacted with machinery on the same day to ensure open crevices are not accessible to GCN the following night;
- Areas of wet cement will be covered or surrounded at night to prevent access by GCN.

6.0 Delays to Works

Wherever possible, works will proceed quickly and without delay, to minimise the duration of ground disturbance. If any delay is predicted following commencement of works, the site will always be left in a condition that is unsuitable for GCN i.e. following the measures detailed in section 5.0.

7.0 Discovery of GCN during works

If a GCN is found on site at any point during construction, all works will cease. An ecologist will be contacted for further advice, if not already present on site. Natural England will be informed, and works will not re-commence until a development (EPSM) licence or Low Impact licence has been secured or other provisions have been agreed with Natural England.

8.0 Great Crested Newt ID

Great crested newts: these newts are **noticeably black to very dark brown** in colour, with a warty texture to their skin. Some of the warts are white, accentuating the warty and slightly speckled appearance. In spring male newts have a white stripe along the centre of their tail, and females have an orange stripe at the end of their tail. The bright orange-yellow belly colouring extends fully to join with the dark upper skin tone.

By contrast, common or palmate newts are a lighter brown-green colour and are significantly smaller (up to 9cm in length, whilst great crested newts may be up to 15cm in length). **Both common and great crested newts have an orange-yellow belly with black spots**; however the orange colouring fades towards the edges of the belly of common newts. Both males have crests in the spring.



Female Great Crested Newt



Female Common Newt



Female Great Crested Newt & Smooth Newt



Male Great Crested Newt



Liz Lord Ecology

