



Rendham Parish Council
C/O Chris Salmon
Pippins
Bruisyard Road
Rendham
Saxmundham
IP17 2AH

10 February 2019

Dear Chris

I write to formalise verbal advice given to you following a site visit to Rendham Green on 9 February 2019 to assess proposed tree and scrub removal for impacts on bats and other Protected Species.

Background

Gray Ecology was commissioned in January 2019 to complete a Preliminary Roost Assessment (PRA) of trees within Rendham Green to assess their potential to support roosting bats as well as their potential importance in providing a key foraging and commuting area. An assessment was also made of the likelihood of other Protected Species being in the area proposed for works to determine if any significant impacts upon these were likely. A brief summary of the legislation for the protection of such wildlife is included in Appendix 1 of this report.

It is understood that Rendham Parish Council wish to remove a number of trees, low-level scrub and some stands of deadwood to create a public footpath through the Green, removing the need for pedestrians to use a short stretch of road. A small number of trees are also proposed for removal due to Health and Safety considerations. Some ivy removal on retained trees is proposed, as well as cutting back a boundary hedgerow on the western edge.

The Forestry Commission have visited the site and confirmed that a felling licence is not required due to the small volume of trees proposed for clearance. They have provided advice on the potential removal of turkey oak and ash within the site at a later date, to be replaced with native broadleaves.

It is also understood that informal bat surveys of the Green have been completed and found evidence of activity within this area.



Methodology

The PRA was completed between 11:00-13:00 on Saturday 9 February by Abi Gray BSc. (Hons) MSc ACIEEM, who holds Natural England survey licences for bats [reference 2016-26862-CLS-CLS], barn owls [reference CL29/00374] and great crested newts [reference 2015-17248-CLS-CLS].

Environmental conditions during the survey are shown in Table 1:

Table 1: Environmental variables

Survey Date	09/02/2019
Temperature	10°C
Cloud Cover	40%
Precipitation	None
Wind	Beaufort Scale 3 - Gentle Breeze

The surveyor was shown trees which are proposed for removal, and had been marked up with white paint. Following a ground-level inspection of each tree for features of potential interest to roosting bats (Potential Roost Features – PRFs), trees were assigned a category of Negligible, Low, Moderate or High suitability, following guidance from the Bat Conservation Trust (2016) and shown in Appendix 2.

In accordance with Good Practice Guidelines (BCT, 2016), recommendations were then made based on whether the trees could be felled, felled with precautionary actions, or retained on site unless further surveys were completed. Trees were marked up with white paint based on these recommendations for clarity, using the following key:

- No additional white mark – no further surveys required and no constraints regarding bats necessary
- White mark “SF” – no further surveys required but constraints regarding bats necessary
- White mark “K” – trees must not be felled unless further bat surveys are undertaken

A general assessment as to the suitability of the habitat to support any other Protected Species or Species of Principle Importance (S41 Species) was also made during the site visit.

Results

Bats

The majority of trees proposed for removal were considered to have **Negligible** potential to support bat roosts as they lacked the age and structure were PRFs were likely to be found.

Two trees proposed for removal were assessed as having **Low** suitability for roosting bats. This included a tree with a split trunk, likely to be the result of wind damage/lightning strike, and a dead willow overhanging the adjacent road which contained a minor woodpecker holes.



Four trees, all along the western boundary of the site, were assessed as having **Moderate-High** potential to support bat roosts. Numerous features were identified during the PRA, including splits in the trunk, peeling bark and cavities within branches, which could be used by a larger number of bats.

Dense ivy growth on trees has occasionally be found to be used by roosting bats. However, none of the growth on trees within Rendham Green appeared to be dense enough to support such a use, and its removal from the trees is unlikely to impact bats.

The number of trees proposed for removal is small, and the majority of trees around the periphery of the site are being retained. It is not considered that any fragmentation or degradation of bat foraging habitat is likely given the scale of the work.

Other Protected Species and Species of Principle Importance

The trees and scrub habitat within the Green is likely to be used by nesting birds and there is a resultant risk that active nests may be damaged or disturbed if work takes place during the bird breeding season.

The deadwood piles provided habitat for a number of Protected Species and S41 Species, including common reptiles, hedgehogs and amphibians. Although the number of piles proposed for removal during creation of the path is low, there is still a small risk that wildlife may come to harm during the removal of these features if care is not taken.

Recommendations

The following recommendations are made for the site:

- This report must be given to all Contractors working on the site prior to any clearance taking place and they must be made aware of the potential for Protected Species and S41 Species to be present across the site.
- Trees proposed for removal should be cleared outside of the bird breeding season (which runs 1 March – 31 August) where possible. If work is undertaken during the season, trees and scrub should be visually assessed for the presence of active nests for half an hour prior to their clearance. If an active nest is suspected, contact Gray Ecology or a suitably qualified ecologist for advice on how best to proceed. Contractors should be aware that some bird species will nest throughout the year, and vigilance for active nests at all times is essential.
- The two trees identified as having low potential for bats and marked with a “SF” must be soft-felled on a precautionary basis. Removal should start at the top of the tree, working down systematically. Any section of the tree identified as having roost potential will be cut and lowered carefully to the



ground, where the cavity will be turned outwards and exposed and left untouched for a minimum of 24 hours during dry and calm weather conditions. No cavities within the tree will be cut through. If a bat is found at any point, all work must stop and Gray Ecology or a suitably licenced ecologist must be contacted for advice.

- Trees identified as having moderate-high potential for bats and marked with a “k” will be retained on site unless further surveys for bats are completed. The proposed footpath route will be amended to ensure retention of these features.
- Deadwood piles within the route of the path will be carefully removed from the site and placed on adjacent land prior to being removed/burned. If at any point a reptile, hedgehog or amphibian is found all work to the pile must stop immediately and Gray Ecology or a suitably licenced ecologist contacted for advice on how to proceed. Photographs of potential wildlife that may be found is included in Appendix 3 of this report to assist in identification. Other piles within the site should be retained to ensure suitable habitat for wildlife is retained. One new pile should also be created within the site using freshly cut wood to provide a new source of rotting wood in the future.

Enhancements

The proposed works are not considered to have any significant impacts on Protected Species or S41 Species, and public engagement with their local environment is likely to improve as a result of the clearance activities. Further enhancement of the local area is possible through the installation of bird and bat boxes within the site. Given that two trees identified as having low potential for bat roosts are being removed, it is recommended that as a minimum, two bat boxes are installed on the site, ideally towards the western edge of the site, facing south, and at a height of 3m on trees unlikely to be removed during any future works on site. A Kent Bat Box style would be suitable for this woodland and is a self-cleaning design.

Please be aware that this assessment only covers the trees identified for removal within the proposed footpath area. If more trees require removal at a later date, especially if recommendations made by the Forestry Commission are followed, further assessment as to impacts on bats will be required.

If you have any questions regarding the above recommendations, or on any other matters, please do not hesitate to get in touch.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Abi Gray', is placed below the 'Yours sincerely' text.

Abi Gray BSc. (Hons) MSc. ACIEEM
Ecological Consultant



Appendix 1

Breeding birds

Wild birds, their young, eggs, and their nests whilst in use or being built, are protected under the Wildlife and Countryside Act 1981 (as amended).

Great Crested Newts

Great crested newts are protected under The Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981 (as amended). This legislation fully protects great crested newts in all life stage from intentional or reckless activities, as well as protecting their breeding and resting places from damage or destruction.

Reptiles

All reptiles are protected under the Wildlife and Countryside Act 1981 (as amended), making it illegal to intentionally kill or injure a common reptile.

Bats

All UK bat species are protected under The Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981 (as amended). This legislation fully protects bats and their breeding sites or resting places, making it an offence to deliberately capture, injure or kill bats, deliberately disturb bats, damage or destroy a bat breeding or resting place.



Appendix 2

Table 2: Assessing the potential suitability of a development site for bats (taken from BCT, 2016)

Suitability	Description of roosting habitats	Description of commuting and foraging habitat
Negligible	Negligible habitat features onsite likely to be used by roosting bats.	Negligible habitat features on-site likely to be used by commuting or foraging bats.
Low	A tree of sufficient size and age to contain potential roost features but with none seen from the ground or features seen with only very limited roosting potential.	Habitat that could be used by small numbers of commuting bats such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	A tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only – the assessments in this table are made irrespective of species conservation status, which is established after presence is confirmed).	Continuous habitat connected to the wider landscape that could be used by bats for commuting such as lines of trees and scrub or linked back gardens.
High	A tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting bats such as river valleys, streams, hedgerows, lines of trees and woodland edge. Site is close to and connected to known roosts.



Appendix 3

Photographs of Protected Species which have been identified as having potential to be on site have been included within this section to aid in identification of wildlife found during periods when an Ecologist is not present on site.



Adder



Common lizard



Grass snake



Slow worm



Great crested newt