



# Reptile Precautionary Method Strategy

for

**Phase 2 (A & B),**

**Haverhill,**

**Suffolk**

on behalf of

**Persimmon Homes (Suffolk)**

**August 2020**

**Revision A: October 2020**

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34-52 Out Westgate, Bury St. Edmunds, Suffolk IP33 3PA  
tel: **01284 335797** email: [jamesblake@jba-landmarc.com](mailto:jamesblake@jba-landmarc.com)

**Chairman:** James Blake BA (Hons) Dip LA (Hons) CMLI

**Company Secretary:** Louise Blake BSc PGCE

**Directors:** Elzbieta Zebrowska MSc Eng LArch MScEnvSc CMLI : Kevin Slezacek DipArb MArborA

**Associate Directors:** Vivienne Jackson : Marie Lowe CIMA Cert BA

[www.jba-landmarc.com](http://www.jba-landmarc.com)

Registration no. 08169866 VAT no. 512 4127 91

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<p><b>Job Number:</b> JBA 18/351</p>		<p><b>JAMES BLAKE</b>  <span style="background-color: #4a697d; color: white; padding: 2px;">A S S O C I A T E S</span></p> <p><b>Title:</b> Reptile Precautionary Method Strategy for Phase 2 (A &amp; B), Haverhill, Suffolk</p>			

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*James Blake Associates Ltd have made every effort to meet the client's brief. However, no survey ensures complete and absolute assessment of the changeable natural environment. The findings in this report were based on evidence from thorough survey: It is important to remember that evidence can be limited, hard to detect or concealed by site use and disturbance. When it is stated that no evidence was found or was evident at that point in time, it does not mean that species are not present or could not be present at a later date: The survey was required because habitats are suitable for a given protected species, and such species could colonise areas following completion of the survey.*

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## Executive Summary

Reptile surveys of Phases 2A and 2B at Haverhill, Suffolk were carried out between the 5<sup>th</sup> of April and 22<sup>nd</sup> May 2019.

The site is currently unmanaged tall ruderal vegetation (previously active arable fields), providing good quality foraging habitat for reptiles. Hedgerows and scrub border the majority of the site boundaries and also run through the centre of Phase 2, dividing the site (Phase 2A and 2B).

No reptiles were recorded during the surveys visits in 2019 (JBA, 2019). However, a single record of slow worm (*Anguis fragilis*) was recorded during works on site in 2009 (JBA, 2018).

The development proposals are for residential housing with associated parking, landscaping and access.

It was considered that by following this precautionary method strategy, the development can proceed with minimal risk of harm to the potential population of slow worms using the site.

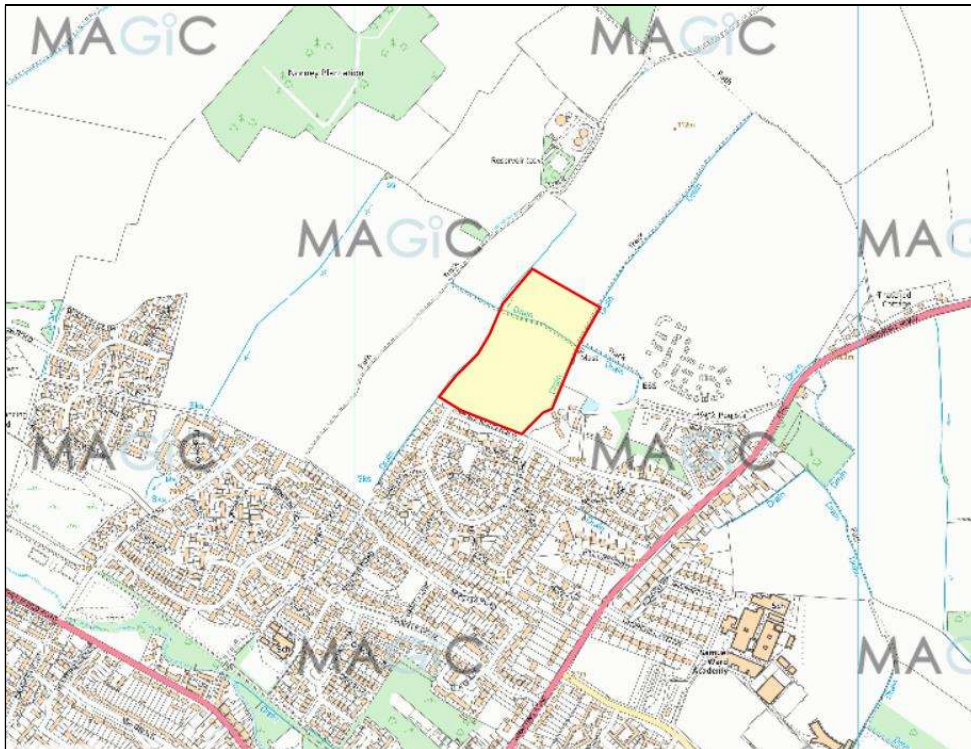
## 1 Introduction

### *Background*

- 1.1 James Blake Associates Ltd was commissioned by Persimmon Homes (Suffolk) to prepare a Reptile Precautionary Method Strategy for a proposed development site at Phase 2 (A&B) Haverhill, Suffolk.
- 1.2 The method statement details precautionary methods for the reptiles which may be utilising the proposed development site. No reptiles were recorded during the surveys between 5<sup>th</sup> April and 22<sup>nd</sup> May 2019 (JBA, 2019); however, a single record of slow worm was identified during works on site in 2009 (JBA, 2018) and it is therefore deemed appropriate to produce this method statement detailing reasonable avoidance measures and precautionary methods of working to ensure that any risk of harm to reptiles is minimised.
- 1.3 The development proposals are for residential housing with associated parking, landscaping and access.

### *Site Description*

- 1.4 The site is located to the west of Haverhill Road (A143), adjacent to Ann Suckling Road, north of Haverhill town, Suffolk. Ordnance Survey National Grid reference: TL 67341 46831 (take from the centre of Phase 2).
- 1.5 The site itself is currently unmanaged tall ruderal vegetation (previously active arable fields). Hedgerows and scrub border the majority of the site boundaries and also run through the centre of Phase 2, dividing the site (Phase 2A and 2B). A well-worn footpath has been made by dog-walkers around all boundaries of the site. See Figure 1 for site location.

**Figure 1:** Site location

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### *Relevant Legislation*

1.6 The smooth snake (*Coronella austriaca*) and sand lizard (*Lacerta agilis*) are fully protected under Schedule 5 of The Wildlife and Countryside Act (WCA) (1981), amended. As such they receive full protection under section 9 of this Act. They also are protected under Regulations 41/42 of The Conservation of Habitats and Species Regulations 2010. Collectively these pieces of legislation means that it is an offence to;

- intentionally kill, injure, disturb or take any individual of these species;
- intentionally take or destroy the eggs of any individual of these species;
- intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by any individual of these species;
- intentionally or recklessly disturb any individual of these species while it is occupying a structure which it uses for that purpose; and
- keep, transport, sell or exchange or offer for sale any individual of these species or anything derived from these species.

1.7 The likelihood of smooth snake or sand lizard being present is negligible.

- 1.8 The other native species of reptiles (common or viviparous lizard (*Zootoca vivipara*), adder (*Vipera berus*), grass snake (*Natrix helvetica*) and slow worm) are partially protected under Schedule 5 of the WCA (1981), as amended, under part of Section 9(1) and all of Sections 9(5). As such it is an offence to;
- intentionally kill or injure an individual of these species; and
  - transport for sale or exchange, or offer for sale or exchange a live or dead an individual or any part of an individual of these species.
- 1.9 The Conservation of Habitats and Species Regulations 2010 mean is it not a defence to show that the killing, capture or disturbance of a species covered by the Regulations or the destruction or damage of their breeding sites or resting places was the incidental and unavoidable result of a lawful activity.
- 1.10 All native reptiles species are Natural Environment and Rural Communities (NERC) Priority Species.

### *Reptile Ecology*

- 1.11 Slow-worms are a species of reptile native to the UK. Unlike birds and mammals, reptiles are unable to internally generate heat and regulate their body temperature. Instead, ambient temperature and the absorption of heat energy from the environment influence body temperature. Activity is not possible for reptiles until a critical minimum threshold temperature has been achieved, therefore reptiles are inactive when they are too cold and become dormant during the winter months ('hibernation'). Conversely, reptiles can become too hot and reach a critical maximum temperature threshold. During spells of very hot weather these reptiles seek shelter and become inactive, a state known as aestivation.
- 1.12 For reptiles to reach a critical minimum temperature, they will often seek out basking spots or refuges. Basking spots allow reptiles to receive the maximum heat from the sun's rays to warm up their internal body temperature and therefore allow them to forage. Basking in the open however increases the risk of predation. Basking behaviour is often adopted by grass snakes and common lizards. On breezy days, the wind chill can reduce the effectiveness of basking and on these days reptile species will often use refuges to warm their body temperatures instead. This behaviour is also favoured by slow-worms.
- 1.13 Reptiles require habitats with suitable basking spots, a good food supply and places to shelter. Typically, suitable habitats are often south facing inclines with rough grassland, heaths and woodland edges. Man-made habitats such as railway cuttings



and embankments, road verges, old industrial sites, overgrown gardens are also suitable. Sheltered sites are needed for night time refuge (when animals are inactive) and during the winter when animals hibernate. Dense vegetation, ground crevices and piles of vegetation, logs and rubble are used for shelter.

- 1.14 A licence from Natural England is not required for mitigation work but best practice and lawful standards should be followed. Methods follow standards set out by the Herpetofauna Groups of Britain and Ireland (HGBI, 1998).

## **2 Mitigation**

### *Summary of Mitigation Strategy*

- 2.1 The habitats on site to be potentially lost that could harbour reptiles are areas of tall ruderal vegetation, hedgerows and scrub and the boundary of Phases 2A and 2B. The aim of the mitigation strategy on site is to clear these areas (if required) and carry out the construction works using precautionary methods of working to avoid harm to any reptiles present and moving reptiles found out of harm's way.
- 2.2 The areas of potential habitat are well connected to other suitable areas in the wider landscape and is not deemed 'important' for the local reptile populations. However, retained areas of vegetation, as well as newly created areas of green infrastructure could provide suitable habitat for reptiles. No post-development monitoring is deemed necessary.
- 2.3 Potential enhancements have been given within this strategy to create more opportunities for reptile species on site post-development.

### *Habitat Clearance*

- 2.4 All vegetation clearance works will be undertaken when common reptiles are likely to be fully active (i.e. during March/April to October) to avoid any chance of disturbing reptiles during the sensitive hibernation period.
- 2.5 Clearance of taller vegetation would be undertaken using a strimmer or brush cutter in two parts; the first to 20-30cm high and left for at least 24 hours, the second cut will be close to the ground. The cuttings will be raked and removed the same day it is cut.
- 2.6 Clearance will take place from the centre of the vegetation towards retained habitats,



preferably at the site boundary; this is to allow any animals to disperse and move to adjacent habitats without getting trapped between works.

### *Care and Vigilance During Works*

- 2.7 Should any common reptiles be discovered during clearance or construction, which are likely to be impacted by the development, clearance or works will cease immediately. The site manager will then seek the advice of a suitably qualified and experienced ecologist and works will only proceed in accordance with the advice given by the ecologist.
- 2.8 Any reptiles found will be relocated by a suitably qualified and experienced ecologist to an area of retained habitat on the perimeter of the site or as close to the site as possible.
- 2.9 Any trenches left overnight will be covered or provided within ramps (or wildlife 'ladders') to prevent common reptiles and other animals (such as badger) being trapped.
- 2.10 Any building materials (such as bricks, stone etc.) that are to be stored on site will be stored on pallets to discourage reptiles from using them as shelter.

### *Enhancements*

- 2.11 A number of possible enhancements for the site are given below, however, these are not considered to be a legal requirement but should be a consideration towards the overall biodiversity of the site post-development:
- Proposed public open space (POS) areas could be networked to allow connectivity within the site and surrounding area.
  - A man-made hibernaculum could be incorporated within POS or boundary vegetation. This can be created simply and cheaply, with no or minimal maintenance requirements.
  - Additional log/rubble piles could be created; these will not only provide safe hibernation locations but will also provide basking spots for reptiles.
  - A grassland mosaic could be established: A low intensity management regime to promote a varied structure within the sward, providing a variety of thermal opportunities for reptiles.

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