



global environmental solutions

Anzio Camp, Leek

Ecological Assessment, Final Update Report

SLR Ref: 421-04017-00001

August 2014

Enhanced Developments Limited

Version: Rev 1

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## **1.0 INTRODUCTION**

### **1.1 Terms of Reference**

SLR Consulting Limited was commissioned by Enhanced Developments Limited to update ecology surveys at Anzio Camp, Leek, Staffordshire (approximate centre grid reference SK 007 590), throughout the summer of 2014.

The ecology of the site was originally assessed by Apex Ecology in 2006, with further work being undertaken by Andrew McCarthy Associates in 2008, and by SLR Consulting in 2012.

### **1.2 Site Context**

The Anzio Camp is a former army barracks, located to the east of the A53 Buxton Road; it is surrounded by pasture land with large woodland blocks and mature hedgerows. The site is located 1.5 km to the east of Tittesworth Reservoir, north of Leek, and is located on the southern boundary of the Peak District National Park.

## **2.0 METHODOLOGY**

### **2.1 Desk Study**

Desk study data from Staffordshire Ecological Record (the local environmental records centre for Staffordshire) was purchased for the site and 2 km radius around the site boundary, identifying all statutory and non statutory sites, and all protected and notable species, in 2012.

### **2.2 Flora**

#### *Habitats*

The habitat survey and mapping exercise undertaken by SLR Consulting in 2012 was updated by Dale Broadbent BSc (Hons) MIEEM, an experienced ecologist with SLR Consulting, on 2 June 2014, following the standard Phase 1 Habitat survey methodology (JNCC, 2007).

### **2.3 Fauna**

Habitats and features with potential to support protected and/ or conservation priority fauna species, together with any field signs of such species, were recorded on the field map using target notes (relevant details are reproduced on the digitised plan in Drawing ANZ-HAB).

#### **2.3.1 Badger**

During the site visit any field sign of badger activity (tracks, prints, setts, snuffle holes or latrines) was noted.

### **2.3.2 Bats**

#### **Building Inspections**

The building inspection, to search for bats and signs of bats, was undertaken by SLR staff Dale Broadbent (Natural England Bat Licence 20114467) and John Mason on 2 June 2014.

Buildings were inspected for field evidence of roosting bats including droppings, urine staining, feeding remains, potential roosting/ access points and individual bats. Where necessary, an endoscope was used to facilitate the inspection of crevices. While all buildings were checked externally, an internal inspection of some buildings was not possible for health and safety reasons, due to their unstable nature.

The criteria for building assessment and grading (as well as that for trees) can be found in Appendix B.

#### **Evening Emergence & Dawn Survey**

Evening and dawn bat detector surveys were undertaken by Licensed Ecologists with SLR Consulting during July 2014; survey dates, weather conditions and the buildings covered on each survey are displayed in Table 3-2.

Evening emergence surveys commenced 15 minutes before sunset and continued until 2 hours after sunset. Dawn surveys commenced 1.5 hours before sunrise and ended at sunrise. The surveyors were strategically positioned around the buildings so as to be able to observe any bats, if present, leaving or entering their roost. All observed bat passes were recorded on a detailed plan of the site; noting the time, the location and, where possible, the direction of flight, species and behaviour of the bat (i.e. commuting, foraging, social calling). Particular importance was placed on searching for possible bat access/ egress points. Surveyors were equipped with a Duet (Batbox Ltd.) combined frequency division and heterodyne bat detector, or Petterson D 240x (Petterson Elektronik AB, Uppsala, Sweden): Heterodyne and time expansion detector, connected to a creative Zen Nano digital recording device.

Temperature, wind speed/ direction and cloud cover were recorded at the beginning and end of the survey.

### **2.3.3 Birds**

During the site visit and building inspections a search for evidence of nesting birds and general bird activity was undertaken and recorded on the Phase 1 map as target notes.

### **2.3.4 Reptiles**

Forty heat refuges (0.5 x 0.5m square pieces of bitumen roofing felt) were deployed in suitable habitat (i.e. rough grassland habitats along hedge banks and between scattered scrub) on 2 June 2014.

After allowing a suitable amount of time for the refuges to 'bed in', they were subsequently checked for reptiles on seven occasions within June, July and August 2014.

Each reptile survey visit was conducted in appropriate weather conditions (temperature between 14 °C and 24 °C, with intermittent or hazy sunshine, little or no wind and no

persistent rainfall), either in the morning or late afternoon, so as to maximise the likelihood of finding basking reptiles.

As well as checking the heat refuges, a passive reptile survey was undertaken during each visit. This involved looking for reptiles at existing suitable basking and refuge locations around the site, such as rocks, rubble, discarded metal sheets, logs and ant hills.

## **2.4 Limitations**

### **2.4.1 *Field Survey***

Access to the roof voids of allof the buildings, and the rest of the interior of most buildings, was not possible due to safety considerations. Water seepage had rotted roof beams,since the inspection of 2012, posing a potential health risk to the surveyors. However, this is not considered to be a significant limitation, as the roof voids themselves are unlikely to support roosts, due to the missing tiles and water damage.

### **Quality Assurance & Environmental Management**

The surveyor is a member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and follows the Institute's code of professional conduct when undertaking ecological work.

## 3.0 RESULTS

### 3.1 Desk Study

The desk study is data is contained within the Anzio Camp Ecological Assessment Final Update Report, 2012, written by SLR Consulting.

### 3.2 Field Survey

#### 3.2.1 Overview

The site consisted of a series of buildings surrounded by grassland, with scattered scrub, mature trees and overgrown borders.

The results of the Phase 1 Habitat Survey are illustrated in map form (Drawing ANZ HAB1) with associated target notes listed in Appendix A.

#### 3.2.2 Habitats

##### Semi Improved Grassland

The areas of grassland surrounding the buildings remain as a mixture of species poor semi-improved grassland, and marshy grassland, as was the case in 2012, although there is evidence of an increase in orchid numbers, particularly in the vicinity of Buildings B7, B8 and B9. The grassland is dominated by creeping bent *Agrostis stolonifera*, and fescue *Festuca sp.* grasses, with lesser amounts of dandelion *Taraxacum officinale* agg, meadow fox tail *Alopecurus pratensis*, Yorkshire fog *Holcus lanatus*, broad leaved dock *Rumex obtusifolius*, cuckooflower *Cardamine pratensis*, hogweed *Heracleum sphondylium* and occasional common spotted orchid *Dactylorhiza fuchsii*.

Interspersed within the grassland surrounding the buildings are a large number of semi mature trees, surrounded by secondary regeneration, including willow *Salix sp.*, field maple *Acer campestre*, oak *Quercus robur*, beech *Fagus sylvatica* and silver birch *Betula pendula*. The areas of scattered scrub and tree coverage on the site continues to show expected levels of regeneration. Three of these trees (the two beech trees denoted by target note 4 and the tree containing a woodpecker hole, denoted by Target Note 2) have High potential for roosting bats. All other trees are currently of negligible potential for roosting bats.

The grassland within the Anzio Camp Site of Biological Importance (SBI) in the east of the site is unmanaged and dominated by creeping bent, with lesser amounts of cocksfoot *Dactylis glomerata*, common sorrel *Rumex acetosa* and cuckooflower. This area shows an increase in coarse grass species and lower floristic diversity than in the 2012 survey.

##### Marshy Grassland

The area of marshy grassland located in the north of the site is unmanaged and consists of patches of sedge *Carex sp.* and grass species including Yorkshire fog, sweet vernal grass *Anthroxanthum odoratum*, soft rush *Juncus effusus*, hard rush *Juncus Inflexus*, cocksfoot and fescue grasses, with broad leaved dock, common sorrel, dandelion, and cuckooflower; the area is unmanaged and has remained largely unchanged since the 2012 survey.

## Non Native Scrub

The herbaceous borders have become dominated by the non-native shrubs consisting of cotoneaster *Cotoneaster horizontalis*, buddleia *buddleija davidii*, burberis *Berberis sp* and Rhododendron *Rhododendron sp*.

### **3.2.3 Badger**

Badger tracks were located in the east of the site, within the SBI boundary; a badger snuffle hole was also observed in the north-west corner of the site. No evidence of badger latrines or setts were found on site.

### **3.2.4 Bats**

The buildings have continued to degrade, due to weather damage, but remain in a broadly comparable condition to the 2012 survey.

#### **3.2.4.1 Building Inspections**

**Table 3-1  
Building Inspection Results**

|                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |  |
|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <p><b>Building B1</b></p>        |                                                                                                                                                                                                                                                                                                                                                                                                 |  |
| <p><b>Moderate Potential</b></p> | <p>Description:<br/>A single storey brick building with a double pitch clay tile roof. The windows and doors are open. The brickwork is in good condition with no cracks, crevices or eroded mortar joints. The roof is of modern construction with a bitumastic membrane beneath the tiles.</p> <p>Potential Roosting Features:<br/>- Slipped and broken roofing tiles</p> <p>Evidence of Bat Activity in 2012:<br/>- None</p> <p>Evidence of Bat Activity in 2014:<br/>- None</p> |  |

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**Building B2**



**Moderate  
Potential**

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**Description:**

A single storey brick building with a double pitch clay tile roof. The windows and doors are open. The brickwork is in good condition with no cracks, crevices or eroded mortar joints. The roof is of modern construction with a bitumastic membrane beneath the tiles.

---

**Potential Roosting Features:**

- Slipped and broken roofing tiles

---

**Evidence of Bat Activity in 2012:**

- None

**Evidence of Bat Activity in 2014:**

- None
- 

---

**Building B3**



**Moderate  
Potential**

---

**Description:**

A single storey brick building with a double pitch clay tile roof. The windows and doors are open. The brickwork is in good condition with no cracks, crevices or eroded mortar joints. The roof is of modern construction with a bitumastic membrane beneath the tiles. An internal inspection was not possible due to health and safety considerations

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**Potential Roosting Features:**

- Slipped and broken roofing tiles
- Holes into soffit box

---

**Evidence of Bat Activity in 2012:**

- None

**Evidence of Bat Activity in 2014:**

- None
-



**Building B4**

**Moderate/High  
Potential**

**Description:**

A single storey brick building with a double pitch clay tile roof. The windows and doors are open. The brickwork is in good condition with no cracks, crevices or eroded mortar joints. The roof is of modern construction with a bitumastic membrane beneath the tiles. An internal inspection was not possible due to health and safety considerations

**Potential Roosting Features:**

- Slipped and broken roofing tiles
- Gaps into soffit box
- Holes into cavity wall

**Evidence of Bat Activity in 2012:**

- None

**Evidence of Bat Activity in 2014:**

- None



**Building B5**

**Confirmed  
Roost in 2012**

**Confirmed  
Roost in 2006**

**Description:**

A two storey brick building with a multiple pitched clay tile roof. The brickwork is in good condition; though the roof has been broken open in many locations. The roof is of modern construction with a bitumastic membrane beneath the tiles. An internal inspection was not possible due to health and safety considerations

**Potential Roosting Features:**

- Slipped and broken roofing tiles
- Gaps into soffit box
- Some lead flashing remains on the eastern aspect

**Evidence of Bat Activity in 2012:**

- Common pipistrelle observed emerging during dusk survey in 2012

**Evidence of Bat Activity in 2014:**

- None

---

**Building B6**

**Moderate  
Potential**



**Confirmed  
roost in 2006**

**Confirmed  
roost in 2012**

**Description:**

A two storey brick building with a multiple pitched clay tile roof. The brickwork is in good condition; though the roof has been broken open in many locations. The roof is of modern construction with a bitumastic membrane beneath the tiles. An internal inspection was not possible due to health and safety considerations

**Potential Roosting Features:**

- Slipped and broken roofing tiles
- Gaps into soffit box

**Evidence of Bat Activity in 2012:**

- None

**Evidence of Bat Activity in 2014:**

- 2 Common pipistrelle bats observed emerging during dusk survey and re-entering during dawn survey
- 

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**Building B7**

**Moderate  
Potential**



**Confirmed  
roost in 2006**

**Description:**

A two storey brick building with a multiple pitched clay tile roof. The brickwork is in good condition; though the roof has been broken open in many locations. The roof is of modern construction with a bitumastic membrane beneath the tiles. An internal inspection was not possible due to health and safety considerations

**Potential Roosting Features:**

- Slipped and broken roofing tiles

**Evidence of Bat Activity in 2012:**

- None

**Evidence of Bat Activity in 2014:**

- None
-

---

**Building B8**

**Confirmed  
Roost in 2012**



**Confirmed  
Roost in 2006**

**Description:**

A two storey brick building with a multiple pitched clay tile roof. The brickwork is in good condition; though the roof has been broken open in many locations. The roof is of modern construction with a bitumastic membrane beneath the tiles. An internal inspection was not possible due to health and safety considerations

**Potential Roosting Features:**

- Slipped and broken roofing tiles

**Evidence of Bat Activity in 2012:**

- Common pipistrelle observed entering roost during dawn survey

**Evidence of Bat Activity in 2014:**

- None
- 

---

**Building B9**

**Confirmed  
Roost in 2012**



**Description:**

A two storey brick building with a multiple pitched clay tile roof. The brickwork is in good condition; though the roof has been broken open in many locations. The roof is of modern construction with a bitumastic membrane beneath the tiles. An Internal inspection was not possible due to health and safety considerations

**Potential Roosting Features:**

- Slipped and broken roofing tiles

**Evidence of Bat Activity in 2012:**

- Common pipistrelle observed entering roost during dawn survey

**Evidence of Bat Activity in 2014:**

- None
-

---

**Building B10**

**Moderate  
Potential**



**Confirmed  
roost in 2006**

---

**Description:**

A two storey brick building with a multiple pitched clay tile roof. The brickwork is in good condition; though the roof has been broken open in many locations. The roof is of modern construction with a bitumastic membrane beneath the tiles. An internal inspection was not possible due to health and safety considerations

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**Potential Roosting Features:**

- Slipped and broken roofing tiles

---

**Evidence of Bat Activity in 2012:**

- None

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**Evidence of Bat Activity in 2014:**

- None
- 

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**Building B11**

**Moderate  
Potential**



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**Description:**

A one and two storey brick building with a single pitched clay tile roof. The brickwork is in good condition; though the roof has been broken open in many locations. The roof is of modern construction with a bitumastic membrane beneath the tiles. An internal inspection was not possible due to health and safety considerations.

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**Potential Roosting Features:**

- Slipped and broken roofing tiles

---

**Evidence of Bat Activity in 2012:**

- None

---

**Evidence of Bat Activity in 2014:**

- None
-

---

**Building B12**



**Confirmed  
maternity  
roost in 2006**

**Confirmed  
roost in 2012**

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**Description:**

A single storey brick building with a multiple pitched clay tile roof. The brickwork is in good condition; though the roof has been broken open in many locations. The roof is of modern construction with a bitumastic membrane beneath the tiles. The roof is of modern construction with metal beams and wooden joists, light levels were high, and the roof void was cool and drafty due to the number of holes in the roof.

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**Potential Roosting Features:**

- Slipped and broken roofing tiles
- Wooden soffit box on northern aspect

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**Evidence of Bat Activity in 2012:**

- Two droppings consistent with common pipistrelle were found in the roof void. The droppings appeared quite old

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**Evidence of Bat Activity in 2014:**

- None
- 

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**Building B13**



**Moderate  
Potential**

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**Description:**

A single storey brick building with a single pitched clay tile roof. The brickwork is in good condition; though the roof has been broken open in many locations. The roof is of modern construction with a bitumastic membrane beneath the tiles. The roof void was cluttered with numerous wooden joists and metal beams, light levels were high and the roof void was cool and drafty.

---

**Potential Roosting Features:**

- Slipped and broken roofing tiles

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**Evidence of Bat Activity in 2012:**

- None

---

**Evidence of Bat Activity in 2014:**

- None
-

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**Building B14**

**Moderate  
potential**



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**Description:**

A single storey brick building with a multiple pitched clay tile roof. The brickwork is in good condition; though the roof has been broken open in many locations. The roof is of modern construction with a bitumastic membrane beneath the tiles. An Internal inspection was not possible due to health and safety considerations

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**Potential Roosting Features:**

- Slipped and broken roofing tiles

---

**Evidence of Bat Activity in 2012:**

- None

---

**Evidence of Bat Activity in 2014:**

- None
- 

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**Building B15**

**Negligible  
Potential**



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**Description:**

A single storey brick building with a flat concrete roof. The brickwork is in good condition. Light levels within the building were low to moderate.

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**Potential Roosting Features:**

- None

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**Evidence of Bat Activity in 2012:**

- None

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**Evidence of Bat Activity in 2014:**

- None
-

**Building B16**  
**Negligible**  
**Potential**



**Description:**

A single storey metal skin building, with a single pitched metal roof.

**Potential Roosting Features:**

- None

**Evidence of Bat Activity in 2012:**

- None

**Evidence of Bat Activity in 2014:**

- None

**Building B17**

**Moderate /**  
**High Potential**



**Description:**

A single storey prefabricated concrete building with a pitched clay tile roof and hanging tiles on the east and west aspects. The building is in poor condition and the roof appears to be unstable, preventing any internal inspections.

**Potential Roosting Features:**

- Slipped and broken roofing tiles
- Hanging tiles on east and west aspects

**Evidence of Bat Activity in 2012:**

- None

**Evidence of Bat Activity in 2014:**

- None

### 3.2.4.2 Dusk and Dawn Activity Surveys During 2014

**Table 3-2**  
**Survey Dates, Weather Conditions and Buildings Covered**

| Date                      | Weather conditions                                                                       | Coverage               |
|---------------------------|------------------------------------------------------------------------------------------|------------------------|
| 2/7/14<br>Dusk<br>Survey  | Start:<br>Temp: 16, Cloud 5/8 Wind 2, Dry<br>Finish:<br>Temp: 15, Cloud 7/8, Wind 1, Dry | B1, B2, B3, B4, B12    |
| 3/7/14<br>Dawn<br>Survey  | Start: Temp 15, Cloud 8/8 Wind 1, Dry<br>Finish: Temp 15 Cloud 8/8 Wind 1, Dry           | B9, B10, B13, B14, B17 |
| 30/7/14<br>Dusk<br>Survey | Start: Temp 13, cloud 3/8, wind 2, Dry<br>Finish: Temp 10, cloud 3/8, Wind 1, Dry        | B5, B6, B7, B8         |
| 31/7/14<br>Dawn<br>Survey | Start: Temp 10, cloud 5/8 Wind 1 Dry<br>Finish: Temp: 11, cloud 4/8 Wind 2, Dry          | B5, B6, B9, B10,       |

Bat activity surveys in 2014 identified one roost in Building B6, involving two common pipistrelle bats *Pipistrellus pipistrellus*. In addition common pipistrelle *Pipistrellus pipistrellus* were recorded foraging on the site, particularly in the vicinity of Buildings B4, B6, B7, B9, B11 and B12.

### 3.2.5 Birds

Nesting swallow *Hirundo rustica* were recorded breeding in Building B12.

### 3.2.6 Great Crested Newt

The south east corner of the site formerly supported a wet ditch surrounded by willow and alder trees, this has now dried up completely. As there is no standing water on or near the site, there does not appear to be any scope to impact upon great crested newt.

### 3.2.7 Reptiles

The results of the reptile survey are detailed in Table 3-4 below. No reptiles were recorded during the seven visits; though a number of common toads *Bufo bufo* were recorded taking shelter beneath the refuges. Drawing ANZ-REP shows the locations of the reptile refugia.

**Table 3-1**  
**Reptile Survey Results**

| Visit | Date    | Temp | Cloud  | Weather       | Results     | Additional Notes |
|-------|---------|------|--------|---------------|-------------|------------------|
| 1     | 09-June | 15   | 2 of 8 | sunny         | No reptiles | 3 toad           |
| 2     | 16-June | 18   | 3 of 8 | hazy sunshine | No reptiles |                  |
| 3     | 30-June | 14   | 1 of 8 | sunny         | No reptiles | 4 toad           |
| 4     | 03-July | 18   | 2 of 8 | hazy sunshine | No reptiles | 2 toad           |
| 5     | 11-July | 19   | 1 of 8 | hazy sunshine | No reptiles | 1 toad           |
| 6     | 22-July | 19   | 2 of 8 | sunny         | No reptiles |                  |
| 7     | 7-Aug   | 17   | 3 of 8 | hazy sunshine | No reptiles | 3 toad           |

## **4.0 RELEVANT LEGISLATION & POLICY<sup>1</sup>**

### **4.1 Legislation**

#### **4.1.1 Habitat Regulations**

The Conservation of Habitats and Species Regulations 2010 transpose Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (Habitats Directive) into English law, making it an offence to deliberately capture, kill or disturb<sup>2</sup> wild animals listed under Schedule 2 of the Regulations. It is also an offence to damage or destroy a breeding site or resting place of such an animal (even if the animal is not present at the time).

#### **4.1.2 Wildlife & Countryside Act**

The Wildlife and Countryside Act 1981, as amended by the Countryside and Rights of Way Act (CROW) 2000 and the Natural Environment and Rural Communities Act (NERC) 2006, consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council Directive 79/409/EEC on the Conservation of Wild Birds (Birds Directive), making it an offence to:

- Intentionally kill, injure or take any wild bird or their eggs or nests (with certain exceptions) and disturb any bird species listed under Schedule 1 to the Act, or its dependent young while it is nesting;
- Intentionally kill, injure or take any wild animal listed under Schedule 5 to the Act; intentionally or recklessly damage, destroy or obstruct any place used for shelter or protection by any wild animal listed under Schedule 5 to the Act; intentionally or recklessly disturb certain Schedule 5 animal species while they occupy a place used for shelter or protection;
- Pick or uproot any wild plant listed under Schedule 8 of the Act.

#### **4.1.3 Natural Environment & Rural Communities Act**

The NERC 2006 places a duty on authorities to have due regard for biodiversity and nature conservation during the course of their operations.

### **4.2 Policy**

#### **4.2.1 National Planning Policy Framework (NPPF)**

The NPPF supersedes PPS9 and lays out current government policy on sustainable development including considerations towards biodiversity and nature conservation and places a duty on planners to make material consideration to the effect of a development on legally protected species when considering planning applications.

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<sup>1</sup> Please note that this legal information is a summary and intended for general guidance only. The original legal documents should be consulted for definitive information. Web addresses providing access to the full text of these documents are given in the References & Bibliography section.

<sup>2</sup> Disturbance, as defined by the Conservation of Habitats and Species Regulations 2010, includes in particular any action which impairs the ability of animals to survive, breed, rear their young, hibernate or migrate (where relevant); or which affects significantly the local distribution or abundance of the species.

#### **4.2.2 Biodiversity Action Plans**

The UK Biodiversity Action Plan (UKBAP) (Anon, 1995) was organised to fulfil the Rio Convention on Biological Diversity in 1992, to which the UK is a signatory. A list of national priority species and habitats has been produced with all listed species/habitats having specific action plans defining the measures required to ensure their conservation. Regional and local BAPs have also been organised to develop plans for species/habitats of nature conservation importance at regional and local levels.

#### **4.2.3 Local Structure Plans**

County, District and Local Councils have Structure Plans and other policy documents that include targets and policies which aim to maintain and enhance biodiversity. These are used by Planning Authorities to inform planning decisions.

## 5.0 DISCUSSION & RECOMMENDATIONS

### 5.1 Habitats

The habitats on site have not changed significantly since 2012; the continued lack of management has allowed a more diverse grassland sward to develop on the former amenity grassland in the western part of the site. It has also led to a significant increase in the amount of scrub on the site, as a whole. The area of marshy grassland in the north of the site has remained largely unchanged, while the area of grassland within the SBI in the east has become dominated by coarse grass species, which has reduced the species diversity since 2012.

It is recommended that a site management plan is formulated to promote the management of the Anzio Camp SBI and the site vegetation. It is advised that the management plan is drawn up in consultation with the Local Authority and the local Wildlife Trust to meet identified objectives for the SBI.

### 5.2 Protected Species

#### Bats

A climb-and-inspect assessment by a competent tree climber under the supervision of a licensed bat worker, or a series of dusk / dawn bat detector surveys, is recommended for the two beach trees (TN4) and the tree containing the woodpecker hole (TN2) if these trees are to be lost as part of the development. If there is no evidence of bat activity the trees should be sensitively felled in sections within 24 hours of the inspection / surveys. The cord wood should be left in situ for a further 24 hours before being cleared, or potentially moved to the SBI, in order create piles of dead wood habitat. If any of the trees are found to support roosting bats, it will most likely be necessary to obtain a European Protected Species (EPS) licence, before the tree/ trees concerned can be felled.

The buildings on site were found to support fewer roosts during 2014, than in 2012, most probably as a result of the natural degradation that the buildings have experienced since the last survey. Bat activity on the site indicates that it is still a valuable foraging resource for local bat populations, and as such, as much of the existing tree cover should be retained, and any that is lost, should be replaced elsewhere. All bat roosting locations recorded during the 2006, 2012 and 2014 surveys are illustrated in drawing ANZ-ROOST1.

Before any of the buildings historically or currently supporting roosts can be demolished or stripped, it will be necessary to obtain a European Protected Species Licence (EPSL) from Natural England. Such applications detail the methods of demolition and the levels of mitigation that will be installed to compensate for the loss of on-site roosts. Natural England take up to, and sometimes in excess of, 30 working days, to determine such applications, and these licences can only be issued once detailed planning permissions are obtained, or unless the site is unsafe and posing a threat to the public (including those members of public trespassing on the site, if they cannot feasibly be prevented from doing so).

#### Consideration of the Three Tests

Local Authorities now need to consider the “Three Tests” when determining planning applications. Test 1 relates to justifying the proposed development, providing a “reason of overriding public interest”. Test two is the “No Satisfactory Alternative Test” in which you need to demonstrate that all reasonable alternative options, including the “do nothing approach” have been considered, and discounted. Test 3 is concerned with the

maintenance of the resident bats at “favourable conservation status” in their natural range.” It is this final test that is addressed below:

### Demolition Works

**Once the EPSL is acquired**, and before demolition or site stripping works can start, all confirmed roosting locations (dating from 2006 onwards) will need to be exhaustively searched by a licensed bat ecologist, using an endoscope, and where possible (i.e. where the search is comprehensive, and no bats are found to be present) sealed or dismantled (preventing them from being used by roosting bats in the future). Where an exhaustive search is not possible, one way exclusion devices may need to be installed (which allow bats to vacate their roosts, but prevent them from returning). After these devices have been *in situ* for five nights of good weather, careful demolition of that part of the building may take place. This will entail the removal, by hand, of all tiles and/ or other features which could potentially conceal roosting bats, on/ in the buildings, before the main phase of demolition may proceed. A tool box talk would need to be provided by a licensed ecologist to ensure the safety of the workforce and the welfare of any roosting bats. Buildings assessed as having negligible bat roost potential can be demolished with no restrictions.

### Enhancement and Mitigation Recommendations

The mitigation scheme proposed in the Ecological Assessment, produced by SLR Consulting in 2012, was designed on the basis of the bat assemblage and bat roosts present at that time. Although the number of roosts found in the 2014 update surveys has reduced to just one, it is recommended that the measures proposed in 2012 are left unchanged. .

All recommended bat enhancement and mitigation is summarised in Table 5-1 below

**Table 5-1**  
**Recommended Enhancement and Mitigation Provision**

| <b>Mitigation Measures</b>                          | <b>Number</b>             |
|-----------------------------------------------------|---------------------------|
| Schwegler 2F Bat Box (to be tree mounted)           | 6                         |
| Schwegler 2F-DFP Bat Box (to be tree mounted)       | 6                         |
| Schwegler 1FS Colony Bat Box (to be tree mounted)   | 3                         |
| Oak double Chambered Bat Box (to be tree mounted)   | 5                         |
| <b>Enhancement Measures</b>                         |                           |
| Schwegler 1FW Hibernation Box (inside Building B15) | 2                         |
| Exterior Fascia Boarding                            | Around building perimeter |
| Interior Roosting Features                          | 8                         |

### Birds

The site offers a wide range of bird nesting opportunities, both within the buildings and in surrounding scrub and woodland. Nesting birds are protected, and if possible all demolition works and scrub clearance should be scheduled to avoid the main bird breeding season, which for most species extends between March and August inclusive. If this cannot be achieved it will be necessary to undertake a nesting bird check immediately before works commence, and if any active nests are found, these would need to be left until the young have fledged. As compensation for the loss of nesting opportunities resulting from building demolition and scrub clearance, it is recommended that the following nesting boxes should be provided.

**Table 5-2  
Proposed Nest Boxes**

| <b>Nest Box</b>                                                    | <b>Number</b> |
|--------------------------------------------------------------------|---------------|
| Kestrel Box                                                        | 2             |
| Barn Owl Nest Box                                                  | 2             |
| Sparrow terraces                                                   | 3             |
| Hole fronted bird Boxes (suitable for both blue tit and great tit) | 8             |
| Swallow Nesting Cups                                               | 5             |

The swallow nesting cups should be located within Building B15, while the sparrow terraces should be installed on the outside of this building. The hole fronted bird boxes, kestrel and barn owl boxes should be positioned under the advice of a suitably experienced ecologist.

## **6.0 CLOSURE**

This report has been prepared by SLR Consulting Limited with all reasonable skill, care and diligence, and taking account of the manpower and resources devoted to it by agreement with the client. Information reported herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of Enhanced Developments Limited; no warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR.

SLR disclaims any responsibility to the client and others in respect of any matters outside the agreed scope of the work.

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[www.naturalareas.naturalengland.org.uk](http://www.naturalareas.naturalengland.org.uk) (Accessed 12/04/2012)

*Web addresses for access to full UK legislation and policy text:*

Conservation of Habitats and Species Regulations 2010:

[http://www.opsi.gov.uk/si/si2010/uksi\\_20100490\\_en\\_1](http://www.opsi.gov.uk/si/si2010/uksi_20100490_en_1)

Habitats Directive:

[www.europa.eu.int/eur-lex/en/lif/dat/1992/en\\_392L0043](http://www.europa.eu.int/eur-lex/en/lif/dat/1992/en_392L0043)

Birds Directive:

[eur-lex.europa.eu/LexUriServ/site/en/consleg/1979/L/01979L0409-20070101-en](http://eur-lex.europa.eu/LexUriServ/site/en/consleg/1979/L/01979L0409-20070101-en)

Wildlife and Countryside Act 1981:

[www.opsi.gov.uk/RevisedStatutes/Acts/ukpga/1981/cukpga\\_19810069\\_en\\_1](http://www.opsi.gov.uk/RevisedStatutes/Acts/ukpga/1981/cukpga_19810069_en_1)

Countryside and Rights of Way Act 2000:

[www.legislation.hmso.gov.uk/acts/acts2000/20000037](http://www.legislation.hmso.gov.uk/acts/acts2000/20000037)

Natural Environment and Rural Communities Act 2006:

[http://www.opsi.gov.uk/acts/acts2006/ukpga\\_20060016\\_en\\_1](http://www.opsi.gov.uk/acts/acts2006/ukpga_20060016_en_1)

Protection of Badgers Act 1992:

[http://www.opsi.gov.uk/ACTS/acts1992/ukpga\\_19920051\\_en\\_1](http://www.opsi.gov.uk/ACTS/acts1992/ukpga_19920051_en_1)

National Parks and Access to the Countryside Act 1949:

[http://www.opsi.gov.uk/RevisedStatutes/Acts/ukpga/1949/cukpga\\_19490097\\_en\\_1](http://www.opsi.gov.uk/RevisedStatutes/Acts/ukpga/1949/cukpga_19490097_en_1)

National Planning Policy Framework 2012

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf>

## APPENDIX A – TARGET NOTES

| Number | Note                                                                                                                                      |
|--------|-------------------------------------------------------------------------------------------------------------------------------------------|
| TN1    | Swallows nesting inside of Building B12                                                                                                   |
| TN2    | Woodpecker hole in tree. The tree has been assessed as being a Category 1 tree for its bat roost potential due to the woodpecker hole.    |
| TN3    | Small area (approx 10m X 15m) of Species Poor Neutral Grassland, dominated by red fescue and creeping bent with common vetch and yarrow . |
| TN4    | Two mature beech trees assessed as being a category 1* (High) for bat roost potential due to hollow cavities.                             |

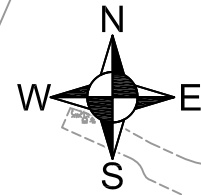
## APPENDIX B – BUILDING AND TREE GRADING SYSTEM

It should be noted that the grading system below only reports on the situation at the time of survey; should bat activity levels change after the initial survey, or should the trees/ buildings/ structures be modified (for example if roof tiles are removed or fascia boards develop cracks), the category may need revision. Generally speaking, assessments are considered to be valid for 12 months.

| Building/<br>Structure<br>Category<br>(Potential Value in<br>Summer) | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|----------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| No/negligible value<br><br>(Category 3 trees)                        | <p>Buildings with no or very few features capable of supporting roosting bats. Most buildings in this category tend to be 'sound' well-sealed structures (with no or very few potential bat access points), or have a single prefabricated steel or sheet material skin and no separate roof void. They tend to have high interior and/ or exterior light-levels, and be cool, with little or no insulation; they may be subject to regular disturbance. They may be within a highly urbanised location, within cities for example, with no obvious 'connectivity' or potential bat flight lines between the building and suitable foraging habitat. Buildings without any roofs may also fall into this category.</p> <p>Trees with no potential to support roosting bats.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Low value<br><br>(Category 2 trees)                                  | <p>Buildings without features with potential to support a significant roost, but with a small number of 'opportunistic' features capable of supporting a small number of roosting bats, most likely common pipistrelles (perhaps due to a very urban setting). Buildings within this category may contain a small number of gaps above windows a small number of slipped or missing roof or hanging tiles, a cavity between tiles and underfelt, or small numbers of apparently shallow crevices, for example). Buildings in this category do not have potential to support, for example, a maternity colony (including of common pipistrelles), large numbers of hibernating bats, or a significant transitory roost. Buildings within this category may be surrounded by poor or sub-optimal bat foraging habitat, with few mature trees, little parkland, woodland or wetland within circa 400 metres, and have few bat flight lines/ 'broken' connectivity to such habitats, as is often the case with urbanised (such as town or city centre) locations.</p> <p>Trees with no obvious potential, although the size and/ or age of the tree suggests it may contain cracks and crevices. The tree may support some features which could have limited potential to support small numbers of bats.</p> |
| Moderate value<br><br>(Category 1 trees)                             | <p>Buildings usually of brick or stone construction with a large number of features of obvious potential to roosting bats e.g. loose roof / ridge tiles, gaps in brickwork, gaps under fascia boards, and/or warm sealed roof-spaces with under-felt. Buildings falling into this category would not be expected to support a maternity colony, or significant hibernation or transitory roost. For example, whilst a large number of potential roosting features and bat access points may exist, the building may be externally lit, be subject to regular disturbance, be draughty and cold, have a cluttered roof void, or not have good connectivity with high quality bat foraging habitat within circa 400 metres. Nonetheless, they may have some</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

| Building/<br>Structure<br>Category<br>(Potential Value in<br>Summer) | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                      | <p>potential to support small roosts, of more than one bat species (i.e. not just potential to support small numbers of common pipistrelle).</p> <p>Trees with definite bat potential, but not considered likely to support large numbers of bats.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <p>High value<br/>(Category 1* trees)</p>                            | <p>Buildings with a large number of features of likely significance to bats (such as extensive areas of 'lifted' fascia boards and/ or a large number of gaps beneath weather boarding or roof/ hanging tiles), suggesting it may be used either as a maternity colony, a hibernation site for large numbers of bats, or as a significant transitory roost. Buildings within 'core areas' of greater horseshoe, lesser horseshoe, barbastelle or Bechstein's distribution would generally fall into this category, if they have potential to support roosts of these species (including significant 'night roosts'). Buildings falling into this category may include those with brick or stone construction with exposed wooden beams (generally &gt;20 cm wide roof timbers with mortice joints, cracks and holes) and a dark, uncluttered roof void; buildings with damp, dark cellars containing a large number of crevices; and buildings close to and with good connectivity with woodland and/ or water bodies may also have High intrinsic value. Caves; tunnels; mines; ice-houses; military fortifications; churches; bridges (particularly over water); follies and viaducts/ aqueducts, and underground ducts may also, depending on their construction and location, also have High bat potential.</p> <p>Trees with multiple, highly suitable features capable of supporting larger roosts.</p> |
| <p>Confirmed roost</p>                                               | <p>Bats discovered roosting within a building or tree, or recorded emerging from / entering the building / tree at dusk and / or dawn, or building / tree found to contain conclusive evidence of occupation by bats, such as bat droppings. A confirmed record (as supplied by an established source such as the local bat group) would also apply to this category.</p> <p>The intrinsic nature conservation value of the roost (i.e. the value of the 'receptor') will depend upon the bat species roosting within it, the number of bats, and their seasonality of use (for example, a maternity colony would generally be of higher intrinsic value than a transitory roost). Furthermore, the 'setting' of the roost may influence its value, for example, a transitory roost of common pipistrelles in a city centre location may be ascribed greater value than a similar roost in a rural location.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

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- LEGEND
- EXISTING TREES
  - MARSHY GRASSLAND
  - SEMI IMPROVED NEUTRAL GRASSLAND
  - POOR SEMI-IMPROVED GRASSLAND
  - DENSE SCRUB
  - SCATTERED SCRUB
  - INTACT HEDGE WITH TREES
  - INTACT HEDGE
  - DAMAGED HEDGE
  - HARDSTANDING
  - BUILDING
  - BUILDING NUMBER
  - TARGET NOTE
  - WALL

|   |    |    |          |                      |
|---|----|----|----------|----------------------|
| 1 | ET | JM | AUG-2014 | Updated Target Notes |
|---|----|----|----------|----------------------|

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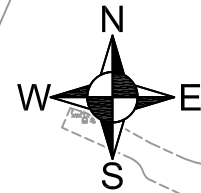
ANZIO CAMP  
PHASE 1 HABITAT PLAN

ANZ-HAB1

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- LEGEND
- SITE BOUNDARY
  - BAT ROOST 2014
  - FLIGHT PATH & DIRECTION  
COMMON PIPISTRELLE,  
*Pipistrellus pipistrellus* (Pp)
  - FORAGING ZONE
  - HARDSTANDING
  - BUILDING
  - B18 BUILDING NUMBER
  - WALL

|   |    |    |          |                                         |
|---|----|----|----------|-----------------------------------------|
| 1 | ET | JM | AUG-2014 | Advised 2014 Bat Roost and flight lines |
|---|----|----|----------|-----------------------------------------|

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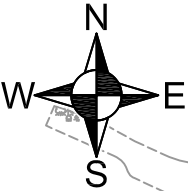
**BAT ACTIVITY DURING  
DUSK & DAWN SURVEYS 2014**

**ANZ-BAT**

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|-------|------------|------|----------|
| Scale | 1:500 @ A3 | Date | AUG 2014 |
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421.04017.00001 Anzio Bat Survey Data.1.dwg

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- LEGEND
- SITE BOUNDARY
  - BAT ROOST 2012
  - BAT ROOST 2006
  - BAT ROOST 2014



|   |    |    |          |                        |
|---|----|----|----------|------------------------|
| 1 | ET | JM | AUG-2014 | Advised 2014 Bat Roost |
|---|----|----|----------|------------------------|

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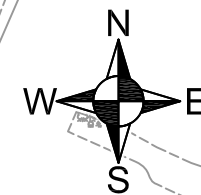
ANZIO CAMP  
BAT ROOSTS  
2006, 2012 and 2014  
ANZ-ROOST

|       |            |      |          |
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|        |
|--------|
| LEGEND |
|--------|



— SITE BOUNDARY



GROUP OF 5 REPTILE  
REFUGIA



|   |    |    |          |             |
|---|----|----|----------|-------------|
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ANZIO CAMP  
REPTILE SURVEY  
2014

**ANZ-REP**

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|------|----------|
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|------|----------|