



CRESTWOOD ENVIRONMENTAL LTD

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Brownshore Management Limited,
M54 Space Centre
Halesfield 8,
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TF7 4QN

Emailed to: joe@brownshore.co.uk

FAO: Mr. Joe Nugent Esq.

Dear Joe,

RE: Review of Ecological Condition and Recommendations – Anzio Camp

Introduction and Background

Crestwood Environmental Ltd. (**'Crestwood'**) have been appointed by Brownshore Management Ltd. (**'the Client'**) to undertake a review of the previous ecological information provided by the client to make an initial assessment of any ecological impacts from the proposed change of use at Anzio Camp in Leek (**'the Site'**).

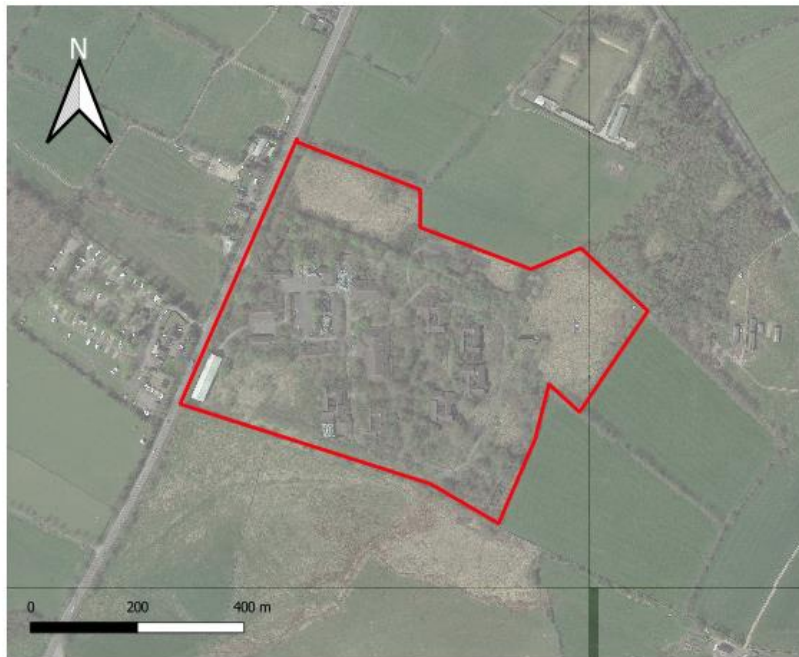
Planning permission has previously been granted at the Site for the demolition and subsequent construction of extra care housing, live work units, ancillary social centre and facilities building (Application No: SMD/2014/0683). Several ecological surveys were undertaken as part of the planning application. The client is now applying for change of use to a holiday park. It is understood the new application will see the construction of new access roads within the Site, as well as installation of 126 temporary holiday lodges and 12 permanent cottages with associated amenities (**'The Proposed Works'**).

Previous Site Context and Surveys

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 (approximate centre grid reference SK 007 590). The Site is located 1.5 km to the east of Tittesworth Reservoir, north of Leek, as well as located outside the southern boundary of the Peak District National Park.



Plate 1 Site location Plan



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. SLR Consulting Limited was then commissioned to update ecology surveys at the Site throughout summer 2014 (Report reference 421-04017-00001) (SLR Consulting , 2014).

Habitats on Site at the time of the previous surveys included scattered trees, marshy grassland, semi-improved neutral grassland, poor-semi-improved grassland, dense scrub, scattered scrub, hedgerows, hardstanding, buildings and a wall. It is understood that the neutral grassland in the north-east of the Site is a Priority Habitat and forms part of a Site of Biological Importance ('SBI'). The Site is also located adjacent to an area of deciduous woodland (Priority Habitat) along the east of the northern boundary.

Results and Recommendations of Previous Survey Work

Site of Biological Importance

Anzio Camp Site of Biological Importance is located within the northeast of the Site. No direct impacts were anticipated as part of the proposed development. However, It was recommended that a site management plan was produced to promote the management of the Anzio Camp SBI and vegetation/ habitats within the Site. It was advised that the management plan was drawn up in consultation with the Local Authority and the Local Wildlife Trust to meet identified objectives for the SBI.

Great Crested newt

No ponds were identified within the Site. The southeast corner of the Site formerly supported a wet ditch surrounded by willow (*Salix sp.*) and alder (*Alnus glutinosa*) trees; this had dried up completely. As no standing water was noted on or near Site, no further surveys regarding great crested newt were recommended and it was considered that this species would not be adversely impacted by the proposals.

Birds

Swallows (*Hirundo rustica*) were identified nesting in Building B12 on Site and a pair of Barn owl were also recorded on Site. No further surveys for breeding birds were recommended, however, sensitive and supervised site clearance regarding suitable habitats for breeding birds was recommended. Several mitigation and compensation features were also recommended including a barn owl nest boxes and sparrow terraces.



Reptiles

Reptile surveys were undertaken in 2014, with mats largely concentrated around the northern and eastern boundaries of the Site. No reptiles were recorded during the seven survey visits, though a number of common toads (*Bufo bufo*) were recorded taking shelter beneath the refuges.

Badger

Only evidence of mammal paths and badger snuffle holes were located on Site. Therefore, no further surveys or recommendations regarding badgers were made.

Bats

Three trees (TN2 and TN4 (Report reference 421-04017-00001) (SLR Consulting , 2014).) were identified as having bat roost potential within the Site. It was recommended that 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 was completed on the suitable trees at the Site, if they are to be removed as part of the Proposed Works.

15 buildings on Site were identified as having potential for roosting bats. Emergence / re-entry surveys were completed between 2012 and 2014 on the buildings. In the most recent surveys (2014), one building (Building B6) noted a small common pipistrelle bat roost comprising two bats. The buildings were found to support fewer roosts year on year due to the natural degradation of the buildings on Site. It was recommended that it will be necessary to obtain a European Protected Species Licence (EPSL) from Natural England before any of the buildings, historically or currently supporting roosts can be demolished or stripped.

Several mitigation and enhancement measures including the installation of bat boxes were made.

Current Site Context and Surveys (2022)

A Site walkover was completed by Crestwood on 30th March 2022. The habitats on Site largely remained unchanged from previous surveys. However, due to the lack of management over several years, the amount of dense scrub on the Site had significantly increased comprising largely bramble with self-set trees. The grassland habitats on Site also appeared to be largely unmanaged at the time of the survey becoming tussocky in places and growing to a sword of approximately 30 cm. The trees originally mapped as scattered in the west of the site now formed an area of broad-leaved woodland. In addition, large amounts of cotoneaster and rhododendron were noted on the Site surrounding the buildings.

Site of Biological Importance

The habitats within the Site of Biological Importance remain unchanged from previous surveys, however, the Proposed Works would now impact the Site with an increase in the hardstanding in the form of roads, as well as installation of holiday lodges. This would lead to a loss of unimproved grassland within the SBI and without mitigation is considered to have an adverse impact upon the SBI, therefore further recommendations have been made below.

Birds

The habitats on Site provide suitable nesting opportunity for birds, as well as foraging and commuting habitats with connectivity to further suitable habitat within the surrounding area. The existing habitats comprising buildings, scattered trees, increasing amounts of dense scrub and woodland on Site provides a greater opportunity for nesting birds. Birds were noted nesting within the trees and within several of the buildings on Site at the time of the 2022 survey. Species recorded during the Site visit comprised blackbird (*Turdus merula*), blue-tit (*Cyanistes caeruleus*), great-tit (*Pas major*), chiff chaff (*Phylloscopus collybita*), pheasant (*Phasianus colchicus*). Without mitigation it is considered that the development would have a minor adverse impact on birds at the Site, therefore recommendations have been made below.

Badger

The increase in scrub within the Site provides further opportunity for sheltering and sett building for



badger. During the 2022 survey, a mammal path was noted within the eastern boundary of the Site. However no further evidence of badger was found and based on this the proposals would not result in any adverse effects on this species. Due to the presence of suitable habitats on Site further recommendations have been made below.

Great Crested Newt

No waterbodies were found during the survey and the wet ditch that had previously been dry, remained dry at the time of the 2022 survey. Aerial imagery suggest there is one pond located within 500 m of the Site boundary located c.424 m north-east of the Site. This pond however, appears to be a large fishing lake separated from the Site by arable fields, a habitat considered sub-optimal for GCN. Due to the lack of suitable waterbodies for GCN on Site and in the local area, it is considered that GCN will not be impacted by the Proposed Works and therefore the proposals would have no adverse impact on this species and so no further recommendations have been made. However, recommendations for other amphibians present on Site have been made below.

Bats

No evidence of bats was found during the 2022 survey, however, a thorough inspections of all buildings and trees were not carried out. The buildings on Site were present at the time of the Survey however several were in a state of disrepair or damaged. It is understood that only one building (B4) is to be retained as part of the new proposals. Slipped tiles, broken facias and missing mortar provide opportunity for roosting bats in a large number of the buildings. Both maternity and day roosts have previously been confirmed in buildings on the Site, therefore there is potential for these roost types to be lost as part of the proposals.

Several of the mature trees on Site also had features suitable for roosting bats including woodpecker holes. Due to the suitable habitat on Site for roosting and foraging / commuting bats, recommendations have been made below.

Reptiles

The habitats on Site provide suitable habitat for reptiles on Site and within the local area, the increased amount of dense scrub, unmanaged grassland and undulating topography of the site provide reptiles within suitable foraging, shelter and commuting habitats. However, no evidence of reptiles was noted at the time of the survey and no reptiles were recorded previously on Site. It is anticipated that if reptiles have colonised the Site, the proposals are likely to have a minor adverse impact upon them. Therefore, a recommendation has been made below.

Conclusions and Recommendations

The recommendations from the previous ecological works are both relevant to the current planning permission and development agreed at the Site. However, do not take into account the lack of management and change in quality / quantity of each habitat. The change in use will see the Proposed Works extend into further areas of the Site including land within the SBI to the north-east. The habitats on Site have also been left largely unmanaged since the previous surveys were conducted leading to an increase in scrub and development of tussocky grassland and more established woodland habitat.

Construction works, without appropriate measures in place could result in disturbance to or accidental killing or injury of individual animals including breeding birds, badgers and bats. Such effect, whilst unlikely to affect the integrity of the local populations of these species, would be in breach of legal protection afforded by the Wildlife and Countryside Act 1981 (as amended) and the Badger Protection Act (1992).

The habitats therefore are more suitable for a range of protected species, including birds, reptiles and bats. Taking the previous survey work in to account and due to the change in use, habitats on the site and lapse in time from the previous surveys work, the initial following recommendations have been made:

- **Site of Biological Importance:** The proposed change of use could potentially directly or indirectly impact upon the SBI located on Site. As such, the Local Planning Authority ecologist and / or the local Wildlife Trust should be consulted prior to any works commencing to determine how works



may proceed without adversely impacting this Site. The Proposed Works should also seek to mitigate and enhance the other Site habitats in line with the previous proposals.

- **Terrestrial Mammals including badger and hedgehog:** Any excavations that need to be left overnight should be covered or fitted with mammal ramps to ensure that any animals that enter can safely escape. Any open pipework with an outside diameter of greater than 120 mm must be covered at the end of each workday to prevent animals entering/becoming trapped.

Given the suitability of the on-site and adjacent habitats for badger, there is a risk of this species colonising the Site prior to works commencing. It is recommended that a walkover of the Site is undertaken prior to mobilisation to determine the status of badger within the Proposed Works area.

- **Bats:** An EPS license is required for the demolition of buildings containing bat roosts. Due to the lapse in time from the previous bat surveys, it is recommended an updated PRA and subsequent emergence / re- entry surveys are completed on all buildings at the Site to inform the licence.

Mature and semi-mature trees should be retained where possible. If any of the mature / semi - mature trees are to be removed as part of the Proposed Works, these should be first subjected to a PRA inspection and subsequent emergence / return surveys should be completed before removal. Due to the lapse in time from the previous surveys, features that are suitable for roosting bats may have formed.

The Proposed Works should also seek to mitigate and enhance the Site for roosting bats in line with the previous proposals. In addition, a lighting strategy should be implemented for the Site:

In accordance with best practice guidance relating to lighting and biodiversity (Miles et al, 2018; Gunnell et al, 2012), any new lighting should be carefully designed to minimise potential disturbance and fragmentation impacts on sensitive receptors, such as bat species. Examples of good practice include:

- Avoiding the installation of new lighting in proximity to key ecological features, such as hedgerows and woodland edges.
 - Using modern LED fittings rather than metal halide or sodium fittings, as modern LEDs emit negligible UV radiation.
 - The use of directional lighting to reduce light spill, e.g. by installing bespoke fittings or using hoods or shields. For example, downlighting can be used to illuminate features such as footpaths whilst reducing the horizontal and vertical spill of light.
 - Where the use of bollard lighting is proposed, columns should be designed to reduce horizontal light spill.
 - Implementing controls to ensure lighting is only active when needed, e.g. the use of timers or motion sensors.
 - Use of floor surface materials with low reflective quality. This will ensure that bats using the site and surrounding area are not affected by reflected illumination.
 - For internal lights, recessed light fittings cause significantly less glare than pendant type fittings. The use of low-glare glass may also be appropriate where internal lighting has the potential to influence sensitive ecological receptors.
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- **Amphibians and Reptiles:** The clearance of suitable reptile and amphibian habitat should be undertaken under the supervision of an experienced ecologist. This will involve the clearance of vegetation in a directional manner to allow herpetofauna to disperse and careful removal of any hibernacula. All vegetation clearance should be completed when reptiles and amphibians are active, generally between March and October inclusive, and weather dependent.
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- **Breeding Birds:** due to the suitable habitats present on Site such as buildings, dense scrub, hedgerows, grassland and woodland. Clearance of any suitable habitats should be done outside of the nesting bird season. The nesting bird season is weather dependent but generally extends



between March and September inclusive (peak period March-August). If this is not possible then any vegetation/buildings to be removed or disturbed should be checked by an experienced ecologist for nesting birds immediately prior to works commencing. If birds are found to be nesting any works which may affect them should be delayed until the young have fledged and the nest has been abandoned naturally, for example via the implementation of an appropriate buffer zone (species dependent) around the nest in which no disturbance is permitted until the nest is no longer in use. The Proposed Works should also seek to mitigate and enhance the site for birds in line with the previous proposals.

- **Invasive Species:** A Method Statement must be developed for the Proposed Works to ensure that works do not result in the spread of any invasive non-native species such as cotoneaster and rhododendron. This Method Statement should reflect established best management practices for the treatment of both species.

Yours sincerely

Elizabeth Davis

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ENVIRONMENT	LANDSCAPE	NOISE	LIGHTING
ECOLOGY	HERITAGE	WATER	TREES
MINERALS / WASTE	AIR QUALITY	LAND QUALITY	VISUALISATION

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