

Dear Jane Curley

SMD/2022/0031

**Section 73 Application for Substitution of two care homes with extra care lodges, Variation of Conditions 2, 18, 18 & 19 and Removal of Conditions of 20, 21, 22 & 24 of SMD/2014/0683
Anzio Camp, Buxton Road, Blackshaw Moor, Leek, Staffordshire, ST13 8TN**

Staffordshire Wildlife Trust has been asked to review the above application as part of a service level agreement with Staffordshire Moorlands District Council to provide ecology advice regarding planning and development management functions.

We have viewed the following documents:

- Non-Technical Summary of Environmental Statement, Tyler Parkes 2014
- Ecological Assessment, Final Update Report SLR Ref: 421-04017-00001, August 2014
- Planning Statement, Brown Shore Management August 2023 (Rev.1)
- Proposed Site Masterplan drawing ref: 3262/SM/14/1000-P6 (dated 17 June 2024)
- Ecology Letter report, Crestwood Environmental Limited dated 3 May 2022

SUMMARY –Staffordshire Wildlife Trust, having reviewed the information provided, has **no objection** and for clarity confirms that the original conditions of SMD/2014/0683 relating to protection of ecology and provision of a landscape habitat management and maintenance plan should continue to have effect:

1. Conditions 13, 16 and 17

In addition, due to the changes in habitats at the site since granting of SMD/2014/0683 new conditions should be attached as follows:

2. Bat inspection and survey prior to any further demolition of buildings
3. Precautionary method statement for protected species prior to any further demolition and commencement of site clearance
4. Sensitive lighting strategy for bats
5. Method Statement for Invasive Species

CHANGE IN SITE CONDITION

The letter report from Crestwood (2022) confirms that a site walkover was completed by Crestwood on 30 March 2022. The letter report confirms that although habitats on site are largely unchanged since previous surveys in 2014, due to lack of management the amount of dense scrub had significantly increased comprising mainly bramble with self-set trees. The grassland habitat has become tussocky in places and growing to a height of 30cm. Trees originally mapped as scattered in the west of the site now form an area of broadleaved woodland. In addition, the invasive non-native species cotoneaster and rhododendron are now present in large amounts.

A thorough inspection of all buildings and trees was not carried out as part of the Crestwood 2022 walkover but the buildings on site at the time of the walkover were noted as being in a state of disrepair of damage. Slipped tiles, broken facias and missing mortar were noted as providing an

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. Several of the mature trees on site were also noted as having features suitable for roosting bats including woodpecker holes.

There is Site of Biological Importance (SBI) in the north-east of the site which will remain unimpacted by the development. The interest of the SBI can be safeguarded through the submission of a Landscape Habitat Management and Maintenance Plan as required by Condition 16 of SMD/2014/0683.

We note that the S73 application relates to the substitution of two residential care homes with lodges in the same part of the site. No other changes in layout or changes of use proposed.

Notwithstanding, due to the changes in habitat condition since the previous ecology surveys for SMD/2014/0683 it is considered reasonable to require new conditions to be attached, should the S73 application be granted. It should be noted these changes in habitat condition apply to the whole site, including the part of the site where the care homes would be substituted with lodges.

BAT INSPECTION AND SURVEY

We note that previous ecology surveys have confirmed the presence of roosting bats on site. The most recent comprehensive bat surveys in 2014 (SLR 2014) recorded a smaller number of bats than in previous years, and this was thought to be because the buildings on site had deteriorated.

Notwithstanding, due to the amount of time that has now lapsed since the 2014 surveys, an update inspection for roosting bats is required prior to any further building demolition. Follow up dusk surveys and a licence from Natural England will be required prior to demolition of any building with a confirmed roost in accordance with the advice given in the Ecology Report (SLR 2014) and ecology letter report (Crestwood 2022).

The requirement for update bat surveys prior to any further demolition can be secured via a suitably worded new planning condition to reflect the change in site condition.

PRECAUTIONARY METHOD STATEMENT FOR PROTECTED SPECIES

We note that the ecology letter report (Crestwood 2022) identifies potential for the site to support badgers, hedgehogs, reptiles, amphibians and breeding birds due to the change in habitat condition. A precautionary method statement is required to ensure that any future works take account of the potential presence of these species. The precautionary method statement should include details of pre-clearance/demolition walkovers, sensitive timing and methods of working and ecological supervision as required to avoid harm or disturbance to protected species. The precautionary method statement should be submitted prior to any further demolition or commencement of vegetation clearance works and can be secured via a suitably worded new planning condition.

SENSITIVE LIGHTING STRATEGY FOR BATS

We note the existing Condition 4 of SMD/2014/0683 requires full details of proposed external lighting/illumination to be agreed in writing. Due to the change in site conditions since 2014 which have resulted in more dense scrub and tree habitat, the site is now likely to be of increased value for foraging and commuting bats. It is recommended that an additional condition is attached, should

consent be granted, to require details of lighting in relation to bats that accords with latest best practice guidance to be agreed in writing.

METHOD STATEMENT FOR INVASIVE SPECIES

We note that the most recent ecology walkover (Crestwood 2022) has identified large amounts of the invasive non-native species rhododendron and cotoneaster which have colonised the site due to lack of site management. A method statement is recommended to set out measures to control, remove and/or dispose of these species to avoid further spread. The requirement for a method statement of invasive species can be secured via a suitably worded new planning condition to reflect the change in site condition.

Regards,

Dated 26 July 2024