



Buxton Caravan and
Motorhome Club

Construction Ecological Management Plan

Prepared by
CSA Environmental

on behalf of
The Caravan and Motorhome
Club

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1.0 INTRODUCTION

Background

- 1.1 A preliminary roost assessment of the existing toilet block at Buxton Caravan and Motorhome Club was undertaken in November 2016 to inform a planning application at the Site, where proposals included demolition of the existing toilet block and construction of a new block. The inspection found no droppings or evidence of bats internally or externally on the building and as such, roosting bats were concluded to be likely absent from the toilet block. Due to the nearby presence of Poole's Cavern and Grin Low Wood SSSI (c. 135m east) which is known to support significant roosting activity by *Myotis* bats, it was recommended a sensitive lighting strategy be adopted and two bat boxes be erected on the replacement toilet block, to increase roosting opportunities at the Site and prevent any increase in disturbance to local bat populations.
- 1.2 Full planning permission has been approved by High Peak Borough Council (HPBC) for a for demolition and replacement of the toilet block, erection of wardens accommodation, demolition of existing garage, construction of new utility room, installation of 10 all-weather caravan pitches and conversion of 12 pitches to serviced pitches with a 1.8m fence adjacent to a pond to the west, at Buxton Caravan and Motorhome Club, Buxton (HPK/2016/0655).
- 1.3 A consultation response to the planning application from Derbyshire Wildlife Trust (DWT) gave recommendations relating the proposals. Further to the recommendations of the DWT, two conditions relating to ecology and biodiversity were attached to the planning consent.

Purpose

- 1.4 The Construction Ecological Management Plan (CEcMP) presented here has been prepared to discharge two conditions attached to the Decision Notice from HPBC.
- 1.5 Condition 4 of the Decision Notice (24th July 2017) states that:

"No development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the Local Planning Authority. The CEMP (Biodiversity) shall include the following:

- *Risk assessment of potentially damaging construction activities*
- *Identification of "biodiversity protection zones"*

- *Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements)*
- *The location and timing of sensitive works to avoid harm to biodiversity features*
- *The times during construction when specialist ecologists need to be present on-site to oversee works.*
- *Responsible persons and lines of communication*
- *The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person*
- *Use of protective fences, exclusion barriers and warning signs.*

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the Local Planning Authority."

1.6 Also of relevance is Condition 5 of the Decision Notice, which states that:

"No construction shall be carried out on the Site between 1st March and 31st August inclusive, unless the Site is surveyed for breeding birds, and a scheme to protect breeding birds is submitted to and approved in writing by the Local Planning Authority. The development shall thereafter only be carried out in accordance with the approved scheme."

Scope of Work

1.7 The CEcMP is principally concerned with the site preparation phase of construction. This will include:

- The clearance of on-site tree and shrub vegetation.
- The clearance of on-site grassland and scrub vegetation.
- The removal of existing on-site buildings.
- The widening of roads on-site in three locations.

1.8 The CEcMP is intended to cover only the construction phase, and makes no prescription for operational phase management procedures. A copy of this document will be retained on-site for reference for the duration of construction.

Roles and Responsibilities

1.9 The Caravan and Motorhome Club (CAMC) has appointed CSA Environmental to provide an Ecological Clerk of Works (ECoW), to be responsible for advising relevant persons with regard to ecological issues. The CAMC have appointed Dale Contractors Ltd to undertake demolition and construction site works.

1.10 Responsibilities of the ECoW will include, though not necessarily be limited to:

- Advising on the locations of ecological constraints, such as protected or notable species, or valuable habitats.
- Supervising key works activities to ensure the correct implementation of ecological impact avoidance and mitigation measures as set out here-in (if required).
- Providing reactionary advice to Dale Contractors and CAMC on ecological issues.
- Liaising as necessary with HPBC.

1.11 The responsibilities of CAMC and Dale Contractors will include, though not necessarily be limited to:

- Adhering to the management procedures set out here-in, including any appointed third party contractor.
- Liaising as necessary with the ECoW regarding any uncertainties in the management procedures set out here-in, or where there is any concern of impacts to ecological features.

2.0 IMPORTANT ECOLOGICAL FEATURES

- 2.1 In order to inform the CEcMP presented here, a desktop study and site walkover survey were completed during August 2017 by Alex Perry GradCIEEM. This was necessary to ensure an accurate understanding of the baseline ecological conditions, such that suitable construction-phase control measures may be implemented to avoid and minimise the potential for, and effects of, ecological impacts. A summary of the baseline conditions is provided here.

Designated Sites

- 2.2 There are 23 designated nature conservation sites within 2km of the Site boundary. Those of particular relevance to the Site are the Grin Low Local Wildlife Site (LWS), which encompasses the Site on all aspects, and Poole's Cavern and Grin Low Wood Site of Special Scientific Interest (SSSI), which is located c. 30m north-east of the Site.
- 2.3 The Grin Low LWS, which measures c. 33.5 ha in size, surrounds (though does not include) the Buxton Caravan and Motorhome Club. The LWS is designated for the presence of four grassland habitats; unimproved calcareous, unimproved neutral, unimproved acid and semi-improved calcareous grasslands. Due to the variety grassland types within the LWS, the site supports a varied and interesting assemblage of plants and butterflies, including dingy skipper *Erynnis tages* and small heath *Coenonympha pamphilus*. Common lizard is also recorded as present at Grin Low LWS. The LWS is separated from the Site by semi-mature treelines and post and wire fences.
- 2.4 Poole's Cavern and Grin Low Wood SSSI measures c. 45.5 ha in size and lies immediately to the south of Buxton. The site is designated for the presence of nationally important cave features. Soils at the site are thin and the site is mostly wooded, which is thought to have originated from planting in the early 19th century. The woodland is dominated by beech *Fagus sylvatica* and sycamore *Acer pseudoplatanus*, resulting in a relatively poor ground flora layer due to shading by the canopy. Limited survey of the cave work at this site has found it to support Natterer's *Myotis nattereri* and Daubenton's *Myotis daubentonii* bats in the winter and whiskered *Myotis mystacinus* in the summer.

Habitats and Flora

- 2.5 On-site habitats reflect the current use as a caravan park, comprising large areas of amenity grassland with hardstanding caravan pitches, interspersed with stands of young planted trees and small areas of taller grassland. Three buildings, the reception block, toilet block and garage, are present toward the south-east of the Site.

- 2.6 Amenity grassland and hardstanding are the dominant habitats across the Site, making up the majority of the caravan park. Areas of less intensively managed species-poor, semi-improved grassland are present within the stands of planted trees and edges of the Site. A longer sward has been allowed to develop which includes a greater diversity of both grass and broad-leaved herb species such as Yorkshire fog *Holcus lanatus*, false oat grass *Arrhenatherum elatius*, birds-foot trefoil *Lotus corniculatus* and red campion *Silene dioica*.
- 2.7 Trees present at the Site are generally groups of young, planted broad-leaved trees within areas of amenity grassland in order to provide breaks in the caravan site, or a natural screen. Tree used as screening included rowan *Sorbus aucuparia*, aspen *Populus tremula*, ash *Fraxinus excelsior*, blackthorn *Prunus spinosa*, hawthorn *Crataegus monogyna* and hazel *Corylus avellana*. The northern and eastern boundary of the Site are comprised of managed hedgerows.
- 2.8 A wet ditch runs east to west along the northern boundary of the Site and cuts from the north to the south of the Site before joining another ditch in the Grin Low LWS.

Species

- 2.9 Internal and external inspections of the existing toilet block for bat roost potential was undertaken in November 2016. No bats or significant potential roost features were found internally or externally on the building. Trees on-site are young and generally devoid of potential roost features such as cracks, rot holes and crevices.
- 2.10 During the preliminary roost assessment, evidence of nesting birds was incidentally recorded in the toilet block. Breeding birds are likely to utilise other on-site buildings and above-ground vegetation for nesting during the breeding season.
- 2.11 The adjacent Grin Low LWS is known to support populations of common lizard *Zootoca vivipara*. However, the walkover survey found habitats on-site to be intensively managed and unsuitable for supporting reptile populations.
- 2.12 Although the surrounding LWS has the potential to support badgers *Meles meles*, the walkover survey identified no evidence of badger activity within the Site. It is possible that this species will occasionally disperse through the Site, but on-site habitats are unlikely to support foraging or sett building.

3.0 LEGISLATIVE CONTEXT

3.1 The Conservation of Habitats and Species Regulations 2010 (as amended) enacts the Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora, and Council Directive 79/409/EEC on the Conservation of Wild Birds, into UK law. The Regulations define European Protected Species ('EPS' including all UK bat species) which are assigned a greater level of protection than that afforded under other domestic legislation. Key offences under the Regulations of relevance to the site include:

- The damage or destruction of a breeding or resting place used by an animal of an EPS (e.g. a bat roost).
- The deliberate killing or injury of any animal of an EPS.
- The deliberate disturbance of any animal of an EPS.

3.2 The Wildlife and Countryside Act 1981 (as amended) forms the primary piece of UK legislation relating to the protection of habitats and species (including nesting birds, reptiles and widespread amphibians). Key offences under the Act of relevance to the site include:

- The intentional or reckless damage or destruction of nests or eggs of any wild bird.
- The intentional or reckless killing or injury of any native reptile.

3.3 Additionally, badgers and their setts are protected under the Protection of Badgers Act, 1992.

4.0 ECOLOGICAL CONTROL MEASURES

Grin Low LWS

Protection Measures

- 4.1 The Site itself, although surrounded by the LWS, is not within the designation. However, the consented proposals include the partial widening of the access road for a short section along the boundary with the LWS. The patch of grassland in this location was identified by the DWT as being rich in wildflowers including orchids. Protective fencing will therefore be used to establish a Construction Exclusion Zone on retained grassland west of the access road, thereby keeping the damage/loss of this habitat to the absolute minimum.
- 4.2 Works personnel will be made aware of the presence of the LWS designation surrounding the Site, and forbidden from storing materials or machinery outside the Site's boundary.

Outcome

- 4.3 Subject to implementation of the above controls, it is anticipated that site clearance and handling of materials will be achieved with the minimum possible impact on the Grin Low LWS.

Trees and Hedgerows

Protection Measures

- 4.4 Site works will be carried out in accordance with the Tree Information report (November 2016) compiled by James Pinder of Treecare Consulting, and submitted alongside the consented planning application. A copy of this document will be retained on-site for reference for the duration of construction.
- 4.5 All retained trees, hedgerows and groups of shrubs (as shown on the approved plans) will be protected by Tree Protection Fencing (TPF) for the duration of construction activities, in accordance with BS5837:2012.
- 4.6 No works (including initial site-clearance) will commence until the TPF has been erected around tree Groups G1-5 and G7 (see Tree Information report). This will be maintained fully intact and upright at all times, until the completion of all construction operations. Signage will be used to advertise the fenced areas as Construction Exclusion Zones, where no heavy plant, machinery or material storage will be permitted.

Outcome

- 4.7 Subject to implementation of the above controls, it is anticipated that no damage will occur to retained trees and hedgerows during construction operations.

Bat Species

Protection Measures

- 4.8 No evidence of bats was recorded during the preliminary roost assessments, and no significant bat roost potential has been identified in any trees to be removed. As such, no impacts to roosting bats are anticipated to result from the construction of the proposed development, and no specific construction-phase control measures are proposed.
- 4.9 In order to enhance the Site's carrying capacity for roosting bats, two new bat boxes will be incorporated into the gable end walls of the new toilet block. These will be Habibat 001 Bat Box or similar design, built into the fabric of the structure.

Outcome

- 4.10 Construction of the consented development is not anticipated to adversely affect bat species. Dedicated bat roost features incorporated into the new toilet block building during construction will constitute an ecological enhancement.

Bird Species

Protection Measures

- 4.11 Condition 5 of the planning consent requires that no construction shall be carried out between 1st March and 31st August inclusive, unless preceded by a nesting bird check. In the absence of such measures, affecting vegetation and buildings could potentially result in the damage or destruction of nests or eggs of breeding wild birds, thereby constituting an offence under the Wildlife and Countryside Act 1981.
- 4.12 In order to minimise the potential for impacts to nesting birds, initial site clearance will take place in October/November 2017. As this is outside the nesting bird period, no pre-works nesting bird check by the ECoW is considered necessary. However site personnel will remain vigilant for the potential presence of nesting birds, such certain species (notably pigeons) can nest all year round. Where there is any doubt, advice will be sought in the first instance from the ECoW.

Outcome

- 4.13 Site works will be undertaken with sensitive seasonal timing, avoiding impacts to nesting birds and ensuring compliance with Condition 5 of the Decision Notice.

Reptile Species

Protection Measures

- 4.14 The walkover survey found on-site habitats to be uniform and generally lacking in structural diversity, and are therefore considered unlikely to support common lizard or other reptile species. Furthermore, the demolition and construction activities are programmed to take place during the months of October through April 2017/18, hence are largely confined to the reptile hibernation period. As such, the risk of works personnel encountering active reptiles is considered to be minimal.
- 4.15 However, if in the unlikely event works personnel do encounter a reptile, works will be brought to a temporary halt and advice sought from the ECoW.

Outcome

- 4.16 It is considered that the consented development poses minimal risk to reptile species such as common lizard.

5.0 CONCLUSIONS

- 5.1 In the absence of ecological impact avoidance and/or mitigation measures, construction of the consented development at Buxton Caravan and Motorhome Club has the potential to damage retained tree, hedgerow and shrub vegetation, and to kill or injure and damage the habitats of protected species, thereby constituting an offence.
- 5.2 The management procedures set out here-in, such as the erection of protective fencing, sensitive timing of works and vegetation clearance, will ensure that construction works are achieved lawfully and with minimal risk to important ecological features.



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