

24 January 2023

Our ref: 233044/JDT

Mr M Wood
Camp Mohawk
Crazies Hill
Reading
RG10 8PU

Dear Mr Wood

CAMP MOHAWK, CRAZIES HILL

Introduction

In accordance with your instructions, AA Environmental Limited (AAe) carried out a follow-up survey at the above site on Monday 16 January 2023. Although an initial ecological survey was carried out on the site by AAe in February 2016, it was considered best practice to carry out a follow-up survey to update the previous findings and to record any changes that may have occurred during the intervening period. A series of photographs has been attached for reference.

The proposals are to construct a replacement changing room facility, as the current one is no longer fit for purpose requiring the demolition of the existing building and derelict electricity sub-station, as well as some alterations to the hardstanding surrounding the pool.

Methodology

Baseline Data

The previous Letter Report produced by AAe (dated March 2016) was reviewed in order to provide baseline information. In addition, as certain baseline data is now readily available on the internet, the Multi-agency website (www.magic.defra.gov.uk) was consulted to determine whether any part of the site or nearby habitats have been statutorily or otherwise designated and a review of Google Earth's satellite imagery (http://www.google.co.uk/intl/en_uk/earth/index.html) was completed to determine past land uses of the site and surrounding land.

Walk-over Site Survey

During the follow-up walk-over survey, particular attention was paid to record fresh evidence of badgers, bats and herpetofauna (amphibians and reptiles) that may be using the site or present in adjacent habitats, in accordance with the following survey methodologies:

Badgers

Badgers (*Meles meles*) and their setts are protected by the *Protection of Badgers Act 1992*, under which it is an offence to harm badgers or their setts. A sett is defined as "any structure or place which displays signs indicating current use by a badger". Natural England has provided the following guidance on the interpretation of current use:

A sett is defined as such (and thus protected) as long as signs indicative of 'current use' are present. Thus, a sett remains protected by the Act until such times as the signs (i.e. 'field signs') have deteriorated or decayed to such an extent that they indicate that the sett is no longer in 'current use'.

A thorough survey of the whole site and adjacent habitats, where access was available, was carried out. Particular attention was paid to dense areas of vegetation to check for any evidence of badger activity, which is usually detected by any one or more of the following signs:

- presence of holes with evidence of badger, such as footprints, discarded hair, etc.;
- presence of dung pits and latrines;
- presence of well-used runs with subsidiary evidence of badger activity; and
- presence of other indications of badger activity, such as signs of foraging and footprints.

Bats

Currently there are 17 species of bat known to breed in the UK. All species and their roosts are protected under Regulation 41 of *The Conservation of Habitats and Species Regulations 2010 (as amended)*. As a signatory to the *Bonn Convention (Agreement on the Conservation of Bats in Europe)* the UK is also required to protect their habitats. This legislation makes it illegal to kill, injure, capture or disturb bats, or to obstruct access to, damage or destroy bat roosts. Under the law, a roost is any structure or place used for shelter or protection.

A visual survey of the site was completed to record any evidence of bats or features that could provide potential roosting opportunities. The survey was carried out following the guidelines provided by the Bat Conservation Trust¹ by an experienced and licensed ecologist². A thorough internal and external re-examination of the existing buildings was carried out, where access was possible, with any potential access points inspected for evidence of bats. All internal roof voids/spaces, where present, were checked for any evidence of bats.

In addition, a careful inspection of each tree within the vicinity of the works was carried out to identify those features that are important for roosting bats. Surveying trees presents particular problems at any time of the year as bats will use a wide variety of roost sites in cavities, splits, cracks, knotholes and under loose bark, many of which are not easily detected from the ground.

Each tree was assessed in accordance with the following criteria:

- **Negligible** – negligible habitat features likely to be used by roosting bats.
- **Low** – a tree of sufficient size and age to contain potential roosting features (PRFs) but with none seen from the ground or features seen with only very limited roosting potential.
- **Moderate** – a tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
- **High** – a tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.

The surrounding habitat was also surveyed to identify any important features such as mature trees with suitable features for roosting bats and any established lines of vegetation that might provide important flightlines. Evidence of bats is usually detected by any one or more of the following signs:

- the presence of bat droppings, which tend to accumulate under established roost sites or at roost entrances;
- the accumulation of large numbers of moth wings, which have been discarded by feeding bats;
- areas of staining by urine or from fur rubbing; and
- the presence of bats themselves or their corpses.

¹ Collins, J. (ed) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (3rd edition). The Bat Conservation Trust, London.

² Lead surveyor was Julian Thornber BSc (Hons), MCIEEM.

The visual survey was facilitated by the use of binoculars, ladders, powerful torches (1M candlepower) and a Ridgid Micro CA-350 Inspection Camera endoscope.

Herpetofauna

Amphibians

All amphibian species have some level of protection under the *Wildlife and Countryside Act 1981 (as amended)*. Great crested newts (*Triturus cristatus*) are protected under the *Wildlife and Countryside Act 1981 (as amended)* and *The Conservation of Habitats and Species Regulations 2010 (as amended)*. The intentional or reckless killing, injury or taking, and intentional or reckless disturbance of great crested newts whilst occupying a 'place used for shelter or protection' is prohibited, as is the destruction of these places.

Reptiles

All reptile species are protected at some level under Schedule 5 of the *Wildlife and Countryside Act 1981 (as amended)* and *The Conservation of Habitats and Species Regulations 2010 (as amended)*. The more common species of reptiles, which include slow-worm (*Anguis fragilis*), common or viviparous lizard (*Zootoca vivipara*), adder (*Vipera berus*) and grass snake (*Natrix helvetica*) are protected by the *Wildlife and Countryside Act 1981 (as amended)* by part of Section 9(1) and all of Section 9(5). This means that they are protected against intentional or reckless killing and injuring (but not 'taking') and against sale and transporting for sale.

An assessment of the site was carried out to determine its suitability for herpetofauna by recording the habitats present. In addition, any natural/artificial refugia present on the site was lifted to check for any sheltering animals or evidence of animals, such as sloughs (shed skins) ³.

Other Wildlife

In accordance with good practice, the site was checked for any evidence of other protected species or species of particular note.

Results

Baseline Data

No evidence of protected species was recorded during the previous survey completed by AAe, with the site assessed to be of overall low ecological value. The previous report concluded that there were no ecological constraints to the re-development proposals and suggested a number of generic mitigation and enhancement measures.

According to the Multi-agency website, there are no ecological statutory designated sites located on, adjacent or within the 2 km search area. According to the Multi-agency website, part of the campsite boundary is noted as High Knowl Wood (Tithe: Dedicatts Coppice), an area of Ancient and Semi-natural Woodland and Deciduous Woodland, a Habitat of Principal Importance. However, it is important to note that the woodland will not be affected by the works.

Google Earth Imagery shows that the site has remained largely unchanged since at least 2003, comprising the existing changing rooms, swimming pool and a few small outbuildings.

Site Description (Photographs 1-4)

The site is within Camp Mohawk grounds, located off Highfield Lane in Crazies Hill, Reading, and centred at National Grid Reference: SU 799800. The application boundary comprises the existing changing rooms, swimming pool and pump house. It is surrounded by Deciduous Woodland and other buildings within the same landownership of Camp Mohawk.

³ Although considered 'out of season' when reptiles will not be active, certain species can still be found hibernating under refugia.

The existing changing room facility was a single-storey, timber-framed and clad garden shed type structure with a flat, felt covered roof. Internally the building was unlined with no separate roof void present. Externally the timber cladding was in good condition and tightly fitting and any restricted gaps present at the roof line heavily cobwebbed. The pump house was of masonry construction with a concrete flat-roof, which was well-sealed. A wooden/metal shelter had been constructed to house additional equipment for the swimming pool.

Habitat to the rear of the buildings comprised some bramble (*Rubus fruticosus* agg.) scrub, with blackthorn (*Prunus spinosa*), hazel (*Corylus avellana*), dandelion (*Taraxacum* agg.), cleavers (*Galium aparine*), Yorkshire-fog (*Holcus lanatus*), spurge (*Euphorbia* sp.) and cow parsley (*Anthriscus sylvestris*) also recorded. There were a few ash (*Fraxinus excelsior*) and sycamore (*Acer pseudoplatanus*) saplings and a young oak (*Quercus* sp.) which had a thin covering of ivy (*Helix hedera*). The area to the front of the changing rooms was dominated by the swimming pool and hardstanding with a restricted perimeter of well-maintained amenity grassland also present. Species recorded within the amenity grassland included perennial rye-grass (*Lolium perenne*), Yorkshire-fog, annual meadow-grass (*Poa annua*), creeping buttercup (*Ranunculus repens*), daisy (*Bellis perennis*) and dandelion.

Badgers

As previously recorded, no evidence of badger or their setts was recorded on or adjacent to the site.

Bats

During the follow-up inspection of the buildings, no evidence of bats was recorded and found to be in a similar condition as previously recorded. No evidence of bats was recorded during the careful internal or external inspection of the changing rooms or pump house. Internally the changing rooms were heavily cobwebbed, with no separate roof voids, and the gaps at the roof line created high light levels and exposed the building to the elements. Externally the timber cladding was tightly fitted and where minimal gaps were recorded these were heavily cobwebbed. The pump house was well-sealed with no separate roof voids or suitable crevices which could provide roosting opportunities. All of the buildings were assessed to provide **negligible** roosting opportunities for bats.

The trees recorded were assessed to provide **negligible** to **low** roosting opportunities for bats, due to their age/size and lacking obvious PRFs. The site, being of a restricted size, only provides limited foraging opportunities for bats.

Herpetofauna

There were no ponds on the site and therefore there were no breeding opportunities for amphibians. The swimming pool on site was largely steep sided, with no vegetation present and, although currently drained down, when operational will be routinely chlorinated and heated, and therefore is unsuitable for amphibians. The remainder of the site was dominated by buildings and hardstanding, regularly disturbed by on-site activities and consequently did not provide suitable terrestrial habitat for any species of herpetofauna. In addition, despite a careful search of the site, no species of herpetofauna were seen or found sheltering under any refugia lifted during any of the site visits completed.

Other Wildlife

Apart from a few common species of birds, either recorded on the site or flying overhead, no other species of any note were recorded.

Conclusions and Recommendations

The proposals are to construct a replacement changing room facility, as the current one is no longer fit for purpose, requiring the demolition of the existing building and outbuildings, as well as some alterations to the hardstanding surrounding the pool.

Although the wider site area is of some ecological value, the area to be re-developed is largely restricted to the existing built footprint and of low ecological value. The species recorded on the site can be described as common or abundant and are found in similar places across much of Britain, with no evidence of protected species recorded. The results of the follow-up survey support the previous findings by AAe, with no significant changes recorded.

The specific mitigation measures as detailed within AAe's original Letter Report (March 2016) are still considered appropriate and proportionate and have been repeated below for ease of reference. Although there are considered to be no ecological constraints to the proposals, a series of generic mitigation measures, as detailed below could be implemented to reduce any impact the re-development proposals may have on local wildlife. There is also an opportunity to implement some enhancement measures to increase the nature conservation value of the site in the long term in accordance with Government guidance as set out in National Planning Policy Framework (NPPF) 2021⁴.

Although no evidence of bats was recorded during the survey, all site operatives should be made aware of current legislation protecting bats and their roosts. In the unlikely event of any bats being encountered on the site, then works should stop immediately and Natural England or AAe contacted so that appropriate advice can be provided.

It should be noted that all species of wild bird and their nests are protected under the *Wildlife and Countryside Act 1981 (as amended)*. Therefore, in order to avoid contravention of current legislation, any site works likely to affect potential bird nesting habitat should be timed to avoid the main bird nesting season, which generally runs from March to August, inclusive. If this is not possible, a check should be carried out prior to any demolition and/or clearance works to ensure there are no active nests present.

In order to protect any vegetation to be retained and the adjacent woodland, suitable fencing may be required at certain locations to reduce the possibility of any damage that could be caused during the works. To minimise accidental damage, any overhanging branches should be pruned back to suitable live growth points. All works should be undertaken by a suitably qualified and experienced specialist contractor and should conform to current industry best practice, i.e. BS 3998: 2010 '*Tree Work - Recommendations*'.

In order to provide enhanced roosting/nesting habitat a series of bat/bird boxes could be installed on suitable vegetation within the adjacent woodland and be positioned in accordance with good practice.

The effects of lighting on plants and animals are difficult to assess, but it is thought that lighting can adversely affect invertebrates, birds and bats. The site is situated in a woodland and experiences minimal lighting, therefore, any new lighting to be introduced should be minimal and designed to minimise light spillage and pollution and not directed onto any bat/bird boxes installed.

The recommendations provided above try to pre-empt any issues that may arise as well as provide some mitigation and enhancement measures. I trust the above is of interest and provides the Council with enough information to determine the application but let me know if further clarification is required.

Yours sincerely



BSc (Hons) MCIEEM
Class Licences CL08 and CL18

Encl. Photograph Record Sheet (Drg. No. 233044/01)

⁴ Ministry of Housing, Communities and Local Government (2021). *National Planning Policy Framework*. London.



Photograph 1: Showing the front of the buildings.



Photograph 2: Showing the front and side of the buildings.



Photograph 3: Showing the rear of the buildings.



Photograph 4: Showing the interior of the changing room facility.

Rev.	Details		Drawn	Date
			Chkd.	
PROJECT				
Camp Mohawk Crazies Hill				
TITLE				
Photograph Record Sheet				
 Environmental Consultants AA Environmental Ltd Units 4-8 Cholswell Court Shippon Abingdon Oxon OX13 6HX T: 01235 536042 F: 01235 523849 info@aae-ltd.co.uk www.aae-ltd.co.uk				
Scale	Date 24.01.23		Drg No.	
NTS	Drawn KC	Chkd. ARB	233044/01	
				Rev.