

**MILL RYTHE HOLIDAY VILLAGE,
HAYLING ISLAND, HAMPSHIRE**

PRELIMINARY ROOST ASSESSMENT

A Report to: Away Resorts
c/o A & M Architectural Partnership LLP

Report No: RT-MME-123420-02

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REPORT VERIFICATION AND DECLARATION OF COMPLIANCE

This study has been undertaken in accordance with British Standard 42020:2013 “Biodiversity, Code of practice for planning and development”.

Report Version	Date	Completed by:	Checked by:	Approved by:
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The information which we have prepared is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management’s Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

DISCLAIMER

The contents of this report are the responsibility of Middlemarch Environmental Ltd. It should be noted that, whilst every effort is made to meet the client’s brief, no site investigation can ensure complete assessment or prediction of the natural environment.

Middlemarch Environmental Ltd accepts no responsibility or liability for any use that is made of this document other than by the client for the purposes for which it was originally commissioned and prepared.

VALIDITY OF DATA

The findings of this study are valid for a period of 12 months from the date of survey. If works have not commenced by this date, it may be necessary to undertake an updated survey to allow any changes in the status of bats on site to be assessed, and to inform a review of the conclusions and recommendations made.

NON-TECHNICAL SUMMARY

In August 2016, Away Resorts commissioned Middlemarch Environmental Ltd to undertake a Preliminary Roost Assessment of structures at Mill Rythe Holiday Village, Hayling Island in Hampshire. This assessment is required to inform a planning application associated with the redevelopment of the site, including the demolition of existing buildings on site and construction of circa. 291 mixed accommodation units (including 204 caravans and lodges and refurbishment of 87 chalets) with associated dining and leisure facilities.

To fulfil the above brief to assess the potential for the existing buildings on site to support roosting bats, a Preliminary Bat Roost Assessment was undertaken on 2nd September 2016.

The external inspection of the buildings confirmed the presence of a small number of access points for bats in some of the buildings such as holes in the soffit, gaps under the ridge tiles, missing bricks and lifted lead flashing. No evidence of bats was recorded during the external assessment. However, it was not possible to fully inspect all the features listed above due to the height at which they were located and as such it was not possible to establish if bats had used these features to enter a roost location at the time of surveying.

Internally, it was not possible to fully inspect all the features within the loft spaces due to the presence of boards between the rafters and the roof tiles and a large number of unsafecables and as such the bat roosting potential of the majority of the loft spaces could not be determined. Furthermore, a number of the buildings did not contain a roof space.

A number of the buildings at Mill Rythe Holiday Village have been identified as having low potential to support roosting bats, with the remaining buildings considered to be of negligible potential to roosting bats. Bat Surveys: Good Practice Guidelines, published by the Bat Conservation Trust (Collins, 2016), recommends for structures with low bat roosting potential that at least one survey (consisting of either a nocturnal emergence survey or a dawn re-entry survey) be undertaken during the bat activity season to determine the presence/absence of roosting bats within the structures. The bat activity season extends from May to September, with mid-May to August being the optimum survey period.

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1. INTRODUCTION

1.1 PROJECT BACKGROUND

In August 2016, Away Resorts commissioned Middlemarch Environmental Ltd to undertake a Preliminary Roost Assessment of structures at Mill Rythe Holiday Village, Hayling Island, Hampshire. This assessment is required to inform a planning application associated with the redevelopment of the site, including the demolition of existing buildings on site and construction of circa. 291 mixed accommodation units (including 204 caravans and lodges and refurbishment of 87 chalets) with associated dining and leisure facilities.

In addition, Middlemarch Environmental Ltd has been commissioned to undertake the following assessments:

- Preliminary Ecological Appraisal, the findings of which could be found in report RT-MME-123420-01; and,
- Habitat Regulations Assessment report RT-MME-123420-03.

To fulfil the above brief to assess the potential for the existing buildings on site to support roosting bats, a Preliminary Roost Assessment was undertaken on 2nd September 2016.

All UK bat species are European protected species and they are capable of being material considerations in the planning process. A summary of the legislation protecting bats is included within Appendix 1. This section also provides some brief information on the ecology of British bat species.

1.2 SITE DESCRIPTION AND CONTEXT

The development site is an irregular parcel of land approximately 14 ha in size, located on Hayling Island, at national grid reference SU 731 008. The development site includes a holiday village with a number of self-catering accommodation units and associated leisure facilities. At the time of the survey, the site included circa. 50 buildings, tennis courts, bowling green, swimming pool, car parking and associated hard and soft landscaping. The east of the site was dominated by a mosaic of grassland, scrub and trees used as a golf course. A large lake was present in the north-eastern corner, with a smaller manmade lake in the north-western corner of the site.

A golf course forms the southern boundary of the site, with Chichester Harbour Site of Special Scientific Interest (SSSI) and Chichester and Langstone Harbours RAMSAR and Special Protection Area (SPA) located to the north and east of the site.

1.3 DOCUMENTATION PROVIDED

The conclusions and recommendations made in this report are based on information provided by the client regarding the scope of the project. Documentation made available by the client is listed in Table 1.1.

Document Name / Drawing Number	Author
Site Survey 1:1250 (Sheet One), Drawing no. 3189-200	A & M Architectural Partnership LLP
Site Survey 1:500 (Sheet Two), Drawing no. 3189-201	A & M Architectural Partnership LLP
Site Survey 1:500 (Sheet Three), Drawing no. 3189-202 Rev A	A & M Architectural Partnership LLP
Site Survey 1:500 (Sheet Four), Drawing no. 3189-203 Rev A	A & M Architectural Partnership LLP
Site Survey 1:500 (Sheet Five), Drawing no. 3189-204	A & M Architectural Partnership LLP
Proposed Site Plan, Drawing no. 3877-200 Rev A	A & M Architectural Partnership LLP

Table 1.1: Documentation Provided by Client

Drawing 3877-200 Rev A – Proposed Site Plan provided within Chapter 7.

2. METHODOLOGY

2.1 DESK STUDY

The desk study included a search for statutory nature conservation sites designated for bats within a 10 km radius of the site.

As part of the Preliminary Ecological Appraisal (Report RT-MME-123420-01) an ecological desk study (which included a search for records of bats) was undertaken within a 1 km radius of the site. The consultees for the desk study was The Hampshire Biodiversity Information Centre.

Middlemarch Environmental Ltd then assimilated and reviewed the desk study data provided by these organisations. Relevant bat data are discussed in Chapter 3. In compliance with the terms and conditions relating to its commercial use, the full desk study data are not provided within this report.

2.2 FIELD SURVEY

In line with the specifications detailed in Bat Mitigation Guidelines (English Nature, 2004) and Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2016), a Preliminary Bat Roost Assessment of the buildings was conducted during daylight hours. A visual assessment was undertaken to determine the presence of any Potential Roost Features (PRFs), together with a general appraisal of the suitability of the site for foraging and commuting. Table 2.1 provides examples of PRFs. Any accessible PRFs were inspected using binoculars, a torch and endoscope for evidence of possible bat presence. Buildings were surveyed externally and internally.

For reasons of health and safety, the survey was only undertaken in areas accessible from 3.5 m ladders.

Based on the PRF's present, the survey area was assessed using the suitability classes detailed within Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2016), as detailed in Table 2.2.

Example of Potential Roost Features	
<u>Externally</u>	
• Access through window panes, doors and walls; • behind peeling paintwork or lifted rendering; • behind hanging tiles; • weatherboarding; • eaves; • soffit boxes; • fascias; • lead flashing; • gaps under felt (even including those of flat roofs); • under tiles/slates; • existing bat and bird boxes; and • any gaps in brickwork or stonework permitting access into access to cavity- or rubble-filled walls.	
<u>Internally</u>	
• behind wooden panelling; • in lintels above doors and windows; • behind window shutters and curtains; • behind pictures, posters, furniture, peeling paintwork; • peeling wallpaper, lifted plaster and boarded-up windows; • inside cupboards and in chimneys accessible from fireplaces. • within attic voids: • the top of gable end or dividing walls; • the top of chimney breasts; • ridge and hip beams and other roof beams; • mortise and tenon joints; • all beams (free-hanging bats); • the junction of roof timbers, especially where ridge and hip beams meet; • behind purlins; • between tiles and the roof lining; and • under flat felt roofs.	

Table 2.1: Potential Roost Features (Adapted from Collins, 2016)

Suitability	Description
High	A structure 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.
Moderate	A structure 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 (with respect to roost type only – the assessments in this table are made irrespective of species conservation status, which is established after presence is confirmed).
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation).
Negligible	Negligible habitat features on site likely to be used by roosting bats.

Table 2.2: Classification of Structures with Bat Potential (Adapted from Collins, 2016)

3. DESK STUDY

3.1 STATUTORY NATURE CONSERVATION SITES

The site is not located within 10 km of any statutory nature conservation sites designated for the presence of bats.

3.2 SPECIES RECORDS

Records of bat species within a 1 km radius of the survey area provided by the local record centre are summarised in Table 3.1. It should be noted that the absence of records should not be taken as confirmation that a species is absent from the search area.

Bat Species	No. of Records	Most Recent Record	Proximity of Nearest Record to Study Area	Species of Principal Importance?	Legislation / Conservation Status
Pipistrelle species <i>Pipistrellus</i> sp.	8	2011	180 m west	#	ECH 4, WCA 5, WCA 6
Soprano pipistrelle <i>Pipistrellus pygmaeus</i>	4	2014	530 m south	✓	ECH 4, WCA 5, WCA 6
Common pipistrelle <i>Pipistrellus pipistrellus</i>	2	2014	700 m south-west	-	ECH 4, WCA 5, WCA 6
Long-eared bat species <i>Plecotus</i> sp.	1	2010	750 m south-west	#	ECH 4, WCA 5, WCA 6
Serotine <i>Eptesicus serotinus</i>	2	2010	750 m south-west	-	ECH 4, WCA 5, WCA 6
Brown long-eared bat <i>Plecotus auritus</i>	1	2010	820 m south-west	✓	ECH 4, WCA 5, WCA 6
Noctule <i>Nyctalus noctula</i>	1	2007	Potentially within 1 km *	✓	ECH 4, WCA 5, WCA 6
Unidentified bat <i>Chiroptera</i> sp.	1	2000	Potentially within 1 km *	#	#
Key: #: Dependent on species. *: Grid reference provided was four figures only. ECH 4: Annex IV of the European Communities Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora. Animal and plant species of community interest in need of strict protection. WCA 5: Schedule 5 of Wildlife and Countryside Act 1981 (as amended). Protected animals (other than birds). WCA 6: Schedule 6 of Wildlife and Countryside Act 1981 (as amended). Animals which may not be killed or taken by certain methods. Species of Principal Importance: Species of Principal Importance for Nature Conservation in England. Note. This table does not include reference to the Berne Convention (Convention on the Conservation of European Wildlife and Natural Habitats), the Bonn Convention on the Conservation of Migratory Species of Wild Animals or the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).					

Table 3.1: Summary of Bat Species Records Within 1 km of Survey Area

4. SURVEY RESULTS

4.1 INTRODUCTION

The Preliminary Roost Assessment was conducted on 2nd September 2016 by:

- Maral Miri, Principal Ecological Consultant, Bat Licence Number 2015-13147-CLS-CLS; and,
- Penny Holgate, Ecological Consultant, Bat Licence Number 2015-14131-CLS-CLS.

Drawing C123420-02-01, illustrating the layout of the buildings on site is provided in Chapter 7.

Weather conditions were recorded and are presented in Table 4.1.

Parameter	Conditions
Temperature (°C)	15
Cloud Cover (%)	100
Precipitation	Showers
Wind Speed (Beaufort)	F1

Table 4.1: Weather Conditions During the Preliminary Roost Assessment of Structures

4.2 CONSTRAINTS

It was not possible to fully access the loft spaces within the single storey accommodation units due to advice by onsite maintenance that cables running along the floor were unsafe.. It was also not possible to access Building 48 as the pool area was closed at the time of the survey and therefore a full assessment of this building was not possible.

4.3 SURVEY RESULTS

The survey area included circa 50 buildings of which the majority were used as holiday units. Additional buildings included dining, entertainment and leisure facilities, with smaller buildings used for storage and as boiler rooms or substations.

4.3.1 Buildings 2, 3, 4, 7, 8, 14, 15, 16, 17, 18, 19, 20, 21, 22, 24, 26, 36, 37, 38, 39 & 40

External Assessment

The majority of the holiday units were single storey brick buildings with rendered walls. These buildings had pitched roofs with interlocking concrete tiles and uPVC soffits (Plate 4.1). The majority of the buildings were in a good state of repair, with the rendered walls and roof tiles in good condition with no gaps or crevices recorded suitable for roosting bats (Plate 4.2).

Buildings 2, 3 and 4 had small gaps under the ridge tiles (Plate 4.3). It was not possible to inspect these areas due to the height at which they were located and therefore their roosting potential could not be determined at the time of survey.



Plate 4.1: Example of the single storey holiday units



Plate 4.2: Roof tiles and walls in good condition



Plate 4.3: Gaps under ridge tiles

The only features recorded at Buildings 2, 3 and 4 which could be utilised by bats to gain entry into the buildings and potential roost locations included gaps under ridge tiles (Plate 4.3).

It was not possible to inspect these features due to the height at which they were located and as such it was not possible to establish if bats had used these features to enter a roost location at the time of surveying. No evidence of roosting bats, e.g. droppings, urine staining, feeding remains or scratch marks, was recorded within the features that could be fully inspected during the survey.

Internal Assessment

Internally, all the buildings were of similar construction and supported timber beams and rafters, with a ridge beam (Plate 4.4). The floor to apex height was approximately 1 m. Timber boards were present between the beams and roof tiles and the floors were insulated (Plate 4.5).

It was not possible to fully inspect all features within the loft spaces, due to advice by onsite maintenance that cables running along the floor were unsafe. (Plate 4.6). Furthermore, the space between the boards and the roof tiles, potentially providing a suitable feature for crevice dwelling bats, could not be inspected. As such the bat roosting potential of the majority of the loft spaces could not be determined during the survey.



Plate 4.4: Internal view of the loft spaces



Plate 4.5: Boarding was present between the rafters and the roof tiles



Plate 4.6: A large number of exposed cables were present preventing safe access

Whilst no evidence of bats, e.g. droppings, urine staining, feeding remains or scratch marks, was recorded during the internal inspection of the buildings, not all areas could be fully assessed.

4.3.2 Buildings 5, 23, 25, 27, 28, 29, 30, 31, 33, 34, 35, 43, 44, 45 & 47

External Assessment

The remainder of the accommodation units were two storey brick buildings with some elevations covered by timber and uPVC cladding. The buildings supported flat felted roofs, with timber soffit boxes (Plate 4.7). The majority of the buildings were in a good state of repair with the walls, timber and PVC cladding and the felt in good condition.

Buildings 5 and 29 had gaps within the timber soffit boxes, providing potential access points into the building for bats (Plate 4.8). It was not possible to inspect these areas due to the height at which they were located and therefore their roosting potential could not be determined.



Plate 4.7: Example of the two storey accommodation units



Plate 4.8: Gaps within the timber soffit boxes (Buildings 5 & 29)

The only features recorded around Buildings 5 and 29 which could be utilised by bats to gain entry into the buildings and potential roost locations included gaps within the timber soffit boxes (Plate 4.8).

It was not possible to inspect these features due to the height at which they were located and as such it was not possible to establish if bats had used these features to enter a roost location at the time of surveying.

Internal Assessment

No loft spaces were present within these buildings.

4.3.3 Buildings 6, 32, 41 & 46 – Boiler Houses

External Assessment

The boiler houses were single storey brick buildings with pitched felted roofs and some areas with flat roofs and a brick chimney breast (Plate 4.9). The majority of the buildings were in a good state of repair with the walls, brickwork and the roofing felt in good condition with no gaps or crevices recorded suitable for roosting bats (Plate 4.9).

Building 41 had a number of weep holes and missing bricks within the chimney breast (Plate 4.10). It was not possible to inspect these features due to the height at which they were located and therefore their roosting potential could not be determined.



Plate 4.9: Example of the boiler houses



Plate 4.10: Weep holes and missing bricks within the chimney breast of Building 41

The only features recorded around Building 41 which could be utilised by bats to gain entry into the buildings and potential roost locations included the weep holes and missing bricks in the chimney breast (Plate 4.10). It was not possible to inspect these features due to the height at which they were located and as such it was not possible to establish if bats had used these features to enter a roost location at the time of surveying.

Internal Assessment

No internal loft spaces were present within these buildings.

4.3.4 Buildings 9 and 10 – Restaurant, Entertainment and Leisure Areas

External Assessment

Building 9 was used as an indoor swimming pool, restaurant and reception area and supported a mixture of single storey and two storey brick buildings with PVC cladding on the walls (Plate 4.11). This building contained a number of flat roofs covered by a mixture of roofing felt and metal cladding. An extension to the south of this building, had breezeblock walls and a corrugated metal roof (Plate 4.12). Building 9 was in a good state of repair with the walls, cladding and roofing felt/metal sheets in a good state of repair with no gaps or crevices recorded suitable for roosting bats.

Building 10 was used as an entertainment hall with an arcade located adjacent to it and was a large brick building with uPVC cladding and a flat felted roof (Plate 4.13). The southern section of this building supported a smaller flat roofed brick extension. The western gable end of Building 10 had a large pitched roof with interlocking clay tiles and wooden cladding (Plate 4.14).

Building 10 had lifted lead flashing and lifted wooden cladding in the western gable end which could be of value to roosting bats (Plate 4.15). It was not possible to inspect these areas due to the height at which they were located and therefore their roosting potential could not be determined.



Plate 4.11: View of Building 9



Plate 4.12: Southern extension of Building 9



Plate 4.13: View of Building 10



Plate 4.14: The western gable end of Building 10 with a large pitched roof with interlocking clay tiles and wooden cladding



Plate 4.15: The western gable end of Building 10 had lifted lead flashing and lifted cladding

A small number of features were recorded around Building 10 which could be utilised by bats to gain entry into the buildings and potential roost locations and lifted lead flashing and wooden cladding (Plate 4.15). It was not possible to inspect these features due to the height at which they were located and as such it was not possible to establish if bats had used these features to enter a roost location at the time of surveying.

Internal Assessment

No internal loft spaces were present within these buildings.

4.3.5 Building 12 – Games Room

External Assessment

Building 12 was a single storey brick building with rendered walls and a pitched roof with interlocking concrete tiles. A small extension was present on the southern elevation with a flat felt roof and wooden cladding (Plate 4.16). This building was in a good condition with no potential gaps or crevices recorded suitable for roosting bats.



Plate 4.16: View of Building 12

No evidence of roosting bats, e.g. droppings, urine staining, feeding remains or scratch marks, and no potential features were recorded during the survey.

Internal Assessment

No internal loft spaces were present within this building.

4.3.6 Building 13

External Assessment

Building 13 was a large brick building with a pitched corrugated metal roof and was used for storage at the time of survey (Plate 4.17). The building was in good condition with no potential gaps or crevices recorded.



Plate 4.17: View of Building 13

No evidence of roosting bats, e.g. droppings, urine staining, feeding remains or scratch marks, and no potential features were recorded during the survey.

Internal Assessment

No internal loft spaces were present within this building.

4.3.7 Building 11 – Bar

External Assessment

Building 11 was a brick building covered by wooden cladding. The building had a mixture of pitched and hipped roofs covered by corrugated metal sheets and flat roofs covered by black felt sarking (Plate 4.18). Wooden soffits were recorded along the eaves. The building was in a good state of repair with no gaps or crevices recorded suitable for roosting bats.



Plate 4.18: View of Building 11

No evidence of roosting bats, e.g. droppings, urine staining, feeding remains or scratch marks, and no potential features were recorded during the survey.

Internal Assessment

No internal loft spaces were present within this building.

4.3.8 Building 42 – Children’s Play Rooms

External Assessment

Building 42 was a single storey brick building with a flat felted roof and uPVC fascia. (Plate 4.19). The building was in good condition with no potential gaps or crevices recorded suitable for roosting bats.



Plate 4.19: View of Building 42

No evidence of roosting bats, e.g. droppings, urine staining, feeding remains or scratch marks, and no potential features were recorded during the survey.

Internal Assessment

No internal loft spaces were present within this building.

4.3.9 Building 48

External Assessment

Building 48 was a single storey rendered building with a pitched roof covered by interlocking concrete tiles (Plate 4.20). It was not possible to access the building therefore it was not possible to fully inspect its potential for bats.



Plate 4.20: View of Building 48

No evidence of roosting bats, e.g. droppings, urine staining, feeding remains or scratch marks, and no potential features were recorded during the survey.

Internal Assessment

No access was possible to this building to determine whether it had an internal loft space.

4.3.10 Building 49 – Cafe

External Assessment

Building 49 was a glass, concrete and timber building (Plate 4.21). The building was in good condition with no features suitable for roosting bats.



Plate 4.21: View of Building 49

No evidence of roosting bats, e.g. droppings, urine staining, feeding remains or scratch marks, and no potential features were recorded during the survey.

Internal Assessment

This building did not contain a loft space.

4.3.11 Building 1

External Assessment

Building 1 was a small wooden structure adjacent to the lake in the north-western corner of the site (Plate 4.22). The building had a large hole in the soffit which could be utilised by bats to gain entry into the building and potential roost locations. This feature was inspected thoroughly and no evidence of bats e.g. droppings was recorded.



Plate 4.22: View of Building 1

Internal Assessment

No internal loft space was present within this building and it was considered to be of negligible potential to roosting bats due to lack of sheltered crevices.

4.3.12 Site and Surrounding Habitats

The development site was dominated by buildings and areas of hardstanding in the west, with the east of the site dominated by grassland and a large lake. A number of scattered trees, hedgerows and areas of scrub were also present within the site, providing suitable foraging and commuting habitat for bats. The west of the site is likely to be well lit due to the presence of a large number of holiday let buildings and entertainment facilities, therefore, reducing the value of the site to support roosting, foraging and commuting bats.

Habitats within 1 km of the site suitable for roosting, commuting and foraging include:

- Running and standing water bodies, with Emsworth Harbour/Mill Rithe running to the north and east.
- Agricultural fields and grassland with tree and hedge lined boundaries.
- Residential housing and associated gardens in Mill Rythe Village to the west.
- Schools with associated grounds.
- Golf course with associated open grassland habitats, hedges and trees (Tournerbury Golf Course is located to the south).

There is some connectivity between habitat features and the wider landscape via the boundary hedges and scrub.

5. DISCUSSION AND CONCLUSIONS

5.1 SUMMARY OF PROPOSALS

Planning proposals include the redevelopment of the site, including the the demolition of existing buildings on site and construction of circa. 291 mixed accommodation units (including 204 caravans and lodges and refurbishment of 87 chalets) with associated dining and leisure facilities.

5.2 ASSESSMENT OF STRUCTURES

The external inspection of the buildings on site confirmed the presence of a small number of access points for bats in a number of the buildings. Buildings 1, 2, 3, 4, 5, 10, 29 and 41 were considered to be of low value to roosting bats due to the presence of features such as holes in the soffit, gaps under the ridge tiles, missing bricks and lifted lead flashing and wooden cladding. No evidence of bats was recorded during the external assessments. However, it was not possible to fully inspect all the suitable features due to the height at which they were located and as such it was not possible to establish if bats had used these features to enter a roost location at the time of surveying.

Internal inspection of the buildings was restricted due to the presence of unsafe, exposed cables and timber boarding between the rafters and the roof tiles. Furthermore, a large number of the buildings lacked a roof void. No evidence of bats, e.g. droppings, urine staining, feeding remains or scratch marks, was recorded during the internal inspection of the buildings but not all areas could be fully surveyed.

The remaining buildings onsite were considered to have negligible bat roosting potential.

5.3 POTENTIAL IMPACTS ON BATS

If bats utilise buildings 1, 2, 3, 4, 5, 10, 29 and 41, demolition of these structures is likely to result in roost destruction and kill/injury of bats.

6. RECOMMENDATIONS

All recommendations provided in this section are based on Middlemarch Environmental Ltd's current understanding of the site proposals, correct at the time the report was compiled. Should the proposals alter, the conclusions and recommendations made in the report should be reviewed to ensure that they remain appropriate.

R1 Buildings 1, 2, 3, 4, 5, 10, 29 and 41

Buildings 1, 2, 3, 4, 5, 10, 29 & 41 at Mill Rythe Holiday Village have been identified as having low potential to support roosting bats. Bat Surveys: Good Practice Guidelines, published by the Bat Conservation Trust (Collins, 2016), recommends for structures with low bat roosting potential that at least one survey (consisting of either a nocturnal emergence survey or a dawn re-entry survey) be undertaken during the bat activity season to determine the presence/absence of roosting bats within the structures. The bat activity season extends from May to September, with mid-May to August being the optimum survey period.

Should this survey confirm the presence of roosting bats, it will be necessary to undertake additional surveys in order to inform a Natural England licence application. In addition, should the survey identify the presence of significant levels of bat activity at the site, it may be necessary to undertake further survey visits to comprehensively assess the value of the site to bats.

7. DRAWINGS

Drawing C123420-02-01 – Location of Buildings within Holiday Village



LEGEND:

SYM.	DESCRIPTION
	BOUNDARY OF DEVELOPMENT SITE
	EXISTING BUILDINGS TO BE RETAINED
	PROPOSED CARAVAN BASES
	EXISTING TREES TO BE RETAINED
	EXISTING HEDGES / SCRUB TO BE RETAINED
	PROPOSED WOODLAND PLANTING.
	PROPOSED SPECIMEN TREES
	PROPOSED WILDFLOWER MEADOW AREAS
	PROPOSED MOWN GRASS AREAS
	EXISTING AMENITY GRASS AREAS
	EXISTING WATER BODIES
	PROPOSED ACCESS ROADS / PARKING BAYS
	PROPOSED PATHS & PEDESTRIAN AREAS
	PROPOSED DECK AREAS AROUND CENTRAL COMPLEX

NOTES:

- PROVIDE MINIMUM DEPTH OF TOPSOIL TO PLANTED AREAS AS FOLLOWS: GRASS AREAS : 200MM, SHRUB PLANTING: 450MM, AND TREE PITS: 750MM.
- TREE PITS SHALL BE BACKFILLED WITH A PRE-MIXED SOIL/ COMPOST MIXTURE INCORPORATING A SLOW RELEASE FERTILIZER.
- SPECIMEN TREES TO BE DOUBLE STAKED WITH SINGLE CROSSBAR.
- TO EACH TREE, TRANSPLANT AND CONTAINER GROWN PLANTING STATION THE CONTRACTOR SHALL SUPPLY AND INCORPORATE A SLOW RELEASE FERTILIZER.
- CONTAINER GROWN STOCK SHALL BE PLANTED IN A PIT EXCAVATED TO SUFFICIENT DEPTH AND WIDTH TO ACCOMMODATE THE PLANT WITHOUT DISTURBING THE ROOTS.
- TRANSPLANT PITS SHALL BE EXCAVATED TO A DEPTH OF 300MM DIAMETER AND 300MM DEPTH BELOW EXISTING GROUND LEVEL. ALL PITS SHALL BE EXCAVATED TO SUFFICIENT DEPTH AND WIDTH TO ACCOMMODATE THE PLANT WITHOUT DISTURBING ITS ROOTS. DURING BACKFILLING THE FINAL SOIL LEVEL AROUND THE TRANSPLANT SHOULD BE RAISED TO 40MM ABOVE THE SURROUNDING SOIL LEVEL.
- ORNAMENTAL PLANTING AREAS SHALL BE CULTIVATED TO A MEDIUM TILTH AND 300MM DEEP. A SLOW RELEASE FERTILIZER SHALL BE INCORPORATED IN A SECOND PASS FOLLOWING INITIAL CULTIVATION. THE CONTRACTOR SHALL PLACE A 50MM LAYER OF ORGANIC MULCH TO COVER THE COMPLETE AREA OF ORNAMENTAL PLANTING AREAS. BEFORE APPLICATION OF THE MULCH THE AREA SHALL BE WEED FREE. THE CONTRACTOR SHALL PLACE A 75MM DEPTH LAYER OF ORGANIC MULCH TO A CIRCLE 500MM RADIUS AROUND THE BASE OF ALL STANDARD TREES WITHIN GRASS AREAS. BEFORE APPLICATION OF THE MULCH THE AREAS SHALL BE WEED FREE.
- PLANTING BEDS SHOULD BE KEPT COMPLETELY WEED FREE AND DEPTH OF MULCH MAINTAINED AT 50MM DEPTH.
- RABBIT GUARDS MAY BE REQUIRED, EITHER INDIVIDUAL GUARDS OR FENCING.
- IT IS THE RESPONSIBILITY OF THE CONTRACTOR TO ESTABLISH THE LOCATION OF SERVICES PRIOR TO PLANTING. TREES WITHIN PLANTING MIXES SHOULD BE PLACED AWAY FROM ANY OVERHEAD POWER LINES.

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APPENDIX 1

LEGISLATION

Bats and the places they use for shelter or protection (i.e. roosts) receive European protection under The Conservation of Habitats and Species Regulations 2010, as amended (Habitats Regulations 2010, as amended). They receive further legal protection under the Wildlife and Countryside Act (WCA) 1981, as amended. This protection means that bats, and the places they use for shelter or protection, are capable of being a material consideration in the planning process.

Regulation 41 of the Habitats Regulations 2010 (as amended), states that a person commits an offence if they:

- deliberately capture, injure or kill a bat;
- deliberately disturb bats; or
- damage or destroy a bat roost (breeding site or resting place).

Disturbance of animals includes in particular any disturbance which is likely to impair their ability to survive, to breed or reproduce, or to rear or nurture their young, or in the case of animals of a hibernating or migratory species, to hibernate or migrate; or to affect significantly the local distribution or abundance of the species to which they belong.

It is an offence under the Habitats Regulations 2010 (as amended) for any person to have in his possession or control, to transport, to sell or exchange or to offer for sale, any live or dead bats, part of a bat or anything derived from bats, which has been unlawfully taken from the wild.

Whilst broadly similar to the above legislation, the WCA 1981 (as amended) differs in the following ways:

- Section 9(1) of the WCA makes it an offence to *intentionally* kill, injure or take any protected species.
- Section 9(4)(a) of the WCA makes it an offence to *intentionally or recklessly** damage or destroy, or *obstruct access to*, any structure or place which a protected species uses for shelter or protection.
- Section 9(4)(b) of the WCA makes it an offence to *intentionally or recklessly** disturb any protected species *while it is occupying a structure or place which it uses for shelter or protection*.

*Reckless offences were added by the Countryside and Rights of Way (CROW) Act 2000.

As bats re-use the same roosts (breeding site or resting place) after periods of vacancy, legal opinion is that roosts are protected whether or not bats are present.

The following bat species are Species of Principal Importance for Nature Conservation in England: barbastelle bat *Barbastella barbastellus*, Bechstein's bat *Myotis bechsteinii*, noctule *Nyctalus noctula*, soprano pipistrelle *Pipistrellus pygmaeus*, brown long-eared bat *Plecotus auritus*, greater horseshoe bat *Rhinolophus ferrumequinum* and lesser horseshoe bat *Rhinolophus hipposideros*.

The reader should refer to the original legislation for the definitive interpretation.

ECOLOGY

At present, 18 species of bats are known to live within the United Kingdom, of which 17 species are confirmed as breeding. All UK bat species are classed as insectivorous, feeding on a variety of invertebrates including midges, mosquitoes, lacewings, moths, beetles and small spiders.

Bats will roost within a variety of different roosting locations, included houses, farm buildings, churches, bridges, walls, trees, culverts, caves and tunnels. At different times of the year the bats roosting requirements alter and they can have different roosting locations for maternity roosts, mating roosts and hibernation roosts. Certain bat species will also change roosts throughout the bat activity season with the bat colony using the site to roost for a few days, abandoning the roost and then returning a few days or weeks later. This change can be for a variety of reasons including climatic conditions and prey availability. Bats are known live for several years and if the climatic conditions are unfavourable at a particular roost, they may abandon it for a number of years, before returning when conditions change. Due to the matriarchal nature of bat colonies, the locations of these roosts can be passed down through the generations.

Bats usually start to come out of hibernation in March and early April (weather dependent), when they start to forage and replenish the body weight lost during the hibernation period. The female bats then start to congregate together in maternity roosts prior to giving birth and a single baby is born in June or July. The female then works hard to feed her young so that they can become independent and of a sufficient weight to survive the winter before the weather gets too cold and invertebrate activity reduces. Males generally live solitary lives, or in small groups with other males, although in some species the males can be found living with the females all year. The mating season begins in the autumn. During the winter bats hibernate in safe locations which provide relatively constant conditions, although they may venture outside to forage on warmer winter nights.