



LIZARD

Landscape Design and Ecology

ECOLOGICAL IMPACT ASSESSMENT

ALTERATIONS AT PARK HOUSE HOTEL, BEPTON

ON BEHALF OF: THE PARK HOUSE HOTEL

Planning Issue

Prepared by	GS
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SUMMARY

Lizard Landscape Design and Ecology has been commissioned by The Park House Hotel to undertake an Ecological Impact Assessment of proposals at The Park House Hotel, Bepton, West Sussex (*Central Grid Reference: SU 86190 18628 – hereafter referred to as ‘the site’*). A preliminary ecological appraisal (PEA) and bat roost assessment was undertaken on the 5th August 2021, to appraise the existing ecological resource within the land and the surrounding area. Further bat emergence surveys of buildings were carried out on 18th August and 17th September 2021.

The site is formed of an existing set of hotel and accommodation buildings, surrounded by hard surfaces, amenity grassland and introduced shrubs. The site itself is of **very low ecological value** with no habitats of interest noted, beyond scattered trees of **local value** and a pond.

The emergence surveys undertaken in 2021 identified the main hotel building B01 to be a day roost of a number of common pipistrelle bats, with 10no. bats identified in areas proposed for alteration. Furthermore the laundry room B02 contained a day roost of 1no. soprano pipistrelle. Mitigation and a licence approach is proposed to ensure no harm to bats, contravention of legislation and ongoing favourable conservation status of the local bat population.

No other significant constraints with regards protected species or habitats have been identified.

Once avoidance and mitigation measures have been taken into account, the impacts of the planned development upon biodiversity will be **negligible**. Proposed enhancements will result in a very minor **net gain** in accordance with National and Local Planning Policy.

1.0 INTRODUCTION

- 1.1 Lizard Landscape Design and Ecology has been commissioned by The Park House Hotel to undertake an Ecological Impact Assessment of proposals at The Park House Hotel, Bepton, West Sussex (Central Grid Reference: SU 86190 18628 – hereafter referred to as ‘the site’).
- 1.2 A preliminary ecological appraisal (PEA) and bat roost assessment were undertaken on the 5th August 2021, to appraise the existing ecological resource within the land and the surrounding area. The *PEA* comprised a baseline survey conforming broadly to the *JNCC Ecology Phase 1 Habitat Survey* protocol, to identify the existing habitats. In addition, a protected species assessment was undertaken to identify the potential for European and nationally protected species within and adjacent to the land. The *PEA* identified the need for Phase 2 bat emergence and re-entry surveys, which were carried out on 18th August and 17th September 2021. A full EclA was then undertaken using this baseline data.
- 1.3 A summary of the results and potential impacts of the proposals, and details of avoidance, mitigation and compensation measures have been detailed within this report. This report has been prepared by George Sayer (*Senior Ecologist; MCIEEM; Lizard Landscape Design and Ecology*). The report has been reviewed by Catherine O’Reilly (*MICEEM; Senior Ecologist; Lizard Landscape Design and Ecology*).

Site Information

- 1.4 The site consists of a country hotel and spa with surrounding grounds. The hotel and grounds cover a large area, but the areas proposed for alterations cover c..2000sqm. The site is within the small village of Bepton, within the South Downs National Park.
- 1.5 The site is located c.68.0 metres above sea level. Soils on site are described as *slightly acid loamy and clayey soils with impeded drainage*.

Surrounding Landscape

- 1.6 The site sits north of the scarp slopes of the South Downs and is surrounded by arable farmland and areas of woodland.
- 1.7 There is one pond to the east of the site, forming part of the hotel grounds. A further pond sits 55.0 m east within a golf course forming part of the hotel grounds.

Development Proposals

- 1.8 It is understood that the proposals include several alterations to the site, namely:
- *Removal of a pitched roof and replacement with a flat roof and balcony (Building B01 Section 1)*
 - *Extension of roof to the north of the hotel to create a kitchen area (Building B01 Section 2);*
 - *Change of a dormer window into a balcony (Building B01 Section 3);*
 - *Extension to the external laundry building (Building B02).*
- 1.9 The above proposals would require removal of roofs, weatherboarding and small sections of wall.

Aims

- 1.10 The aim of this ecological appraisal survey has been:
- *To identify habitats and protected species present, and any other features of ecological value;*
 - *Identify any potential ecological constraints;*
 - *Identify impacts of the proposed development and set out appropriate avoidance, mitigation and compensation measures;*
 - *To provide suggestions for enhancements to be incorporated into the scheme.*

2.0 PLANNING POLICY AND LEGISLATION

Legislation

2.1 Legislation relating to wildlife and biodiversity of particular relevance to this EclA includes:

- *The Conservation of Habitats and Species Regulations 2017;*
- *The Wildlife and Countryside Act 1981 (as amended);*
- *The Natural Environment and Rural Communities (NERC) Act 2006;*

2.2 This above legislation has been addressed, as appropriate, in the production of this report.

National Planning Policy

2.3 The National Planning Policy Framework (NPPF) 2021 sets out the government planning policies for England and how they should be applied. 'Chapter 15: *Conserving and Enhancing the Natural Environment*' states that development should be '*minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.*'

2.4 The Government Circular 06/2005, which is referred to by the NPPF, provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

Local Planning Policy

2.5 South Downs National Park's Local Plan (2019) Core Policy SD2: Ecosystem Services states that 'Development proposals will be permitted where they have an overall positive impact on the ability of the natural environment to contribute goods and services.'

- 2.6 Strategic Policy SD9 (*South Downs National Park, 2019*) states that planning permission will be granted for development where it can be demonstrated that all the following criteria have been met:
1. Development proposals will be permitted where they conserve and enhance biodiversity and geodiversity, giving particular regard to ecological networks and areas with high potential for priority habitat restoration or creation. Prior to determination, up-to-date ecological information should be provided which demonstrates that development proposals:
 - a. Retain, protect and enhance features of biodiversity and geological interest (including supporting habitat and commuting routes through the site and taking due account of any use by migratory species) and ensure appropriate and long-term management of those features;
 - b. Identify and incorporate opportunities for net gains in biodiversity;
 - c. Contribute to the restoration and enhancement of existing habitats, the creation of wildlife habitats and the creation of linkages between sites to create and enhance local and regional ecological networks;
 - d. Protect and support recovery of rare, notable and priority species;
 - e. Seek to eradicate or control any invasive non-native species present on site;
 - f. Contribute to the protection, management and enhancement of biodiversity and geodiversity, for example by supporting the delivery of GI and Biodiversity Action Plan targets and enhance Biodiversity Opportunity Areas (BOA); and
 - g. Comply with the mitigation hierarchy as set out in national policy.

3.0 METHODOLOGY

3.1 Desk Study

3.1.1 The Multi-Agency Geographic Information for the Countryside (*MAGIC*) was consulted for all designated sites, priority habitats and protected species licence records within 2.0km of the site. The desk search was conducted on 18th November 2021. Due to the small scale of the proposals and lack of ecological features beyond the building, a full data search was not considered proportionate or beneficial to determining ecological impact. This approach is in accordance with guidance provided by CIEEM (2020) where the provision of local records would not have a material impact upon the assessment.

3.2 Field Survey

3.2.1 A preliminary ecological appraisal was undertaken on 5th August 2021, and the site subjected to an ecology survey using guidelines set out in the *Handbook for Phase 1 Habitat Survey – A Technique for Environmental Audit (JNCC, 2010)*.

3.2.2 Habitats within the land were classified and the presence, or potential presence, of certain protected and / or notable species of flora and fauna were identified. A summary description of the habitat within the site following the *Phase 1 Habitat Survey Methodology* is presented in Section 4.0. This involved identifying features that may be used by protected species, potential foraging areas and other signs of use. Water bodies were recorded wherever possible, within 500 metres of the proposed development site.

3.2.3 The results are summarised and accompanied in large part by photographic evidence contained in *Appendix A – Site Photographs*.

3.3 Preliminary Bat Roost Assessment

3.3.1 A Preliminary Bat Roost Assessment was undertaken on 5th August 2021 by an experienced, licenced bat surveyor (*George Sayer MCIEEM, 2018-34434-CLS-CLS*) who undertook an internal and external assessment of all buildings and a ground-level assessed of trees within the proposed construction zone. Due to the building being large and complex, and the proposals being related to small discrete areas, some areas of the buildings were not fully assessed. The bat surveyor assessed the existing buildings visually and searched for evidence such as:

- *Grease Marks;*
- *Urine Stains;*
- *Bat Droppings;*
- *Feeding Remains;*
- *Dead or Live Bats.*

3.3.2 Trees were visually identified from the ground, using binoculars where necessary, for features that could be used by bats such as:

- *Woodpecker Holes;*
- *Knot Holes;*
- *Tear-outs;*
- *Flush Cuts;*
- *Double Leaders.*

- 3.3.3 Once features had been assessed the trees were then categorised in accordance with *Table 4.1 of the Bat Conservation Trust's Good Survey Guidelines (2016)*:

Table No. 01 – Categorisation Criteria

Category	Buildings	Trees
`Negligible`	<i>No suitable features identified.</i>	<i>No suitable features identified.</i>
`Low`	<i>A structure which could be used opportunistically, however, are not likely to be used on a regular basis / by a large number of bats.</i>	<i>Tree of sufficient size / age to support bat roost features; but with none identified from the ground.</i>
`Moderate`	<i>A building with features which, could be used regularly by a small number of bats.</i>	<i>Tree with features which, may support a bat roost of low conservation status.</i>
`High`	<i>A building with features suitable for use by a large number of bats on a regular basis.</i>	<i>A tree with several potential bat roost sites that are suitable for use by a large number of bats.</i>

3.4 Bat Emergence Survey

- 3.4.1 A bat emergence survey was undertaken on 18th August 2021, with a bat re-entry survey undertaken on 17th September 2021. The surveys were undertaken in accordance with the *Bat Conservation Trust's Good Survey Guidelines (2016)*. All surveys were designed and led by an experienced, licenced bat surveyor (*George Sayer MCIEEM, 2018-34434-CLS-CLS*).
- 3.4.2 3no. discrete locations were identified which required bat emergence surveys. A single bat surveyor was assigned a point each to adequately cover all three locations. There is no internal connectivity between these areas and other areas of the buildings, and as such full survey of the entire building was not considered necessary.
- 3.4.3 The dusk survey began 15 minutes before sunset and ended 1.5 hours after. Dawn survey begin 1.5 hours before sunrise and ended 15 minutes after. Data including species, behaviour and general patterns of activity were recorded throughout the survey. Full results of the surveys can be found in *appendix B*.

Table No. 02 – Bat Emergence / Re-entry Survey Details

Date	18.08.2021	17.09.2021
<i>Survey Points</i>	<i>SP1 – SP3</i>	<i>B1</i>
<i>Survey Type</i>	<i>Dusk</i>	<i>Dawn</i>
<i>Surveyors</i>	<i>GS, WM, EH</i>	<i>GS, GQ, JH</i>
<i>Weather</i>	<i>18°C, WF2, Light Cloud</i>	<i>11°C, WF2, Light Cloud</i>
<i>Sunset / Sunrise</i>	<i>20:20</i>	<i>06:40</i>
<i>Start</i>	<i>20:05</i>	<i>05:10</i>
<i>Finish</i>	<i>21:50</i>	<i>06:55</i>

3.4.4 Bats were identified using Anabat SD2, Peersonic RPA 3 and Echo Meter Touch Pro 2 bat detectors.

Surveyor Details

3.4.5 All surveys were designed by licenced ecologists assisted by experienced field surveyors. The following surveyors were used:

- George Sayer (GS) – NE Class 2 licence holder with 9 years survey experience
- William Mills (WM) – Project Ecologist with 4 years survey experience
- Joshua Harwood (JH) – Assistant Ecologist with 4 years survey experience
- Eve Hills (EH) – Field Assistant with 2 years survey experience
- Guy Quartermaine (GQ) – Field Assistant with 2 years survey experience

Data Analysis

3.4.6 Sonogram analysis was undertaken using the AnalookW and kaleidoscope viewer programmes.

Limitations

- 3.4.7 Given the scale and complexity of the building, and the small and discrete nature of the proposals, a full survey of the entire main hotel building was considered disproportionate. As such a full baseline of the bat use of the entire site was not provided, but sufficient information was gathered to assess the impacts upon bats.
- 3.4.8 One area of the site (B01 section 3) was not fully assessed for bats due to this being either occupied by guests during all visits, or being scoped into the proposals after the bat activity season. In this case, an assessment has been made of the likelihood for bats based on daytime assessment and the results of the other surveys, to extrapolate the likely findings in these areas.

3.5 Ecological Impact Assessment

- 3.5.1 The methodology for Ecological Impact Assessment (EclA) follows best practice guidelines set by the Chartered Institute of Ecology & Environmental Management (CIEEM): 'Guidelines for Ecological Impact Assessment' (CIEEM, 2018). This includes identifying the baseline conditions on the site and subsequently rating the potential effects of the development based on the sensitivity and value of the resource affected, combined with the magnitude, duration and scale of the impact (or change). This is initially assessed without mitigation measures, and then assessed again after allowing for the proposed mitigation measures; this provides the residual effects. The assessment is divided into construction effects and longer-term operational effects.

3.5.2 Each ecological feature within the site has been considered within a defined Geographic context such as:

- *International and European*
- *National*
- *Regional*
- *County*
- *District*
- *Local*
- *Site Level*
- *Negligible*

3.5.3 Based upon CIEEM guidance, value was determined with reference to the following factors:

- *Its inclusion as a Designated Site or other protected area;*
- *The presence of habitat types of conservation significance, e.g. Habitats of Principal Importance (NERC 2006);*
- *The presence (or potential presence) of species of conservation significance e.g. Species of Principal Importance (NERC 2006);*
- *The presence of other protected species e.g. those protected under The Wildlife and Countryside Act 1981;*
- *The sites social and economic value.*

3.5.4 The ecological impacts resulting from the proposals were then described according to a defined set of characteristics as defined within '*Guidelines for Ecological Impact Assessment in the UK and Ireland*' (CIEEM, 2018). This assessment considers residual impacts (once all mitigation has been taken into account), with any significant effects highlighted. A significant effect is defined as "*an effect which either supports or undermines biodiversity conservation objectives for 'important ecological features' or for biodiversity in general*".

3.5.5 The confidence that a certain activity will result in a significant adverse effect has been ranked as follows:

- *Highly probable;*
- *Probable;*
- *Unlikely;*
- *Highly unlikely.*

3.5.6 Where initial impacts have been identified as significant, avoidance, mitigation and compensation measures have been proposed to avoid, prevent or offset such effects. Enhancement has been proposed to ensure that the development represents a net gain in biodiversity in accordance with National Policy. Given the scale of the proposals, the gain will be relatively minor.

4.0 BASELINE ECOLOGICAL CONDITIONS

4.1 Designated Sites

Statutory Protected Sites

4.1.1 MAGIC was consulted for details of ecologically sensitive statutory protected sites (national sites within 2.0km, international sites within 10.0 km) of the proposed development; these are detailed below.

Table No. 03 – Statutory Protected Sites

Site	Description	Location
<i>South Downs National Park</i>	<i>1,600km² of high-value lowland landscape, including farmland, river valleys, ancient woodland and lowland heaths containing a number of small villages and market towns.</i>	<i>Site Within Designation</i>
<i>Treyford to Bepton Down, SSSI</i>	<i>A 121 ha area of calcareous grassland.</i>	<i>960.0 m S</i>
<i>Singleton and Cocking tunnels, SSSI, SAC</i>	<i>A 1.3 ha area noted for its importance as a roost for Barbastelle and Bechstein's bats.</i>	<i>2.0 km SE</i>
<i>Rook Cliff, SAC, SSSI,</i>	<i>A 10 ha area of calcareous ancient woodland.</i>	<i>3.8 km W</i>
<i>Kingley Vale SAC</i>	<i>A 200 Ha area of calcareous dry grassland and scrubland noted for the presence of rare orchid species.</i>	<i>6.0 km SW</i>
<i>Duncton to Bignor Escarpment SAC, SSSI</i>	<i>An example of mature beech <i>Fagus sylvatica</i> woodland located on the steep scarp face of the South Downs. The site has developed over chalk which is overlain in places by a clay-with-flints capping. Beech dominates in a mosaic with ash <i>Fraxinus excelsior</i> woodland, scrub and grassland. Much of the beech woodland is high forest but with some old pollards.</i>	<i>9.6 km E</i>

- 4.1.2 The Site is located within the Impact Risk Zone (IRZ) of Treyford to Bepton Down (SSSI). The LPA does not have to consult with *Natural England* on rural, non-residential applications of this nature. The site is less than 6.5 km from the *Singleton and Cocking Tunnels SAC*, and as such is within the *Core Conservation Area* for bats using the SAC. The potential for impacts upon bats using the SAC is addressed within this report.

Non-Statutory Protected Areas

- 4.1.3 *Sites of Nature Conservation Interest* (SNCl) are designations applied to the most important non-statutory nature conservation sites. They are recognised by the *National Planning Policy Framework (2021)* and as such are material considerations when assessing planning applications. The following SNCl were identified within 2.0km of the site:

Table No. 04 – Non-statutory Protected Sites

Site	Location
<i>Paddock Wood</i>	<i>1.15 km NE</i>
<i>Hoe Copse</i>	<i>2.0 km SE</i>

4.2 Habitats

- 4.2.1 Within 2.0km of the site there are *Priority Habitats* of *Woodpasture and Parkland, Deciduous Woodland, Ancient Woodland* and *Lowland Calcareous Grassland*. Large areas of ancient woodland are present c. 1.8 km to the south.
- 4.2.2 Habitats within and adjacent to the land include:
- *Existing Buildings;*
 - *Amenity Grassland;*
 - *Introduced Shrubs;*
 - *Hard / Bare Ground;*
 - *Scattered Trees.*

Existing Buildings

- 4.2.3 The site is dominated by the hotel buildings, which are of a mixture of ages but largely of brick construction with tiles roofs. The buildings are discussed further in the bat roost assessment.

Amenity Grassland

- 4.2.4 A well maintained lawn is present to the north-west of the site, and a small area of grassland to the north-east. The habitat is well-maintained and dominated by perennial rye-grass (*Lolium perenne*). This habitat is assessed as being of **site value**.

Introduced Shrubs

- 4.2.5 The site contains beds of introduced shrubs and herbaceous planting. These are well maintained and offer limited ecological value. This habitat is assessed as being of at most **site value**.

Hard / Bare Ground

- 4.2.6 The site is approached through a large gravel parking area, with paved paths and dining/seating areas throughout. These areas offer **negligible value**.

Scattered Trees

- 4.2.7 Interspersed along the site boundaries are a number of scattered trees. Most are relatively isolated from the proposal areas but several holm oaks (*Quercus ilex*) are noted to the frontage. One large holm oak was recorded as dangerous and has recently been removed.

Intact, Species-poor Hedges

- 4.2.8 A dense hedge runs along the south-west boundary of the site, which alongside ornamental species such as cherry laurel contains lots of hazel. The hedge ends abruptly at the neighbouring driveway where hedges then become ornamental. A short section of hawthorn hedge also lines the north-western boundary but is very short and becomes an ornamental hedge formed of Red Robin (*Photinia x fraseri*) for a long length. The hedges could technically be considered Priority Habitats but are disconnected and only of **site value**.

4.3 Protected Species Assessment

Amphibians

Desk Study

- 4.3.1 There are no records of Great Crested Newts (GCN) within the immediate surroundings, nor are there any GCN survey or licence returns (*positive or negative*). This suggests either limited survey effort due to lack of local development, or lack of suitable ponds due to the chalk geology. Great Crested Newts are protected under *The Conservation of Habitats and Species Regulations 2017*. It is an offence for anyone to intentionally kill, injure or disturb a Great Crested Newt or to damage, destroy or block access to areas of suitable habitat.

Site Assessment

- 4.3.2 There is one pond on the edge of the site, as well as another within the golf course. These ponds were not assessed in detail because of the nature of the proposals. The pond in the golf course appears to be suitable for amphibians being fringed with vegetation and of a suitable size. The pond to the east of the hotel ground is fringed with mature trees to the west, south and east and appears to be an ornamental pond with island. It is not possible to rule out GCN presence in either pond but given the lack of local records their presence is considered unlikely.
- 4.3.3 The site is isolated from either pond by hard surfaces and heavily-maintained amenity grassland. It is considered highly unlikely that any amphibians would cross these habitats to reach the hotel building, which in itself offers no value to amphibians. The proposals site offers **negligible potential** for GCN with the wider grounds offering **moderate potential**.

Reptiles

Desk Study

- 4.3.4 There are limited records of widespread reptiles within 2.0km of the site, mostly associated with Copthorne Common. All species of UK reptile are protected against reckless or intentional killing or injuring under *The Wildlife and Countryside Act 1981 (as amended)*.

Site Assessment

- 4.3.5 The is very limited suitable habitat for reptiles within the proposal area, with the grassland being well-maintained. Low numbers of reptiles may persist in marginal habitats and are likely to occur on the wider site. The proposal site is considered to offer **negligible** potential for reptiles.

Bats*Desk Study*

- 4.3.6 There are 16 species of bat present within 5.0 km of the site; Barbastelle, Serotine, Alcahloe, Bechstein's, Brandt's, Daubenton's, Mouse-eared, Whiskered, Natterer's, Noctule, Brown Long-eared (BLE), Common, Soprano and Nathusius' Pipistrelle, Noctule and Greater Horseshoe Bat. Several NE licences have been granted for bats in the surroundings, with the nearest being for common pipistrelle, 1.75 km east. A NE licence c.2.8 km north-east in southern Midhurst was granted in 2010 for Greater Horseshoe, BLE; Whiskered; Brandt's; Bechstein's; Daubenton's; Natterer's Bat.

Preliminary Roost Assessment

- 4.3.7 The existing buildings proposed for alteration were assessed for their potential to support roosting bats, a summary of the assessment is shown below. Discrete Sections of Buildings have been discussed separately:

Table No. 05 – Building Assessment

Ref.	Description	Category
B01 – Section 1 of Main Hotel	Section of roof proposed for alteration to the south of the building, consisting of a large, pitched roof with a smaller hipped roof emerging from the centre. Externally the roofs were clay tiled with a number of small crevices and potential roost/access points noted. Within the hipped roof was a small loft void. This was found to be used for water tanks, and was heavily sealed with BRM membranes and timber sarking. No access into the loft for bats was found and no evidence of bats was recorded.	Low- Moderate
B01 – Section	A small internal area of roof, consisting of two half-hipped roofs, proposed for extension and removal of the	Low- Moderate

2 of Main Hotel	<i>dormer. Externally one section of wall is covered in hanging clay tile, with another covered in wooden weatherboarding. Loose tiles and boards to the edges appeared suitable for bats. No loft spaces were found; roof tiles were flat clay and generally tightly-fitting with only 2-3 noticeable gaps. All ridge and hip tiles were tightly sealed.</i>	
B01 – Section 3 of Main Hotel	<i>A dormer window of timber frame with timber fascias and leaded roof and sides, proposed for removal and replacement with balcony. No internal access was available and the dormer opens into a bedroom. A small void may be present above the window but was not accessed at the time. Beneath the dormer are rows of clay roof tiles which would be removed for alterations.</i>	Low
B02 (Laundry Building)	<i>A laundry building formed of block and timber, covered to all aspects with wooden weatherboarding with a pitched clay tile roof. Several slipped tiles were noted to the roof. Internally, the loft space was tightly felted and well-sealed, heavily cobwebbed with no evidence of bats noted. The weatherboarding and slipped tiles might support individual bats.</i>	Low-Moderate
B03 (Baytree Cottage)	<i>A Detached, single-storey cottage of stone and brick with wooden weatherboarding to several aspects and a pitched, clay tile roof with one gable end and several hipped ends. The weatherboarding was largely too well-sealed for bat access, and most of the roof tiles were well-sealed, but with several gaps at valleys and slightly raised tiles noted. The soffits were of timber and mostly meshed against bird ingress, however several small gaps remained which might allow bat access. No internal access was possible due to guests being present, but the building is likely to contain a small roof void. <i>Building not proposed for alteration as part of this application.</i></i>	Moderate

Preliminary Roost Assessment of Trees

- 4.3.8 An early-mature holm oak close to the laundry building contains a shallow knot hole, conferring 'low' bat roost potential. Otherwise, no significant vegetation is impacted by the proposals. The boundary of the hotel property contains mature oaks and other trees which may support roosting bats, but which will be unaffected and are well distanced from the proposals.

Bat Emergence Survey, 18th August 2021

- 4.3.9 8no. common pipistrelle emerged from varying areas of the southern (Section 1) roof of B01 between 20:30 and 20:41. Apart from this a small number of common pipistrelles were heard but no other bat activity recorded.
- 4.3.10 A common pipistrelle emerged from the weatherboarding at Section 2 of B01 at 20:33, followed by another possible common pipistrelle emergence from the eaves of the adjacent roof at 20:34. Activity consisted of low levels of foraging common pipistrelle, as well as a single soprano pipistrelle and Myotis sp. call.
- 4.3.11 A soprano pipistrelle emerged from the weatherboarding to the rear (west) of the laundry building (B03) at 20:44. No other bats were seen to emerge from this building although a soprano pipistrelle was seen to likely emerge from the nearby South Downs Cottage. Common and soprano pipistrelle were recorded, as were serotine and BLE foraging and commuting along the road to the west of the hotel.

Bat Re-entry Survey, 17th September 2021

- 4.3.12 A total of 4no. common pipistrelle re-entries were confirmed into varying areas of the southern (Section 1) roof of B01 between 06:08 – 06:10, with other common pipistrelle re-entries possible due to a number of bats recorded circling but not entering, which may have re-entered unseen. Activity was otherwise low and consisted of re-entry activity by common pipistrelles and a single noctule pass overhead.
- 4.3.13 A common pipistrelle was recorded flying back and forth over the ridgeline of Section 2 of B01 between 06:02 – 06:07 and is considered to be a possible unseen re-entry into the building. Otherwise bat activity was very low and consisted of common pipistrelle only.

- 4.3.14 A silent bat flew west past the north of the laundry building at 06:07, which may constitute a re-entry into the weatherboarding to west but cannot be confirmed. A BLE was recorded circling the South Downs Cottage to north and single BLE and noctule calls were recorded.

Bat Foraging and Commuting Assessment

- 4.3.15 The surrounding trees, hedge and shrubs likely form part of the foraging and commuting habitat of the local bat population, which includes a number of rare and notable species. The site is relatively open, formed of buildings and grassland and as such some of the rarer woodland specialists such as Bechstein's bat are unlikely to use the site in any regular capacity. The bat emergence and re-entry surveys recorded the following bats using the site, with low numbers BLE bats and serotine recorded flying along the road outside the hotel. Bat activity in general was noted to be low, with pipistrelles roosting at the site but little other activity:

- *Common pipistrelle*
- *Soprano pipistrelle*
- *BLE*
- *Serotine*
- *Noctule*
- *Myotis sp.*

- 4.3.16 The value of the construction area is unlikely to extend beyond **site value**, being dominated by buildings and hard/bare ground.

Dormouse

Desk Study

- 4.3.17 There are limited records of dormice in the immediate vicinity, with numerous records from the monitoring at West Dean Woods and single records south of Cocking and 1.5 km north-east. Suitable habitats within this area of the South Downs are likely to support dormice which are probably under-recorded due to lack of development surveys.

Site Assessment

- 4.3.18 The wider hotel site is bounded by a mature hedge with trees to the north-east, but this is isolated from the proposal areas. The vegetation within the immediate grounds of the hotel consists mostly of unsuitable ornamental shrubs and isolated ornamental hedges. A dense hedge runs along the south-west boundary of the site, which alongside ornamental species such as cherry laurel contains lots of hazel. The hedge ends abruptly at the neighbouring driveway where hedges then become ornamental. A short section of hawthorn hedge also lines the north-western boundary but is very short and becomes an ornamental hedge formed of Red Robin (*Photinia x fraseri*) for a long length. The proposal area offers **negligible value** to dormice which will not be considered further in this assessment.

Badger*Desk Study*

- 4.3.19 Most badger records are confidential, and as such available data on badger likely underestimates their prevalence. Badgers are recorded and likely to be prevalent locally.

Site Assessment

- 4.3.20 No evidence of badger was recorded within the site, and the proposal site's habitats, regular maintenance and use would prevent it being of any significant value to commuting or foraging badgers. The proposal site is of **negligible value** to badgers which shall not be considered further within this assessment. The wider hotel site offers **moderate potential** but is unaffected by proposals.

Other Mammals

- 4.3.21 Numerous records of common mammals including hedgehogs exist within 2.0km of the site. The grassland surrounding the site is suitable for hedgehogs.

Birds*Desk Study*

- 4.3.22 A number of bird species have been returned within 2.0km of the site, including relevant birds such as swift, swallow and house martin.

Site Assessment

- 4.3.23 The majority of the proposal area consists of well-maintained amenity grassland and hard surfacing offering **negligible** potential for birds. The amenity grassland likely supports limited foraging by common birds such as blackbird only. The buildings would be suitable for nesting sparrows and house martins, but most gaps have been meshed; no evidence of nesting birds was noted to B01 whilst a small nest indicative of wren is noted to the Baytree cottage B03. The hedge and shrubs are highly suitable for birds such as robins and blackbirds to nest in, and probably provide some foraging potential. Overall the habitats are likely of value at the **site level** only.

Invertebrates

Desk Study

- 4.3.24 The data search returned records of numerous species of invertebrates within 2.0km.

Site Assessment

- 4.3.25 Suitable habitat for invertebrates is limited within the site to trees, hedges shrubs and amenity grassland. The site in general lacks the floral diversity to support a good range of invertebrates and is likely to be of value within the **site area only**.

Others

- 4.3.26 No suitable habitat for any other protected species was recorded on site.

4.4 Survey Constraints / Considerations

- 4.4.1 Constraints with regards bats have been discussed above. No other constraints which would cast doubt on these results were encountered.

5.0 ASSESSMENT OF EFFECTS AND MITIGATION MEASURES

5.1 Designated Sites

Potential Impacts

5.1.1 The Site is located within the Impact Risk Zone (IRZ) of Treyford to Bepton Down (SSSI). The LPA does not have to consult with *Natural England* on rural, non-residential applications of this nature and the impacts upon this SSSI are considered to be negligible given it is almost 1.0 km away and the proposals are relatively minor.

5.1.2 The site is less than 6.5 km from the *Singleton and Cocking Tunnels SAC*, and therefore is within the *Core Conservation Area* for bats using the SAC. As such all impacts upon bats must be considered. In the absence of mitigation, proposals would harm bats roosting at the site, and may disturb low numbers of foraging and commuting bats. Being 2.0 km from the SAC it is possible the bats roosting, foraging and commuting on-site hibernate there. The survey results suggest that any significant impacts upon rarer bats which hibernate there are highly unlikely.

Mitigation and Compensation

5.1.3 It is likely that a Habitats Regulations Assessment is required to fully assess any potential for significant effects upon the SAC, although this is considered unlikely. Mitigation to avoid harm to bats is addressed separately below. All lighting will be designed to accord with the South Downs National Park: Dark Skies Technical Advice Note (V2 2021, including the Appendix on *Internal Light Spill*) and the BCT/ILP Guidance Note 08/18.

Residual Impacts

5.1.4 **No likely significant effect** upon surrounding European designated sites will arise from the proposed development.

5.2 Habitats

Potential Impacts

- 5.2.1 Development proposals largely consist of building alterations which will have no impacts on habitats. The extensions to the Laundry B02 and Baytree House B03 will remove very small areas of introduced shrubs and hard surface only, which will be replaced elsewhere on-site post-construction. In the absence of mitigation, construction works might result in noise, light and dust pollution, and soil compaction which could harm the surrounding amenity grassland, shrubs and a single tree. The impacts would be of site scale and low impact.

Mitigation and Compensation

- 5.2.2 All construction will be undertaken in accordance with best practise guidelines with regards to control of dust, noise and emissions. All light spill onto surrounding vegetation will be avoided in accordance with BCT/ILP Guidance Note 08/18. Storage of fuel etc will be avoided adjacent to vegetation. All trees shall be protected in accordance with *BS5837:2012 'Trees in Relation to Design, Demolition and Construction - Recommendations'*. Any trees removed shall be replaced with suitable replacements.

Residual Impacts

- 5.2.3 Once mitigation is taken into account, the impacts will be **negligible**.

5.3 Amphibians

Potential Impacts

- 5.3.1 None predicted, the proposal area is of negligible value to protected amphibians. The proposals focus on the buildings only and do not significantly alter habitats other than a very small section of introduced shrubs and hard surface. In the absence of mitigation, inappropriate storage of materials and construction activities close to the pond may result in harm to amphibians.

Mitigation and Compensation

- 5.3.2 In the highly unlikely event that GCN are found on site, all works will cease until a suitably qualified ecologist has been contacted for advice. All materials storage and vehicular access will be undertaken on existing hard surfaces or well-maintained grassland. No works will be undertaken at night when GCN are most active terrestrially.

Residual Impacts

- 5.3.3 The impacts will be negligible and **non-significant**.

5.4 Reptiles*Potential Impacts*

- 5.4.1 None predicted, the site is of negligible-low value to reptiles.

Mitigation and Compensation

- 5.4.2 In the highly unlikely event that reptiles are found on site, all works will cease until a suitably qualified ecologist has been contacted for advice. All materials storage and vehicular access will be undertaken on existing hard surfaces or well-maintained grassland.

Residual Impacts

- 5.4.3 The impacts will be negligible and **non-significant**.

5.5 Bats*Potential Impacts*

- 5.5.1 In the absence of mitigation impacts would include possible damage or destruction of 2no. day roosts, one of up to two common pipistrelles at section 2 and another of up to 8no. common pipistrelles at section 1 within B01 and a further day roost of one soprano pipistrelle within B02, a major impact at the site level. In addition, the works at section 2 of B02 would remove a small number of tiles which might result in blocking of an access point or removal of a roost feature for pipistrelle bats. Most of the roost locations will not be directly impacted or removed but would be subject to noise and vibration damage.

- 5.5.2 B03 Baytree house is not proposed for alteration or disturbance.
- 5.5.3 Indirect impacts may include such as minor habitat fragmentation and loss of foraging areas by inappropriate lighting or damage to boundary trees and hedges. Impacts would be of minor impact magnitude but potentially a significant effect upon the local Singleton and Cocking Tunnels SAC.

Mitigation and Compensation

- 5.5.4 A mitigation licence from Natural England will be required prior to works to building B01 and B02. Mitigation will be as follows:
- Apply for a Mitigation Licence from Natural England once full planning permission is received;
 - No works to the building are to take place until the licence is received.
 - Install suitable bat boxes *2 x timber bat box and 1 x large multi-chamber bat box*) to the southern aspect of nearby mature trees;
 - Once the licence is received, soft strip all areas of interest, most importantly the southern aspect of B01 but also suitable hanging tiles and weatherboarding in the areas of particular interest of B01 and B02 by hand under ecological supervision;
 - Any bats found will be caught by hand and moved to adjacent bat boxes;
 - Conversion and alteration works may only begin once the sections of building have been declared free of bats by the supervising ecologist;
 - Permanent roosting provision is to be provided through integrated bat boxes and bat tiles to the southern aspects of the building. No Breathable Roofing Membranes (BRM) to be used in areas accessible to bats, IF hessian felt only.

- 5.5.5 All light spill onto surrounding vegetation will be avoided in accordance with BCT/ILP Guidance Note 08/18, to allow trees to continue functioning as commuting and foraging habitats. Works at night and external construction lighting shall not be permitted. Trees and the hedge shall be fully protected in accordance with BS:5837:2012.

Residual Impacts

- 5.5.6 The overall impact of the scheme will be **minor adverse** in the short-term, with a **negligible impact** once the new bat roost features are established.

5.6 Dormouse

Potential Impacts

- 5.6.1 None anticipated, no suitable habitat exists on site or will be impacted.

Mitigation and Compensation

- 5.6.2 None required. All hedges on the site shall be maintained and protected in any case.

Residual Impacts

- 5.6.3 The overall impact of the scheme will be **negligible**.

5.7 Badgers

Potential Impacts

- 5.7.1 None predicted, the site is of negligible value to badgers.

Mitigation and Compensation

- 5.7.2 None required. All footings shall be checked each morning for widespread mammals and hedgehogs. In the highly unlikely event that an injured badger, fox, rabbit or hedgehog is found in a footing, a local animal rescue centre shall be called for assistance.

Residual Impacts

- 5.7.3 The overall impact of the scheme will be **negligible**.

5.8 Breeding Birds

Potential Impacts

- 5.8.1 In the absence of avoidance / mitigation, the development could result in the damage / destruction of a bird nest within a tree, shrub or building. Impacts would be of moderate impact magnitude, and moderately unlikely to occur.

Mitigation and Compensation

- 5.8.2 Commencement of works will be undertaken outside the bird nesting season (*season: March-August inclusive*) or following a check for nests by a suitable qualified ecologist. Any nests found must be allowed to fledge before works continue.

Residual Impacts

- 5.8.3 The overall impact of the scheme will be **negligible, non-significant**.

5.9 Invertebrates

Potential Impacts

- 5.9.1 None predicted, current land-use is unsuitable for rare or diverse invertebrates.

Mitigation and Compensation

- 5.9.2 Any habitats lost shall be replaced post-construction.

Residual Impacts

- 5.9.3 The overall impact of the scheme will be **negligible**.

6.0 ECOLOGICAL ENHANCEMENTS

6.1 The design of any proposed development should consider ecological enhancements for the benefit of wildlife in line with the *National Planning Policy Framework* and *Local Planning Policy*. Given the scale of proposals, significant enhancement is considered disproportionate and unfeasible. Ecological enhancements which will be included as part of development proposals include;

- The provision of nesting boxes integrated into the buildings to provide new bird nesting features;
- Installation of a hedgehog box and insect boxes to corners of the site, to increase opportunities for hedgehogs and invertebrates;
- Use of plants from the RHS 'Plants for Pollinators' list within new shrub planters to provide new habitats for invertebrates.

7.0 CONCLUSIONS

- 7.1 The existing site is formed of an existing buildings surrounded by hard surfaces, amenity grassland and introduced shrubs. The site itself is of **very low ecological value** with no habitats of interest noted.
- 7.2 The site offers very limited potential for protected species. The building B01 is used as a day roost by a total of 10no. common pipistrelle bats whilst B02 is used as a day roost by 1no. soprano pipistrelle bat. **The works shall require a licence to proceed post-planning.** Mitigation protocols are recommended to minimise impacts on habitats and species to a 'negligible' significance.
- 7.3 Once avoidance and mitigation measures have been taken into account, the impacts of the planned development upon biodiversity will be **negligible.**

8.0 REFERENCES

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Table No. 06 – Species Lists**Amenity Grassland**

Common Name	Scientific Name	DAFOR
Annual Meadow Grass	<i>Poa annua</i>	LF
Chickweed	<i>Stellaria media</i>	O
Creeping Bent	<i>Agrostis stolonifera</i>	O
Creeping Buttercup	<i>Ranunculus repens</i>	R
Creeping Thistle	<i>Cirsium arvense</i>	
Daisy	<i>Bellis perennis</i>	O
Dandelion	<i>Taraxacum agg.</i>	R
Perennial Rye-grass	<i>Lolium perenne</i>	D
White Clover	<i>Trifolium repens</i>	O

Introduced Shrubs

Common Name	Scientific Name	DAFOR
Shrub Honeysuckle	<i>Lonicera nitida</i>	
Bay Laurel	<i>Laurus nobilis</i>	
Hydrangea	<i>Hydrangea paniculate</i>	
Star Jasmine	<i>Trachelospermum jasminoides</i>	
Red Robin	<i>Photinia x fraseri</i>	
Cherry Laurel	<i>Prunus laurocerasus</i>	
Portuguese Laurel	<i>Prunus lusitanica</i>	
Butterfly Bush	<i>Buddleia davidii</i>	
Box	<i>Buxus sempervirens</i>	
Holly	<i>Ilex aquifolium</i>	
Himalayan Honeysuckle	<i>Leycesteria formosa</i>	
Rose	<i>Rosa sp.</i>	
Hellebore	<i>Helleborus sp.</i>	

Trees and Hedges

Common Name	Scientific Name	DAFOR
Holm Oak	<i>Quercus ilex</i>	LD
Pedunculate Oak	<i>Quercus robur</i>	F
Cherry Laurel	<i>Prunus laurocerasus</i>	LA
Yew	<i>Taxus baccata</i>	F
Hazel	<i>Corylus avellana</i>	LD
Hawthorn	<i>Crataegus monogyna</i>	LD

D – Dominant; A – Abundant; F – Frequent; O – Occasional; R – Rare; L – Locally

Appendix A – Site Photos

Photograph No. 01 – View of the maint hotel B01 from the access drive.



Photograph No. 02 – View of Section 1 of B01, a day roost of 8no. common pipistrelles inhabit this roof area.



Photograph No. 03 – View of loft of small roof of section 1 of B01.



Photograph No. 04 – View of section 2 of B01 which contains a day roost of up to 2no. common pipistrelles, one of which emerged from the weatherboarding.



Photograph No. 05 – View down on section 2 of B01 from a window above.



Photograph No. 06 – View of section 2 of B01, window proposed for new balcony



Photograph No. 07 – View of B02 laundry from the south, which contains a single soprano pipistrelle day roost



Photograph No. 08 – Cobwebbed loft of B02.



Photograph No. 09 – The western weatherboarding of B02 which contains a single soprano pipistrelle day roost.



Photograph No. 10 – View towards B02 from the south showing the introduced shrubs proposed for removal to accommodate an extension.



**Photograph No. 11 – B03 Baytree cottage, which offers ‘moderate’ bat roost potential.
The building is not proposed for alteration or disturbance.**



Photograph No. 12 – Lifted tiles to B03 Baytree cottage.



Photograph No. 13 – Bird nesting material and gaps in soffit of B03.



Photograph No. 10 – Surrounding habitats are very well-maintained and offer no significant potential for protected species.



Appendix B – Full Bat Survey Results

Date	18.08.21
Survey Type	Dusk
Sunrise / Sunset	20:20
Start Time	20:05
End Time	21:50
Temperature	18 °C
Wind	2
Weather	Light Cloud

Surveyor	Gs	
Bat Detector	Peersonic RPA3	
Point	SP3 - W of laundry	
Time	Species	Notes
	20:33 cpip	Flew s along road
	20:33 Spip	F round Holm oaks
	20:38 Spip	2 flew from n, one went s one w
	20:39 Spip	Flew s, one flew round South downs building likely em
	20:41 spip	F round Holm oaks
	20:43 Spip	2 f along road
	20:44 Spip	f from weatherboarding
	20:46 sero	flying along road
	20:37 Cpip	Hns
	20:56 Spip	Flew s along road
	20:59 Ble	Jns
	21:00 Ble	F along road
	21:05 ble	Hns
	21:13 spip	f hns
	21:15 Sero	hns
	21:15 Ble	Hns
	21:17 Ble	Hns
	21:17 cpip	hns
	21:19 sero	hns
	21:22 ble	hns
	21:24 Cpip	Flew s to n

Surveyor	Wm	
Bat Detector	Echo Meter Touch 2 Pro	
Point	SP1 - South of Section 1 of B01	
Time	Species	Notes
	20:30 C.pip	emergence from the eastern side of the gable
	20:33 C.pip	of the window on the west side of the smaller roof
	20:34 C.pip	emerged from somewhere between the gable and the east window
	20:35 C.pip	2 bats emerged from the eastern side of the gable
	20:36 C.pip	HNS
	20:37 C.pip	emerged from the apex of the gable
	20:41 C.pip	2 bats emerged from the apex of the gable
	21:18 C.pip	HNS
	21:26 C.pip	HNS quite active

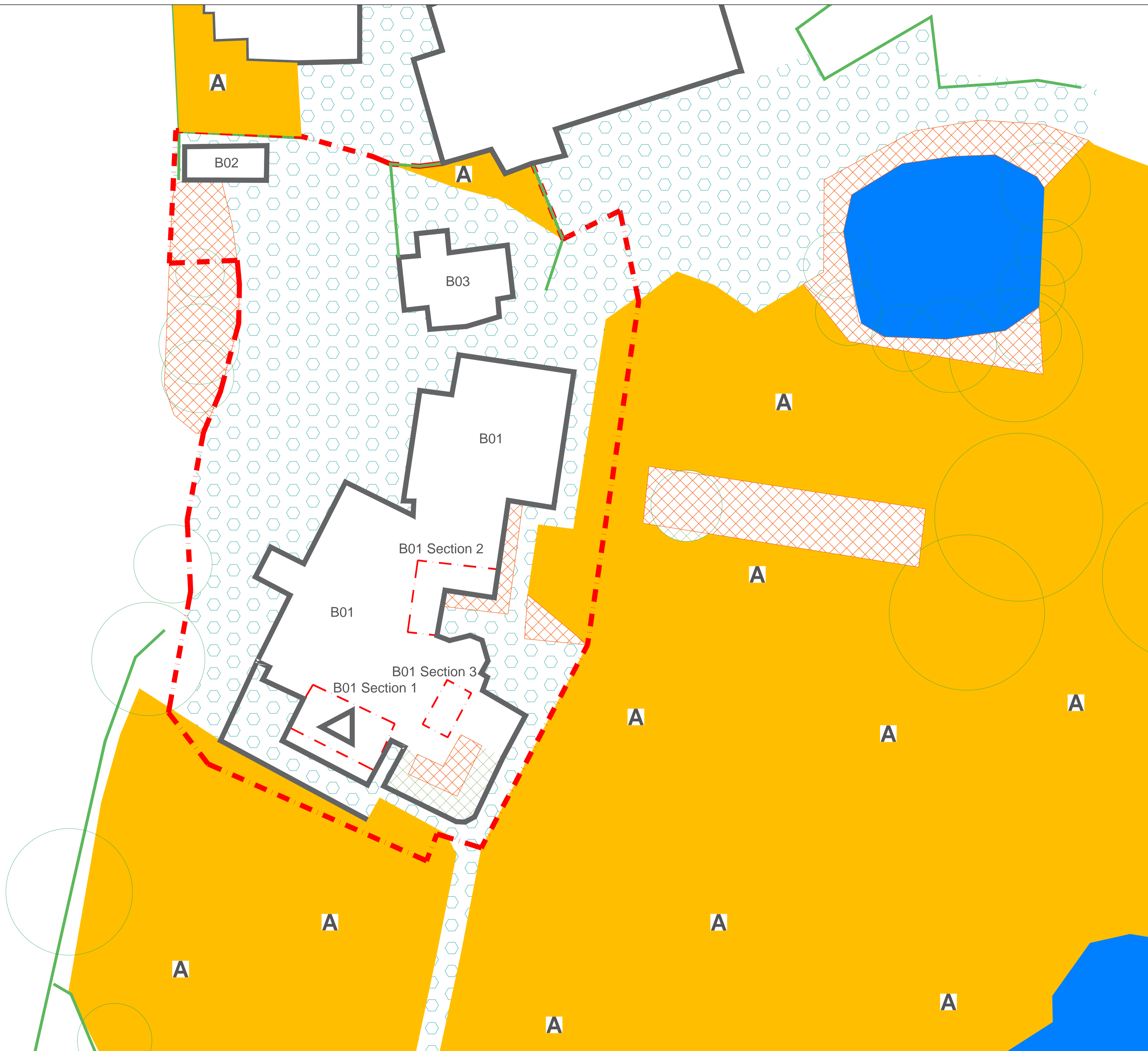
Surveyor	EH	
Bat Detector	Echo Meter Touch 2 Pro	
Point	SP2 - East of Section 2 of B01	
Time	Species	Notes
	20:33 C.pip	Headed west from weatherboarding - possible emergence
	20:34 C.pip	Headed west from eaves - possible emergence
	20:36 C.pip	HNS
	20:37 C.pip	Flew east to west over building
	20:38 C.pip	Flew west over main building
	20:41 C.pip	Flew in from west and behind building
	21:15 Myotis	HNS
	21:16 C.pip	HNS
	21:18 C.pip	HNS
	21:21 C.pip	HNS
	21:29 C.pip	HNS
	21:33 C.pip	HNS

Date	17.09.21
Survey Type	Dawn
Sunrise / Sunset	06:40
Start Time	05:10
End Time	06:55
Temperature	11 °C
Wind	2
Weather	Light Cloud

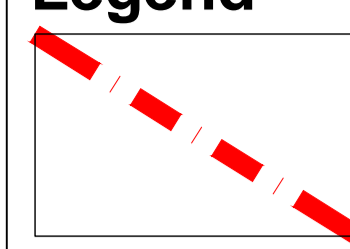
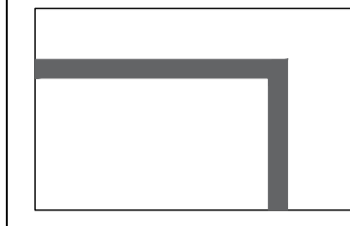
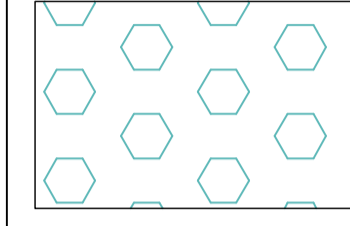
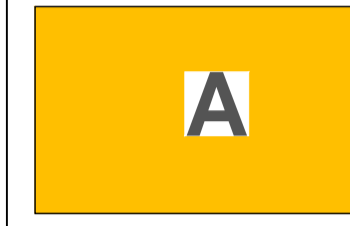
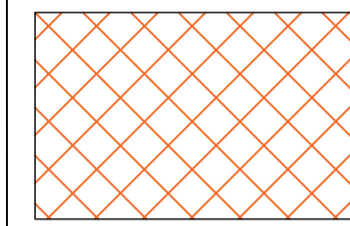
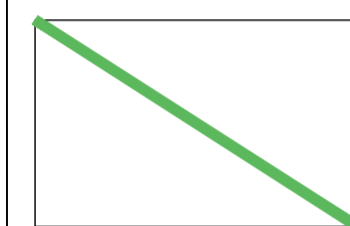
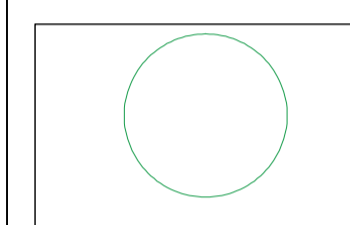
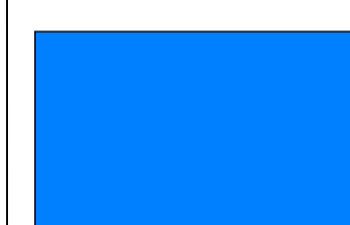
Surveyor	JH	
Bat Detector	Echo Meter Touch 2 Pro	
Point	SP3 - W of laundry	
Time	Species	Notes
05:36	C.pip	Hns
05:38	"	"-possible social call?
05:40	"	Hns
05:42	"	"
05:45	"	"
05:47	"	"
05:49	"	"
06:07	BLE	in front of N aspect. Not seen beyond building to the east
06:10	BLE	Hns
06:10	Noctule	Hns
06:12	ble	Circling the main hotel north of laundry room.

Surveyor	GQ	
Bat Detector	Echo Meter Touch 2 Pro	
Point	SP2 - East of Section 2 of B01	
Time	Species	Notes
5:40)	Cpip	HnS
05:44	cpip	HnS
05:48	Cpip	Flying from west to east over building
05:51	Cpip	HnS
06:02	Cpip	Flying back nd forth over ridge line with clock tower.
06:05	Cpip	Same as above
06:07	Cpip	Same above

Surveyor	GS	
Bat Detector	Echo Meter Touch 2 Pro	
Point	SP1 - South of Section 1 of B01	
Time	Species	Notes
05:45	Cpip	Hns
05:47	Cpip	Hns
05:52	Cpip	Hns
05:57	Cpip	Circling right dormer
05:58	Cpip	Circled right gable
05:59	Cpip	flew in from right
05:59	noct	Hns
06:04	Cpip	Flew over roof to right and away along rear
06:06	Cpip	Circled roof
06:07	Cpip	4 circling roof
06:08	Cpip	Likely re entries east of ridge, to east gable, and east dormer window.
06:10	Cpip	Re entry above ridge.



Legend

-  Development Site Boundary.
-  Existing Buildings.
-  Hard/ Bare Ground.
-  Amenity Grassland.
-  Introduced Shrubs.
-  Intact, Species-poor Hedge.
-  Scattered Trees.
-  Pond.

Planning Issue

Rev	Description	Date	Initials
00	Planning Issue	22.11.21	GS



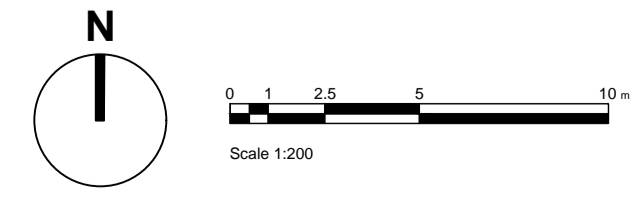
LIZARD
Landscape Design and Ecology
The Old Bank, 34 South Street, Tarring, Worthing, West Sussex, BN14 7LH
T. 01903 216033 E. lizardlandscape@btconnect.com W. lizardlandscapeology.com

Client
The Park House Hotel, Bpton
Project Title and Location
The Park House Hotel, Bpton
West Sussex

Drawing Title
Figure No.1 - Site Habitat Plan

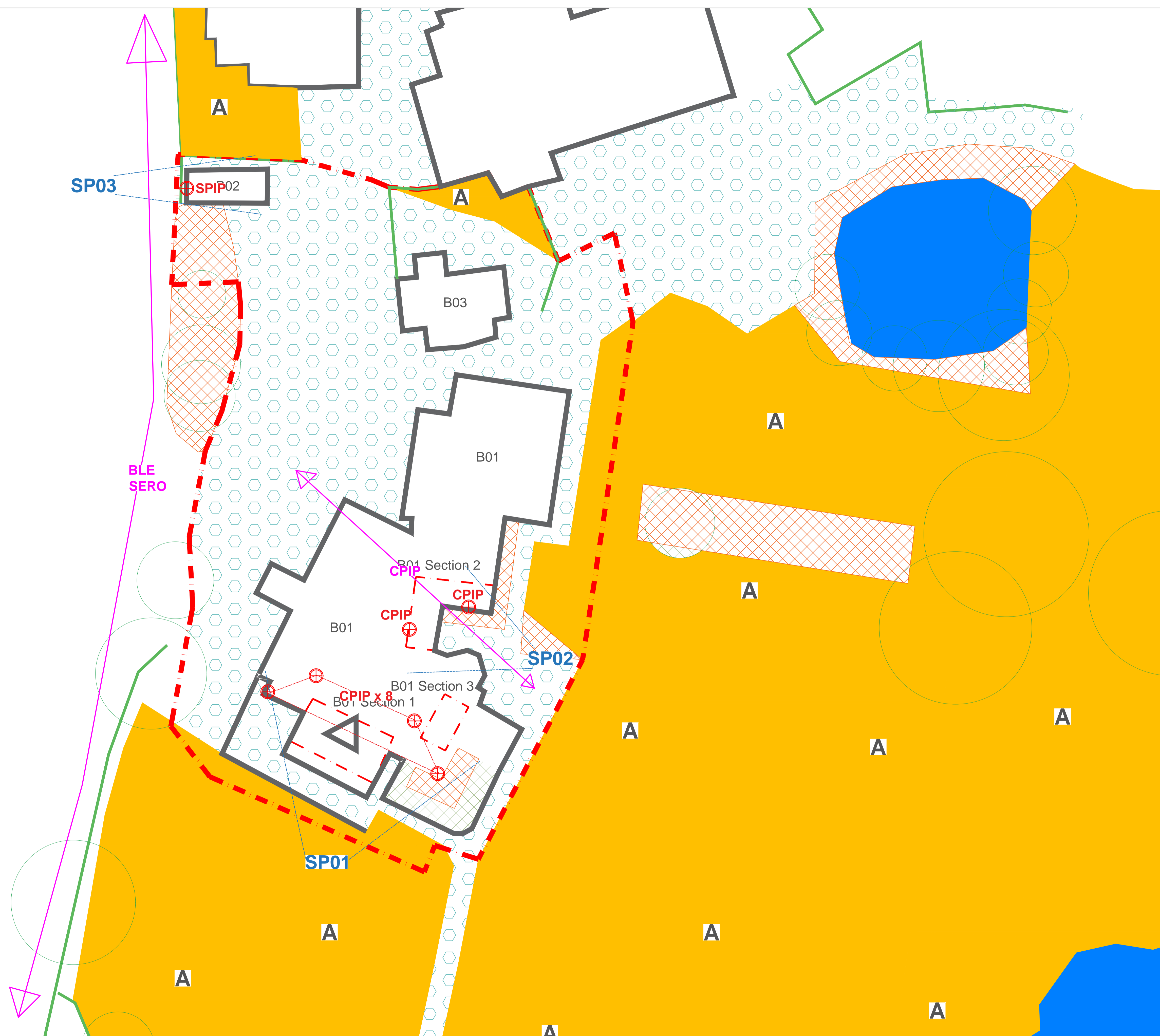
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Drawing No	Revision
LLD2416-ECO-FIG-001	00

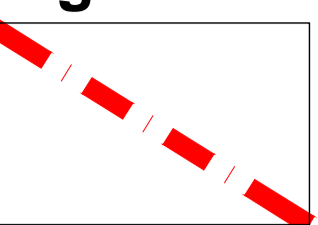

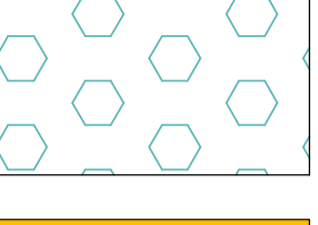
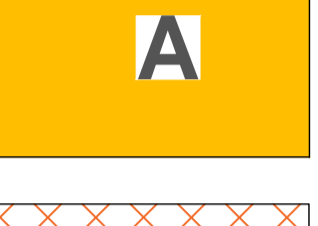

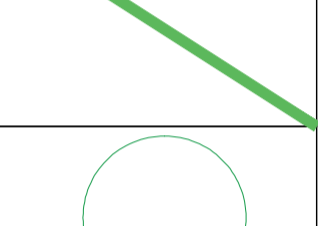
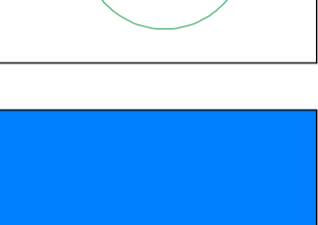


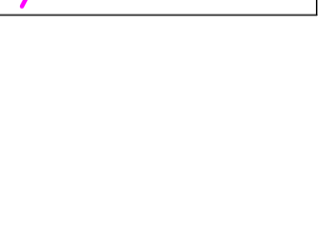


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Scale 1:200

**Figure No.1 - Site Habitat Plan
The Park House Hotel, Bpton**



Legend

-  Development Site Boundary.
-  Existing Buildings.
-  Hard/ Bare Ground.
-  Amenity Grassland.
-  Introduced Shrubs.
-  Intact, Species-poor Hedge.
-  Scattered Trees.
-  Pond.
-  Survey Point with Line of Sight.
-  Bat Flight Lines with Species.

Planning Issue

Rev	Description	Date	Initials
00	Planning Issue	15.09.21	GS



LIZARD
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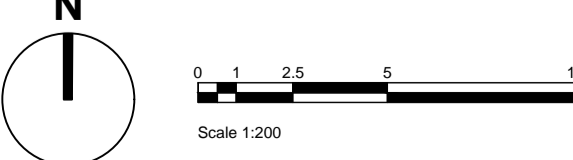
Client
The Park House Hotel, Bepton
Project Title and Location
The Park House Hotel, Bepton
West Sussex

Drawing Title
Figure No.2 - Bat Survey Results Plan

Scale	Drawn	Approved	Date
1:200@A1	GS	CO	23.11.21

Drawing No	Revision
LLD2416-ECO-FIG-002	00

Figure No.2 - Bat Survey Results Plan
The Park House Hotel, Bepton



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