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Job Reference: J006306

15 May 2017

Dear Martyn

THE SULIS CLUB, CLAVERTON DOWN ROAD, BATH

In April 2017, Ecosulis was commissioned by The University of Bath to undertake an initial Preliminary Ecological Assessment of The Sulis Club, Claverton Down Road, Bath.

The purpose of the survey was to identify the habitats present on site to highlight any ecological opportunities and potential for future development, and likely further survey works.

#### Methodology

Annie Hatt BSc (Hons), an experienced ecologist of Ecosulis, completed the survey on 21 April 2017

The site was assessed for any potential ecological constraints relating to any further development of this site. The survey was undertaken according to Joint Nature Conservation Committee (JNCC) (2010) Handbook for Phase I Habitat Survey – a Technique for Environmental Audit. JNCC Peterborough.

The subject areas were systematically walked and all habitats present, along with their dominant flora, are recorded and mapped. Where appropriate, target notes are used to highlight potential features of interest, such as provisional signs of protected or notable species, or habitat features of note. The survey considers the suitability of the habitats on site and within the accessible surroundings to support such species. Habitats are mapped using standard colour codes, allowing rapid visual assessment of the extent and distribution of different habitat types.

#### Limitations of the Survey

The survey will not record any plants or animals that may appear at other times of the year and were therefore not evident at the time of visit. Some species that might use the site or be apparent at other times of year, or only in certain years, would not have been detected. The advice contained in this report relate primarily to factual survey results and general guidance only. On all legal matters you are advised to take legal advice.

#### Results

Ten habitats were present on site including; broadleaved scattered trees, coniferous scattered trees, stone walls, scattered scrub, semi-improved grassland, tall ruderals, amenity grassland, buildings and bare ground. Japanese Knotweed was also recorded on site along the southern boundary and on a large earth mound. Fly-tipping was noted, including large pipes which may support asbestos. All habitats are mapped on Figure 1.

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### A3.1 Broadleaved Scattered Trees

Broadleaved trees are present across the site and include ornamental planted trees located along the northern border and around the car park. Trees are also present along the southern boundary and between the sports pitches and semi-improved grassland, along the centre of the site (Plate 1 Annex 1). Tree species include; cherry, yew, oak and ash.

### A3.2 Coniferous Scattered Trees

Coniferous trees are present across the site, predominantly along the eastern and western borders of the playing fields (Plate 2).

### J2.5 Stone Wall

A stone wall is present along the northern and southern most boundaries. It supports no vegetation.

### J2.8 Earth Bank

Three earth banks are present on site. One along the centre playing field boundary and two towards the south-eastern corner of the site. The former bank is south facing and is around 1m high, very steep and covered by grass and tree vegetation. The larger mound slightly further south is covered by grassland and tall ruderal vegetation as well as scattered immature trees (Plate 3). Deadwood piles and stones are present over the mound, as well as Japanese Knotweed (Plate 4). The smaller mound is steep and also grass covered (Plate 5). Both mounds have extensive excavations by rabbits.

### A2.2 Scattered Scrub

Scattered scrub is present across the site, predominantly along the eastern boundary as well as along the division of the playing fields and semi-improved grassland across the centre of the site. The scrub is dominated by bramble with ivy also present and is unmanaged.

### B2.2 Neutral grassland – semi-improved

Semi-improved grassland surrounds the playing fields along the eastern and southern boundaries. The grass is unmanaged and supports a 30cm sward (Plate 6). Species present within the grassland includes; cleavers, perennial rye-grass, dock, dandelion, common nettle, white dead nettle, ribwort plantain, thistle, creeping buttercup and common daisy. Public footpaths run through this area of the site; one diagonally across the field to the east and one straight across the field to the south, running east to west.

### C3.1 Tall herb and fern – tall ruderal

Tall ruderal habitat is present along the northern boundary of the semi-improved grassland area, within the east of the site, as well as along the southern most boundary central division. Nettles dominate this area with willow-herb and dock species also present.

### J1.2 Amenity grassland

Amenity grassland covers the majority of the site surrounding the buildings. These areas are utilised as playing fields for the sports club. As such they are dominated by perennial rye grass and support very few other species. Amenity grassland habitats support a short sward and are regularly managed.

### J3.6 Buildings

There are three buildings within the centre of this site which support the sports grounds. The main building is large and constructed from profiled tin, the second is a small wooden structure and the third is a concrete structure. The buildings could not be fully assessed due to access restrictions.

#### J4 Bare ground

The site supports a large car park to the north of the buildings which consists predominantly of concrete and tarmac.

#### Assessment and Further Works

The majority of habitats within the Sulis Club including bare ground, buildings and amenity grassland provide very limited opportunities for wildlife. The buildings could not be fully assessed for their suitability for roosting bats, however the building to the south exhibited an entrance opportunity and has therefore been assessed as providing Low suitability for roosting bats (Plate 7).

#### Badgers

Semi-improved grassland and scattered scrub habitats provide opportunities for commuting and foraging badgers, whilst the south facing bank through the centre provides sett building opportunities. No evidence of setts was recorded during the survey, however mammal paths were identified (Plate 8). Due to the presence of the woodland adjacent to the southern boundary, it is likely badgers will utilise the woodland for sett building as it is subject to less disturbance and light-spill, and therefore provides better opportunities. There is evidence of well-used mammal paths entering the site from the woodland, as such it is likely badgers will utilise the site for commuting and foraging. A Precautionary Method of Working document will be required on site prior to any works commencing to ensure badgers are safeguarded against and potential works on site. An update badger walkover will also be required prior to works commencing to assess any further activity of badgers on site.

#### Bats

Boundary habitats including tree lines and scrub provide opportunities for commuting and foraging bats as well as opportunities for nesting birds. These habitats are subject to minimal light-spill particularly along the eastern boundary and the division across the centre of the site. Adjacent woodland to the south of the site, provides further opportunities for commuting, foraging and roosting bats, as such it is likely bats will utilise this site. Horseshoe surveys will be required to assess the activity of bats on site, to assess what species are present and what habitats they are utilising. Any development on this site is likely to require a sensitive lighting plan to protect these dark, green corridors against light-spill, maintaining connectivity across the site for commuting and foraging bats.

#### Reptiles

Unmanaged semi-improved grassland habitats on site, along with deadwood piles and stones provide refuge, basking and foraging opportunities for reptiles. Although no evidence of reptiles was recorded on site it is highly likely that reptiles are present due to the high suitability habitats as well as the connectivity to the woodland to the south of the site. As such further reptile surveys will be required, should semi-improved grassland areas be affected by any development works. If these surveys identify a reptile population on site, further works including a mitigation strategy and a translocation may be required. The well managed areas of grassland should be maintained at this level to prevent reptiles colonising these areas.

#### Japanese Knotweed

Japanese Knotweed was recorded on site within two areas along the southern boundary (Plate 9). Japanese knotweed is listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). It is an offence to plant or otherwise cause to grow in the wild any plant listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). Japanese knotweed is non-native invasive species, which out-compete native wildlife and spread rapidly. The species can also cause structural damage if not controlled correctly.

The underground rhizome system of Japanese knotweed can extend at least 7m from the parent plant, and reach a depth of 3m or more. A piece of rhizome the size of a little finger nail can grow into a new plant (Environment Agency, 2010). As such a Japanese knotweed control strategy will be required for the site.

The possible asbestos pipes recorded within the southern area of the site will require assessment from a qualified asbestos surveyor, as well as appropriate removal (Plate 10).

## Further Recommendations

Should a planning application be put together for the site a full Preliminary Ecological Assessment will be required, including a Preliminary Ecological Assessment for Bats on the buildings and trees and a full desktop study. It is likely the site will also require an update badger walkover, bat activity surveys, reptile surveys, a Precautionary Method of Working and a Japanese Knotweed Control Strategy.

Any vegetation works should avoid nesting bird season where possible (March – September dependent on weather). Where not possible a pre-works nesting bird check will be required.

It is recommended ecological enhancements are considered as part of any landscape plans for the site, including maintaining and enhancing connectivity across the site. Green corridors should be retained where possible, to maintain linkages across the site and a sensitive lighting plan should be implemented to minimise the light spill into these green corridors.

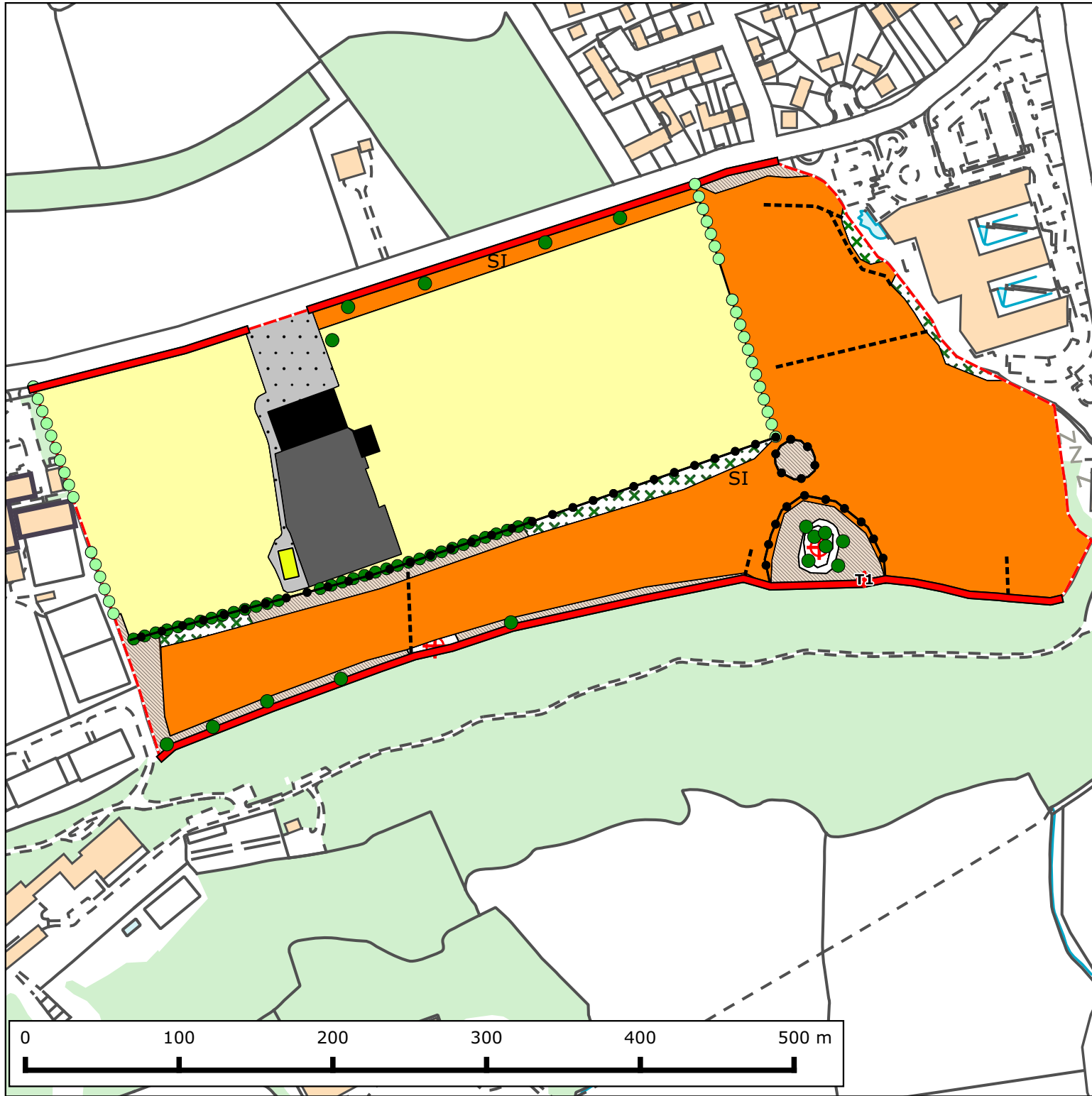
If you have any further queries, please do not hesitate to contact us.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S King', with a stylized flourish at the end.

Sara King BSc (Hons) MCI EEM  
Senior Ecological Consultant

Enc. Figure 1



**Key**

- Site Boundary
- A3.1 Broadleaved parkland/scattered trees
- ◆ Target Note
- A3.2 Coniferous Parkland/scattered trees
- J2.5 Wall
- J2.8 Earth Bank
- Mammal Path
- A2.2 Scrub - scattered
- B2.2 Neutral grassland - semi-improved
- C3.1 Tall herb and fern - tall ruderal
- J1.2 Amenity grassland
- J3.6 Buildings
- J4 Bare ground
- J5 Other habitat - JKW
- Not Accessed

Preliminary Ecological Assessment for Bats

- Buildings with Low suitability



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Client: The University of Bath

Project: The Sulis Club

Title: Initial Preliminary Ecological Appraisal

April 2017

**Figure 1**

[www.ecosulis.co.uk](http://www.ecosulis.co.uk)



Annex I: Site Photos



Plate 1: Broadleaved trees along the southern boundary and centre division



Plate 2: Coniferous trees along the eastern playing field boundary



Plate 3: Larger grassland earth mound



Plate 4: Japanese Knotweed and deadwood on the larger earth mound



Plate 5: Small earth mound



Plate 6: Semi-improved grassland





Plate 7: Southern buildings with Low bat roosting suitability



Plate 8: Mammal paths on site



Plate 9: Japanese Knotweed on southern boundary



Plate 10: Possible asbestos pipes (as identified as T1 on Figure 1)