

PRELIMINARY ROOST ASSESSMENT AND BAT SURVEY REPORT
OF
LAND AT PIER VIEW HOTEL, BERKELEY



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| Report type | Bat Survey Report |
| Client | GFC Property Ltd. |
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The material and data in this report were prepared under the supervision and direction of the undersigned.

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VALIDITY

Due to the dynamic nature of ecological conditions the results of the survey(s) and related conclusions and recommendations as contained within this report should only be considered valid for up to 12 months from the date the last survey was undertaken.

Any alterations to the site proposals may invalidate the recommendations contained within this report.

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Non-Technical Summary

Abricon Ltd. was commissioned by GFC Property Ltd to undertake a Preliminary Roost Assessment and subsequent bat surveys in order to establish the likely impacts of the proposed change of use at Pier View Hotel at 34 Oldminster Road, Sharpness, Gloucestershire, GL13 9NA, referred to as 'the site'.

A Preliminary Roost Assessment (PRA) of the onsite buildings were undertaken on 18th April 2023, with the aim of identifying any features, and protected/priority species which would constitute potential constraints to the refurbishment taking place, in order to make recommendations for any further actions which may be required.

In addition, PRA considered the potential of the hotel grounds to support foraging and commuting bats.

It is understood that the proposed plans for the site include the conversion of the former hotel into five residential units with new access, parking, and associated works. Proposed site plan is provided in Appendix D at the end of this document.

During the PRA, access to the loft spaces was not possible due to the ceiling in the whole building being stripped prior to the inspection (allegedly due to a water tank leak in one part of the roof void). The entire building was stripped internally leaving the bare structure with roof timbers visible internally from the rooms on the top floor.

Evidence of bats was identified during the building inspection in the form of large accumulation of droppings therefore, the building was identified as a confirmed roost, and so three roost characterisation surveys were recommended and carried out on the building.

DNA analysis confirmed the droppings to be from two species of bat, those being common pipistrelle *Pipistrellus pipistrellus* and brown long-eared bat *Plecotus auritus*. Furthermore, record of Whiskered bat *Myotis mystacinus* maternity roost was noted during the desk top study search for this site. Roost characterisation surveys were subsequently undertaken. These surveys further confirmed that Pier View Hotel is being used for day and night roosting by common pipistrelle bats (please note the survey limitations listed in section 2.6 likely affected the outcomes of the surveys and it is considered likely further roosts/species were present within this structure prior to the disturbances caused by the works) and day roosting soprano pipistrelle bats.

On 16th August 2023 surveyors from Abricon Limited discovered (while on site undertaking Ground Level Tree Assessment (GLTA) of the parcel of land immediately north of the hotel) that works on roof of the building (the entire roof being re-roofed) had gone ahead without a Natural England EPS Mitigation licence being in place and prior to the granting of planning permission.

As the roosts identified during the surveys have been lost a derogation licence can no longer be applied for. An appropriate mitigation and compensation plan will need to be devised and agreed with the LPA and / or Natural England.

The building was also identified to be supporting nesting birds. Further works on the building may result in the death, injury or disturbance of nesting birds and the damage or destruction of active nests. It is therefore recommended that any further works are undertaken outside of the nesting season or that a pre works check is undertaken within 48 hours of any works.

1 Introduction

1.1 Survey Background, Aims & Objectives

- 1.1.1 Abricon Ltd. was commissioned by GFC Property Ltd. to undertake a Preliminary Roost Assessment (PRA) and bat surveys in order to establish the likely impacts of the proposed refurbishment and development on Pier View Hotel, 34 Oldminster Road, Sharpness, Gloucestershire, GL13 9NA, referred to as 'the site'.
- 1.1.2 A PRA of the building was undertaken 18th April 2023, with the aim of identifying any features, and protected/priority species which would constitute potential constraints to the development, in order to make recommendations for any further actions which may be required.
- 1.1.3 Evidence of bats was identified during the building inspection in the form of droppings therefore, the building was confirmed as a roost, and so three roost characterisation surveys were recommended and carried out on the building.
- 1.1.4 The aim of the further surveys was to identify how bats are using the building and in what numbers and to identify the areas being used and access and egress points. This allows for an accurate assessment of the likely impacts of the proposed development on bats and to make recommendations for any further actions which may be required, including mitigation and/or licensing as appropriate.
- 1.1.5 On 16th August surveyors visited the site to undertake a Ground Level Tree Assessment of the wider site (Abricon Ltd, 2023) and discovered that works on roof of the building (the entire roof being re-roofed) had gone ahead without a Natural England EPS Mitigation licence being in place and prior to the granting of planning permission.
- 1.1.6 In line with wildlife legislation this incident has been reported -
Report ref RWC-556-23-5353
Police Incident Number 201:16/08/23
- 1.1.7 This report details the methodology, results of the surveys undertaken by Abricon Limited and potential impacts and constraints identified and then makes recommendations in respect of future actions.

1.2 Previous survey work relating to bats

- 1.2.1 A Phase 1 habitat survey of the site which included a preliminary bat roost assessment of an onsite former hotel building was undertaken by Nicholas Pearson Associates in September 2015 (Nicholas Pearson Associates, 2015). The building inspection identified the presence of large accumulations of Whiskered bat droppings within the roof void, indicating the presence of a maternity roost.
- 1.2.2 Bat activity surveys of the grounds were undertaken by Alder Ecology UK Ltd in 2016 and 2019. The bat surveys confirmed that the site is well used by foraging and commuting bats, with a maximum of nine species of bat recorded foraging and commuting on the site.
- 1.2.3 A Preliminary Ecological Appraisal of the grounds of the site was conducted by Smart Ecology in 2019 however this did not include an inspection of the hotel building.

1.3 Site Location & Description

- 1.3.1 The site comprises the former Pier View Hotel building. The site is centred on National Grid Reference: SO 67462 02086.
- 1.3.2 The site (approximately 0.18ha) is surrounded by the hotel grounds to the north, east and west which are bounded by hedgerows with trees. Residential gardens back onto the site towards the south.
- 1.3.3 Beyond the boundaries an area of broadleaved woodland is located towards the north and an agricultural field is located to the east. Oldminster Road is located to the west following a tree line and park dominated by amenity grasslands.

- 1.3.4 The wider landscape includes areas of broadleaf woodland, as well as arable and pasture farmland bounded by tree lines and hedgerows, lowland meadows, and floodplains, grazing marsh and intertidal habitats associated with the River Severn which is located approximately 680m towards the west of the site.

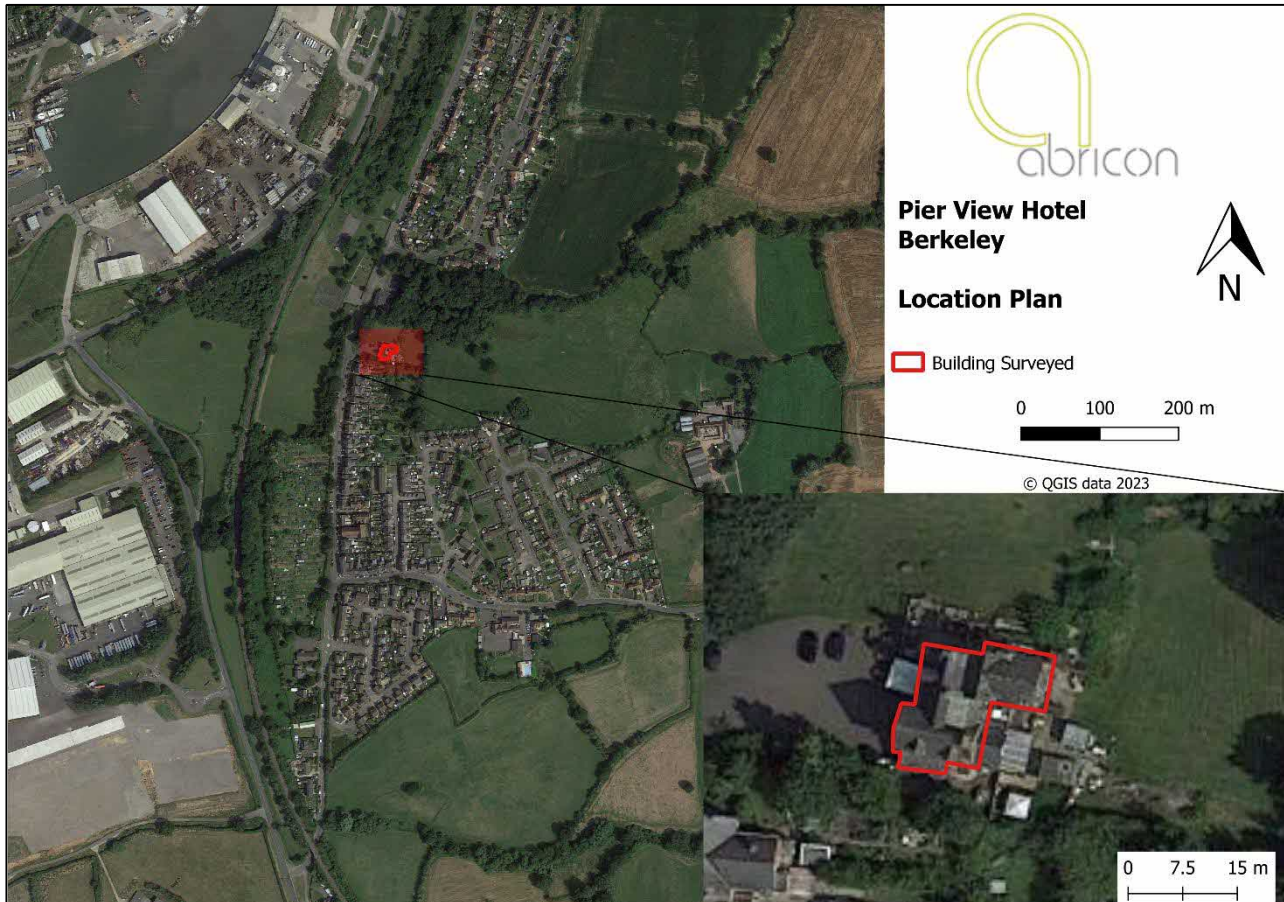


Figure 1 - Site Location and building (highlighted) – Accessed on 18/04/23

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1.4 Proposed Development

- 1.4.1 It is understood that the proposed plans for the site include the conversion of the former hotel into five residential units with new access, parking, and associated works. The proposed site plan is provided in Appendix D at the end of this document.
- 1.4.2 Additionally, a separate application for the construction of nine new residential properties on the adjacent hotel grounds is also proposed.

2 Methodology

2.1 Desk Study

- 2.1.1 Records of statutory sites including Special Areas of Conservation (SAC) and European protected species licences (EPS) and Local Policies were received from MAGIC website from within 2km of the site.
- 2.1.2 Only records from the past ten years (since 2013) were considered within this report, to ensure that the ecological baseline of the site and the surrounding area was established from up-to-date information. Statutory designated sites within 2km of the development site were obtained from the UK Governments Countryside Geographic Information Website (MAGIC). Data was used in conjunction with an assessment of site plans and aerial photographs.
- 2.1.3 Previous ecological survey reports were also used to establish the previous use of the site by bats.

Table 1 – Consultees for the Desk Study

| Consultee | Information Provided |
|--|---|
| Defra MAGIC Maps website | Statutory sites for bats European Protected Species Licences (EPSL) granted within 2km of the site |
| Previous survey reports. Nicholas Pearson Associates (2015) Alder Ecology UK Ltd (2016 & 2019) Smart Ecology (2019) | Results and analysis of findings of bat surveys between 2015 - 2019 |

2.2 Building Inspection

- 2.2.1 The Preliminary Roost Inspection (PRA) of the building onsite was conducted on the 18th April 2023 by Jana Prapotnikova (NE Class 2 License holder) and Yasmine Garland in order to identify any evidence of use by bats and nesting birds. The PRA was used to determine whether further surveys would be required in line with the Bat Conservation Trust’s (BCT) Bat Surveys for Professional Ecologists: Good Practice Guidelines (2016) and to identify potential roosting features (PRF) onsite.
- 2.2.2 To assist in a thorough search for bats and nesting birds the following equipment was used;
 - Binoculars;
 - Million candle power spotlight;
 - Head torch;
 - Ladder;
 - Digital camera;
 - Wraparound scaffolding already erected around the structure was also utilised to aid with the external inspection of the roof.

Bats

- 2.2.3 Signs of bats looked for include;
 - Bats (alive or dead);
 - Droppings;
 - Staining;
 - Feeding signs;
 - Smell;
 - Social calling.
- 2.2.4 The building was also inspected internally and externally for its suitability to be used by roosting bats, with any potential roosting features (PRF) being recorded.

Nesting Birds

2.2.5 Signs of nesting birds looked for include;

- Birds (alive or dead);
- Nests (current or disused);
- Droppings;
- Eggs.

2.3 Bats – DNA Analysis

2.3.1 During the building inspection undertaken on the 18st April 2023, thousands of droppings which could not be identified to species level were found scattered within the hotel structure. A collection was sent to Ecotype Genetics Limited based at Sussex University for DNA analysis in order to determine the species from which they were derived.

2.4 Roost Characterisation Surveys

2.4.1 Roost characterisation surveys aid a building inspection by positive confirmation of access and egress points into and out of a structure. This method also allows recordings of bat echolocation calls for species identification to help determine the use and importance of a roost. Activity surveys may also identify new roost areas where no evidence of bats was found during the inspection.

2.4.2 Three roost characterisation surveys comprising two dusk emergence and one dawn re-entry surveys were undertaken. The surveys were conducted according to the Bat Conservation Trust's (BCT) 'Bat Survey for Professional Ecologists - Good Practice Guidelines' (Collins, 2016).

2.4.3 A total of five surveyors were present during the surveys of the buildings onsite plus an infra-red camera was used during the final survey – see Appendix C for surveyor locations. The surveyors were situated at key locations to ensure that all aspects of the buildings to be impacted by the proposed works were always observed, particularly those areas that had the highest potential to be used by bats and/or where evidence of bat use was found. The surveys commenced approximately 15 minutes prior to sunset and continued 1.5 hours after sunset.

2.4.4 The final survey of the building was augmented with the use of an infrared camera (Canon XA11) with standalone infrared lights (two Nightfox XC5 850nm infrared flashlights and two 12-LED 850nm wide angle infrared floodlights) to illuminate the viewing area. The camera was positioned to record activity on the western elevation of the building. The camera was manned by a suitable experienced surveyor at all times throughout the survey, and recorded footage was subsequently viewed at 1-1.5x speed to cross reference potential emergences.

2.4.5 Night Vision Aids (NVAs) Infra-red cameras can be used as a complementary method to increase precision during emergence surveys, particularly where there is potential for late-emerging species and/or in dark conditions. (Collins, 2016)

2.4.6 Any bats observed were recorded. Information included;

- Time;
- If the bat(s) were observed emerging from or re-entering the buildings.
- Access and/or egress points;
- Direction of flight;
- Use of landscape;
- Flight characteristics;
- Size;
- Height above ground and;
- Behaviour.

2.4.7 The bat detectors used were Echo Meter Touch paired with Samsung Galaxy tablet, Echo Meter Touch 2, Anabat Express paired with Elecon Batscanner. All three types of detectors automatically record time-stamped data suitable for later analysis. Analysis of calls was undertaken using AnalookW and Wildlife Acoustics Kaleidoscope software.

2.4.8 The surveys were undertaken during suitable weather conditions.

Table 2 – Weather Conditions for Emergence/Re-entry Surveys

| Structure | Date | Sunset/Sunrise | Survey Time | | Weather |
|-----------------|----------|----------------|-------------|--------|-------------------------------|
| | | | Start | Finish | |
| Pier View Hotel | 08/06/23 | 21:25 | Start | 21:10 | 18°C, Dry, Cloud 0%, Wind 1 |
| | | | Finish | 22:55 | 17°C, Dry, Cloud 10%, Wind 1 |
| Pier View Hotel | 27/06/23 | 04:53 | Start | 03:23 | 15°C, Dry, Cloud 100%, Wind 1 |
| | | | Finish | 05:08 | 14°C, Dry, Cloud 100%, Wind 1 |
| Pier View Hotel | 11/07/23 | 21:26 | Start | 21:11 | 16°C, Dry, Cloud 50%, Wind 3 |
| | | | Finish | 22:56 | 15°C, Dry, Cloud 30%, Wind 4 |

2.5 Personnel

- 2.5.1 [REDACTED] has worked in consultancy sector since 2006 with a focus on mammalian ecology, particularly bats [REDACTED] runs Abricon's Ecology Department as well as being involved in project delivery. She has managed various ecological projects and has expertise in a range of ecological survey techniques including Phase 1 habitat assessments and a variety of protected species surveys (e.g. the aforementioned mammal species as well as reptiles and great crested newts). [REDACTED] devises ecological mitigation schemes for a variety of protected species. She is well versed in producing preliminary ecological appraisals, BREEAM/CSH Ecology Assessments, protected species licences, Ecological Impact Assessments (EclA), Construction Environmental Management plans, Biodiversity Enhancement Schemes and Ecological Design Strategies. [REDACTED] holds Natural England and Natural Resources Wales Class 2 licence for bats as well as Natural England Class and Natural Resources Wales Class 1 licence for great crested newts. She is also a Registered Consultant of the Bat Low Impact Class Licence (BMCL) and holds a CSCS card. [REDACTED] is a full member of Chartered Institute of Ecology and Environmental Management (MCIEEM).
- 2.5.2 [REDACTED] has been working in environmental consultancy since 2021. She holds a BSc and MSc in related subjects. Her primary experience comprises Preliminary Ecological Appraisals, Preliminary Roost inspections, report writing, protected species surveys and analysis of data collection.
- 2.5.3 [REDACTED] has worked in ecological consultancy since 2012 and is an experienced project manager and environmental survey coordinator, including for major infrastructure projects. She is a full member of CIEEM and skilled in undertaking various ecological surveys including Preliminary Ecological Appraisal, protected species surveys and habitat condition assessment for Biodiversity Net Gain. [REDACTED] has also provided advice on wildlife legislation and planning policy including commenting on ecological matters regarding planning applications on behalf of local planning authorities.
- 2.5.4 [REDACTED] has been working in environmental consultancy since 2018. [REDACTED] a qualifying member of CIEEM. Her primary experience comprises Preliminary Ecological Appraisal, Ecological Clerk of Works, report writing, reptile translocations, completion of bat emergence/re-entry and activity surveys and analysis of bat sound files. [REDACTED] a trainee bat carer with the Bat Conservation Trust.
- 2.5.5 [REDACTED], has been working in environmental consultancy since 2020. She holds a BSc and MSc in related subjects. Her primary experience comprises Preliminary Roost Assessments and subsequent report writing, completion of bat emergence/re-entry and activity surveys and analysis of bat sound files.

2.5.6

2.6 Limitations

General Ecological Constraints

- 2.6.1 This survey only offers a “snapshot” of the site conditions and takes no account of seasonal differences, or of any species which may take up residence subsequently.

Site Specific Constraints

- 2.6.2 During the PRA, access to the loft spaces was not possible due to the ceiling in the whole building being stripped prior to the inspection (allegedly due to a water tank leak in one part of the roof void). The entire building was stripped internally leaving the bare structure with roof timbers visible internally from the rooms on the top floor. This would have caused evidence found in the roof voids to be lost and/or disturbed.
- 2.6.3 Wraparound scaffolding was present around the structure during the PRA and the emergence surveys. Although the presence of this scaffolding aided with a detailed external inspection of the roof structure, the wooden planks present at the top floor level obstructed full view of the roof to the surveyors positioned on the ground during emergence surveys.

3 Results and Evaluation

3.1 Desk Study

- 3.1.1 The site lies within 2km of four statutory sites, full details of which are outlined in PEA report for this site (Smart Ecology, Nov 2022).

Special Area of Conservation (SAC)

- 3.1.2 The site does not lie within 2km of any Special Areas of Conservation (SAC) for bats.

European Protected Species Licences (EPSL)

- 3.1.3 One European protected species licence was granted for lesser horseshoe species in 2016 (case reference: 2016-19703- EPS-MIT). The licence granted is located approximately 830m from the site.

3.2 Preliminary Roost Assessment

Pier View Hotel Description

- 3.2.1 Pier View Hotel is a large Victorian three-storey public house. It is constructed from red brick with PVC windows sealed with cement. The hotel appeared to have no obvious gaps or cracks within the brick structure and appeared well-sealed.
- 3.2.2 The roof was complex and covered with slate tiles. Many of the roof tiles were missing or broken displaying several gaps within the roof, including gaps beneath the ridge tiles especially on the southern and eastern elevation. The windows were PVC and cement framed and in a good state of repair (Appendix B; Photograph 12).
- 3.2.3 The entire structure has been gutted with ceiling completely removed, leaving the former roof voids open to rafters and visible from the top floor rooms. The roof appeared to be lined with bitumen lining in most places. Several tears were present especially around the windows towards the western elevation.
- 3.2.4 There were three chimneys present on the eastern and western elevation of the Pier View Hotel. Wooden fascia and bargeboards were present on all elevations of the building. A small gap between the bargeboard and walls was present in some areas.
- 3.2.5 It is believed that the building featured 3 roof (although it is possible they were interconnected internally for bats) voids before it was stripped – one in south western section of the building, one in north western section and one in north eastern section. All roof voids were approximately 2m high in most places.

Pier View Hotel Findings

- 3.2.6 Small number (a total of 5 droppings) of fresh looking medium sized bat droppings were found in the top floor rooms of the hotel in the western sections. DNA analysis of the droppings collected confirmed that they were derived from brown long-eared bats. Furthermore, thousands of small sized bat droppings were found near the northeastern gable end of the building. It is believed that these droppings would have been present inside the roof void prior to the ceiling being stripped and it is highly likely a lot of the droppings were removed following the ceiling removal. DNA analysis of the droppings collected confirmed that they were derived from common pipistrelle bats. See Appendix C for location of the droppings.
- 3.2.7 The building featured a large number of suitable roosting features that may be utilised by bats. These features included:
- Gaps under the ridge tiles;
 - Gaps between the roof lining and the roof tiles;
 - Gaps under barge and fascia boards;
 - Gaps between the window frames and walls;
 - Roof voids (before the ceilings were removed);
 - Cavity walls.

3.2.8 Potential access features included:

- Gaps under ridge tiles;
- Gaps created by missing, broken or slipped roof tiles;
- Gaps under barge and fascia boards;
- Lifting lead flashing;
- Broken windowpanes.

Evaluation

3.2.9 Due to the evidence found within the former hotel structure, it was assessed as containing confirmed bat roost.

3.3 DNA Analysis

3.3.1 Bat droppings found during the building inspection within the roof voids of Pier View Hotel could not be identified to species level. A selection of samples collected was sent to Swift Ecology for DNA analysis in order to determine the species from which they were derived.

3.3.2 The analysis confirmed the droppings to be from two species of bat, those being common pipistrelle and brown long-eared bat.

3.3.3 The results are shown in Appendix E.

3.4 Foraging/Commuting Bats

3.4.1 The Pier View Hotel is located within a suburban location within Sharpness, Berkeley. The nearest linear feature to the building is a tree/line/hedgerow present immediately south of the building. Oldminster Road present approximately 38m east of the building contains street lighting.

3.4.2 The grassland and trees within the grounds provide foraging habitat although due to the size of the site, it is unlikely that any species would be reliant on the site alone.

3.5 Bat Emergence Survey

Dusk Emergence Survey – 8th June 2023

3.5.1 See Appendix C for locations of all emergence/return to roost points.

3.5.2 A common pipistrelle was seen emerging (EM1, Appendix C) at 21:36 from underneath the slipped roof tile of the dormer window on the western elevation of the building. Another non-echolocating bat (most likely common pipistrelle) was seen re-entering the building under the rain gutter/eaves of the main house on the western elevation at 21:42 (RE1, Appendix C). The exact location of the return is unclear due to the obstructed view caused from the scaffolding.

3.5.3 Two common pipistrelle bats were seen to return to roost under the lead flashing on the corner of the single storey lean to on the south-eastern corner at 22:01 and 22:08 (RE2, Appendix C). An emergence of a soprano pipistrelle *Pipistrellus pygmaeus* was noted from the same location at 22:29 (EM2, Appendix C).

3.5.4 Swarming behaviour of a common pipistrelle was also seen outside the north-eastern elevation of the building at 22:36 (SW1, Appendix C).

3.5.5 A total of 172 common pipistrelle passes were recorded during the survey, the majority of the passes were seen commuting and foraging along the northern and eastern tree lines/hedgerows (of-site). Other species recorded during the surveys were noctule *Nyctalus noctula* (114 passes) and soprano pipistrelle (11 passes).

Dawn Re-entry Survey – 27th June 2023

3.5.6 A single common pipistrelle was seen re-entering the building during the survey at 4:31am to feature under eaves of the main roof beneath the dormer window on the western elevation of the building (RE3, Appendix C). The exact location of the return is unclear due to the obstructed view caused from the scaffolding but is likely to be the same/similar location as RE1.

- 3.5.7 During the survey, incidental records of common pipistrelle (90 passes) were recorded, alongside soprano pipistrelle (2 passes), noctule (9 passes) and serotine *Eptesicus serotinus* (1 pass).

Dusk Emergence Survey – 11th July 2023

- 3.5.8 One common pipistrelle bat was seen to emerge at 21:35 from the north-western elevation of the building from underneath the eaves (EM3, Appendix C). The video recording from the infra-red camera positioned with the surveyor was analysed and confirmed the emergence from the building (See Appendix B). The exact location of the emergence is unclear due to the obstructed view caused from the scaffolding.
- 3.5.9 Additionally, another emergence (EM4, Appendix C) of a common pipistrelle was noted from a vent hole in the brickwork on the eastern elevation at 21:51.
- 3.5.10 During the survey, incidental records of common pipistrelle (74 passes) were recorded, alongside soprano pipistrelle (3 passes) and noctule (12 passes).

Evaluation

- 3.5.11 Evidence of bats in the form of droppings (brown long-eared and common pipistrelle species as confirmed by DNA analysis) was identified inside the former hotel building during the daytime walkover inspection. Additionally, multiple roosting features and access points were identified on the building which have the potential to support roosting bats.
- 3.5.12 The emergence surveys have identified that building is currently being used as a day and night roost by common pipistrelle bats, occasional day roost by soprano pipistrelle and likely day or night roost by brown long-eared bats. Evidence of this comes in the form of a peak count of 3 common pipistrelle bats emerging/returning to roost from/to the building, 1 soprano pipistrelle and small number of brown-long eared bat droppings found inside the building during the initial inspection. The amount of common pipistrelle bat droppings (even after the ceilings have been removed) in the building is highly suggestive of presence of maternity roost prior to the disturbances caused by the works.
- 3.5.13 A presence of Whiskered bats maternity roost (noted by Nicholas Pearson in 2015) was not detected during the surveys.
- 3.5.14 The disturbance caused by the internal strip of the building prior to the initial inspection and the presence of scaffolding during the emergence surveys (obstructing views), it is considered that the bat survey results are not a true representation of bat roost status present within the building prior to these disturbances, although presence of bat roosts within the structure was confirmed.
- 3.5.15 Considering the evidence noted during the surveys carried out in 2023 (bat droppings, and live bats observed emerging/returning to roost) but also historical records of roosts within the building (Whiskered bat maternity roost presence noted in 2015), it is possible that the building contained maternity roosts of common pipistrelle bats, Whiskered bats, soprano pipistrelle day roost and likely day/night roost by brown long-eared bats meaning that the building was of moderate conservation importance (Mitchell-Jones, 2004) or of district/county importance (Reason, Wray, 2023) for bats.

3.6 Nesting Birds

- 3.6.1 During the emergence/re-entry surveys numerous birds were noted to be flying in and out of several locations on the building (for example a hole in brickwork on the east face and under the eaves on the eastern elevation), likely flying to and from their nests.
- 3.6.2 During the emergence survey on the 8th June 2023 a likely house sparrow was seen flying to and from a suspected nest located on the southern elevation of the building from underneath the bargeboard of the gable end (BN1, Appendix C).
- 3.6.3 Additionally, on the 8th June 2023, two likely swifts were seen emerging to and from a large vent hole in the brickwork located on the eastern elevation of the building (BN2, Appendix C).

Evaluation

- 3.6.4 The site is being used by nesting birds.
- 3.6.5 The wider site also provides suitable habitat for nesting birds particularly a common assemblage of garden bird species within the trees and shrubs. However, there are plentiful habitats for nesting birds outside of the site boundary, in nearby parks and trees. Due to the size of the site, it is unlikely that any species would be reliant on the site alone and any population is considered to be of up to local ecological importance.

4 Assessment of Impacts

4.1 Site Proposals

- 4.1.1 It is understood that a planning application for the change of use of the building onsite into five flats with associated access, parking, and infrastructure will be submitted to Stroud District Council in 2023.
- 4.1.2 Areas of amenity grassland, species-poor semi-improved grassland and tall ruderal are proposed to be cleared to facilitate the new development resulting in permanent loss of areas of these habitats. All the hedgerows and scattered trees on site are proposed for retention and protected as part of the proposals.
- 4.1.3 Please note, entire roof of the former hotel building has been re-roofed in August 2023.

4.2 Bats

- 4.2.1 All bat species within the UK are protected by national and international legislation.

Roosting Bats

Buildings

- 4.2.2 It is considered likely that the unlicensed works have resulted in the loss of the confirmed roosts in the building. This is considered a **significant adverse impact at a district/county level** and that the internal alterations and the re-roofing works were carried out unlawfully (breaches of The Conservation of Habitats and Species Regulations (Amendment) (EU Exit) 2019 and the Wildlife and Countryside Act 1981) and resulted in the loss of bat roosts, and potentially the disturbance and accidental killing and/or injury of bats.

Commuting and foraging bats

- 4.2.3 It has been identified that the hotel grounds is being used by foraging and commuting bats.
- 4.2.4 External lighting plans were not drafted at the time of writing this report. Any new lighting on the site should be sensitive to bats ensuring that exterior lighting is kept to a minimum to avoid light exposure on likely/confirmed commuting routes. The majority of species recorded onsite during 2023 are relatively light-tolerant species including pipistrelles and individual passes by other species like noctules and serotines.
- 4.2.5 Impacts on foraging and commuting bats will need to be considered in combination with proposed development plans for the wider site (see Appendix D).

4.3 Birds

- 4.3.1 All birds within the UK are protected whilst nesting.
- 4.3.2 The building was being utilised by nesting birds during the bat surveys.
- 4.3.3 The building is considered suitable habitat for a variety of nesting within the building itself within the framework of the building and on the roof.
- 4.3.4 Five trees within the grounds are anticipated to be removed as a result of the proposed development.
- 4.3.5 Without mitigation, the proposed works may result in the disturbance of nests and possible killing, injury, and disturbance of birds and/or dependent young. This would therefore constitute a **certain long-term adverse impact**.
- 4.3.6 With mitigation, including either timing of works and/or an inspection for nesting birds immediately prior to work being undertaken (including demolition or tree felling), it is anticipated that there will be no **negative impact** on these species.

5 Recommendations

5.1 Further Actions

- 5.1.1 The results of this preliminary roost assessment have highlighted the requirement for further actions. Table 3 below provides a summary of the works required, whilst details are provided in the following paragraphs.

Table 3 – Table of Further Actions

| Species/Groups | Phase | Action(s) Required |
|-------------------------|-------------------------|--|
| Bats | Prior to approval | A bat compensation plan will need to be developed and agreed with the LPA. Suggestions are included in section 5.2 below. |
| | Design | Sensitive lighting design should be designed and implemented to minimise impacts of artificial lighting as detailed in 5.2 below |
| Birds | Construction | Demolition of the building will either avoid the bird nesting seasons or follow precautionary methods of working to minimise impacts as outlined in 5.3 below. |
| Ecological Enhancements | Design and Construction | Inclusion of bat and bird boxes as outlined in 5.4 below. |

5.2 Bats

Roosting Bats

- 5.2.1 The 2023 surveys identified that the former Pier View Hotel was being used for day and night roosting by common pipistrelle bats (although presence of maternity roost of this species prior to disturbances is highly likely), occasional day roosting by soprano pipistrelle and brown long-eared bats. Although no other species were noted during the 2023 surveys, Whiskered bat maternity roost was also noted to be present within this building back in 2015 (Nicholas Pearson Associates, 2015).
- 5.2.2 As the internal alterations (carried out prior to April 2023) and the re-roofing works (carried out in August 2023) resulted in the loss and/or disturbance of the confirmed bat roosts in the building, a derogation licence can no longer be applied for. Compensation for the loss of bat roosts will be required. A Bat Compensation Plan will need to be developed and agreed with the LPA and / or Natural England. It is recommended the plan take into consideration the loss of the whiskered bat and common pipistrelle maternity bat roost in addition to the brown long-eared day/night bat roost.
- 5.2.3 As a minimum, re-instatement of all of the roof voids is recommended. Furthermore, all confirmed and suspected bat exit/entry point will need to be retained (where possible) or recreated in same or similar locations. Additional bat roosting features (i.e. bat boxes) should be added. Only traditional Type 1F bitumen felt underlay should be used or if breathable lining is chosen, then only lining approved by Natural England (with evidence of passed snagging propensity test) will be used in areas accessible by bats, as modern breathable roofing membranes (BRM) have been shown to cause fatalities in bats due to them getting caught in the polypropylene fibres once the material becomes worn.

Lighting

5.2.4 No external lighting can be installed on the site with the exception of security/safety lighting above pedestrian entranceways to the residential units. This will utilise a number of key design points to limit any impact;

Low level lighting pointed towards the ground (bollards preferred);

Warm white spectrum lighting <2700 Kelvin;

Use of light shields and hoods to direct the light downwards and prevent vertical and horizontal light spill;

Use of passive infrared (PIR) motion sensors and/or short timers (<1 minute) to ensure lights only come on when necessary.

5.3 Birds

5.3.1 Refurbishment of the former hotel building, and any woody vegetation clearance should be undertaken outside of nesting bird season. The breeding season is influenced by the climatic conditions of a given year but is generally taken to be between March and August inclusive.

5.3.2 If the works are required to take place between March and August (inclusive), affected areas should be checked by a suitably qualified ecologist immediately prior to works taking place. If birds are found to be nesting, works would have to be delayed until nesting had ceased, as confirmed by the ecologist.

5.3.3 It is also recommended that the swift and sparrow nests are retained or if not possible, artificial nests are erected in the same or similar locations.

5.4 Enhancements and Planning Policy

5.4.1 Enhancement features for wildlife should be included in new developments to meet the recommendations contained within the National Planning Policy Framework 2023.

5.4.2 In addition to any bat and bird compensation, it is recommended that four artificial bird boxes (such as 2 x swift nest boxes and 2 x sparrow terraces, or similar designs) should be installed as part of the development. Each box will be installed on the northern or eastern elevations of the new building. Bird boxes should be installed as high as possible onto buildings (under eaves or at the apex of gable ends where possible), see location details in Appendix F.

5.4.3 All boxes should be installed as per the manufacturer's instructions.

References

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- Bat Conservation Trust (2018). Bats and artificial lighting in the UK. *Bats and the Built Environment series*.
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- Mitchell-Jones A. J. (2004) Bat Mitigation Guidelines. English Nature, Peterborough.
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- Smart Ecology (2022). Preliminary Ecological Appraisal Report, Land at Pier View Hotel, 34 Oldminster Road, Sharpness, Gloucestershire, GL13 9NA
- UK Governments Countryside Geographic Information website: www.magic.gov.uk.

Appendix A – Wildlife Legislation & Policy

Bats

In the UK, all bat species are fully protected under The Conservation of Habitats and Species Regulations (Amendment) (EU Exit) 2019 and the Wildlife and Countryside Act 1981 (as amended). It is illegal to kill, injure, disturb, capture, possess or trade bats (or parts thereof); disturb bats whilst in a place of shelter or rest; or damage, destroy or obstruct access to a breeding site or resting place whether bats are present or not.

Operations which may affect bats may require a development licence from Natural England, which provides derogation for an otherwise unlawful activity.

Birds

In the UK, birds and their nests are protected under The Conservation of Habitats and Species Regulations (Amendment) (EU Exit) 2019 and the Wildlife and Countryside Act 1981 (as amended).

The Wildlife and Countryside Act 1981 (as amended) makes it a criminal offence to:

- Kill, injure, or take any wild bird (with exceptions to species listed in Schedule 2);
- Take, damage or destroy the nest of any wild bird while in use or being built;
- Take or destroy an egg of any wild bird.

Appendix B – Site Photographs



Photograph 1: S and E elevation - BN1 sparrow nest location (yellow)



Photograph 2: S elevation – Location of emergence and return of bat to roost (EM2, RE2)



Photograph 3: S elevation – Location of SP emergence and return to roost of 2x CP (EM2, RE2)



Photograph 4: Slipped tiles and gaps on southern elevation



Photograph 5: Northern elevation gables and EM3 location



Photograph 6: Location of EM4 and BN2 (swift nest) on eastern elevation



Photograph 7: Slipped tiles on dormer window on western elevation where EM1 located



Photograph 8: N elevation gable features near chimney and gaps beneath ridge tiles



Photograph 9: W elevation - Location of EM1 (red) and RE1 (green) and EM3 (blue)



Photograph 10: Slipped tiles and gaps on northern elevation



Photograph 11: Gaps on gable end on eastern elevation – most likely bat access point beneath the barge board (for the Whiskered and common pipistrelle maternity roosts) due to staining (suspected fur staining) present between the barge board and the brickwork



Photograph 12: Gaps under ridge tiles near eastern gable end



Photograph 13: Gaps under lifting lead flashing



Photograph 14: Gaps under ridge tiles and slipped roof tiles



Photograph 15: Bat dropping found (BLE) in top floor room in SW section



Photograph 16: Wooden rafters and roof structure with ceiling removed in north western section of the hotel



Photograph 17: CP droppings found SW of Hotel



Photograph 18: Dropping found in NE of Hotel



Photograph 19: Exposed void near E gable and large accumulation of droppings between joist and the brickwork (circled)



Photograph 20: 1000s of droppings found in top floor room beneath the NE gable



Photograph 21: Large holes and cracks in brickwork and large pile of bat dropping on to or wall plate (circled in red)



Photograph 22: Large hole in bitumen felt



Photograph 23: Exposed rafters in south western section of the hotel



Photograph 24: Small room to the east of building



Photograph 25: Screenshot from IR cam footage showing bat shortly after emergence (green) and EM3 location (red)

Appendix C – Bat Survey Results



Appendix D – Existing and Proposed Site Plan

PROPOSED RESIDENTIAL DEVELOPMENT
PIER VIEW HOTEL
 SHARPNESS



AFFORDABLE

| REF. | | TOTAL |
|--------|------------------|--------------|
| A | 2B4P HOUSE 2 BED | 78.5 02 159 |
| B | 3B5P HOUSE 3 BED | 93.4 01 93.4 |
| TOTALS | | 03 252.4 |

OPEN MARKET

| REF. | | TOTAL |
|---------------|------------------|-----------------|
| C | 1B2P FLAT 1 BED | 50.0 01 50.0 |
| D | 1B2P FLAT 1 BED | 55.0 01 55.0 |
| E | 3B5P HOUSE 3 BED | 93.4 01 93.4 |
| F | 3B5P HOUSE 3 BED | 93.4 01 93.4 |
| G | 3B5P HOUSE 3 BED | 106.9 01 106.9 |
| H | 4B5P HOUSE 4 BED | 118.8 01 118.8 |
| TOTALS | | 06 517.5 |
| TOTALS | | 09 769.9 |

KEY

- 450mm high timber trip fence.
- 900mm high timber post and wire.
- 1800mm high timber close boarded fencing.
- 1800mm high timber gate
- Indicates concrete flag paved path/patio area.
- Indicates private drives.
- Porous paving to road
- Indicative proposed turf planting.
- Existing trees to be retained
- Existing trees to be removed
- Proposed tree and shrub planting
- Front / rear door position.
- Patio / french door position.
- External bin storage location
- Cycle storage location

Note:
Scale via 25 metre grid

HOTEL

| REF. | | TOTAL |
|--------|-----------------|----------------|
| F1 | 2B4P FLAT 2 BED | 93.4 01 93.4 |
| F2 | 2B4P FLAT 2 BED | 119.1 01 119.1 |
| F3 | 2B4P FLAT 2 BED | 91.4 01 91.4 |
| F4 | 3B5P FLAT 3 BED | 92.0 01 92.0 |
| F5 | 2B3P FLAT 2 BED | 94.6 01 94.6 |
| TOTALS | | 05 490.5 |

IN HOUSE BUILDING DESIGN



PIER VIEW HOTEL
 34 OLDMINSTER ROAD
 SHARPNESS, BERKELEY
 GL13 9NA

PROJECT NO.
22-014

DRAWING: PL01

REVISION: A

SCALE:
1/500 @ A3

PLANNING LAYOUT

Appendix E - DNA Analysis Results

Order Number: 1916



Samples submitted

| Sample Code | Multi-species? | Sample Type | Date Sample Found | Species Group | Site postcode/ post town /grid ref | Site description / comments (Optional) | Suspected identity of species |
|-------------|----------------|-------------|-------------------|---------------|--|--|-------------------------------------|
| SEL-1916-1 | No | Faecal | 18/04/2023 | C. Bats | GL13 9NA | | |
| SEL-1916-2 | No | Faecal | 18/04/2023 | C. Bats | GL13 9NA | Pier View Hotel | Myotis species |

Analysis Results

| Sample Code | DNA Extraction Code | Species Identified | ID Method | Ct value | % match |
|-------------|------------------------|--|-----------|----------|---------|
| SEL-1916-1 | EG-2023-0344 | Plecotus auritus (Brown long-eared bat) | qPCR | 20 | |
| SEL-1916-2 | EG-2023-0345 | Pipistrellus pipistrellus (Common pipistrelle bat) Note: Myotis bat species suspected - all UK myotis species tested for - none detected in this sample. | qPCR | 18 | |