



IMPORTANT – THIS COMMUNICATION AFFECTS YOUR PROPERTY

COUNCIL OF THE ISLES OF SCILLY

Town Hall, St Mary's TR21 0LW
Telephone: 01720 424455 – Email: planning@scilly.gov.uk

Town and Country Planning Act 1990
Town and Country Planning (Development Management Procedure) Order 2010

PERMISSION FOR DEVELOPMENT

Application No:	P/20/043/FUL	Date Application Registered:	6th July 2020
Applicant:	Jeff & Rachel Knowles Carnwethers Country House Pelistry Lane Pelistry St Mary's Isles Of Scilly TR21 0NX	Agent:	Barry Coupe Courtney Cottage Fairfield Road Shroton Blandford Forum DT11 8QA

Site address: Carnwethers Country House Pelistry Lane Pelistry St Mary's Isles Of Scilly
Proposal: Conversion of existing ancillary buildings into two holiday cottages.

In pursuance of their powers under the above Act, the Council hereby **PERMIT** the above development to be carried out in accordance with the following Conditions:

- C1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.**
Reason: In accordance with the requirements of Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).
- C2 The development hereby permitted shall be carried out in accordance with the approved details only including:**
- **Plan 1, Block Plan**
 - **Plan 2, Location Plan**
 - **Plan 3, Proposed North West Elevation**
 - **Plan 4, Proposed Floor Plan,**
 - **Plan 5, Proposed North East and South East Elevation Plans**
 - **Plan 6, Proposed South West Elevation and Roof Plan**
 - **Plan 7, Preliminary Ecological Appraisal**
 - **Plan 8, Bat Presence/Absence Survey (Timing, Mitigation, Enhancements)**
- These are stamped as APPROVED**
Reason: For the clarity and avoidance of doubt and in the interests of the character and appearance of the Conservation Area, Area of Outstanding Natural Beauty and Heritage Coast in accordance with Policy 1 of the Isles of Scilly Local Plan (2005) and Policy OE1 and OE7 of the submission Isles of Scilly Local Plan (2015-2030).
- C3 Notwithstanding the provisions of the Town and Country Planning (General**

Permitted Development) Order 2015 (As Amended), (or any order revoking or re-enacting that Order) prior to installation, details of any external lighting shall be submitted to and approved, in writing, by the Local Planning Authority. The lighting shall thereafter be installed in accordance with the agreed details.

Reason: To protect the amenities of the locality, including the amenities of neighbouring residential properties and to protect the amenities of this rural area and preserve the dark night skies of the Isles of Scilly and the Garrison Dark Sky Discovery Site (Milky Way Class) in accordance with Policy OE4 of the Submission Draft Isles of Scilly Local Plan 2015-2030.

PRE-COMMENCEMENT CONDITION: Sustainable Design Measures

C4 Prior to the commencement of the development hereby permitted a detailed scheme indicating the sustainable design measures to be incorporated into the proposal shall be agreed in writing with the Local Planning Authority and should include water conservation and harvesting measures and renewable energy generation including a water consumption standard of no more than 110 litres per person, per day. The sustainable design scheme shall be implemented in strict accordance with the details as agreed prior to the occupation of the development hereby permitted.

Reason: This is a pre-commencement condition that requires details that were not submitted as part of the application but are required to in order to comply with Policy 2 of the Local Plan (2005) and Policies SS1(b) and SS2(k) of the Submission Draft Isles of Scilly Local Plan 2015-2030 and to minimise the impact of the development on the islands carbon footprint and reduce energy and water demands.

C5 Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order with or without modification), no extensions (Class A), alterations to the roof (Class B and C), porches (Class D), ancillary outbuildings (Class E), hard surfaces (Class F) or chimneys or flues (Class G) shall be erected or constructed on the dwelling, here by permitted, without the prior permission, in writing, of the Local Planning Authority through the submission of a further application.

Reason: To control any subsequent enlargements in the interests of the visual and residential amenities of the locality and in the interests of the affordability of the dwelling and the local housing stock.

C6 All works involving machinery required in connection with the implementation of this permission shall be restricted to between 0800- and 1800-hours Monday to Saturdays. There shall be no works involving machinery on a Sunday or Public or Bank Holiday.

Reason: In the interests of protecting the residential amenities of neighbouring properties.

C7 Prior to the first use of the holiday lets, hereby approved, the biodiversity enhancement measures including the bat boxes, as set out in the Bat Presence/Absence Survey (17/08/2020), shall be installed as recommended and retained as such thereafter.

Reason: In the interests of securing appropriate and proportionate biodiversity net gains at this site in accordance with Policy OE2, SS1(d) and SS2(g).

C8 The development hereby permitted shall not be used otherwise than for the provision of short let holiday accommodation. The property shall not be occupied as a permanent dwelling and shall not be occupied by any person for a period exceeding 28 days in any calendar year. The owner or operator shall maintain a register of occupants for each calendar year in accordance with the General Data Protection Regulations. This shall be made available on request for inspection by any duly authorised officer of the Local Planning Authority.

Reason: To ensure that the development is occupied as holiday accommodation in

accordance with Policy 4 of the adopted Isles of Scilly Local Plan (2005) and Policy WC5 the Submission Draft Isles of Scilly Local Plan (2015-2030).

PRE-COMMENCEMENT CONDITION: Site Waste Management Plan

C9 Prior to the commencement of the development, hereby approved, a scheme including details of the sources of all building materials and the means/location of disposal of all demolition material and all waste arising from building works, shall be submitted to and agreed in writing with the Planning Authority. The development shall thereafter proceed in strict accordance with the approved scheme only.

Reason: This is a pre-commencement condition that requires details that were not submitted as part of the application but are required to fully understand the impact upon landscape and management of waste, to be submitted and agreed by the Local Planning Authority. This is to ensure those characteristics which contribute to the status of the Isles of Scilly as a Conservation Area, Area of Outstanding Natural Beauty and Heritage Coast are not eroded by uncontrolled mineral extraction or the tipping of waste. In accordance with the requirements of Policy 1 of the adopted Isles of Scilly Local Plan (2005) and Policy SS2 (2) of the Submission Draft Isles of Scilly Local Plan (2015-2030).

Further Information

1. In dealing with this application, the Council of the Isles of Scilly has actively sought to work with the applicants in a positive and proactive manner, in accordance with paragraph 38 the National Planning Policy Framework 2019.
2. In accordance with the provisions of Section 96A of the Town and Country Planning Act which came into force on 1st October 2009, any amendments to the approved plans will require either a formal application for a non-material amendment (for which a fee of £234 would be required) or the submission of a full planning application for a revised scheme. If the proposal relates to a Listed Building you will not be able to apply for a non-material amendment and a new application for a revised scheme will be required. Please discuss any proposed amendments with the Planning Officer.
3. In accordance with the Town and Country Planning (fees for Application and Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2017 a fee is payable to discharge any condition(s) on this planning permission. The fee is £116 for each request to discharge condition(s) which is payable for each individual request made to the Local Planning Authority.
4. The Applicant is reminded of the provisions of the Wildlife and Countryside Act 1981 and the E.C. Conservation (Natural Habitats) Regulations Act 1994, the Habitat and Species Regulations 2012 and our Natural and Environment and Rural Communities biodiversity duty. This planning permission does not absolve the applicant from complying with the relevant law protecting species, including obtaining and complying with the terms and conditions of any licences required, as described in part IV B of Circular 06/2005. Care should be taken during the work and if bats are discovered, they should not be handled, work must stop immediately and a bat warden contacted. Extra care should be taken during the work, especially when alterations are carried out to buildings if fascia boards are removed as roosting bats could be found in these areas. If bats are found to be present during work, they must not be handled. Work must stop immediately and advice sought from licensed bat wardens. Call The Bat Conservation Trust's National Bat Helpline on 0845 1300 228 or Natural England (01872 245045) for advice.

Signed:



Senior Officer, Planning and Development Management

Duly Authorised Officer of the Council to make Planning Decisions on behalf of the Council of the Isles of Scilly.

DATE OF ISSUE: 16th September 2020



COUNCIL OF THE ISLES OF SCILLY

Planning & Development Department
Town Hall, The Parade, St Mary's, Isles of Scilly, TR21 0LW

☎0300 1234 105

✉planning@scilly.gov.uk

Dear Jeff & Rachel Knowles,

Please sign and complete this certificate.

This is to certify that decision notice: P/20/043/FUL and the accompanying conditions have been read and understood by the applicant: Jeff & Rachel Knowles.

- 1. Development of the approved plans:** Conversion of existing ancillary buildings into two holiday cottages **at:** Carnwethers Country House Pelistry Lane Pelistry St Mary's Isles Of Scilly **on:** (insert date)
.....
- 2. I am/we are** aware of any conditions that need to be discharged before works commence.
- 3. I/we will** notify the Planning Department in advance of commencement in order that any pre-commencement conditions can be discharged.

Print Name:

Signed:

Date:

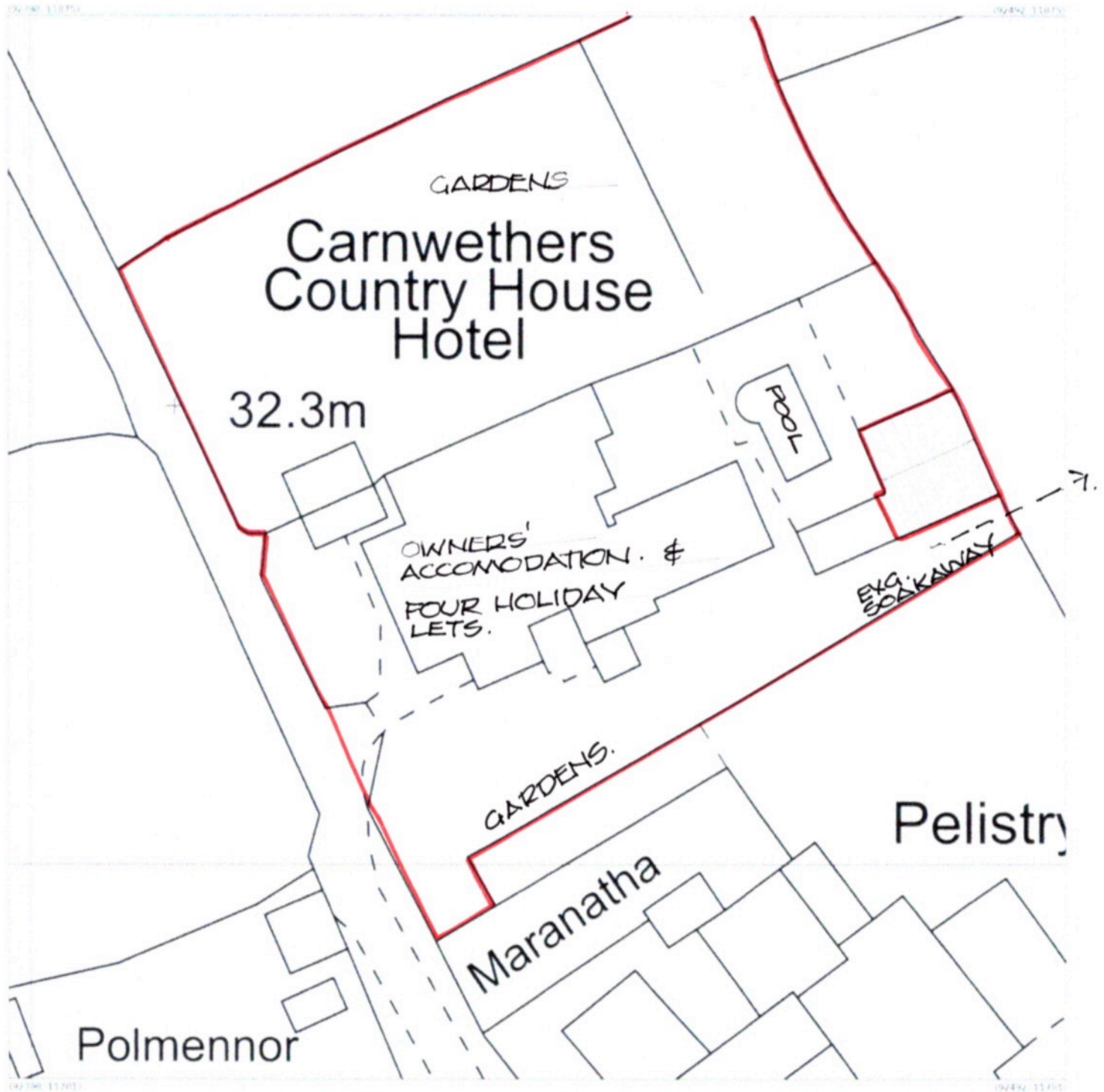
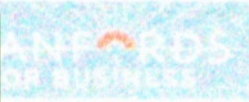
For the avoidance of doubt, you are reminded to address the following condition(s) before you commence the implementation of this permission. Although we will aim to deal with any application to discharge conditions as expeditiously as possible, you are reminded to allow up to **8 weeks** for the discharge of conditions process.

PRE-COMMENCEMENT CONDITION(S)

- C4 Prior to the commencement of the development hereby permitted a detailed scheme indicating the sustainable design measures to be incorporated into the proposal shall be agreed in writing with the Local Planning Authority and should include water conservation and harvesting measures and renewable energy generation including a water consumption standard of no more than 110 litres per person, per day. The sustainable design scheme shall be implemented in strict accordance with the details as agreed prior to the occupation of the development hereby permitted.
- C9 Prior to the commencement of the development, hereby approved, a scheme including details of the sources of all building materials and the means/location of disposal of all demolition material and all waste arising from building works, shall be submitted to and agreed in writing with the Planning Authority. The development shall thereafter proceed in strict accordance with the approved scheme only.

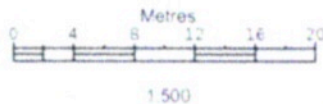
APPROVED

By Lisa Walton at 6:38 pm, Sep 16, 2020



Produced 28 May 2020 from the Ordnance Survey MasterMap (Topography) Database and incorporating surveyed revision available at this date

The representation of a road, track or path is no evidence of a right of way. The representation of features as lines is no evidence of a property boundary.



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Centre coordinates: 92445 11828



Carnwethers Country House, Pelistry, St Marys, Isles Of Scilly
TR21 0NX

ISLANDS ARCHITECTS

Porthcressa, St Mary's, Isles of Scilly, TR21 0JQ and
Courtney Cottage, Fairfield Rd, Shroton, DT11 8QA,

Project:

Carnwethers, St Mary's, Isles of Scilly

Drawing:

Block Plan

Scale:

1:500 @ A4

Drawn:

bdc 25.05.20

Dwg No:

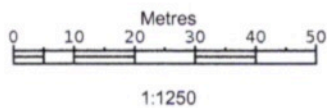
2107 / 07A

APPROVED
By Lisa Walton at 6:39 pm, Sep 16, 2020



Produced 28 May 2020 from the Ordnance Survey MasterMap (Topography) Database and incorporating surveyed revision available at this date.

The representation of a road, track or path is no evidence of a right of way. The representation of features as lines is no evidence of a property boundary.



Carnwethers Country House, Pelistry, St Marys, Isles Of Scilly TR21 0NX

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Order Licence Reference: OI1398551
Centre coordinates: 92445 11828

ISLANDS ARCHITECTS

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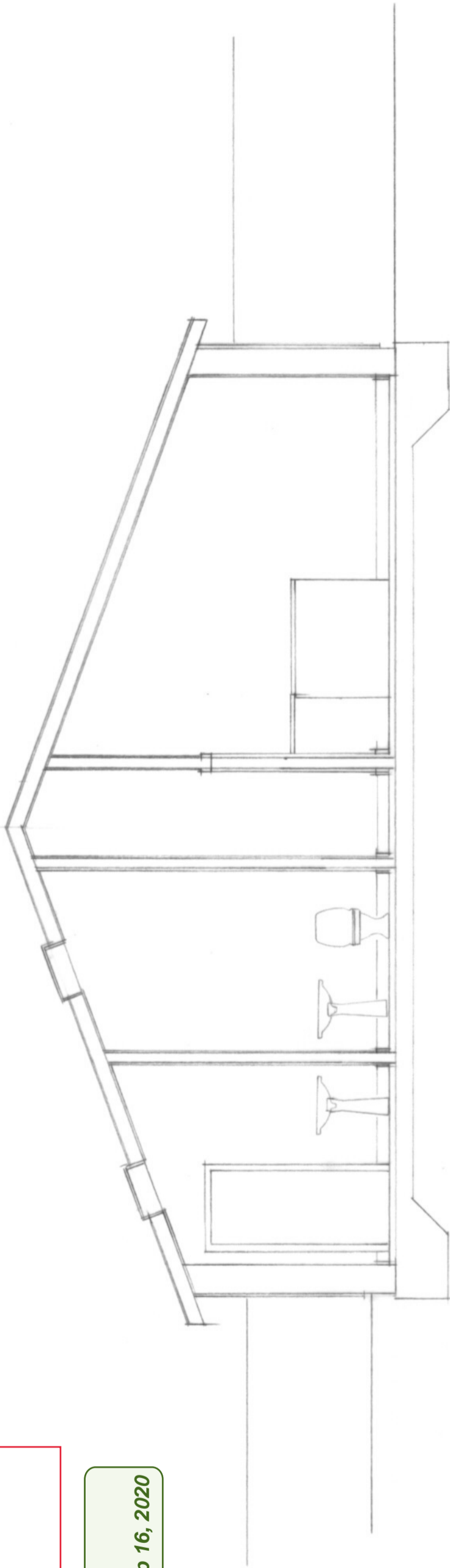
Project:
Carnwethers, St Mary's, Isles of Scilly

Drawing:
Site Location Plan

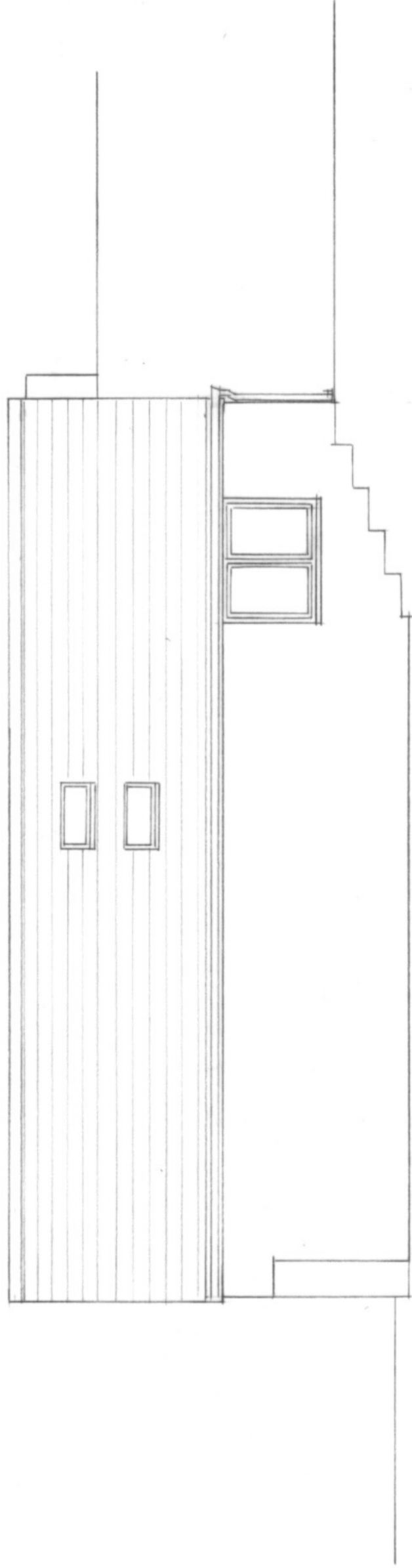
Scale: 1:1250 @ A4	Drawn: bdc 25.05.20	Dwg No: 2107 / 08
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Plan 3 Proposed NW Elevation and Section

APPROVED
By Lisa Walton at 6:39 pm, Sep 16, 2020



SECTION 'A-A'



NORTH WEST ELEVATION

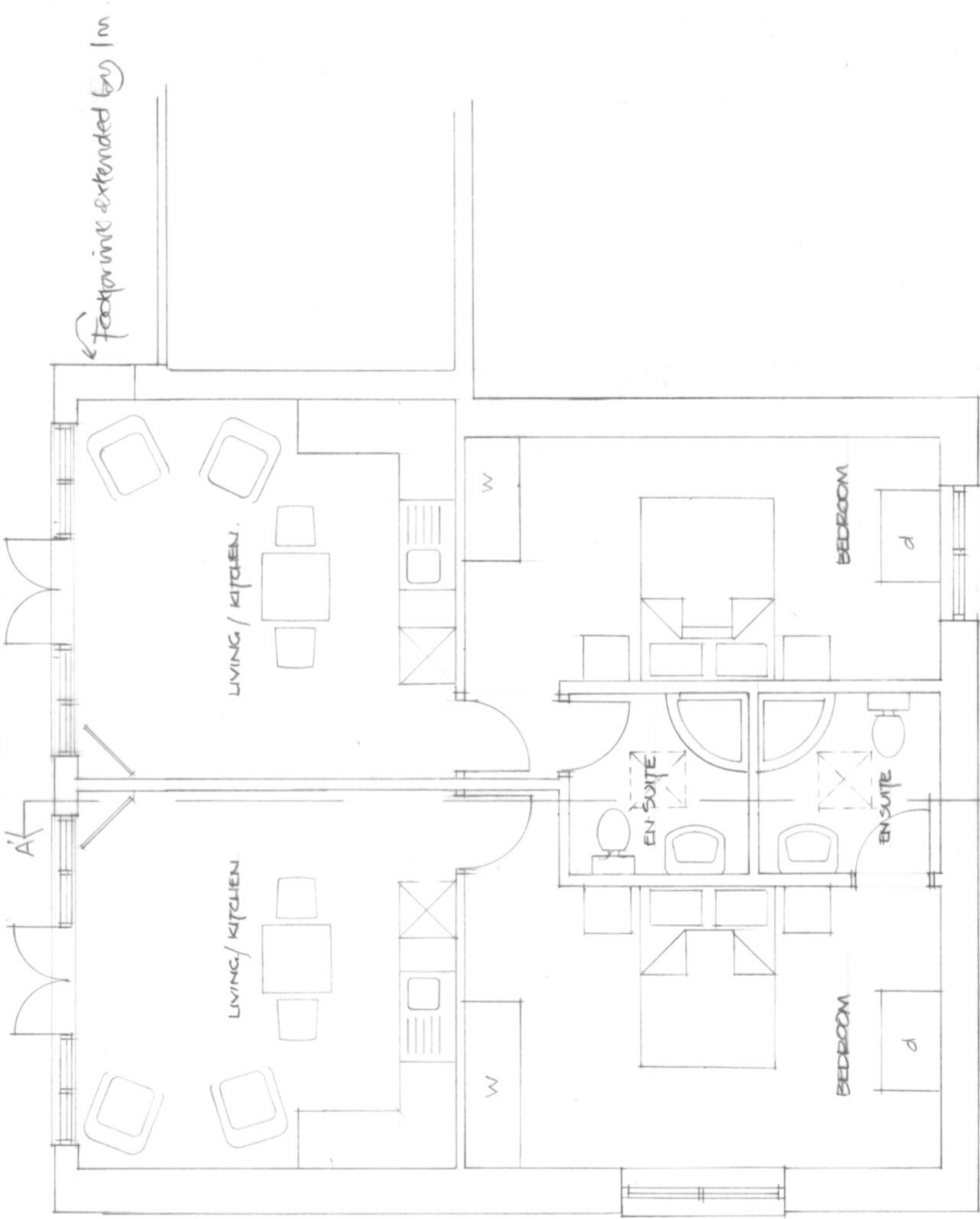


ISLANDS ARCHITECTS
Porthcressa, St Mary's, Isles of Scilly, TR21 0JQ and
Courtney Cottage, Fairfield Rd, Shroton, DT11 8QA,

Project:
Carnwithers, St Mary's, Isles of Scilly
Drawing:
Proposed NW Elevation & Section A'A'
Scale:
1:50 @ A3 **Drawn:** bdc 25.05.20 **Dwg No:** 2107 / 05

APPROVED

By Lisa Walton at 6:39 pm, Sep 16, 2020



GROUND FLOOR PLAN

C steps removed Plan level. 20.5.20

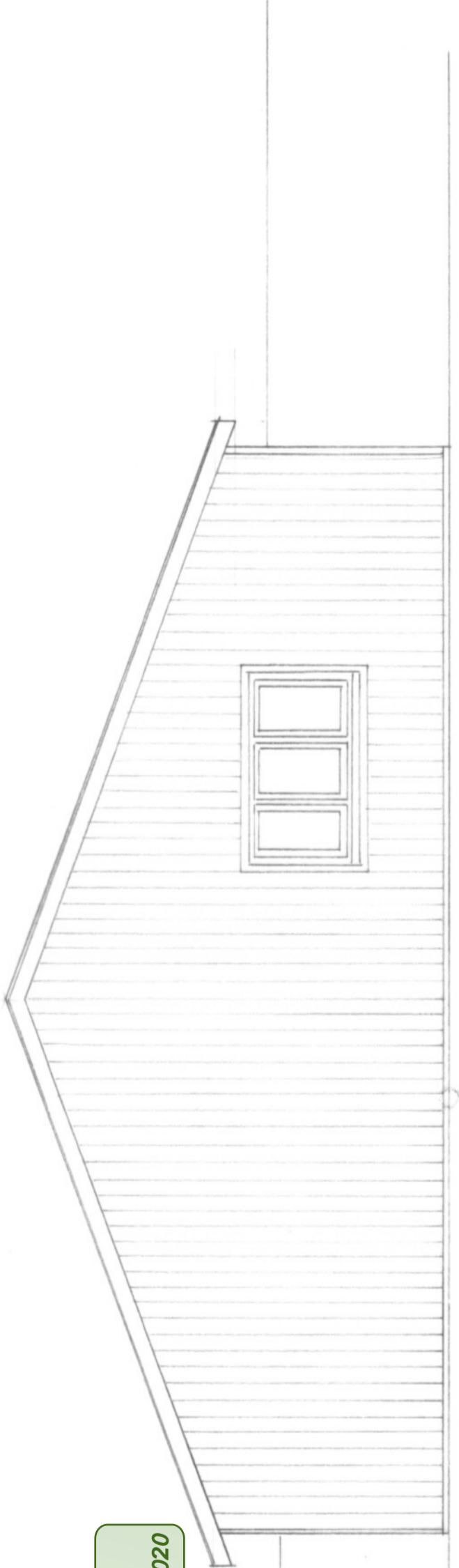
ISLANDS ARCHITECTS

Porthcressa, St Mary's, Isles of Scilly, TR21 0JQ and
Courtney Cottage, Fairfield Rd, Shroton, DT11 8QA.

Project:	Carnwithers, St Mary's, Isles of Scilly
Drawing:	Proposed Floor Plan
Scale:	1:50 @ A3
Drawn:	bdc 12.03.19
Dwg No:	2107 / 01C

APPROVED

By Lisa Walton at 6:40 pm, Sep 16, 2020



NORTH EAST ELEVATION



SOUTH EAST ELEVATION



ISLANDS ARCHITECTS

Porthcressa, St Mary's, Isles of Scilly, TR21 0JQ and
Courtney Cottage, Fairfield Rd, Shroton, DT11 8QA,

Project:

Carnwithers, St Mary's, Isles of Scilly

Drawing:

Proposed NE & SE Elevations

Scale:

1:50 @ A3

Drawn:

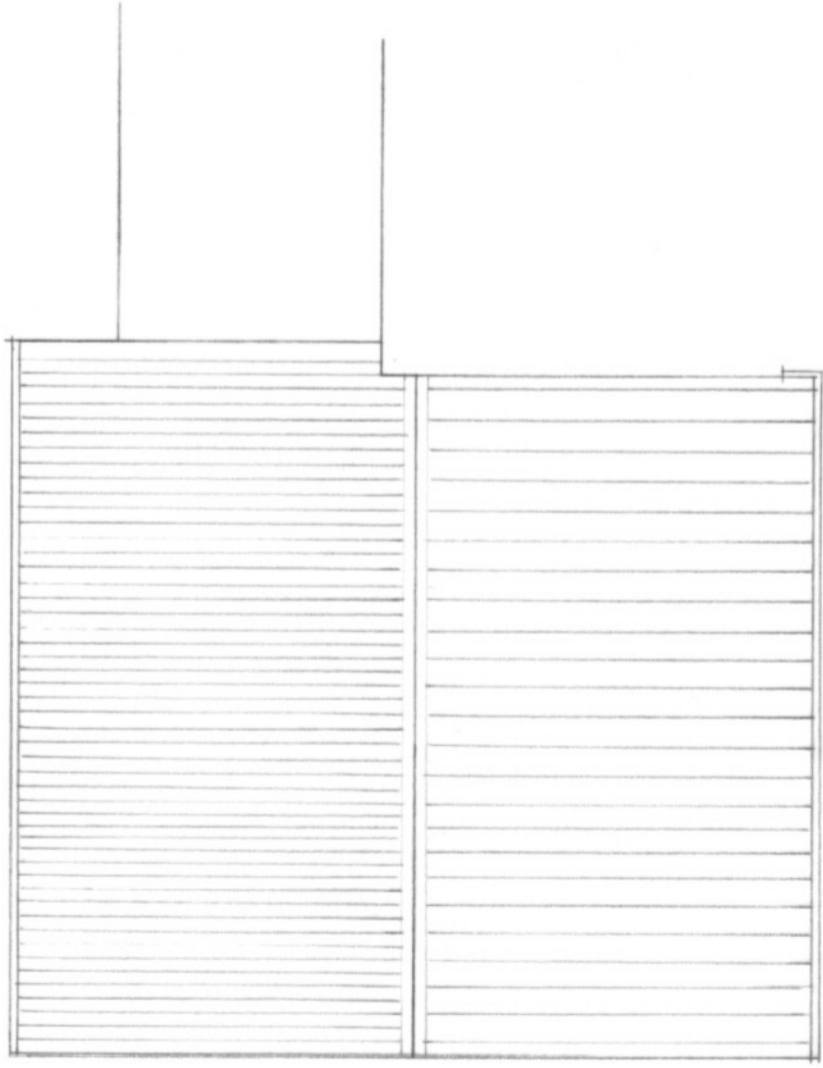
bdc 25.05.20

Dwg No:

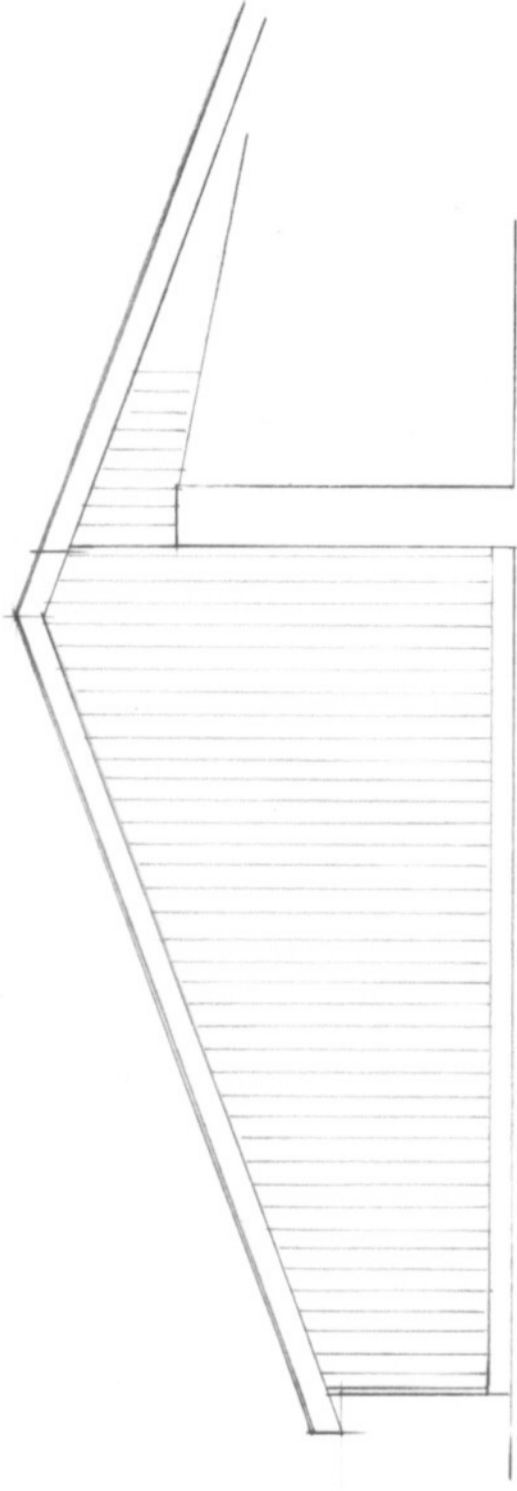
2107 / 04

APPROVED

By Lisa Walton at 6:41 pm, Sep 16, 2020



ROOF PLAN.



SOUTH WEST ELEVATION.



ISLANDS ARCHITECTS

Porthcressa, St Mary's, Isles of Scilly, TR21 0JQ and
Courtney Cottage, Fairfield Rd, Shroton, DT11 8QA,

Project:

Carnwithers, St Mary's, Isles of Scilly

Drawing:

Proposed SW Elevation & Roof Plan

Scale:

1:50 & 1:100 @ A3 Drawn: bdc 25.05.20 Dwg No: 2107 / 06

APPROVED

By Lisa Walton at 6:42 pm, Sep 16, 2020

PRELIMINARY ECOLOGICAL APPRAISAL AND PRELIMINARY BAT ROOST ASSESSMENT OF:

CARNWETHERS COUNTRY GUEST HOUSE
GREEN LANE
PELISTRY
ST MARY'S
ISLES OF SCILLY
TR21 0NX

Client: Mr Jeff Knowles

Our reference: BS31-2020

Report date: 21-4-20

Author: Darren Mason BSc (Hons)

Report peer reviewed: Sarah Mason

Report signed off: Sarah Mason

REPORT ISSUED IN ELECTRONIC FORMAT ONLY

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Non-Technical Summary

- On 23rd June 2020, the Isles of Scilly Wildlife Trust (IoSWT) conducted a Preliminary Ecological Appraisal (PEA) and a Preliminary Roost Assessment (PRA) of an outbuilding at Carnwethers Country Guesthouse, Green Lane, Pelistry, St Mary's, Isles of Scilly, TR21 0NX in order to establish baseline conditions, determine the importance of any ecological features within and around the survey area and to establish the actual or potential use of the building by bats to help inform the determination of a future planning application.
- This report outlines the findings of the PRA and provides advice based on the surveys' conclusions. As no planning application has been submitted to date, this assessment is primarily focused on the PRA of the building outlined in the supplied 'proposed elevations' drawings.
- During the PRA, an external/internal inspection of the building was undertaken (where accessible).
- Not all areas could be accessed and evaluated for roost potential and for evidence of bats.
- No evidence of nesting birds was found.
- The immediate habitat surrounding the proposed development and its link to the wider countryside provides optimal foraging and commuting habitat for several species of foraging bat including mature gardens, a network of small bounded agricultural fields and abundant semi-natural habitat
- The mixed outbuilding presented with limited features which may be used by both crevice dwelling species such as Common pipistrelle externally and internal features suitable for void dwelling species of bat such as Brown Long-eared bat. These features are most likely to provide suitable conditions for non-breeding summer or transitional roosts.
- The features of the building and the surrounding habitat suggest **low roost potential** for bats. The recommendations of this PRA are that two activity surveys are carried out, consisting of one dusk emergence and a separate dawn re-entry survey carried out within the bat active season between May and September.
- Aside bats, if the recommendations given in this report are adhered to, there should be no further ecological constraints to the proposal.
- **It must be noted that this report alone is not enough to support a planning application.**

1.0 Introduction

1.1 Survey and reporting

This report details the results of a preliminary ecological appraisal (PEA) and a preliminary bat roost assessment (PRA) of a mixed-use outbuilding that forms part of Carnwethers Country Guest House, Green Lane, Pelistry, St Mary's, Isles of Scilly TR21 0NX. The survey, carried out on 23rd June 2020, was undertaken in order to determine the importance of any ecological features within and around the survey area to establish the actual or potential use of the outbuilding by bats to help inform the determination of a future planning application.

1.2 The application site

The development is located at the southern end of Green Lane, Pelistry an area in the northern eastern part of the island of St Mary's (National Grid Reference SV9230611987). The application site is comprised of a large detached and extended guesthouse with two associated outbuildings, set within its own plot of mature gardens (see figure 1.).



Figure 1. Location

1.3 Details of proposed works

The work concerns the mixed-use outbuilding in the south-east corner of the plot (see Figure 2 – outbuilding outlined in solid red.) which includes extending the fabric of the building by a further 1m

south-eastwards; raising the roof of the south-east aspect to match the opposing side, to re-lay both aspects of the roof with modern slate tiles and to make alterations and additions to the fenestration of the building including new windows and doors on both elevations.



Figure 2. Location of outbuilding



2.0 Methodology

2.1 Preliminary Ecological Appraisal - Desk Study

A desk study data search was undertaken. This involved carrying out a review of the Local Records Centres (LRC) available records for bat species and publicly available datasets and citations of statutory designated sites of importance for nature conservation for sites within the zone of influence (ZOI) of the survey area (considered to be a maximum of 2km in this case). The desk study was also undertaken to identify habitats and features that are likely to be important for bats and assess their connectivity using aerial photographs.

2.2 Preliminary Bat Roost Assessment

The Preliminary Bat Roost Assessment comprised a survey of the building for bats, signs of bats and features potentially suitable for use by roosting bats, and an assessment of the surrounding habitat in terms of its suitability for commuting and foraging bats.

The survey consisted of a ground based inspection and a detailed search of the interior and exterior of the building (from ground level), looking for bats and/or evidence of bats including droppings (on walls and windowsills and in roof and loft spaces), rub or scratch marks, staining at potential roosts and exit holes, live or dead bats and features, such as raised or missing tiles, potentially suitable for use by roosting bats. Binoculars, a ladder and a high-powered torch were used as required.

2.3 Classification of building

The building was classified according to its suitability for use by roosting bats. The classification was dependent on a number of factors including (but not limited to):

- Bats and/or signs of bats;
- External and internal features potentially suitable for use by roosting bats (e.g. raised or missing tiles, gaps behind fascia boards etc);
- Setting;
- Night time light levels;
- Disturbance levels;
- Proximity of suitable foraging habitat and commuting routes (e.g. ponds, streams, woodland, large gardens, hedgerows).

The categories used to classify buildings and the survey effort required to determine the presence or absence of bats (as per the Bat Conservation Trust’s Bat Survey Guidelines¹, referred to by Natural England in their standing advice to planning officers) are described in Table 1 (see below).

2.4 Surveyor details

The survey was undertaken by Darren Mason BSc (Hons) of the Isles of Scilly Wildlife Trust. Darren has undertaken professional Bat Licence Training and holds a Natural England WML-A34-Level 2 (Class 2 License); registration number: 2020-46277-CLS-CLS which permits him to survey bats using artificial light and endoscopes and capture bats using hand and hand-held static nets.



Photo 2. North-west elevation

Table 1 – Description of the categories used to classify a building’s bat roost potential and the survey effort required to determine the likely presence or absence of bats

	Roost status	Description	Survey effort required to determine the likely presence or absence of bats
Bat Roost Potential	High	Numerous features potentially suitable for use by roosting bats, optimal or good quality bat foraging habitat nearby and good habitat connectivity. Alternatively, a building with fewer features potentially suitable for use by roosting bats and optimal foraging habitat nearby.	Three dusk emergence and/or pre-dawn re-entry surveys between May and September. Optimum period May – August. Two surveys should be undertaken during the optimal period and at least one survey should be a pre-dawn survey.
	Moderate	More than a few features potentially suitable for use by roosting bats, good foraging habitat nearby and limited habitat connectivity. Alternatively, a building with a few features potentially suitable for use by roosting bats but optimal foraging habitat nearby.	Two or three dusk emergence and/or pre-dawn re-entry surveys between May and September (but only if features will be affected by the proposals).
	Low	Only a few features potentially suitable for use by roosting bats but good bat foraging habitat nearby. Alternatively, a building with more than a few features potentially suitable for use by roosting bats but sub-optimal foraging habitat nearby and limited habitat connectivity.	One or two dusk emergence and/or pre-dawn re-entry surveys between May and September (but only if features will be affected by the proposals).
	Negligible	Very few features potentially suitable for use by roosting bats and / or in an area (such as a densely populated urban area) which has limited habitat connectivity and poor foraging habitat.	No further surveys required.

Table 1. Categorising and classifying a building’s bat roost potential

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

3. Results

Preliminary Ecological Appraisal - Bats

3.1 Pre-existing information on bat species

The desk study showed that no species of bat had previously been recorded within the building. A data search of LRC records for bats revealed information on 5 species of bat recorded within the 2km ZOI of the site. The species conclusively identified were Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*) and Brown Long-eared Bat (*Plecotus auritus*) both UK Biodiversity Action Plan (BAP) priority species and the rare Leisler's Bat (*Nyctalus leisleri*) and Nathusius Pipistrelle (*Pipistrellus nathusii*). Eighteen bat roosts are known to exist within 2km of the proposed development, with 5 known roosts within 500m of the property, the nearest being located 199m due north of Carnwethers.

3.2 Statutory and non-statutory sites

In addition, the desk study revealed the presence of the following statutory designated sites within the 2Km ZOI of the site:

- i.) **Lower Moors SSSI** – Situated 1.5km due south-west of Green Farm Cottage lies Lower Moors SSSI. A topogenous mire that has a range of wetland habitats supporting a diverse range of wetland wildflower species, including the Nationally Scarce Tubular Water-dropwort (*Oenanthe fistulosa*). The site also holds locally important populations of Royal Fern (*Osmunda regalis*) and Southern Marsh Orchid (*Dactylorhiza praetermissa*) and is particularly important feeding for passage and wintering birds including Corncrake (*Crex crex*) and Spotted Crake (*Porzana porzana*).
- ii.) **Higher Moors & Porth Hellick Pool SSSI** – 900m south of the proposed development is Higher Moors SSSI. A topogenous mire designated for several rare and notable plant species) including; Bog pimpernel (*Anagallis tenella*), Star Sedge (*Carex echinata*) and Marsh St John's-wort (*Hypericum elodes*).
- iii.) **Porthloo SSSI** – Situated 1.6km west of the proposed development lies Porthloo SSSI designated for its geology, particularly for its Quaternary sediments in the cliffs that show changes in the climates and environments of the Quaternary period in Scilly.

iv.) **Watermill Cove SSSI** – Lying 250m north-east of Green Farm Cottage, Watermill Cove SSSI is designated for its cliff exposures of Quaternary sediments, that clearly show the sequence of changes in the climate and environment during the Quaternary period.

3.3 Habitats surrounding the application site

Carnwethers Country Guest House is in the north-east region of the island of St Mary's, situated at the southern end of an area known as Pelistry. The area comprises of 8 detached or semi-detached dwellings (including Green Farm Cottage) and a large farm holding. Carnwethers can be found adjacent to Pelistry Farm at the southern end of Green Lane farm track.

This track is bounded on both sides by a mix of both native hedgerow comprising of Hawthorn (*Crataegus monogyna*), Dutch Elm (*Ulmus x hollandica*) and rare Sweet Chesnut (*Castanea sativa*) which primarily encloses improved cattle-pasture and non-native hedgerow dominated by Karo (*Pittosporum crassifolium*) which encloses small cultivated bulb fields or productive 'fallow' leys, immediately to the north and west of the development. This patchwork of improved pasture and cultivated fields and their inter-linking hedgerows is dominant for at least 900m north and south, 1.5km west and 600m east of the proposed development.

This contiguous habitat links important habitat used by bats including the Elm tree-lined stream at Watermill, the large coniferous shelterbelt of Monterey and Lodgepole Pine (*Pinus radiata* and *Pinus contorta*) at Trenoweth (200m and 900m north respectively). Likewise, this connectivity continues southwards and south-westward reaching the wet woodland at Holy Vale (600m south-west) and the large wet woodlands and reedbeds at both Lower (1.5km south-west) and Higher Moors SSSIs (900m due south).

Several large areas of open habitat are also linked by this contiguous hedge network including the coastal headlands consisting of their mosaic of maritime grassland, heathland and scrub which are grazed for conservation purposes (1.3km south-east), the local airport 1.4km south-west dominated by mown semi-natural grassland of varying height as well as the golf course with its very short mown grassland and heathland sward 1.5km west.

In summary, the habitats surrounding the proposed development and links to the wider countryside provide optimal foraging habitat for species in the *Pipistrellus* genus and Leisler's bat, particularly as it has been shown that these species require 'edge' habitat (such as hedgerows, tree-lined lanes or woodland edge) to both feed from and to use as commuting routes to other feeding areas^{2,3,4&5}. This habitat is particularly contiguous for at least 1.5km west, south-west and south-east, providing access to a wide variety of habitats for which these species are known to take advantage⁶. This continuity of habitat is also important for both Soprano and Nathusius Pipistrelle as it provides feeding corridors to their preferred habitat of open water and watercourses^{2,3&4}, such as Lower and Higher Moors SSSIs and other riparian habitats such as those found at Watermill and Holy Vale. As these habitats fall within the core sustenance zones of all 3 pipistrelle species (1.7km, 1.5km and 3km respectively⁷) the location of Carnwethers makes it suitable as a potential roost site.

Brown Long-eared bat have been shown to prefer to feed in open canopy deciduous woodland typically located close to their roosts. Larger tracts of woodland should be available (no greater than .5km away⁸), making the shelterbelt and tree-lined stream at Watermill and its onward link to Trenoweth Shelterbelt potential feeding sites. Despite the distance the woodland at Holy Vale 600m to the south-west could be reached by utilising the small native shelterbelt due south of the cottage and the native hedges that link Holy Vale to the area surrounding the development. Although there is initially little woodland cover in this direction, Brown Long-eared bats are known to emerge from their roosts much later than other species of bat due to their method of feeding and the type of prey they take which reduces the need for cover and avoids the risk of predation⁹. All sites also fall within this species' core sustenance zone of 1.1km¹⁰.

Leisler's bat also takes advantage of woodlands, particularly woodland edge¹¹, making the woodland blocks at Trenoweth and Lower and Higher Moors suitable as feeding sites, as would the smaller woodland block at Holy Vale. As Leisler's bat has a large core sustenance zone of 4.2-7.4km⁵, the Garrison 3km to the south-west could also be used. Leisler's bats in England are also known to take advantage of open areas of pasture⁵, making the immediate area surrounding the property, the coastal headlands to the south-east, the golf course and the airport to the west and south respectively potential feeding areas. This contrasts with most other species of bat which typically avoid this type of open habitat, particularly during peak times of prey abundance (dusk and dawn) to avoid predation^{12&13}.

3.4 Habitats within the application site

Set within its own grounds Carnwethers is bounded on three sides (north-west, north-east and south-east) by non-native Karo and Tree Bedstraw (*Coprosma repens*) hedgerow, which is also used to divide the garden into 4 separate sections. Section 1 is broadly 'L-shaped' circling the south-west and south-east of the property. Several mature trees including Monterey Pine, Sweet Chestnut, Sycamore (*Acer pseudoplatanus*) and Pedunculate Oak (*Quercus robur*) dominate the south-west corner, whilst below and running along the length of the south-east side of the building the section is laid to lawn, which is well-mown. Section 2 dominates the centre of the plot and encompasses mature borders surrounding the swimming pool. The mature borders include several tree species including Ash (*Fraxinus excelsior*) immediately adjacent to the north-west elevation, Hawthorn (*Crataegus monogyna*), European Olive (*Olea europaea*) and Cabbage Palm (*Cordyline australis*). Whilst below shrubs including Snow-rose (*Rhododendron* sp.), Butterfly Bush (*Buddleja davidii*), Chilean Gum box (*Escallonia* sp.), Bottlebrush (*Callistemon* sp.), French Hydrangea (*Hydrangea macrophylla*), Tutsan (*Hypericum androsaemum*) and Rosemary (*Salvia rosmarinus*) dominate the field layer. Sections 3 and 4, to the north-west of the pool area are laid primarily to lawn, with a similar mix of shrubs within the borders and include tree specimens such as Bull bay (*Magnolia* sp.), Blue Gum (*Eucalyptus* sp.) and Cherry (*Prunus avium*).

In summary, the garden and immediate habitats surrounding Carnwethers provide cover for bats within 10m of the outbuilding and there are many species of shrub and plant that may attract a wider variety of invertebrates which bats may prey upon, making the immediate habitat optimal for bats to feed and leave and enter a roost safely.

Preliminary Roost Assessment

This assessment will focus only on those elements of the property which are to be directly affected by the proposals contained, for clarity and brevity. This is restricted to the outbuilding in the south-east corner of the plot of Carnwethers Country Guesthouse (see Figure 2 for location).

3.5 External

The outbuilding at Carnwethers can be split into two halves, north-west and south-east, but are broadly constructed with the same materials and with the south-eastern half having a lower roofline than the north-western component. The building is constructed of granite block and well-pointed for the most part, with some mortar missing from its north-east elevation (see photo 3) and along the top of the 2 wall-



Photo 3.

plates on the south-east elevation, which may be suitable for roosting bats (see photo 4). At the time of survey bird droppings were found below the gap of the eastern most wall plate, but no nesting birds were recorded. Full height windows and associated doors dominate the south-east elevation which are wooden in construction, which in places have timber clad surrounds. Several crevices are present between the window frames and the

uneven external walls (see photo 5). Likewise, between the timber cladding and wall at the eastern end of the south-east elevation, both would provide suitable roosting conditions for bats, or access into the interior of the building. A single timber-framed window was present on the north-east elevation but was well fitting and offered no opportunities for bats to roost. No other windows were present on the remaining elevations.

Fascia with or soffit boards run along the eaves of all four elevations, with several gaps created between the fascia or soffit boards and the natural irregularity of the granite stonework, particularly along both the south-west and south-east elevations (see photo 6). These present with potential roosting opportunities behind the boards themselves,



Photo 4.

Both components of the building have single-pitched roofs with a pitch of approximately 15° , constructed of different materials and with the south-east aspect having a lower roofline (approximately .5m), which is well tied into the opposing aspect with mortar. The south-east roof is constructed of corrugated fibre-cement sheets, that sit on top of the fascia which present with many



Photo 5.

The north-west elevation held a wooden framed door, whose frame was well tied-in to the surrounding granite stonework. However, the door was open during the survey, which if left permanently open could provide access for bats. An assessment of the features of the far northern corner of the north-west elevation was not possible as it was partially obscured by a mature *Rhododendron* species and Tree Fuchsia (*Fuchsia excorticata*)

3.6 Internal

The south-east component of the building comprised of a workshop with floor to ceiling shelving

and a worktable along the full length of the rear (north-west) and left-hand (south-west) walls. The interior is well-lit and appears to be regularly used, albeit for brief periods. Abundant House Mouse (*Mus musculus*) and Brown Rat (*Rattus norvegicus*) droppings were found on the floor, worktable, the shelving,

gaps along the full length of the eaves that bats may utilise to gain access into the interior of the building. The joins between the sheets could not be searched as solar thermal panels for the swimming pool and their associated frame covered 80% of the roof surface.

The north-west aspect is constructed of pre-formed ridged metal roof-sheets, with 3 raised opaque and equally spaced rooflights in the centre. These are well tied into the roof with zinc flashing and present with no opportunities for bats to roost, as does the raised corrugated profile of the roof sheet at the eaves which has been filled within foam insulation material.

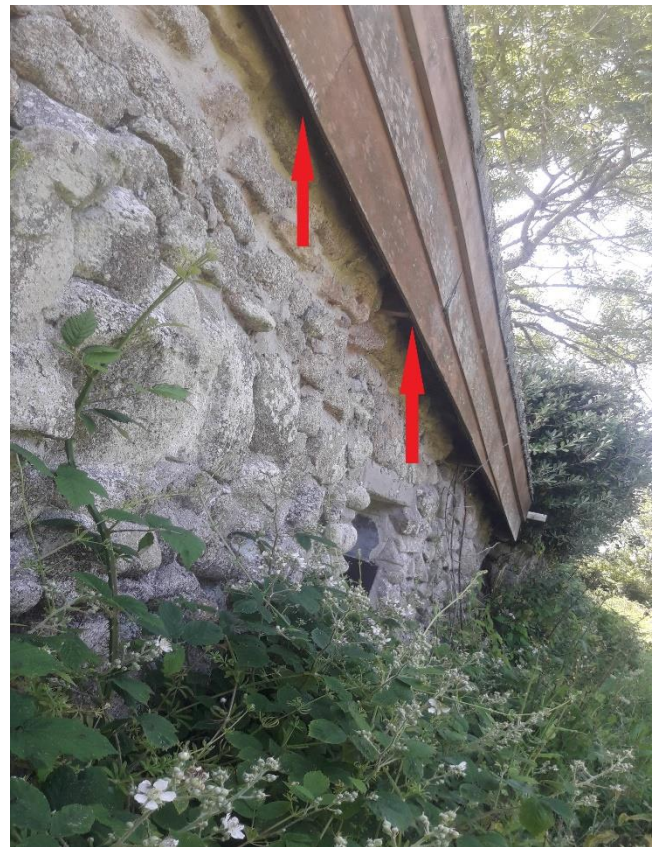


Photo 6.

and their contents. The roof was open, with no ceiling void present and simply built with modern treated timbers and butt joints. These joints do not appear to provide any roosting opportunities for bats, but free-hanging bats could take advantage of the rafters and open interior. Along the top of the wall plate of the rear wall several tears in the felting (see photo 7.) and a redundant pipework hole permitted access to the roof-space of the opposite elevation and the cavity between the two components of the building respectively. Both offer either access to other roosting opportunities or offer roosting opportunities themselves.



Photo 7.

The interior of the north-west component of the building is split into 3 rooms, a kitchen/washroom, a storeroom and a sauna and shower area. Both the kitchen and storeroom walls comprised of exposed, modern concrete blocks, whilst the sauna and shower room were constructed of timber clad stud-walling. Previous pipework holes in the cladding (see photo 8) provides roosting opportunities for bats, as they provide access to the cavity between the two components of the building. The roof is clad throughout with hardboard and marine plywood, including the recesses for the raised rooflights in each of the rooms. Here, particularly in the kitchen and sauna area where the rafters were cut through the timber cladding, gaps leading into the roof space above provides opportunities for bats (see photo 9.). Inspection however of the surrounding timber revealed no staining through regular use.



Photo 8.



Photo 9.

Access by bats into the roof void is also possible through gaps in the woodwork either side of the loft hatch (see photo 10). The roof void itself is insulated and un-cluttered. The air during the survey was hot



Photo 10.

and humid, making the conditions ideal for a roost. However, these conditions may fluctuate throughout the day due to the in-effective heat retaining metal roofing sheets. The original triangular roof frame of rafters, purlins and battens appears to have been built-up to achieve the extra .5m height. The main rafters sit on the central wall plate and the frame is constructed with butt joints, leaving no crevices. However, the square battens (see photo 11.), the rafters and the open space of the roof void provides free-hanging roosting and flight space (prior to emergence) for species such as Brown Long-eared bat. On inspection Brown Rat droppings were numerous, but no evidence of bat droppings was recorded.



Photo 11.

In general, the interior of the north-west component of the outbuilding is light and airy and is well-maintained. The nature of the building suggests that it is more likely to be used more frequently during the summer months when guests will be using the pool and less frequently outside of the tourist season. Access to the interior of the north-west component of the building is possible by the door, therefore unless this door remains open, it is unlikely to offer any long-term roosting opportunities for bats.

3.7 Summary

The outbuilding at Carnwethers Country Guesthouse presents with several features associated with the building which are considered suitable for a transition or non-breeding summer roost, particularly for crevice dwelling species such as Common or Soprano pipistrelle. These include features behind the soffit or fascia board along the eaves, gaps between the window frames/timber cladding and the exterior granite blockwork. Though the roof void presents with suitable flight space and roosting perches for species such as Brown Long-eared bat, access to the roof void is restricted primarily to features found inside both component parts of the outbuilding and access to these features from the outside is limited to very few permanent features, or temporary features such as the open door on the north-west elevation.

4. Assessment and recommendations (excluding bats)

4.1 Protected sites

The proposed development falls within the main SSSI Impact Risk Zones of Lower Moors and Higher Moors SSSIs. Impact zones are used in the assessment of planning applications for likely impacts on SSSI's, Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar Sites (England). However, the likely attributable impact in these zones is for residential developments of 100, or 50 or more houses outside existing settlement/urban areas. The proposals under consideration are highly unlikely to impact on the SSSIs.

4.2 Nesting birds

All wild birds are protected under the Wildlife and Countryside Act 1981 (as amended). Section 1 of this Act makes it an offence to kill, injure or take any wild bird, or intentionally to take damage or destroy the nest of any wild bird while that nest is in use or being built¹⁴. During this survey, no evidence of nesting birds was identified. However, if work was to commence between the months of March and August inclusive, then the site would need to be checked first for nesting birds and if, any evidence of breeding activity was found, or nests are identified works that would disturb the adults, the nest or young must be postponed until all young have fledged the nest and it is no longer in use.

5. Assessment and recommendations (bats)

5.1 Survey constraints

The survey was undertaken at a time of year suitable for undertaking preliminary bat roost assessments, during the main summer active season. However, a full inspection of the north corner of the north-west elevation could not take place due to dense vegetation covering the blockwork and inspection of the majority of the south-east roof aspect was not possible due to the installation of the solar thermal panels for the swimming pool. All other areas of the proposed development were assessed for their roost potential.

5.2 Further survey requirements

Carnwethers Country Guesthouse outbuilding is considered to provide 'low' potential to support roosting bats (see Table 1). This assessment is based on the occurrence of the following features within or immediately adjacent to the site:

- The building has limited features which would provide suitable roosting habitat for a small number of crevice dwelling bats – most likely as a transition or a non-breeding summer roost, with a lower likelihood of use for maternity or hibernation roosts.
- The building has limited features that would provide suitable roosting habitat for Brown Long-eared bat.
- Access to the internal roof void is limited to features within the component parts of the building, with very limited access to these from the exterior
- The building is situated within optimal foraging habitat in a dark environ with excellent connections to the wider landscape.

To confirm whether this proposed development site hosts roosting bats, further surveys need to be undertaken during the bat active season (see section 5.3).

5.3 Presence or absence surveys

The Bat Conservation Trust's Bat Survey Guidelines¹ (referred to by Natural England in their advice to planning officers) state that buildings with 'low' bat suitability require one to two separate survey visits between May and September, with at least one undertaken between May and August. These surveys should consist of either two dusk emergence surveys, or one dusk emergence survey and a separate dawn re-entry survey.

The surveys should take place in optimum weather conditions, in order to maximise the likelihood of recording bats, with dusk air temperatures exceeding 10⁰C and not rain or strong wind.

Dusk emergence surveys should commence 15 minutes before sunset and continue for 1.5 – 2 hours after sunset. A pre-dawn re-entry survey should commence 1.5 – 2 hours before sunrise and continue until 15 minutes after sunrise.

Sufficient surveyors should be used on each survey so that all aspects of the building can be viewed at one time, therefore the building should be adequately surveyed by two surveyors and a night vision camera. Surveyors should be positioned no more than 50m away from the buildings with an awareness of the likely exit/access points and potential roost locations. Each surveyor should be equipped with a bat detector and recording equipment and should count the number and species of bats and their activity in a defined area.

If no roosts are found during the presence or likely absence surveys, then no further surveys would be required.

5.4 Mitigation

To comply with planning policy and wildlife legislation (both domestic and European) it will be necessary to ensure that following the development the "favourable conservation status" of bats will be maintained. This means that, where a roost will be lost, appropriate mitigation needs to be provided.

If roosts are confirmed then further detailed roost characterisation survey may be required to establish how bats use the roost, the intensity of use and what features and characteristics of the roost and the surroundings are important. The information gained would allow an accurate assessment of the potential impacts of the development on bats and inform the requirement of a European Protected Species Mitigation licence, to be considered and issued by Natural England prior to the works commencing.

6. Summary

The outbuilding at Carnwethers Country Guesthouse was found to have low potential to support transition or non-breeding summer roosts for cavity dwelling species such as Common and/or Soprano pipistrelle and Brown Long-eared bat.

To assess whether bats roost in the main building or utilise the outbuildings, two further surveys are recommended; one dusk emergence and a separate dawn re-entry survey carried out between May and September, with at least one being carried out between May and August. Each survey would require two surveyors to be strategically positioned to ensure all potential roosting features which may be affected by the proposals can be observed. If bats are found to be roosting in the dwelling the status of the roost(s) will need to be identified. Likewise, if bats are shown to preferentially utilise the eastern and southern

hedgerows further surveys will then be required to inform a mitigation strategy which would need to be implemented.

Aside from bats, if the recommendations given in this report are adhered to, there should be no further ecological constraints to the proposals.

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BAT PRESENCE/ABSENCE SURVEYS OF:

CARNWETHERS COUNTRY GUEST HOUSE
GREEN LAND
PELISTRY
ST MARY'S
ISLES OF SCILLY
TR21 0NX

Client: Mr Jeff Knowles

Our reference: BS31-2020PAS

Report date: 17th August 2020

Author: Darren Mason BSc (Hons)

Report peer reviewed: Sarah Mason.

Report signed off: Sarah Mason.

REPORT ISSUED IN ELECTRONIC FORMAT ONLY

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Non-Technical Summary

- On 23rd June 2020, the Isles of Scilly Wildlife Trust (IoSWT) conducted a Preliminary Ecological Appraisal (PEA) and a Preliminary Roost Assessment (PRA) of an outbuilding at Carnwethers Country Guest House, Green Lane, Pelistry, St Mary's, Isles of Scilly, TR21 0NX in order to establish baseline conditions, determine the importance of any ecological features within and around the survey area and to establish the actual or potential use of the building by bats to help inform the determination of a future planning application.
- Two presence/absence surveys were recommended, and the results of these surveys are outlined in this Presence/Absence (PAS) report.
- A dusk survey conducted on the 28th July 2020 did not identify any bats emerging from roosting sites associated with the building but did identify bats commuting and foraging along the shelterbelt edge to the north-east of the property and over the swimming pool immediately north of the proposed development.
- A dawn re-entry survey conducted on the 11th August did not identify any bats returning to potential roosting sites associated with the building. Foraging behaviour was again noted in and around the pool area and commuting behaviour seen along the shelterbelt edge to the north-east as well as the southern boundary hedge of the property.
- Both the PEA/PRA and PAS reports should be considered together to provide a comprehensive assessment of nature conservation issues at the site.
- The results confirm the likely absence of bats using the outbuilding at Carnwethers Guest House as a roost
- The recommendations from the PEA/PRA along with this report, suggest no further surveys and no requirement to obtain an EPS license.
- Mitigation measures for bats should include the installation of free-standing bat box(es) at each gable end of the modified roof of the outbuilding.

1.0 Introduction

1.1 Background

A Preliminary Roost Assessment report (BS31-2020) dated 23rd June 2020 identified that the building under consideration provided low roosting potential for bats. Additional presence/absence surveys were recommended to meet best practice guidance to support a future planning application. This report outlines the results of these additional surveys.

1.2 Survey Objectives

The objectives of this Presence and Absence Survey (PAS) report, is to provide further ecological information to support the planning proposal by:

- Ascertaining if roosting bats are present at the application site
- To identify the location of these bat roosts (including exit/entry points)
- Subjecting this information (and the information from the PEA and PRA) to evaluation and impact assessment
- To provide advice on the potential for contravention of legislation/policy
- To provide recommendations on any further actions needed (i.e. further surveys, licensing, mitigation or enhancement)

1.3 Surveyor details

The survey was undertaken by Darren Mason BSc (Hons) of the Isles of Scilly Wildlife Trust and with the assistance of Rob Carrier and Rhianna Pearce. Darren has undertaken professional Bat Licence Training and holds a Natural England WML-A34-Level 2 (Class 2 License); registration number: 2020-46277-CLS-CLS which permits him to survey bats using artificial light, endoscopes, hand, and hand-held static nets.

2.0 Methodology

2.1 Dusk emergence and Dawn re-entry surveys

The objective of the dusk emergence surveys was to detect active bat use of the site and identify any exit locations being used around the building. Survey effort was concentrated on areas of the site where suitable features or bat field signs were noted from the PRA. The survey involved;

- The survey timings accord with best practice guidance, with dusk surveys commencing 15 minutes before sunset and continuing for approximately 1.5-2hours after¹. Dawn re-entry surveys commenced 1.5 hours before sunrise and continued until 15 minutes after sunrise¹;
- commenced
- Identification of further bat species primarily using ultrasound characteristics. To aid identification flight and habitat characteristics were also noted (where possible) to determine the species.
- The surveys were designed with sufficient surveyors appropriately positioned to ensure that all potential access points to the building could be observed simultaneously.
- The use of a night vision camera assisted in Identifying how bats may use the surrounding habitat
- The surveys also identify the number of bats leaving or entering the building

2.2 Equipment

The following equipment was used for the dusk emergence survey at the site:

- Anabat Express (Frequency Division) static bat recorder
- Elekon Batscanner Stereo Heterodyne
- Elekon Batscanner Heterodyne
- Magenta Bat 4 Bat Detector
- Bestguarder WG-50 Night vision camera

Sound recordings were analysed using Anabat Insight software to confirm surveyors' identification of species.

2.3 Survey Limitations

Surveys carried out during a specific season can only provide information on bat presence at that particular time, as bats are highly mobile in nature and may only use buildings at certain times of the year that favours a particular part of their roosting, maternity and hibernating requirements.

3.0 Results

3.1 Weather conditions, temperatures and timings

Survey Information:	Start and End Times:	Conditions (Start):	Conditions (End):
Dusk emergence: 28/7/20	Start: 20:57 Sunset: 21:12 End: 22:45	Temp: 18°C Humidity: 67% Wind speed: 13mph - WNW Cloud cover: 25% Rain: none	Temp: 12°C Humidity: 93% Wind speed: 12mph -WNW Cloud cover: 15% Rain: none
	Surveyors		
	1. Darren Mason 2. Rob Carrier 3. NV Camera 4. Rhianna Pearce	Notes: Light level at Lux 2: 21:40	

Table 1. Site conditions for dusk emergence survey 28-7-20



Location of surveyor for the dusk emergence survey 28-7-20

Survey Information:	Start and End Times:	Conditions (Start):	Conditions (End):
Dawn re-entry 11/8/20	Start: 04:42 Sunset: 06:12 End: 06:17	Temp: 21.5°C Humidity: 77% Wind speed: 7mph NW Cloud cover: 100% Rain: none	Temp: 18.5°C Humidity: 81.5% Wind speed: 4mph WSW Cloud cover: 85% Rain: Yes
	Surveyors		
	1. Darren Mason 2. Rob Carrier 3. NV Camera	Notes:	

Table 2. Site conditions for dawn re-entry survey 11-8-20



Location of surveyors for dawn re-entry survey 11-8-20

3.2 Dusk emergence and dawn re-entry survey results

The species confirmed from the dusk emergence survey was Common Pipistrelle (*Pipistrellus pipistrellus*). During the dusk emergence survey no bats were seen leaving or entering the outbuilding. Activity during this survey was dominated by commuting behaviour (as noted from calls recorded on heterodyne and the Anabat Express), particularly along the south-east edge of the Monterey Pine (*Pinus radiata*) shelterbelt north-east of the outbuilding. In total 19 bat contacts were made, the first at 21:42 and the last at 22:39pm

The species confirmed during the dawn re-entry survey was Common Pipistrelle. Throughout the survey period no bats were seen to enter or leave the outbuilding. In contrast to the dusk emergence survey, activity was dominated by feeding. A short intense period immediately at the start of the survey recorded several bat passes within the garden to the north-east of the swimming pool picked up by both surveyors between 04:41 and 04:44am. Feeding activity was recorded again by surveyor 1 from between 04:47 and 05:05am. After this period both surveyors recorded commuting activity only until just before dawn when surveyor 2 recorded bat feeding activity along the eastern elevation of the main guest house, before moving on to feed amongst the palms and trees north of the outbuilding.

3.3 Summary

The results of the dusk and dawn surveys have confirmed the likely absence of bats at the outbuilding immediately to the south-east of Carnwethers Guest House. However, the results can only be based on presence/absence at a particular time as bats are highly mobile in nature may use the building at other times of the year. Avoidance measures set out under Section 5 will help to reduce the probability of committing an offence if bats were to be found during the demolition phase of the works.

4. Evaluation of Results

To identify which ecological features are important and which could potentially be affected by the proposed project, an evaluation of their importance for example, in a geographical context, degree of scarcity or level of protected status needs to be undertaken². The table below outlines those features identified as important, the nature conservation legislation relevant to those features and an assessment of the level of impact from the proposed development on those features.

Ecological Feature	Relevant Legislation	Evaluation (of importance)	Mitigation Hierarchy	Impact Level
Bats	CHSR ³ , W&CA ⁴	Local	A, & E	Low
<p>Impact to roost site: Confirmed likely absence of a bat roost at the outbuilding immediately south-east of Carnwethers Guest House suggests that the impact to a roost site at this location is low. However, if a roost were located this would have a negative effect on the population status of Common Pipistrelle bats on the Isles of Scilly. Therefore, consideration and due care must be considered and undertaken at the following stages:</p> <p>Impacts to bats:</p> <p>Demolition: – Undertaking Reasonable Avoidance Measures (RAM) can reduce the likelihood of negatively effecting the local population status and minimise the probability of committing an offence with respect to bats and their roosts if measures are adhered to.</p> <p>Construction: – A positive impact on the local population of Common Pipistrelle bats may result through the incorporation of new roost(s) in the new buildings⁵</p>				
Key to Legislation and Mitigation Hierarchy				
CHSR – Conservation of Habitats and Species Regulations 2017 ³ - http://www.legislation.gov.uk/uksi/2017/1012/made W&CA – Wildlife & Countryside Act 1981 (as amended) ⁴ - http://www.legislation.gov.uk/ukpga/1981/69/contents				
A – Avoid, M – Mitigate, C – Compensate, E – Enhancement				

5. Recommendations and Mitigation

The recommendations in this section are provided as information only and specialist legal advice may be required. If works are delayed for more than one year, then re-assessment may be required.

5.1 Survey constraints

The surveys were undertaken at an appropriate time of year, during the main summer active season.

5.2 Further survey requirements

No further surveys are recommended with regards to the proposed development – it is considered that this report, alongside the PEA/PRA (BS31-2020), constitute a comprehensive ecological baseline from which to assess the impacts of the application.

5.2 EPS Licence requirement

For any development that is likely to commit an offence (or offences) in respect to a European Protected Species (EPS) i.e. bat, or their habitat, a licence will be required. In this instance based on sufficient survey work **no licence is required**. If, in the unlikely event a bat was found during the demolition phase of the project, Reasonable Avoidance Measures (RAM) must be followed and will determine any further action, such as licensing if necessary.

5.4 Planning Recommendation(s)

The information gathered in the PEA/PRA (BS31-2020) and this report is sufficient to support a planning application in accordance with relevant best practice guidelines and to ensure protected species are considered.

The impacts of the proposed works on protected species can be mitigated sufficiently to ensure that the conservation status of Common Pipistrelle on St Mary's is not negatively impacted and the mitigation outlined in Section 5.5. would represent appropriate measures.

It is recommended that planning permission be granted if compliance with the recommendations in Section 5.5 of this report is conditioned.

5.5 Mitigation Proposals

5.5.1 Avoidance (A) – Bats

As there is a very low risk that bats may roost within the building, prior to demolition, precautions should be taken to reduce the probability of committing an offence. By undertaking Reasonable Avoidance Measures (RAM), if affected RAM should include:

- i. When roofing works are planned these should avoid the main breeding and mating season of *Vespertilionidae* bats, work should typically take place between the 1st November and 1st May inclusive, however the months of **November to February should be avoided where possible** as this is when bats enter a time of reduced activity and torpor which makes disturbance impacts more significant
- ii. Ensure all workers on site (including sub-contractors) are made familiar with bat legislation and agree to work in accordance with and fully follow best practice measures.
- iii. Carry out prior to demolition careful checks of any cracks/crevices and cavities in or on the building. Signs of usage include bat droppings, dis-colouration or polishing of access points where bats rub against them, urine stains and a lack of cobwebs, particularly if other crevices around them have plenty.
- iv. Individual bats may be found in/under; cladding, between timber boards, between corrugated sheeting, in soffit boxes, behind lead flashing and sometimes just clinging to timber beams around joins as well as other areas. When any of these are removed, please do so carefully, lifting outwardly, and checking for bats continually. If in doubt, consult a licensed bat worker.
- v. Try to minimise any dust generated from demolition works from entering off-site buildings and gardens
- vi. In the unlikely event that a bat is found please see below:

1. At no point should a worker handle a bat. Untrained handling may cause undue stress and injury to the bat, and if bitten may expose the worker to rabies-related European Bat Lyssavirus
2. Where possible replace any covering without damaging the bat, then halt works and contact **Natural England** (Tel: 0845 601 4523), or the **Bat Conservation Trust Helpline** (0845 1300 228), or **IoSWT** (01720 422153) for advice.
3. Any bats that go to ground should be covered with a box and left alone until a licensed bat worker arrives to assess the condition of the bat
4. If the bat attempts to fly at any point allow it to do so. Preventing natural behavior will cause unnecessary stress and may cause injury. Attempt to see where bat goes. If the bat returns to the building, halt works and report the escaped bat to the local bat worker

5.5.2 Enhancement (E) – Bats

The Isles of Scilly have the most southern population of Common Pipistrelle (*Pipistrellus pipistrellus*) bats in the United Kingdom. The islands also hold small populations of Soprano Pipistrelle (*Pipistrellus pygmaeus*) and Brown Long-eared Bat (*Plecotus auritus*) both UK Biodiversity Action Plan (BAP) priority species and holds records for the rare Nathusius Pipistrelle (*Pipistrellus nathusii*). Any loss of roosting, commuting or foraging sites could have a detrimental effect on these species distributions as a whole and cause a net loss in biodiversity on the islands.

Each local planning authority in England and Wales has a statutory obligation under Part 3 Section 40 of the Natural Environment & Rural Communities Act 2006⁶ (NERC 2006) to have due regard for biodiversity when carrying out their functions and under Section 15 paragraph 170(d) of the NPPF 2019⁷, all planning policies and decisions shall contribute to and enhance the natural and local environment by providing net gains in biodiversity. **Therefore, to assist in meeting these obligations the following suggestion should be undertaken:**

- i. Erect two free-standing bat boxes developed for crevice-dwelling species (see Appendix B for supplier details) one on each of the north-east and south-west modified gable ends of the outbuilding. Erect as high as possible (apex of gable) below the level of the fascia.

6. Bibliography

1. Collins, J. (ed.) (2016). *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (3rd edition). The Bat Conservation Trust
2. CIEEM. (2016). *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal* (2nd edition). Chartered Institute of Ecology and Environmental Management, Winchester.
3. H.M.S.O. (2017). *The Conservation of Habitats and Species Regulations*. London.
4. H.M.S.O. (1981). *The Wildlife and Countryside Act 1981* (as amended). London.
5. Mitchell-Jones, A.J. (2004). *Bat mitigation guidelines*. English Nature.
6. H.M.S.O. (2006). *The Natural Environment and Rural Communities Act 2006*. London
7. Ministry of Housing, Communities & Local Government. (2019). *National Planning Policy Framework*. OGL

APPENDIX A – BAT CONTACTS SURVEY TABLES

Date:	28-7-20 – Dusk emergence survey			
Survey Type:	Surveyor 1	Surveyor 2	NV Camera	Surveyor 4
Location:	Unseen, SW to NE, unseen NW to SE, NW to SE, unseen, unseen, unseen, unseen, unseen, unseen and unseen	Unseen, unseen, unseen, unseen, unseen, unseen and over swimming pool	No contacts recorded	Unseen, unseen and unseen
Exit/Entry point:	None recorded	None recorded	None recorded	None
Time(s):	21:42 ; 21:44; 21:45; 21:57; 22:03; 22:09; 22:10 ; 22:18; 22:27 ; 22:29; 22:31 ; 22:32; 22:36 and 22:39	21:42; 21:54; 22:04; 22:10; 22:13; 22:15 and 22:28	No contacts recorded	22:27; 22:31 and 22:36
Species of bat:	Common pipistrelle	Common pipistrelle	None recorded	Common pipistrelle
Roost present:	None confirmed	None confirmed	None confirmed	None confirmed

(fb) – feeding buzz

Date:	11-8-20 – Dawn re-entry survey		
Survey Type:	Surveyor 1	Surveyor 2	NV Camera
Location:	Unseen, unseen, unseen, unseen, unseen, unseen, unseen, unseen, unseen, unseen, N to S, unseen and E to W	Feeding around palm/trees NW of outbuilding, unseen, unseen, unseen, unseen, feeding by main house and feeding around palm/trees NW of outbuilding	No contacts recorded
Exit/Entry point:	None recorded	None recorded	None recorded
Time(s):	04:37; 04:40; 04:43; 04:46; 04:47 (fb); 04:52 (fb); 04:53 (fb); 04:57 (fb); 05:02 (fb); 05:05 (fb); 05:24; 05:34; 05:35 ; 05:41; 05:46; 05:50 ; 05:53	04:42; 04:47; 04:49; 04:53; 05:02; 05:06; 05:23; 05:35; 05:49 and 05:50	
Species of bat:	Common pipistrelle	Common pipistrelle	None recorded
Roost present:	None confirmed	None confirmed	None confirmed

(fb) – feeding buzz

APPENDIX B – SUPPLIERS

1. Natural History Book Service
1-6 The Stables
Ford Road
Totnes
Devon, TQ9 5LE
Tel: 01803 865913
Email: customer.services@nhbs.com
Website: <https://www.nhbs.com/>
2. Habibat
Tel: 01642 724626
Email: <http://www.habibat.co.uk/contact>
Website: www.habibat.co.uk
3. Dreadnought Tiles
Dreadnought Works
Brierley Hilly
West Midlands, DY5 4TH
Tel: 01384 77405
Email: sales@dreadnought-tiles.co.uk
Website: www.dreadnought-tiles.co.uk
4. Wildlife & Countryside Services
Covert Cottage
Pentre Lane
Rhuddlan
North Wales, LL18 6LA
Tel: 0333 9000927
Email: support@wildlifeservices.co.uk
Website: www.wildlifeservices.co.uk
5. Wildcare
Eastgate House
Moreton Road
Longborough
Gloucestershire, GL56 0QJ
Tel: 01451 833181
Email: sales@wildcare.co.uk
Website: www.wildcare.co.uk