

# PRELIMINARY ROOST ASSESSMENT (PRA)

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## SELECTED STRUCTURES AT KAVORNA HUGH TOWN, ST MARY'S, ISLES OF SCILLY



**Client:** Paul Osborne

**Our reference:** 2021/06

**Planning reference:** Produced in advance of submission

**Report date:** 10<sup>th</sup> November 2021

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## Executive Summary

### Bats – Results and Findings

The preliminary roost assessment (PRA) survey concluded that there was **negligible potential** for use of the structures under consideration by bats. This assessment relates solely to the re-roofing of a pitched roof of Kavorna and the demolition of a single-storey outbuilding, as identified in this report. It does not provide a comprehensive assessment of the buildings in question nor assess the potential impacts of works beyond the scope specified in this report.

Whilst a negligible potential is concluded, it is noted that there is a small chance of opportunistic/transient use of gaps beneath slipped tiles within the pitched roof during the bat active season only. This potential is not sufficient to justify further surveys or significant constraints to works, but should be taken into account in accordance with the precautionary principle.

This judgement was reached in accordance with the survey methodologies and evaluation criteria outlined in the Bat Surveys for Professional Ecologists: Good Practice Guidelines 3rd edition<sup>1</sup>

### Bats – Further Survey Requirements

No further surveys are recommended – the PRA conclusion does not require further survey information with regards to bats in order to inform a planning application.

### Bats – Recommendations

Standard good practice and vigilance should be observed by the contractors undertaking the proposed works in acknowledgement that bats are transient in their use of roosting opportunities and may explore potential locations. Recommendations to ensure legislative compliance are provided in Appendix 2.

Adherence to the Method Statement provided in Appendix 2 could be secured through a Planning Condition at the discretion of the Planning Authority, though it is noted that this should be a compliance rather than a pre-commencement condition and should not require discharge.

### Nesting Birds – Results and Findings

The survey did not identify any suitable nesting habitat for breeding birds associated with the elements of the structure under assessment.

### Nesting Birds - Recommendations

There is no requirement to replace nesting habitat for breeding birds as no suitable features are identified associated with the elements of the structure under assessment.

Any woody or climber vegetation removal required to facilitate the outbuilding demolition should be undertaken outside of the bird nesting season as a precaution.

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

## APPENDIX 1 – PRELIMINARY ROOST ASSESSMENT (PRA)

<b>Planning Authority:</b> Isles of Scilly	<b>Location:</b> 90187(E), 10585(N)	<b>Planning Application ref:</b> Report produced in support of application
<b>Planning application address:</b> Kavorna, Hugh Town, St Mary's, Isles of Scilly		
<b>Proposed development:</b> <p>The proposed works were identified by the client and accord with the documentation submitted in support of the application. These involve:</p> <ol style="list-style-type: none"> <li>1) The re-roofing of an existing pitched scantle-tiled roof with natural slate;</li> <li>2) The demolition of a single-storey outbuilding.</li> </ol>		
<b>Building references:</b> <p>The elements of the structure under assessment in this report are identified in the plans provided in Appendix 3.</p>		
<b>Name and licence number of bat-workers carrying out survey:</b> <p>James Faulconbridge (2015-12724-CLS-CLS)</p>		
<b>Preliminary Roost Assessment date:</b> <p>The visual inspection was undertaken on 3<sup>rd</sup> November 2021 in accordance with relevant Best Practice methodology<sup>2</sup>.</p>		
<b>Local and Landscape Setting:</b> <p>The property is situated at the north-western end of Hugh Town in St Mary's in the Isles of Scilly.</p> <p>The land use immediately surrounding the property comprises dense residential and small-scale commercial development. The shoreline of Town Beach lies close to the north of the property and beyond a band of further development, the more vegetated landscape associated with the Garrison and Star Castle lie to the west.</p> <p>Three records of common pipistrelle roosts are identified in relatively close proximity to the property – these relate to individual bats utilising features such as hanging slates around dormer windows.</p>		

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<sup>2</sup> Collins, J. (ed.) 2016 Bat Surveys for Professional Ecologists: Good Practice Guidelines (3<sup>rd</sup> edn). The Bat Conservation Trust, London.

**Building Description(s):****PITCHED ROOF**

The section of roof subject to this planning application is associated with the element of Kavorna which runs parallel to Well Lane. It attaches to and forms a single loft space with the remainder of the property which runs parallel to Hugh Street.

The building is of granite construction with a pitched scantle slate-tiled roof. The exterior facade is in good condition with exposed granite blocks with well-maintained pointing. The gable is well-pointed with no gaps along the roof verge. A wooden fascia board runs along the eaves with guttering attached – there are gaps beneath this boarding in places but these were generally wide and could be fully inspected from the ground with a torch and binoculars. Whilst discreet sections of the fascia provide cavities with dimensions suitable for bats to roost behind, these are infrequent and relatively exposed due to the irregular surface provided by the granite blockwork. The ridge tiles and concrete-rendered chimney are well-sealed and in good condition.

The scantle tiled roof itself is predominantly well-sealed with mortar beneath the tiles. The exceptions to this are areas where the roof has slipped, necessitating the proposed re-roofing works. Even in these instances, the mortar is often still present and intact; though in other places there are gaps beneath the tiles which provide direct potential access into the roof space.

Internally, a full inspection of the loft space was conducted including the adjacent areas of the loft within the roof running parallel to Hugh Street which would not be directly affected by the proposals. The roof is built around an A-frame timber structure with no under-felting or insulation – the tiles are directly visible attached to battens. No ridge beam is present – instead the ridge tiles directly cap the scantle tiles of the roof. No evidence of bats or other species such as rats, mice or birds were identified.

The following features were identified as potentially suitable for use by roosting bats – these are given individual consideration below:

- The gaps beneath the fascia boards – however their dimensions and level of exposure result in negligible potential for use by roosting bats;
- The gaps beneath scantle tiles which have slipped – however the size of the scantle tiles mean that these gaps are generally too small and even at their largest would offer very little protection from predation, temperature fluctuations or the elements. The only potential use of these features by bats is likely to be restricted to opportunistic day roosts during the active season though no evidence was identified. The gaps which do occur could be inspected from the inside and offer direct passage into the loft space with no apex niche which is often favoured by pipistrelle bats.
- Free-hanging from timbers or within other discreet niches inside the loft space itself, as accessed through the gaps in the slipped tiles. However a comprehensive inspection of the loft identified no evidence of occupation.

No evidence of current or historic use by bats or nesting birds was identified during the survey and an overall negligible potential was determined; however it is noted that there is a small chance of opportunistic/transient use of gaps beneath slipped tiles within the pitched roof during the bat active season only.



OUTBUILDING	<p>The outbuilding is situated within a garden courtyard to the rear of the property. It is a single-storey building with a gently-sloping single-pitched roof. The change in ground level of the surroundings means that the front of the building is full height, whilst the distance between the ground and the eaves is only around 1m at the rear.</p> <p>The construction is fully-rendered and in good condition throughout. uPVC windows are well fitted in their frames with no gaps noted associated with these or the door.</p> <p>The roof is of corrugated sheet. The gaps at the peaks of the corrugations are open at both ends and could therefore be inspected fully with a torch and endoscope. No evidence of use by bats or other species could be determined and the construction means that the features do not provide the apex niche characters favoured by common pipistrelle. A fascia board with attached guttering is present on the rear aspect of the building. This is generally well fitted with only occasional cavities behind – however in the discreet locations where a gap does occur, it is open at both the top and the bottom resulting in an exposed feature which is unlikely to be utilised by bats. Tightly fitted fascia boards supporting wiring occur on other aspects also – no gaps were identified associated with these features.</p> <p>Internally, the building is used as a food store and is subsequently well-sealed and maintained with no potential access for bats or other species.</p>
<p><b>Survey Limitations</b></p> <p>There were no significant limitations to access or survey inspection which might affect the evidence base or subsequent conclusions of this survey.</p>	
<p><b>Assessment of Potential for use by Roosting Bats</b></p> <p>It is considered that overall, the western pitch of the roof provides <b>negligible potential</b> for use by roosting bats, however it is noted that there is a small chance of opportunistic/transient use of gaps beneath slipped tiles within the pitched roof during the bat active season only.</p> <p>The outbuilding is considered to provide <b>negligible potential</b> for use by roosting bats.</p>	
<p><b>Recommendations and Justification (Bats):</b></p>	
PITCHED ROOF	<p>No further surveys are recommended with regards to the proposed re-roofing of the pitched roof; however the works should be undertaken outside of the main active season of April - September inclusive and in accordance with the Method Statement provided in Appendix 2. This is considered proportionate to the unlikely risk of individual bats being present within discreet features within the roof on an opportunistic basis.</p> <p>Adherence to the Method Statement provided in Appendix 2 could be secured through a Planning Condition at the discretion of the Planning Authority, though it is noted that this should be a compliance rather than a pre-commencement condition and should not require discharge.</p> <p>The position of Kavorna within a densely residential/commercial complex of buildings means that there is an abundance of the type of features which can be used opportunistically and on a transient basis by roosting pipistrelle bats, therefore additional bat boxes and other roost creation measures are not considered necessary in this instance.</p>

OUTBUILDING	<p>No further surveys are recommended with regards to the outbuilding – the conclusion of <b>negligible potential</b> does not require any further information with regards to bats in order to inform a planning application.</p> <p>It is not recommended that any Planning Conditions are required with regards to bats in relation to the demolition of this outbuilding.</p> <p>Standard good practice and vigilance should be observed by the contractors undertaking the replacement works in acknowledgement that bats are transient in their use of roosting opportunities and may explore potential locations. Recommendations to ensure legislative compliance are provided in Appendix 2.</p>
<p><b>Assessment of Potential for use by Nesting Birds</b></p> <p>It is considered that the pitched roof and outbuilding provide <b>negligible potential</b> for use by nesting birds.</p> <p>It is noted that surrounding vegetation in the environs of the outbuilding may provide suitable nesting habitat though this is considered to be low risk.</p>	
<p><b>Recommendations and Justification (Birds):</b></p> <p>Removal of any woody or climbing vegetation which would be directly affected by the removal of the outbuilding should be undertaken outside of the breeding season which runs from March – September inclusive.</p> <p>There is no requirement to mitigate for loss of nesting habitat for breeding birds.</p>	
<p><b>Signed by bat worker(s):</b> <span style="float: right;"><b>Date:</b> 10<sup>th</sup> November 2021</span></p> <div style="background-color: black; width: 200px; height: 50px; margin-top: 10px;"></div>	

## APPENDIX 2

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### PRECAUTIONARY METHOD STATEMENT WITH REGARDS TO BATS

The purpose of this Method Statement is to ensure that works can proceed where presence of bats has been determined to be unlikely, but a precautionary approach is still advisable. It has been determined that direct harm to roosting bats during the proposed works would be highly unlikely.

Contractors should, however, be aware of **their own legal responsibility with respect to bats**:

#### **Relevant Legislation regarding Bats**

The Conservation of Habitats and Species Regulations 2017, or the 'Habitat Regulations 2017', transposes European Directives into English and Welsh legislation. Under these regulations, bats are classed as a European Protected Species and it is, therefore, an offence to:

- *Deliberately kill, injure or capture bats;*
- *Deliberately damage or destroy bat roosts.*

A bat roost is commonly defined as being any structure or place that is used as a breeding site or resting place, and since it may be in use only occasionally or at specific times of year, a roost retains such a designation even if bats are not present.

Bats are also protected from disturbance under Regulation 43. Disturbance of bats includes in particular any disturbance which is likely:

- (a) *To impair their ability -*
- *to survive, to breed or reproduce, or to rear or nurture their young; or*
  - *in the case of animals of a hibernating or migratory species, to hibernate or migrate; or*
- (b) *To affect significantly the local distribution or abundance of the species to which they belong.*

Bats also have limited protection under the Wildlife and Countryside Act 1981 (as amended) and the Countryside Rights of Way Act 2000 (as amended). It is, therefore, an offence to:

- *Intentionally or recklessly destroy, damage or obstruct any structure or place which a bat uses for shelter or protection.*
- *Intentionally or recklessly disturb bats whilst occupying any structure or place used for shelter or protection.*

Contractors should undertake works **at a time when the risk of bats being present is at its lowest as a precautionary practise.**

#### **Pitched Roof Only**

There is a small risk of bats making transient use of minor cavities created by the slippage of the tiles which have necessitated the replacement works. Works to the pitched roof should therefore be conducted outside of the active season when the conditions would not be suitable for opportunistic or transient use of these features.

Roof replacement works should therefore be undertaken between November – March inclusive. This timing of works recommendation applies to the pitched roof replacement only and does not apply to the demolition of the outbuilding.

Contractors should be aware of **where bats are most likely to be found** in respect to the structures in question:

#### **Pitched Roof Only**

There is a small risk of bats making transient use of minor cavities created by the slippage of the tiles which have necessitated the replacement works. The tiles around the area where the slippage occurred should be removed carefully in such a way that in the highly unlikely event of a bat being present beneath, they are not crushed by the removal of the tile.

#### **Pitched Roof and Outbuilding**

Fascia boards associated with both the pitched roof and the outbuilding have negligible risk of being used by roosting bats. These should be removed carefully by hand in such a way that in the highly unlikely event of a bat being present beneath, they are not crushed by the removal of the board.

Contractors should be aware of **the process to follow in the highly unlikely event of finding bats** or evidence indicating that bats are likely to be present:

If bats are identified, works should cease and the named ecologist contacted immediately for advice.

If the bat is in a safe situation, or a situation which can be made safe, they should remain undisturbed.

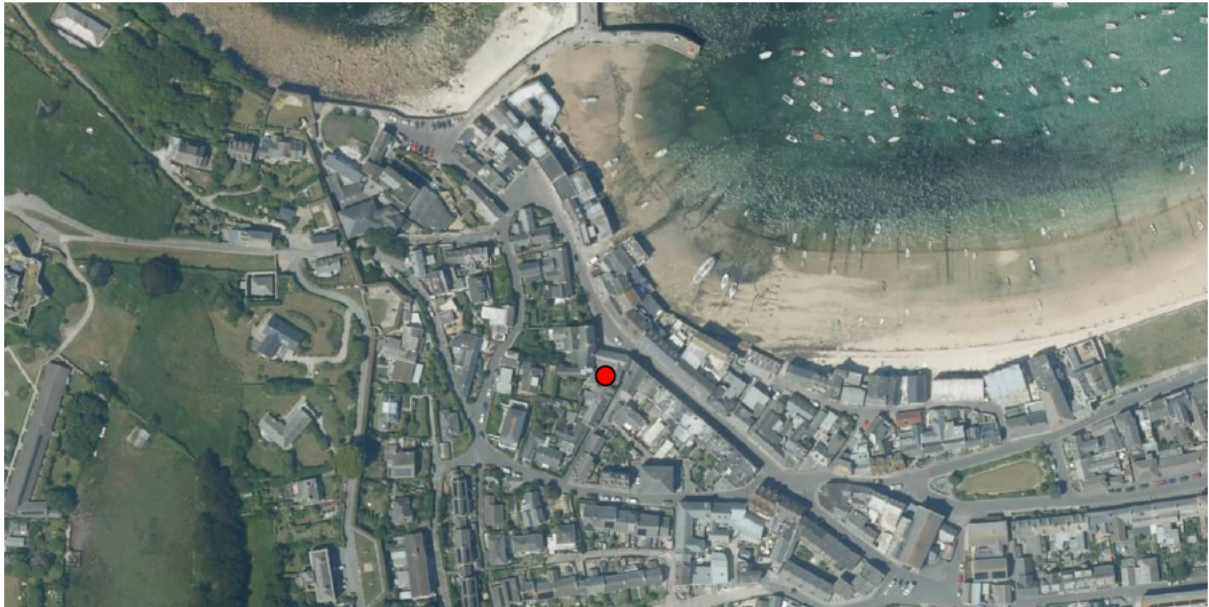
Only if the bat is in immediate risk of harm can the bat be moved with care and using a gloved hand. This is a last resort and should only be undertaken for humane reasons if the bat is at immediate risk of harm **and** if the ecologist cannot be contacted for advice.



## APPENDIX 3

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### LOCATION PLAN AND PHOTOGRAPHS



**Map 01** – Illustrating location of property within the local environs (red circle). Reproduced in accordance with Google's Fair Use Policy.



**Map 02** – Showing the roof to be replaced (blue) and the outbuilding (red) at Kavorna.



**Photograph 1:** Showing eastern aspect of the pitched roof to be replaced at Kavorna.



**Photograph 2:** Showing fascia board and guttering which runs along the eaves, along with the well-sealed gable end.



**Photograph 3:** Showing the areas of slipped tiles on the roof.



**Photograph 4:** Showing eastern pitch of the roof to be replaced.



**Photograph 5:** Showing the interior of the loft space with scandle tiles laid directly onto timber battens – no underfelting present.



**Photograph 6:** Showing the internal pitch of the roof – no ridge board/beam is present.





**Photograph 7:** Showing the western aspect of the outbuilding – this surrounding land is elevated on this side of the building resulting in low profile.



**Photograph 8:** Showing typical uPVC windows fitted tightly with rendering in good condition.



**Photograph 9:** Showing the timber fascia with guttering attached running along the western aspect of the outbuilding.



**Photograph 10:** Showing the western aspect with a pitched, corrugated roof.



**Photograph 11:** Showing the interior of the outbuilding – well sealed to a high standard and used for storage of food produce.



**Photograph 12:** Showing the view of the corrugated roof sheets viewed from the eaves on the western aspect.