

PRELIMINARY ROOST ASSESSMENT (PRA)

SELECTED ASPECTS OF SANTA MARIA, HUGH TOWN, ST MARY'S, ISLES OF SCILLY



Client: Liz O'hara

Our reference: 22-9-1

Planning reference: P/22/066/FUL

Report date: 20th September 2022

Author: James Faulconbridge BSc (Hons), MRes, MCIEEM

Contact: ios.ecology@gmail.com

Executive Summary

Bats - Results and Findings

The preliminary roost assessment (PRA) survey concluded that there was **negligible potential** for use by bats of the structures under consideration. This assessment relates solely to the aspects of the structure to be directly or indirectly affected by the proposed works. It does not provide a comprehensive assessment of the building 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 individual discreet features. 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 edition¹

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

There is a minor risk of individual bird species finding occasional nesting habitat associated with gaps behind the wooden shutters though no evidence was noted at the time of survey. The survey did not identify any other suitable nesting habitat for breeding birds associated with the elements of the structure under assessment.

Nesting Birds - Recommendations

Works to remove the shutters should take account of the minor residual risk of species such as wren or robin making use of nesting opportunities during the breeding season. There is no requirement to replace nesting habitat for breeding birds.

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

APPENDIX 1 – PRELIMINARY ROOST ASSESSMENT (PRA)

| | | |
|--|------------------------------------|---|
| Planning Authority: Isles of Scilly | Location: SV 90119 10424 | Planning Application ref: Report produced in support of application |
| Planning application address: Santa Maria, Sally Port, Hugh Town, St Mary's, Isles of Scilly | | |
| Proposed development: The proposed works were identified by the client and should accord with the documentation submitted in support of the application. These involve: <ol style="list-style-type: none"> 1) The removal of asbestos hanging tiles from dormers and replacement with timber cladding; 2) The like-for-like replacement of existing windows; 3) The removal of aesthetic window shutters from the frontage of the property. | | |
| Building references: The elements of the structure under assessment in this report are identified in the plans provided in Appendix 3. | | |
| Name and licence number of bat-workers carrying out survey: James Faulconbridge (2015-12724-CLS-CLS) | | |
| Preliminary Roost Assessment date: The visual inspection was undertaken on 13 th September 2022 in accordance with relevant Best Practice methodology ² . | | |
| Local and Landscape Setting: The property is situated at the southern end of Sallyport, which is situated at the south-western tip of Hugh Town, St Mary's. The land immediately north and east of the property is dominated by Hugh Town, a small but densely developed area of residential and small-scale commercial properties. The shoreline of Little Porth lies close to the south of the property and beyond individual dwelling houses, the more vegetated landscape associated with the Garrison and Star Castle lie to the east. Three records of common pipistrelle roosts are identified in Hugh Town to the east of the property – these relate to individual bats utilising features such as hanging slates around dormer windows. There is also a single record of brown long-eared bat utilising a roosting feature in a pine tree in the Garrison woods to the west. All of these records are within 400m of the property. | | |

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

Building Description:

Overview

The building is three stories with an effective fourth built into the roof space through the incorporation of dormer windows which occupy the majority of the pitch on both aspects. The building is rendered throughout and the finish is in good condition with no cracks, cavities or other accessible features noted. The pitched roof is tiled with asbestos slate-effect tiles including hanging tiles associated with the dormers. There is a small chimney situated on the northern aspect.

A separate staff accommodation building is attached on the southern aspect and a single-storey conservatory is present on the western aspect – these elements of the construction were not included within the scope of the survey.

Whilst a generic building description is provided above for context, the remainder of the description will focus on those aspects of the property which may be directly or indirectly impacted by the proposals.

Window shutters

There are wooden window shutters on the eastern frontage of the property – these appear to be aesthetic and are attached directly to the wall by battens in an ‘open’ position. Whilst window shutters can provide suitable roosting habitat for bats, especially on the continent, the width and open character of this void behind these features would be too wide to provide suitable roosting opportunities for bats.

Windows and doors

The windows and doors throughout the property are uPVC and are well-fitted with no gaps noted between the frames and the walls. No roosting opportunities were identified associated with these windows.

Dormer and roof tiles

The asbestos tiles around the windows were thin and well-fitted throughout. Their manufactured character means there is negligible variation in shape or surface which could offer natural gaps beneath tiles. The tiles were well fitted and in good condition throughout. Although a fully comprehensive inspection could not be achieved from ground-level due to angles of visibility, the inspection was sufficient to provide a high degree of confidence that there were no roosting opportunities for bats associated with the tiles either on the dormer windows or the adjacent roof sections.

There are fascia boards running along the eaves of the dormers above uPVC windows – these were inspected using an endoscope at height and did not provide suitable cavity sizes or dimensions to support roosting bats.

The lead flashing which seals the joints between dormer windows and roof tiles appeared to be in good condition – very occasional superficial gaps were noted.

Internal Opportunities

There were no internal roof spaces or lofts – this is due to the extent to which the dormers and associated top-floor living area occupy the roof space. The top floor of the property was accessed and inspected and the absence of sealed or accessible loft spaces was confirmed.

Summary

The following features were identified as potentially suitable for use by roosting bats – however in all cases the potential identified falls below the level which would require further surveys and can be addressed through a Precautionary Method of Working (PMW).

- The gaps behind the shutters – these appear unsuitable due to their wide and exposed dimensions but occasional transient or exploratory use by individual bats cannot be ruled out;
- The very minor gaps where lead flashing has lifted – these appear too small and lack a suitable fly-in but occasional transient or exploratory use by individual bats cannot be ruled out.

Survey Limitations

It was not possible to comprehensively inspect all tiles around the roof and dormers due to the lack of access at height and intervening structures. However the majority of the relevant features could be fully inspected with binoculars and their structure and condition does not indicate a high probability of unobserved features on other aspects. This residual limitation can be addressed through a PMW.

There were no other significant limitations to access or survey inspection which might affect the evidence base or subsequent conclusions of this survey.

Assessment of Potential for use by Roosting Bats

No evidence of current or historic use by bats was identified during the survey and an overall **negligible potential** was determined; however it is noted that there is a small residual risk of opportunistic/transient use of the features noted.

Recommendations and Justification (Bats):

No further surveys are recommended – the conclusion of **negligible potential** related to the structures to be impacted does not require any further information with regards to bats in order to inform a planning application.

Standard good practice and vigilance should be observed by the contractors undertaking the works in acknowledgement that bats are transient in their use of roosting opportunities and may explore potential locations. The potential for individual common pipistrelle bats to make use of minor opportunities associated with listed features should be considered. The lead flashing and wooden shutters should be removed carefully and by hand in order to ensure that, in the unlikely event of bats being present at the time of works, they would not be harmed or killed. Recommended measures to ensure legislative compliance are provided in Appendix 2.

At the discretion of the Planning Authority, a compliance condition could be included in any Planning Application approval requiring that works proceed in line with the PMW requirements outlined in Appendix 2 of this report. This is in order to ensure that roosting bats are not impacted by the proposed works.

Assessment of Potential for use by Nesting Birds

It is considered that the structures under consideration in this report provide **negligible potential** for use by nesting birds; however there is a minor residual risk of species such as wren or robin making use of gaps behind the shutters to build a nest.

Recommendations and Justification (Birds):

Removal of the wooden shutters should be undertaken outside of the breeding season which runs from March – September inclusive. If this is not possible, then contractors should visually inspect behind the shutters before their removal to confirm that no nests are present. In the unlikely event that a birds nest is present, it must be left undisturbed until chicks have fledged the nest, at which point removal works can proceed.

There is no requirement to mitigate for loss of nesting habitat for breeding birds.

Signed by bat worker(s):

Date: 20th September 2022



APPENDIX 2

-

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

Wooden shutters

There is a small risk of bats making transient or exploratory use of the cavity behind the wooden shutters. These shutters should be removed carefully in such a way that in the highly unlikely event of a bat being present in the apex of the gap between the shutter structure and the wooden batten attached to the wall, they are not crushed by the removal of the feature.

Lead flashing

Very minor lifted sections occur within the lead flashing where the dormers meet the roof. If these are to be removed as part of the works, locations where the flashing is lifted should be exposed carefully such that if any bats were present behind the lifted element, they would not be crushed or otherwise injured by the operation.

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

-

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 Santa Maria property highlighted in red.



Photograph 1: Showing the front aspect of the property with the shutters visible.



Photograph 2: Showing the rear of the property taken from an elevated position within the back garden.



Photograph 3: Showing detail of the shutters on the front of the property.



Photograph 4: Showing the battens attaching the shutters to the wall and the cavity created behind.



Photograph 5: Showing a typical example of a well-fitted uPVC window found throughout the property.



Photograph 6: Showing the well-fitted asbestos tiles on the front and side of the dormer window on the rear of the property.



Photograph 7: Showing the join between the dormer window and the roof in which it is situated.



Photograph 8: Showing the hanging tiles on the dormer window viewed at height.