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PRELIMINARY ROOST ASSESSMENT (PRA)

BEVERLEY HILLS,
7 PILOTS RETREAT, ST MARY'S, ISLES OF SCILLY



Client: Peter Green

Our reference: 23-5-4

Planning reference: P/23/037/FUL

Report date: 19th June 2023

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Executive Summary

Bats – Results and Findings

The preliminary roost assessment (PRA) survey concluded that there was **negligible potential** for those aspects of the building affected by the proposals to be used by roosting bats.

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 edition.¹

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 works in acknowledgement that bats are transient in their use of roosting opportunities and may explore potential locations, especially if the condition of structural features were to change. A specific methodology is provided in Appendix 1.

A Planning Condition requiring compliance with the Precautionary Method of Works (PMW) outlined in Appendix 1 could be attached to a Decision Notice. If so, it is recommended that this should be compliance only – no further information would be required as the methodology outlined in the PMW is comprehensive.

If the applicant wishes to provide biodiversity enhancement, a bat box could be erected on the gable of the building. Guidance on suitable specifications is provided.

Nesting Birds – Results and Findings

There was no evidence of nesting birds recorded within the building; however there are discreet opportunities which may be suitable for some species such as house sparrow.

Nesting Birds - Recommendations

Works should take account of the minor residual risk of species such as sparrow making use of nesting opportunities during the breeding season.

There is no requirement to replace nesting habitat for breeding birds as no nesting habitat would be lost. If the applicant wishes to provide biodiversity enhancement, nest boxes for common bird species could be erected in the garden or on the buildings.

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

PRELIMINARY ROOST ASSESSMENT (PRA)

Planning Authority: Isles of Scilly	Location: SV 90864 10410	Planning Application ref: P/23/037/FUL
Planning application address: Beverley Hills, 7 Pilots Retreat, 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 installation of dormer windows in the western roof pitch of the property;2) The construction of a flat-roof extension on the western aspect of the property. The following assessment takes into account both the potential direct impacts to the structure (e.g. removal of the existing roof tiles and Velux windows) and the indirect impacts (e.g. disturbance to adjacent or offsite features which may support roosting bats).		
Building references: The building is identified in the plans provided in Appendix 2.		
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 14 th June 2023 in accordance with relevant Best Practice methodology ² .		
Local and Landscape Setting: The building is located to south-eastern end of Hugh Town, where the land rises and the character of the housing becomes more widely spaced with larger gardens in contrast to the more tightly spaced buildings which characterise the main town. The property itself is set on a slope with a garden to the west of the property. The land use immediately surrounding the building is residential development on all sides, with associated gardens, roads, hardstanding and access features. Beyond the residential edge of the town to the east, there is abundant suitable habitat for bats, dominated by Lower Moors SSSI – a topogenous mire with areas of elm woodland and scrub as well as a series of pools and marshy grassland. Records from the Local Bat Group indicate that this is an important foraging resource for bats on the island. Small-scale agricultural fields and associated trees and hedge lines occur to the east. There are three records of bat roosts within 500m of the property – the closest is a common pipistrelle roost in a building situated within 100m of the Site. The two other roosts relate to common pipistrelle utilising features such as hanging slates around dormer windows in Hugh Town to the west and south-west of the site.		

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

Building Description(s):

The property is built on a slope such that the building occupies two stories at the front but a single storey at the rear. The property was constructed around 20 years ago and is rendered externally to a high standard. The multi-pitch roof is tiled with interlocking pre-fab tiles.

The proposals under consideration in the current Planning Application are restricted to installation of dormer windows in the western roof pitch and the construction of a small flat-roof extension on this aspect – therefore the remainder of this description and assessment will relate to those aspects of the property to be directly and indirectly affected by these works only. This is to ensure clarity and brevity.

The western pitch of the roof has well-fitted interlocking pre-fab roof and ridge tiles – all are well fitted with no gaps noted. There are existing Velux rooflight windows, some of which would be removed to permit the installation of the new dormers. At the intersection between the roof and the windows there are occasional gaps but these appear large and sealed with battens and are unlikely to provide suitable roosting opportunities for bats. The shallow pitch of the roof would also limit the fly-in at this location. The gables are capped with end-tiles which appear to be well-fitted but would not be directly impacted by the proposals.

There are uPVC soffits with guttering at the eaves which would preclude direct fly-in access – these were well-fitted and in good condition. The wall below is rendered in good condition, with well-fitted uPVC window and door frames offering no roosting opportunities.

Internally, the upper floor rooms are built into the roof space with three discreet and unconnected voids – these are at the two eaves and at the apex above the tie-beam.

- The void at the apex is sealed but external inspection of the roof indicates no potential access for bats due to the tight fit of the tiles;
- The void associated with the eastern eaves would not be directly or indirectly impacted by the proposals;
- The void associated with the western eaves would be directly impacted by the proposals and was subject to a full internal inspection. The modern timber trusses do not offer roosting opportunities due to their tight fit. Insulation occurs between the joists. The void is tightly under-felted throughout – daylight can be seen at the eaves but any potential fly-in for bats would be significantly obstructed by the positioning of the guttering and conjunction with uPVC soffits. The void was clean and free from obstructing storage – a single mouse dropping was identified but no evidence of bats was found.

Survey Limitations

There were no 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 taken into account during works. These features are restricted to:

- The gaps associated with tiles around the existing Velux windows which do not appear to offer roosting opportunities but where a precautionary approach to removal would be advisable.

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 1 of this report. This is in order to ensure that bats are not impacted by the proposed works.

If the applicant wishes to provide biodiversity enhancement, the gables of the property would offer a suitable location to install a bat box. This should be positioned above 3m from the ground to minimise the risk of predation. An open-based box design would ensure that it would not require cleaning, though siting should avoid being positioned directly above windows or doors to prevent nuisance. The location and aspect would be optimal for common pipistrelle which is the dominant species present on the island and the most likely species to use the environs for foraging and roosting.

A suitable box could be purchased or constructed following freely available plans. Kent Bat Box-style boxes are slim easy to construct from appropriate timber using the plans provided at:

<http://www.kentbatgroup.org.uk/kent-bat-box.pdf>

Assessment of Potential for use by Nesting Birds

No evidence of nesting birds was identified associated with the property; however access at the eaves may allow species such as house sparrow to find nesting opportunities within the building.

Care should be taken to ensure that no birds are nesting prior to works taking place. This could be achieved either through timing of works, or a pre-commencement inspection.

Recommendations and Justification (Birds):

Timing of Works

Works affecting the roof should be undertaken outside of the breeding season which runs from March – September inclusive, where practicable. This would provide the most robust means of avoiding risk of impact to nesting birds.

Pre-commencement Inspection

If this is not possible, then contractors should visually inspect the work area internally and externally before they are affected by the works, in order to confirm that no nests are present. In the unlikely event that a bird nest is present, it must be left undisturbed until chicks have fledged the nest, at which point works can proceed.

Care must also be taken to ensure that the works do not cause disturbance or damage to proximate nesting areas through indirect impacts including vibration, noise or contractor presence. This includes adjacent parts of the building, as well as vegetation within the garden and boundary hedges.

Enhancement Opportunities

There is no requirement to mitigate for loss of nesting habitat for breeding birds as no nesting habitat would be removed; however if the applicant wished to provide biodiversity

enhancement measures, this could be achieved through the erection of bird boxes on the residential property or within the garden.

House sparrows nest communally and nest boxes could accommodate this, either through the installation of a single purpose-built nest box comprising several individual chambers with separate entrances, or the installation of 3+ nest boxes in close proximity. Nest boxes suitable for hole-dwelling species such as blue tits, or open-fronted boxes for species such as blackbird and robin also have a high likelihood of occupation.

Boxes should be mounted on a wall or tree if possible, at a height of at least 3m above the ground with an entrance clear of vegetation/other features which may put them at risk of predation from cats.

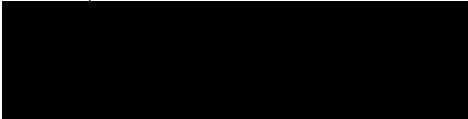
Boxes can be sourced online, or can be constructed on site using methodology and specifications provided by the RSPB:

Sparrows: <https://www.rspb.org.uk/get-involved/activities/give-nature-a-home-in-your-garden/garden-activities/createasparrowstreet/>

Other Species: <https://www.rspb.org.uk/fun-and-learning/for-families/family-wild-challenge/activities/build-a-birdbox/>

Signed by bat worker(s):

Date: 19th June 2023



APPENDIX 1

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PRECAUTIONARY METHOD STATEMENT WITH REGARDS TO BATS

The purpose of this Method Statement is to ensure that proposed 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 existing building:**

Tiles around existing Velux Windows

There are occasional gaps associated with tiles at the junction between the existing Velux rooflight windows and the surrounding tiles. These tiles should be inspected visually and lifted away carefully until any gaps behind them are fully exposed. This should be undertaken by hand and with care in such a way that, in the highly unlikely event that bats are present, they are not injured or killed by the action.

Once these areas are fully exposed, they can be visually inspected by contractors. If any bats are present, or suspected, works should pause and the Named Ecologist contacted to review the situation. If no bats are present, the remaining materials can be removed and works can continue.

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.

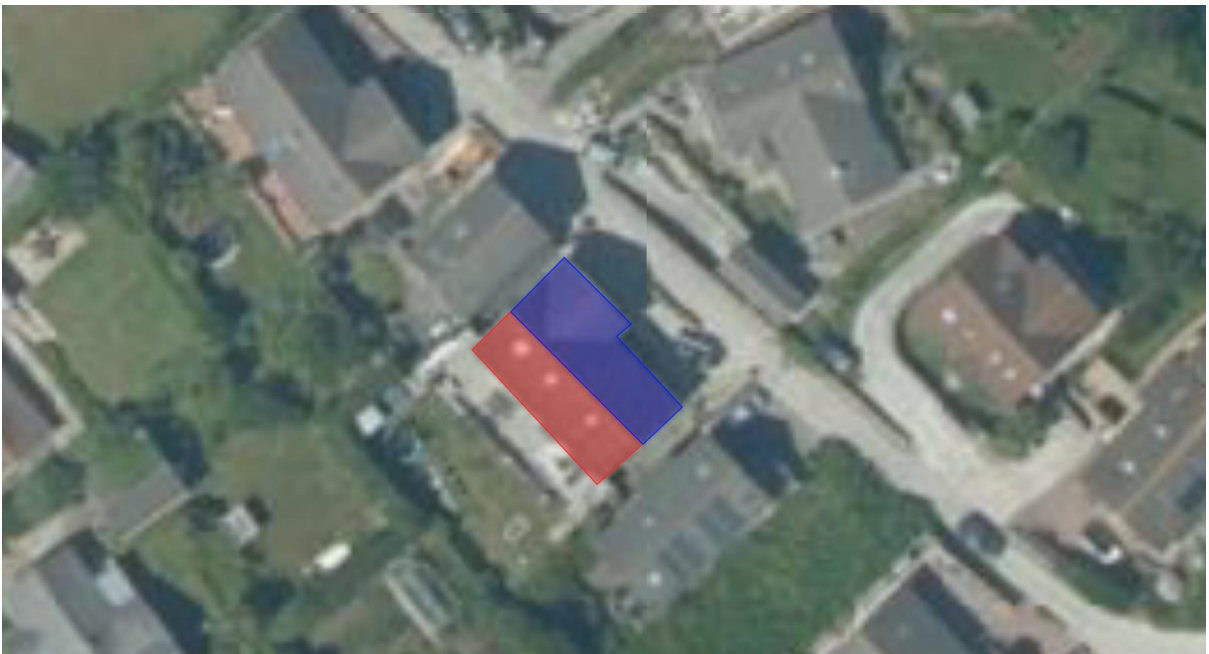
APPENDIX 2

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LOCATION PLAN AND PHOTOGRAPHS



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



Map 02 – Showing the western pitch of the roof (red wash) on the context of the wider building (blue wash). Reproduced in accordance with Google’s Fair Use Policy.



Photograph 1: Showing the building viewed from the north-western corner – this is the western pitch of the roof which would be impacted by the proposals.



Photograph 2: Showing the tight fit of the uPVC soffits with guttering attached at the eaves of the western pitch. The high quality of the render and tightly fitted windows frame on this aspect can also be seen.



Photograph 3: Showing the tightly-fitted interlocking pre-fab roof tiles on the western pitch of the roof.



Photograph 4: Showing the interior of the void which runs along the western eaves of the roof.