IMPORTANT – THIS COMMUNICATION AFFECTS YOUR PROPERTY

COUNCIL OF THE ISLES OF SCILLY

Old Wesleyan Chapel, Garrison Lane, St Mary's TR21 0JD
Telephone: 01720 424455 – Email: planning@scilly.gov.uk

Town and Country Planning Act 1990
Town and Country Planning (Development Management Procedure) Order 2015

PERMISSION FOR DEVELOPMENT

Application No:	**P/24/031/HH**	**Date Application Registered:**	**25 April 2024**

Applicant:
Mr Dorrien-Smith
Tresco Estate Office,
Tresco,
Isles Of Scilly,
TR24 0QQ

Agent:
Mr Joseph Withers
Llewellyn Harker Lowe Architects
Home Barn,
Gattrell,
Steway Lane,
Northend,
Bath,
BA1 8EH

Site address: Racket Town Bungalow Racket Town Road Abbey Farm Tresco Isles Of Scilly
Proposal: Refurbishment and extension to existing cottage, including demolition of existing extension and construction of a new single storey wing

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 Location Plan, Drawing Number: 3886 - 001 B. Dated Jan 2020**
- **Plan 2 Proposed Site Plan, Drawing Number: 3886 - 007 E, Dated March 2024**
- **Plan 3 Proposed Ground Floor Plan, Drawing Number: 3886 - 008 F. Dated March 2024**
- **Plan 4 Proposed Elevations, Drawing Number: 3866 - 009 E. Dated March 2024**
- **Plan 5 Deign and Access Statement, Received 23/04/2024**
- **Plan 6 Ecological Impact Assessment (EIA) & Preliminary Roost Assessment (PRA) and Nesting Bird Survey, Dated 19 April 2024**
- **Plan 7 Bat Survey Report, Dated 12 July 2024**
- **Plan 8 Site Waste Management Plan, Dated 15 July 2024**
- **Plan 9 Bat Mitigation and Compensation Measures, Dated 30 July 2024**

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 Policies OE1 and OE7 of the Isles of Scilly Local Plan (2015-2030).

C3 **The materials used in the construction of the development hereby approved shall be as**

detailed within the permitted application particulars and shall be retained permanently as such for the lifetime of the development.
Reason: In the interests of preserving the character and appearance of the wider conservation area.

PRE-OCCUPATION CONDITION: Submission of Native Planting Proposals

C4 **Prior to the first occupation of the development hereby approved, a detailed scheme of planting proposals shall be submitted to and approved in writing by the Local Planning Authority. Planting should consist of native species. The scheme design shall include a layout of planting to show plant species, planting sizes, locations, densities, and numbers. All such work as may be approved shall then be fully implemented in the first planting season, in strict accordance with the approved details. Any plants or species which within a period of 5 years from the time of planting die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.**
Reason: To ensure the development delivers biodiversity enhancements in accordance with OE2 of the Isles of Scilly Local Plan (2015-2030).

PRIOR TO SLAB LEVEL CONDITION: Solar Installation Details

C5 **Prior to development above slab level of the extension, hereby permitted, details of the proposed Solar Panels (including size, method and angle of siting, colour and reflectivity) shall be submitted to and approved in writing by the Local Planning Authority. The works shall be carried out in accordance with the approved details and shall be retained as approved only.**
Reason: In the interests of preserving the character and appearance of the wider conservation area.

C6 **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 Tresco Dark Sky Discovery Site (Milky Way Class) in accordance with Policy OE4 of the Isles of Scilly Local Plan (2015-2030).

C7 **No construction plant and/or machinery shall be operated on the premises, as part of the implementation of this permission, before 0800 hours on Mondays through to Saturdays nor after 1800 hours. There shall be no works involving construction plant and/or machinery on a Sunday or Public or Bank Holiday.**
Reason: In the interests of protecting the residential amenities of the islands.

C8 **There development, hereby permitted, shall be carried out in accordance with the Bat Mitigation Measures as detailed in the Specification for mitigation and compensation (Plan 9 in condition 2 above), dated 2024.07.30. Once fully implemented the bats' roost area and agreed openings shall be permanently maintained.**
Reason: To retain control over the development to safeguard bats and their roosts which are specifically protected by law.

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 of the National Planning Policy Framework 2023.
2. 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 current £43 for each request to discharge condition(s) where the planning permission relates to a householder application. The fee is payable for each individual request made to the Local Planning Authority. You are advised to check the latest fee schedule at the time of making an application as any adjustments including increases will be applied: https://ecab.planningportal.co.uk/uploads/english_application_fees.pdf
3. It should be noted that some of the conditions attached to this consent are required to be complied with prior to the commencement of the development hereby approved, if those conditions are not fully adhered to, then the consent cannot lawfully be implemented, therefore a new application will be requested and consideration will be given to the expedience of enforcement action.
4. 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 or the submission of a full planning application for a revised scheme. Please discuss any proposed amendments with the Planning Officer. There is a fee to apply for a non-material amendment and the most up to date fee will be charged which can be checked here: https://ecab.planningportal.co.uk/uploads/english_application_fees.pdf

5. 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.
6. Registering for appropriate Business Rates/Council Tax: To ensure appropriate contributions, are made to fund services provided by or on behalf of the Council on the Isles of Scilly please ensure you contact the Council's Revenues Department: revenues@scilly.gov.uk.
7. This decision is not a determination under the Building Regulations. Please ensure that all building works accord with the Building Regulations and that all appropriate approvals are in place for each stage of the build project. You can contact Building Control for further advice or to make a building control application: buildingcontrol@cornwall.gov.uk.

Signed:

Chief Planning Officer

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

DATE OF ISSUE: 31 July 2024

COUNCIL OF THE ISLES OF SCILLY

Planning Department
Old Wesleyan Chapel, Garrison Lane, St Mary's TR21 0JD
0300 1234 105
planning@scilly.gov.uk

Dear Mr Dorrien-Smith

Please sign and complete this certificate.

This is to certify that decision notice: P/24/031/HH and the accompanying conditions have been read and understood by the applicant: Mr Dorrien-Smith.

1. **I/we intend to commence the development as approved:** Refurbishment and extension to existing cottage, including demolition of existing extension and construction of a new single storey wing at: Racket Town Bungalow Racket Town Road Abbey Farm Tresco Isles Of Scilly **on**:.....

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.

You are advised to note that Officers of the Local Planning Authority may inspect the project both during construction, on a spot-check basis, and once completed, to ensure that the proposal has complied with the approved plans and conditions. In the event that the site is found to be inaccessible then you are asked to provide contact details of the applicant/agent/contractor (delete as appropriate):

Name: **Contact Telephone Number:**
And/Or Email:

Print Name:

Signed:

Date:

Please sign and return to the **above address** as soon as possible.

For the avoidance of doubt, you are reminded to address the following condition(s) as part of 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-OCCUPATION CONDITION(S)

C4 Prior to the first occupation of the development hereby approved, a detailed scheme of planting proposals shall be submitted to and approved in writing by the Local Planning Authority. Planting should consist of native species. The scheme design shall include a layout of planting to show plant species, planting sizes, locations, densities, and numbers. All such work as may be approved shall then be fully implemented in the first planting

season, in strict accordance with the approved details. Any plants or species which within a period of 5 years from the time of planting die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.

PRIOR TO SLAB LEVEL CONDITION(S):

C5 Prior to development above slab level of the extension, hereby permitted, details of the proposed Solar Panels (including size, method and angle of siting, colour and reflectivity) shall be submitted to and approved in writing by the Local Planning Authority. The works shall be carried out in accordance with the approved details and shall be retained as approved only.

COUNCIL OF THE ISLES OF SCILLY

Planning Department
Old Wesleyan, Garrison Lane , St Mary's, Isles of Scilly, TR21 0JD
01720 424455
planning@scilly.gov.uk

THIS LETTER CONTAINS IMPORTANT INFORMATION REGARDING YOUR PERMISSION – PLEASE READ IF YOU ARE AN AGENT DEALING WITH IS ON BEHALF OF THE APPLICANT IT IS IMPORTANT TO LET THE APPLICANT KNOW OF ANY PRE-COMMENCMENT CONDITIONS

Dear Applicant,

This letter is intended to help you advance your project through the development process. Now that you have been granted permission, there may be further tasks you need to complete. Some aspects may not apply to your development; however, your attention is drawn to the following paragraphs, which provide advice on a range of matters including how to carry out your development and how to appeal against the decision made by the Local Planning Authority (LPA).

Carrying out the Development in Accordance with the Approved Plans
You must carry out your development in accordance with the stamped plans enclosed with this letter. Failure to do so may result in enforcement action being taken by the LPA and any un-authorised work carried out may have to be amended or removed from the site.

Discharging Conditions
Some conditions on the attached decision notice will need to be formally discharged by the LPA. In particular, any condition that needs to be carried out prior to development taking place, such as a 'source and disposal of materials' condition, an 'archaeological' condition or 'landscaping' condition must be formally discharged prior to the implementation of the planning permission. In the case of an archaeological condition, please contact the Planning Department for advice on the steps required. Whilst you do not need to formally discharge every condition on the decision notice, it is important you inform the Planning Department when the condition advises you to do so 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.

Please inform the Planning Department when your development or works will be commencing. This will enable the Council to monitor the discharge and compliance with conditions and provide guidance as necessary. We will not be able to provide you with any written confirmation on the discharge of pre-commencement conditions if you do not formally apply to discharge the conditions before you start works.

As with the rest of the planning application fees, central Government sets a fee within the same set of regulations for the formal discharge of conditions attached to planning permissions. Conditions are necessary to control approved works and development. Requests for confirmation that one or more planning conditions have been complied with are as follows (VAT is not payable on fees set by central government). More information can be found on the Council's website:

- Householder permissions - £43per application
- Other permissions - £145 per application

Amendments
If you require a change to the development, contact the LPA to see if you can make a 'non material amendment' (NMA). NMA can only be made to planning permissions and not a listed building consent. They were introduced by the Government to reflect the fact that some schemes may need to change during the construction phase. The process involves a short application form and a 14 day consultation period. There is a fee of £43 for householder type applications and £293 in all other cases. The NMA should be determined within 28 days. If the change to your proposal is not considered to be non-material or minor, then you would need to submit a new planning application to reflect those changes. Please contact the Planning Department for more information on what level of amendment would be considered non-material if necessary.

Appealing Against the Decision
If you are aggrieved by any of the planning conditions attached to your decision notice, you can appeal to have specific conditions lifted or modified by the Secretary of State. All appeal decisions are considered by the Planning Inspectorate – a government department aimed at providing an unbiased judgement on a planning application. From the date of the decision notice attached you must lodge an appeal within the following time periods:

- Householder Application - 12 weeks
- Planning Application – 6 months
- Listed Building Consent – 6 months
- Advertisement Consent - 8 weeks
- Minor Commercial Application - 12 weeks
- Lawful Development Certificate – None (unless for LBC – 6 months)
- Other Types - 6 months

Note that these periods can change so you should check with the Planning Inspectorate for the most up to date list. You can apply to the Secretary of State to extend this period, although this will only be allowed in exceptional circumstances.

You find more information on appeal types including how to submit an appeal to the Planning Inspectorate by visiting https://www.gov.uk/topic/planning-development/planning-permission-appeals or you can obtain hard copy appeal forms by calling 0303 444 5000. Current appeal handling times can be found at: Appeals:

How long they take page.

Building Regulations
With all building work, the owner of the property is responsible for meeting the relevant Planning and Building Regulations. Building Regulations apply to most building work so it is important to find out if you need permission. This consent is to ensure the safety of people
in and around buildings in relation to structure, access, fire safety, infrastructure and appropriate insulation.

The Building Control function is carried out on behalf of the Council of the Isles of Scilly by Cornwall Council. All enquiries and Building Control applications should be made direct to Cornwall Council, via the following link Cornwall Council. This link also contains comprehensive information to assist you with all of your Building Control needs.

Building Control can be contacted via telephone by calling 01872 224792 (Option 1), via email buildingcontrol@cornwall.gov.uk or by post at:

Building Control
Cornwall
Council Pydar
House Pydar
Street Truro
Cornwall
TR1 1XU

Inspection Requests can also be made online:
https://www.cornwall.gov.uk/planning-and- building-control/building-control/book-an-inspection/

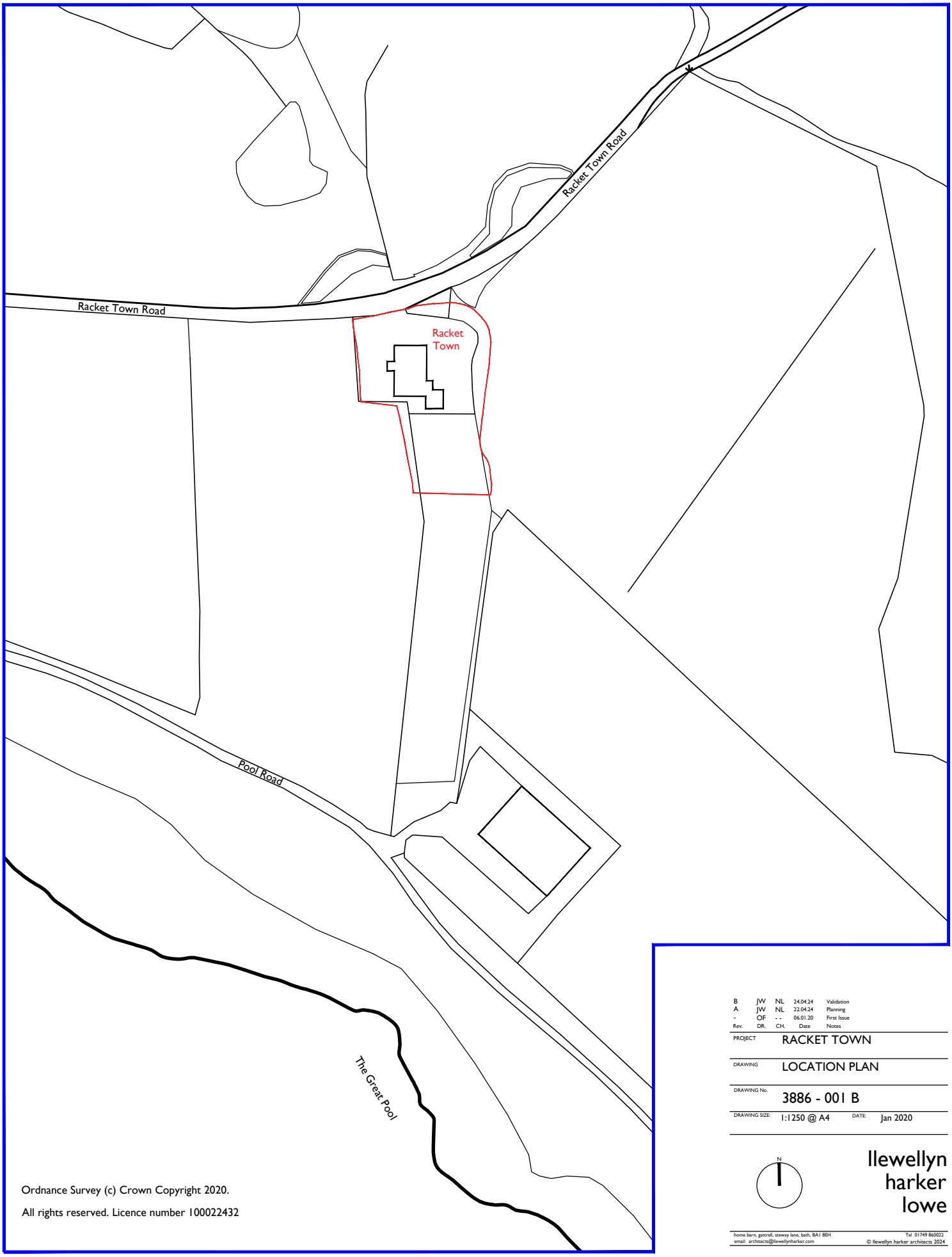
Registering/Altering Addresses
If you are building a new dwelling, sub dividing a dwelling into flats or need to change your address, please contact the Planning Department who will be able to make alterations to local and national databases and ensure postcodes are allocated.

Connections to Utilities
If you require a connection to utilities such as water and sewerage, you will need to contact South West Water on 08000831821. Electricity connections are made by Western Power Distribution who can be contacted on 08456012989.

Should you require any further advice regarding any part of your development, please contact the Planning Department and we will be happy to help you.

APPROVED
By Lisa Walton at 4:10 pm, Jul 31, 2024

RECEIVED
By A King at 8:46 am, Apr 25, 2024



Rev.	DR.	CH.	Date	Notes
B	JW	NL	24.04.24	Validation
A	JW	NL	22.04.24	Planning
-	OF	- -	06.01.20	First Issue

PROJECT: RACKET TOWN

DRAWING: LOCATION PLAN

DRAWING No.: 3886 - 001 B

DRAWING SIZE: 1:1250 @ A4 DATE: Jan 2020

N

llewellyn harker lowe

home barn, gatcrell, stoway lane, bath, BA1 8EH
email: architects@llewellynharker.com
Tel 01749 860022

Note : blue line ownership boundary extends beyond drawing edge.

RECEIVED
By Liv Rickman at 8:58 am, Apr 23, 2024

APPROVED
By Lisa Walton at 4:10 pm, Jul 31, 2024

0 1m 10m 20m

SCALE: 1:100 at A1
SCALE: 1:200 at A3

GP

Rev.	DR.	CH.	Date	Notes
E	JW	NL	22.04.24	Planning
D	JW	NL	07.03.24	Draft Revised Planning

PROJECT: RACKET TOWN

DRAWING: PROPOSED SITE PLAN

DRAWING No.: 3886 - 007 E.

DRAWING SIZE: 1:100 @ A1, 1:200 @ A3

DATE: March 2024

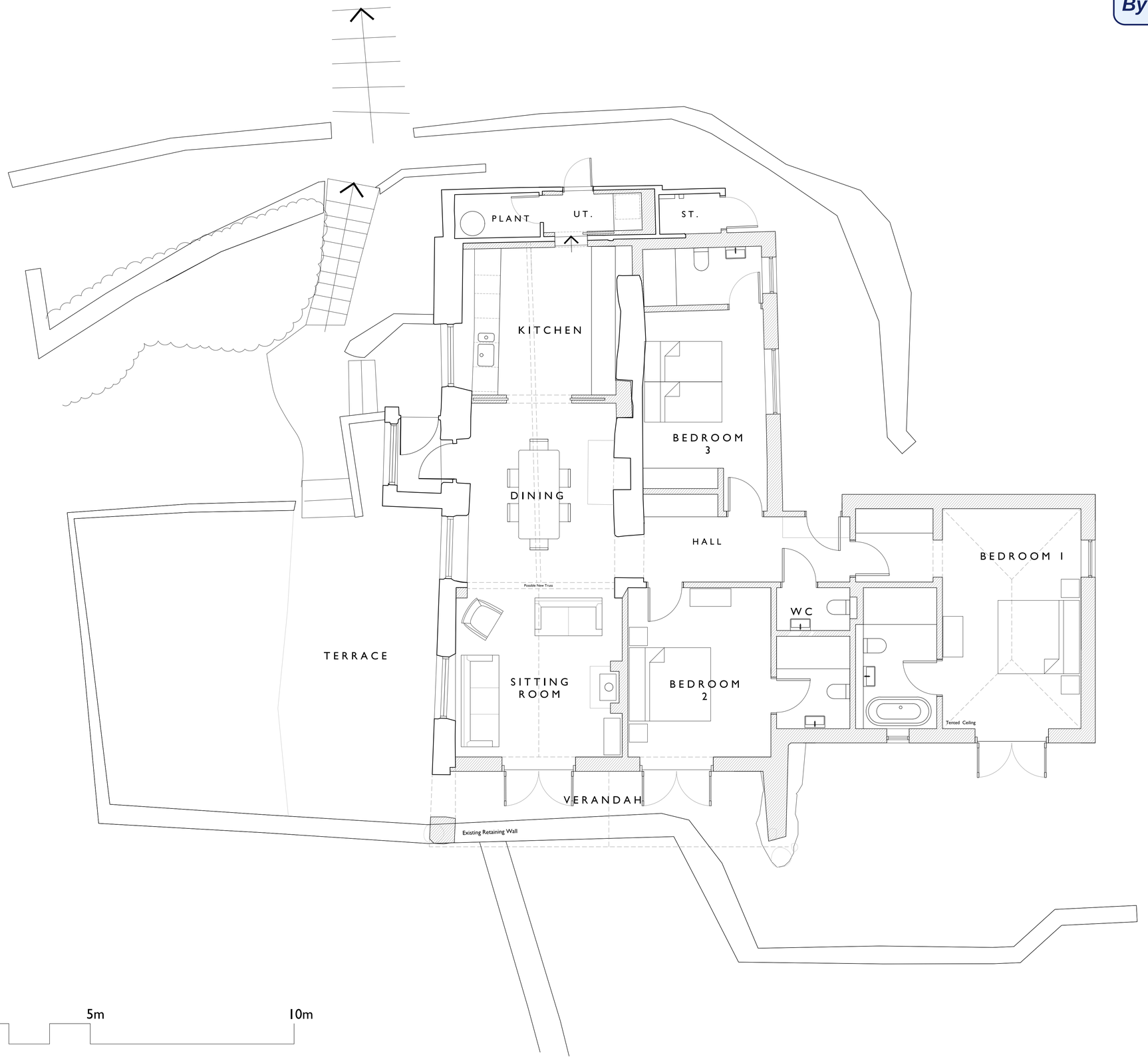
N

llewellyn harker lowe

home barn, gattrell, steway lane, bath, BA1 8EH
email: architects@llewellynharker.com
Tel 01749 860022

RECEIVED
By Liv Rickman at 8:53 am, Apr 23, 2024

APPROVED
By Lisa Walton at 4:10 pm, Jul 31, 2024



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SCALE: 1:50 at A1
SCALE: 1:100 at A3

Rev.	DR.	CH.	Date	Notes
F	JW	NL	25.03.24	Revised Planning
E	JW	NL	07.03.24	Draft Revised Planning

PROJECT: RACKET TOWN

DRAWING: PROPOSED PLAN

DRAWING No.: 3886 - 008 F.

DRAWING SIZE: 1:50 @ A1, 1:100 @ A3 DATE: March 2024

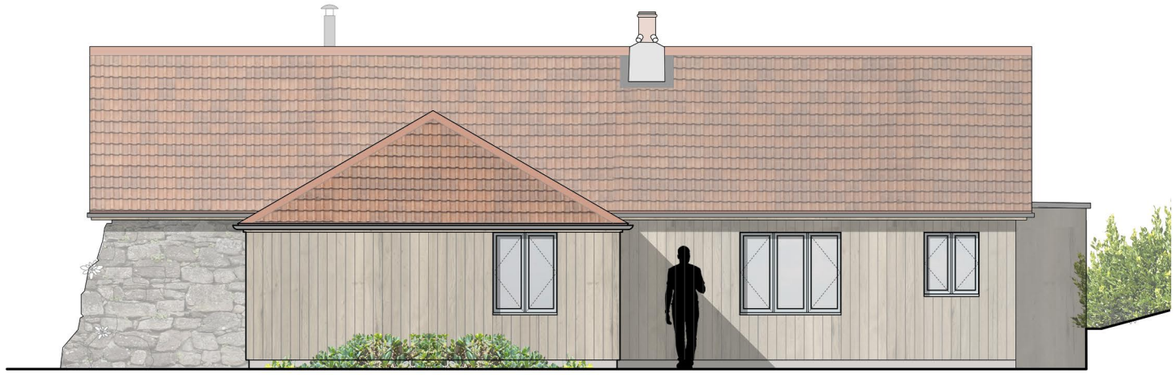
Ilewellyn harker lowe

home barn, gatstrell, stoweay lane, bath, BA1 8EH Tel 01749 860022
email: architects@llewellynharker.com

RECEIVED
By Liv Rickman at 8:51 am, Apr 23, 2024

APPROVED
By Lisa Walton at 4:10 pm, Jul 31, 2024

SOUTH ELEVATION



EAST ELEVATION

NORTH ELEVATION

WEST ELEVATION

0 1m 5m 10m

SCALE: 1:50 at A1
SCALE: 1:100 at A3

Rev.	DR.	CH.	Date	Notes
E	JW	NL	25.03.24	Revised Planning
D	JW	NL	07.03.24	Draft Revised Planning

PROJECT: RACKET TOWN

DRAWING: PROPOSED ELEVATIONS WEST & SOUTH

DRAWING No.: 3886 - 009 E.

DRAWING SIZE: 1:50 @ A1, 1:100 @ A3 DATE: March 2024

llewellyn harker lowe

home barn, gotterill, stowey lane, bath, BA1 8EH Tel 01749 860023
email: architects@llewellynharker.com

Do not scale from this drawing use figured dimensions only

TRESCO
RACKET TOWN

DESIGN, ACCESS AND PLANNING STATEMENT

llewellyn harker lowe

Contents & Introduction

INTRODUCTION

This statement has been prepared in support of a planning application to refurbish and extend the cottage 'Racket Town' located on Tresco.

The existing dwelling is habitable, but is somewhat under-serviced by modern standards. It has a poor energy efficiency performance rating, and parts of the building that were constructed in lightweight materials are now showing signs of deterioration.

The proposed works form part of Tresco Island's policy for ongoing investment in improved accommodation for visitors to the island. Inevitably investment on Tresco has an indirect economic benefit to other islands, with transport services, restaurant and retail services across the islands benefiting.

Llewellyn Harker Architects
tel 01749 860022
email architects@llewelynharker.com

Project ref
3886

EXISTING

Racket Town is sited on Tresco on south facing inland plot overlooking the great pool. The house is situated 200m east of New Grimsby, but is set distinctly away from the settlement cluster. The plot is in isolation from other buildings with the exception of a modern agricultural barn to the south.

The site lies within the Isles of Scilly National Landscape and Conservation Area.

The house is a compact traditional island bungalow, oriented north – south and set into the sloping hillside.
The cottage itself is easily missed from the road that passes by on the northern side, enveloped as it is in garden space and lush green plant-life. The dwelling houses 3 bedrooms, a combined living and dining space and compact kitchen.

The original part of the cottage was constructed in granite masonry, which is still visible on the western elevation. It has subsequently been extended along its eastern side, with a timber framed and boarded extension, and a new expansive tiled roof that has subsumed the footprint of the original cottage. An additional bedroom and bathroom were also added in a new wing to the southeast. The bedroom extension fails to engage in a satisfactory manner with the existing cottage, and somewhat spoils the southern elevation with its disjointed appearance.

The house is habitable, but the cellular nature of the existing layout does not suit 21st Century living arrangements. Internally rooms are small and circulation is dark and labyrinthine. The building fabric, is in most part structurally sound, but was constructed before modern insulation standards. Consequently, the thermal performance and energy efficiency of the property requires some improvement. Some parts of the building that were constructed in lightweight materials are now showing signs of deterioration and need replacing.

Llewellyn Harker Architects
tel 01749 860022
email architects@llewellynharker.com

Project ref
3886

PROPOSALS

The proposed alterations to Racket Town from part of Tresco Island's ongoing strategy of investment into improving the quality and diversity of accommodation on the island. The alterations would improve the architecture of the existing building, both in terms of the internal layout and spaces, its external appearance, and would also improve the thermal performance of the cottage.

Consent was previously granted in 2020 for more extensive works, which included a larger extension to the existing cottage, a larger new wing, a new outbuilding and more extensive works to the grounds.

The modifications and extensions would be vernacular in style, taking it cues from the existing building, and respecting the character of the conservation area. Where more contemporary elements are proposed these continue an architectural language that has been established on Tresco over the last 30 years, using natural materials like untreated timber, in a manner sensitive and appropriate to the existing architecture and natural landscape.

The existing extension along the eastern side of the original cottage is poorly constructed. The walls of this wing would be reconstructed to meet modern performance standards, and the internal layout reconfigured to house an ensuite bedroom and a more generous circulation space. This would remove the small, cellular spaces to create more practical spaces for modern living.

The existing SE bedroom extension would be demolished, replaced with a new wing oriented east - west over the existing footprint. The new wing would house a further ensuite bedroom, WC and a new front entrance to the cottage. The new wing would be narrower than the existing dwelling, with lower ridge and eaves heights and a hipped roof engaging with the existing roof over the main dwelling.

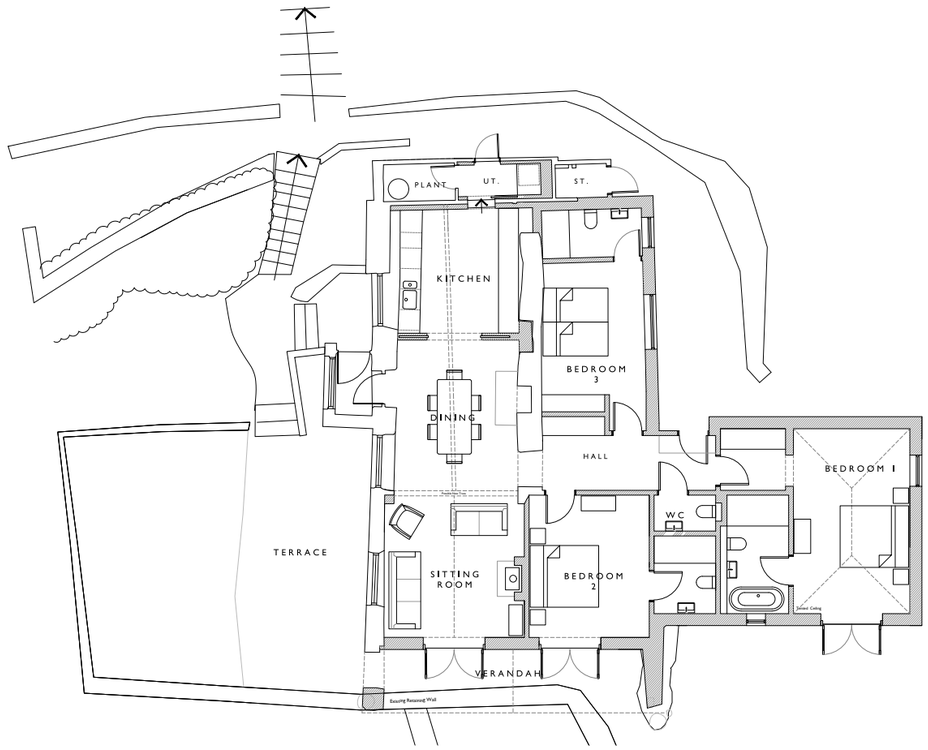
The southern wall of the original part of the cottage – which again has been constructed in lightweight materials – would be reconstructed and clad in natural timber. The internal layout would be altered to house a new south facing sitting room, connected to a reconfigured kitchen and dining area, and a new ensuite bedroom. Glazed screens would be introduced to provide natural light and views out from the gable. Here the roof would oversail, supported on two granite piers, to create a covered canopy outside these rooms.

SOUTH ELEVATION

EAST ELEVATION

NORTH ELEVATION

WEST ELEVATION



Project ref
3886

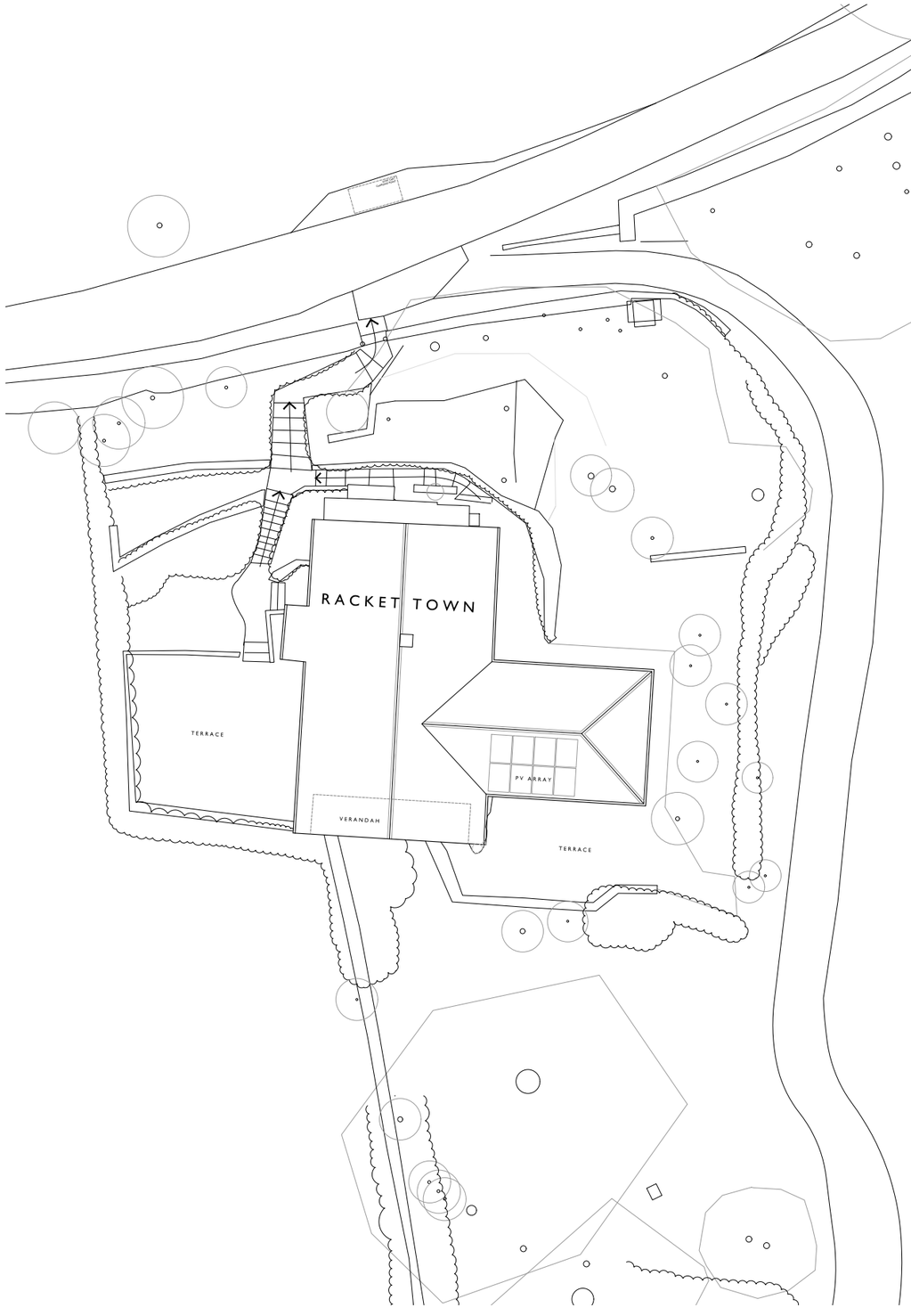
Llewellyn Harker Architects
tel 01749 860022
email architects@llewelynharker.com

The proposed materials would reflect their surroundings and continue the palette established on the existing building, and the island as whole. This would include a palette of tiled roof, timber joinery, and cedar boarded walls with elements of granite masonry.

Some minor alterations to the existing landscape would also be proposed to accommodate the new wing.

The existing house is already connected to the island's electric and water supply. Tresco has ample water and electrical supplies to accommodate this modest development.

The scheme will have minimal outside lighting to respect the dark skies policy of the local plan.



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Project ref
3886

PLANNING POLICY

The Isles of Scilly Local Plan 2015-2030 highlights the importance of tourism to the Islands' economy, and in particularly recognises the need for good quality visitors accommodation on the Islands.

"314. A strong tourism economy will help support and maintain services and community facilities on the islands, especially on the off-islands, and contribute to the management of the environment. Fundamentally, tourism supports vital transport links connecting the islands to the mainland, as well as between the islands.

315. Given the importance of tourism, it is essential that the tourism sector is ready to continually improve its offer and respond to the needs of visitors. New tourism development should enrich and enhance the islands' assets and resources, rather than harming the very character, quality and beauty that make them attractive to visitors and residents.

316. New visitor accommodation will be supported where it improves the quality and choice of existing tourism and responds to the changing needs and expectations of visitors, without reducing the housing stock available to meet the community's needs. It will be important to ensure a balance between the types of accommodation offered, to appeal to the widest range of visitors. There is an expectation that new tourism accommodation will be sustainable in terms of water and energy usage, and proposals must comply with Policies SS1 and SS2.

317. To sustain the islands as a sustainable and competitive visitor destination, it is necessary to support, wherever appropriate, improvements to existing visitor accommodation. Development proposals, however, that would result in the loss of existing housing stock will be resisted, whether this is serviced accommodation or self- catering, as this can exacerbate the housing problems of the islands. Reverting holiday letting accommodation back to permanent residential use, and resisting the loss of permanent homes to other forms of tourism accommodation, can have benefits of reducing the need for more housing development.

318. The re-use or extension of existing tourism accommodation and the provision of appropriately designed, scaled and sited new buildings can play an important part in the tourism industry, through the creation of self-catering accommodation or local craft or artists' studios, for example. Such development needs to be sensitively designed and sited so as to not have an adverse impact on the landscape, as required in Policy OE1 and Policy SS2."

The proposals to improve the quality of the accommodation offer at Racket Town are considered to comply with these policies. The building has an established use as a holiday cottage, but has not been significantly altered in almost 30 years. The changes proposed herewith are in accordance with Tresco Island's policy of improving the quality of the existing building stock and accommodation. The success of this strategy has been key to the ongoing viability of the island economy.

The proposals to extend the property improves the island's accommodation provision. Inevitably investment on Tresco has an indirect economic benefit to other islands, with transport services, restaurant and retail services across the islands benefiting.

Project ref
3886

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SUSTAINABILITY ASSESSMENT

The proposals have been developed to include a range of strategies to achieve sustainability in construction and in the building's ongoing use.

EMBODIED ENERGY IN CONSTRUCTION :
A considerable proportion of a building's carbon footprint is attributable to the manufacturing and transportation of building materials. To minimise this, the extension would be constructed from a lightweight and prefabricated timber frame; a thermally efficient and carbon sequestering construction method. This approach would also the reduce carbon emissions involved in transporting materials to the island.

The building's exterior would be clad in long lasting materials, and installed with robust detailing, capable of withstanding the marine environment would be employed in the construction works. Improved lifespan ensures a better return on the energy expended in construction.

Indigenous natural materials would be used wherever possible.These would include reclaimed granite and some local timber. The specification would be developed with reference to the BRE Green Guide to Specification to evaluate the environmental credentials of the materials procured from further afield.

HEAT LOSS AND ENERGY USE:
The proposals take a 'fabric first' approach to energy reduction, seeking to minimise consumption from the outset through the use of passive design principles. These include optimising orientation and massing, as well as ensuring the use of high-performance building fabric

The new building elements will have insulation that is far superior to the existing extension that is being replaced, this will reduce the energy required to heat the property. Improved double glazing would improve, air tightness, thermal performance and increase natural light entering the property, reducing the energy demand from space heating and artificial lighting.

The south facing elevation would incorporate glazed screens to maximise solar gain and reduce the heating requirements during the winter months. These are protected by an overhanging eaves and projecting roof over the gable to prevent overheating when the sun is high in the summer months.

The deep L-shaped plan of the dwelling would improve the surface area to volume ratio, reducing heat loss per unit of area.

RENEWABLE ENERGY SOURCES:
A new solar PV array would be provided on the south facing roof pitch of the new wing, which is angled and oriented to maximise electrical output. Excess power would be exported to the local grid. The energy and carbon associated with the manufacture and installation of the PV panels will be covered by 3 years of generation in this location.

The existing oil fired boiler would be removed. The dwelling would be heated using air-source heat pumps, which are typically 3 times more efficient than traditional direct electric heating methods. This approach is particularly effective on Tresco, where the temperate climate ensures operating efficiency is maintained through the year. These would be powered by locally generated electricity from the PV array, effectively creating a zero carbon heating system.

An additional stove would allow the property to be heated using fuel from local and sustainable sources. This is particularly effective to top up the heating in the winter when external temperatures and output from the PV array are reduced.

The scheme as whole would be also sustainable in the broader sense, supporting the economy of the Islands, and providing work for the people who live there

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3886

ACCESS

OUTSIDE:

Existing access to the plot will be unchanged

The absence of cars on Tresco creates a safe, peaceful and refreshing environment and reduces emissions. For less mobile guests, golf buggies or mobility scooters can be hired, but most visitors hire bicycles or walk.

Tresco's emergency services would have sufficient existing capacity to deal with the modest increase in scale of this property.

INSIDE:

Internally the modifications have been specifically developed to enable the property to cater for elderly occupants or visitors with impaired mobility. They would comply with Part M of the Building Regulations as a minimum standard. The following improvements have been made to improve the overall accessibility of the dwelling:

- New doorways would have improved clearance
- The front door would have a level threshold
- The dwelling would have level access throughout.
- New glazed screens would be floor to ceiling, ensuring views out for seated occupants.
- Generous circulation spaces would make the dwelling more accessible for wheelchair users or ambulant disabled occupants.
- There would be sufficient space to accommodate a carer if required.
- New services would be installed at heights to suit elderly / disabled occupants.
- Improved heating and comfort for elderly occupants.
- The dwelling would be all on one level.

SUMMARY

The purpose of this project is to provide enhanced accommodation for visitors to Tresco. Improving quality maintains the economic activity of the islands by responding to the changing expectations of the market, in accordance with both Tresco Island's ambitions and local planning policy.

The design of the alterations has taken into account the characteristics and historic context of the area. The bulk of the proposals are heavily screened by existing boundary planting and the existing building; as a consequence the visual impact of the proposals would be minimal.

The form, scale, massing and character of the proposed extension responds directly to the existing building, preserving the vernacular character of the building in the immediate setting, whilst ensuring the proposed additions are architecturally legible. The proposed materials would reflect the traditional and vernacular style across the island, in addition to providing a continuation of more recent patterns of development using natural materials including timber and glass in a low-key contemporary manner.

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RECEIVED
By Liv Rickman at 8:43 am, Apr 23, 2024

APPROVED
By Lisa Walton at 4:10 pm, Jul 31, 2024

Ecological Impact Assessment (EcIA) & Preliminary Roost Assessment (PRA) and Nesting Bird Survey

Site:

Racket Town, Tresco, Isles of Scilly

Grid Reference: SV 89286 14924

19th April 2024

Plan for Ecology Ltd
Tremough Innovation Centre
Tremough Campus, Penryn, Cornwall, TR10 9TA
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www.planforecology.co.uk

Document Control:

Site Name:	Racket town, Tresco, Isles of Scilly
OS Grid Reference:	SV 89286 14924
Report Authors:	Caroline Davey BSc (Hons) MSc ACIEEM
Document Checked By:	Dr Kim Jelbert BSc. (Hons) MSc. PhD. MCIEEM; bat licence no. 2015-10444-CLS-CLS (CL18) Level 2; RC 224 (CL21); BER0205 WML-CL47 (Annex A & B); barn owl licence no. CL29/00037; dormouse license no: 2016-22394-CLS-CLS
Document Approved By:	Kim Jelbert
Client:	Tresco Estate
Report Reference Number:	P4E3404
Version:	01
Date:	19th April 2024

Declaration:

"The information, evidence and advice, which we have prepared and provided is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology & Environmental Management's (CIEEM) Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions."

Caroline Davey	[redacted]
Kim Jelbert	[redacted]

Report Lifespan:

Ecological features can change over time, particularly if site management/ use changes. At the time of writing, Ecological Impact Assessments are typically considered to be valid for 12 months (until March 2025), unless stated otherwise.

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1.0 Non-Technical Summary

Tresco Estate commissioned Plan for Ecology Ltd to undertake a Preliminary Ecological Appraisal / Ecological Impact Assessment (PEA/ EcIA) and an update Preliminary Roost Assessment and Nesting Bird Survey of the property known as Racket Town and its surrounding habitats in Tresco, Isles of Scilly (OS Grid Ref: SV 89286 14924) in March 2024. It is understood that the client proposes to refurbish and extend the property, which will include partial demolition of the existing building and an extension of the footprint of the property.

The Ecological Impact Assessment (EcIA) comprised a desk study and a Phase 1 survey, including a UK Habitat Classification Survey and an assessment of the potential of the site to support protected species. This EcIA report describes and evaluates the results of the desk study and survey and assesses the impacts of the proposed development in accordance with the CIEEM Guidelines for Ecological Impact Assessment (CIEEM, 2018).

The application site, measuring *c.* 0.2 ha, includes the building of Racket Town and surrounding habitats within the red line boundary shown on Map 1 below. Racket Town is located *c.* 0.45km south-east of New Grimsby, on the west side of Tresco, *c.* 4.5km north of Hugh Town on St Mary's and *c.*1.3km east of The Town on Bryher, *c.*48km west of the mainland at Land's End.

There are no protected or priority habitats within the site boundary. Three habitat features of ecological interest are present. These are 'other woodland mixed/plantation (w1h 29) dense scrub/introduced shrub (H3 847) and built linear feature/hedgebank (u1e 111). Notable species / species groups with potential to occur on-site include breeding birds; bats (roosting, foraging and commuting); lesser white-toothed shrew and amphibian species, invertebrate species and vascular and non-vascular plants.

Designated Sites: Racket Town lies within close proximity to several International and National sites designated for nature conservation; however, the proposed development site is considered to be sufficiently distant for the proposed constructional activities and subsequent operational use not to impact the designated sites of nature conservation significance in the wider area. These are listed below:

- The Isles of Scilly Complex Special Area of Conservation (SAC)
- The Isles of Scilly RAMSAR site
- The Isles of Scilly Special Protection Area (SPA)
- The Pentle Bay, Merrick and Round Islands Site of Special Scientific Interest (SSSI)
- Great Pool SSSI
- Castle Down SSSI

Ecological constraints and opportunities are detailed on the accompanying 'Ecological Constraints and Opportunities Plan' (ECOP) shown on Map 1 below. Table 1 summarises the assessment of impact of the proposed development on ecological features.

Table 1: Summary assessment of impact of the proposed development on features of ecological importance before and after mitigation.

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Feature	Effect without mitigation	Mitigation Summary	Significance of effect of residual impact after mitigation
Other woodland mixed/plantation (w1h 29)	Degradation and loss of plantation woodland habitat	Trees to be retained and protected according to principles of the BS5837:2012 Trees in relation to design, demolition and construction. If any trees are to be removed an equal or greater number must be planted to avoid an overall net loss of biodiversity	Neutral – opportunity for enhancement
Dense scrub/introduced shrub (h3 847)	Loss of scrub/introduced shrub habitat from construction and operational activities.	New beds of ornamental shrubs and scrub habitat to be incorporated into the proposed landscaping scheme	Neutral – opportunity for enhancement
Built linear feature/hedgebank (u1e 111)	Degradation and loss of traditional granite hedge	Ensure construction activities do not impact the granite wall/boundary hedge. Ensure access to the property during construction is from the east side and there is a buffer of 2-5m between the hedge and storage of plant and materials.	Neutral
Bats (foraging, commuting)	Small loss of foraging habitat but this is unlikely to impact populations. Artificial lighting when the site is operational could impact foraging and commuting activity.	Light levels to be kept <0.5lux along the boundaries of the site and minimised across the remainder of the site.	Neutral
Bats (roosting)	Potential impact on a known bat roost through construction works.	Retain or reinstate confirmed bat roosts post-development. Two update bat emergence surveys are required to be undertaken during the bat active season (May-September) to inform the planning application and potential licencing requirements.	Neutral
Birds	Small loss of foraging habitat but this is unlikely to impact populations. Disturbance to active nests from construction and operational activities.	Trees to be retained and buffered from the development. Any removal or pruning of shrub habitat, and partial demolition of the building to be undertaken outside the bird breeding season or be preceded by inspection undertaken by an ecologist. Precautionary measures to be implemented to protect	Neutral – opportunity for enhancement

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Feature	Effect without mitigation	Mitigation Summary	Significance of effect of residual impact after mitigation
		individual animals and active nests from harm. Replacement swallows nests to be incorporated into the design of the new building	
Amphibians	Small loss of habitat but this is unlikely to impact populations. Potential injury during construction.	Precautionary measures to be implemented to protect individual animals from harm during construction.	Neutral – opportunity for enhancement
Invertebrates	Small loss of foraging habitat and shelter but this is unlikely to impact populations.	Follow mitigation for habitats	Neutral – opportunity for enhancement
Vascular plants	Reduction in plant diversity from habitat loss and degradation. Spread of non-native invasive species.	Follow recommendations for habitats. Habitat enhancements will increase plant diversity. A pre-construction, post-planning walkover survey for invasive plants will be required. Implement the Invasive Species Control Plan given at Appendix 3.	Neutral – opportunity for enhancement
Non-vascular plants	Reduction in plant diversity from habitat loss and degradation.	Habitat enhancements will increase plant diversity.	Neutral – opportunity for enhancement

Further surveys and assessments: Two update bat emergence surveys in the bat active season (May-September) are required to inform the planning application.

A post-planning, pre-construction survey will be required for invasive species. An ecological watching brief will be required if trees or shrubs are to be cleared or if partial demolition of the building is required during the bird nesting season (March – August/September).

A Biodiversity Metric and BNG report may be required to inform the planning application. All eligible minor developments will need to demonstrate a 10% BNG from 2nd April 2024 onwards.

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Table 2: The baseline statement of predicted change (habitat losses and gains)

Ecological Receptor	Ecological Value	Loss (approximate)	Gain (approximate)
Other woodland; mixed/plantation (w1h 29)	Local	0 m2 for footprint of new extension	unknown
Dense scrub/ introduced shrub (h3 847)	Local	0 m2 for footprint of new extension. Unknown area for clearance during construction phase	unknown
Modified grassland/mown (g4 106)	Within the Zone of Influence	Small area east of extension. Area unknown	unknown
Non-native and ornamental hedgerow (h2b)	Within the Zone of Influence	Approx. 32m east and south garden hedges likely to be impacted	unknown
Built up areas and gardens/introduced shrub (u1 847)	Within the Zone of Influence	Approx. 75m2	unknown
Urban, artificial unsealed surface (u1c)	Negligible	Approx. 100m2	unknown
Built linear feature/hedgebank (u1e 111)	Local	0m2	unknown
Buildings (u1b5)	Negligible	0m2	Approx. 175m2

The residual impact of the proposed development is predicted to have a neutral impact, at a local scale on the ecology of the site, subject to the successful implementation of the mitigation outlined in this report. There is an opportunity for the development to have a positive impact with the inclusion of biodiversity enhancements.

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2.0 Ecological Constraints and Opportunities Plan (ECOP)

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Map 1: Racket Town, Tresco - UK HAB Distribution & Ecological Constraints & Opportunities Plan (ECOP)

Key

- Montbretia (Sch 9, WCA, 1981) invasive species
- Three cornered garlic (Sch 9, WCA,1981) invasive species
- Target note
- Built linear feature/ hedgebank (u1e 111)
- Non-native and ornamental hedgerow (h2b)
- Urban, artificial, unsealed surface (u1c)
- Building (u1b5)
- Dense scrub/introduced shrub (h3 847)
- Built up areas and gardens/ introduced shrub (u1 847)
- Other woodland/mixed plantation (w1h 29)
- Modified grassland (g4)
- Approx. site boundary

N

Date: 2024_04_18_CD

3.0 Introduction

3.1 Background & Purpose of Survey

Tresco Estate commissioned Plan for Ecology Ltd to undertake a Preliminary Ecological Appraisal / Ecological Impact Assessment (PEA/ EcIA) and a Preliminary Roost Assessment (PRA) and Nesting Bird Survey of Racket Town, Tresco, Isles of Scilly (OS Grid Ref: SV 89286 14924) in March 2024. It is understood that the client proposes to refurbish and extend the property, which will include partial demolition of the existing building.

An indicative site layout is shown in Figure 1 below. A location plan showing the designated sites of nature conservation importance within a 1km radius of the site is provided at Appendix 1. The Ecological Constraints and Opportunities Plan (ECOP) for the site is shown on Map 1 above.

3.2 Site Location & Description

The application site, measuring c. 0.2 ha, which includes Racket Town and surrounding habitats within the red line boundary shown on Map 1 above. Racket Town is located *c.* 0.2km east of New Grimsby, on the west side of Tresco, *c.* 4.5km north of Hugh Town on St Mary's, *c.*1.3km east of The Town on Bryher and *c.*48km west of the mainland at Land's End.

The site comprises the house 'Racket Town' and sub-tropical gardens associated with the property, and habitats outside the curtilage of the property which include a small area of plantation woodland, modified grassland and some dense scrub/introduced shrub habitat. The location is rural in character with the property sitting adjacent to an area of mixed plantation woodland to the north and mixed farmland (pasture and arable) to the south, east and west. An area of Reedbeds, a UK BAP priority habitat protected under Section 41 NERC Act ,2006 is *c.* 130 m south of the property.

There are two Schedule 9, WCA (1981) invasive plant species growing within the site boundary. These are three cornered leek (*Allium triquetrum*) and montbretia (*Crocosmia x crocosmiiflora*).

3.3 Proposed Site Plans

The applicant seeks planning consent to refurbish and extend the property. The works will include partial demolition of the existing building and construction of the new building (Figure 1). The grassland strip will be retained for access to the property.

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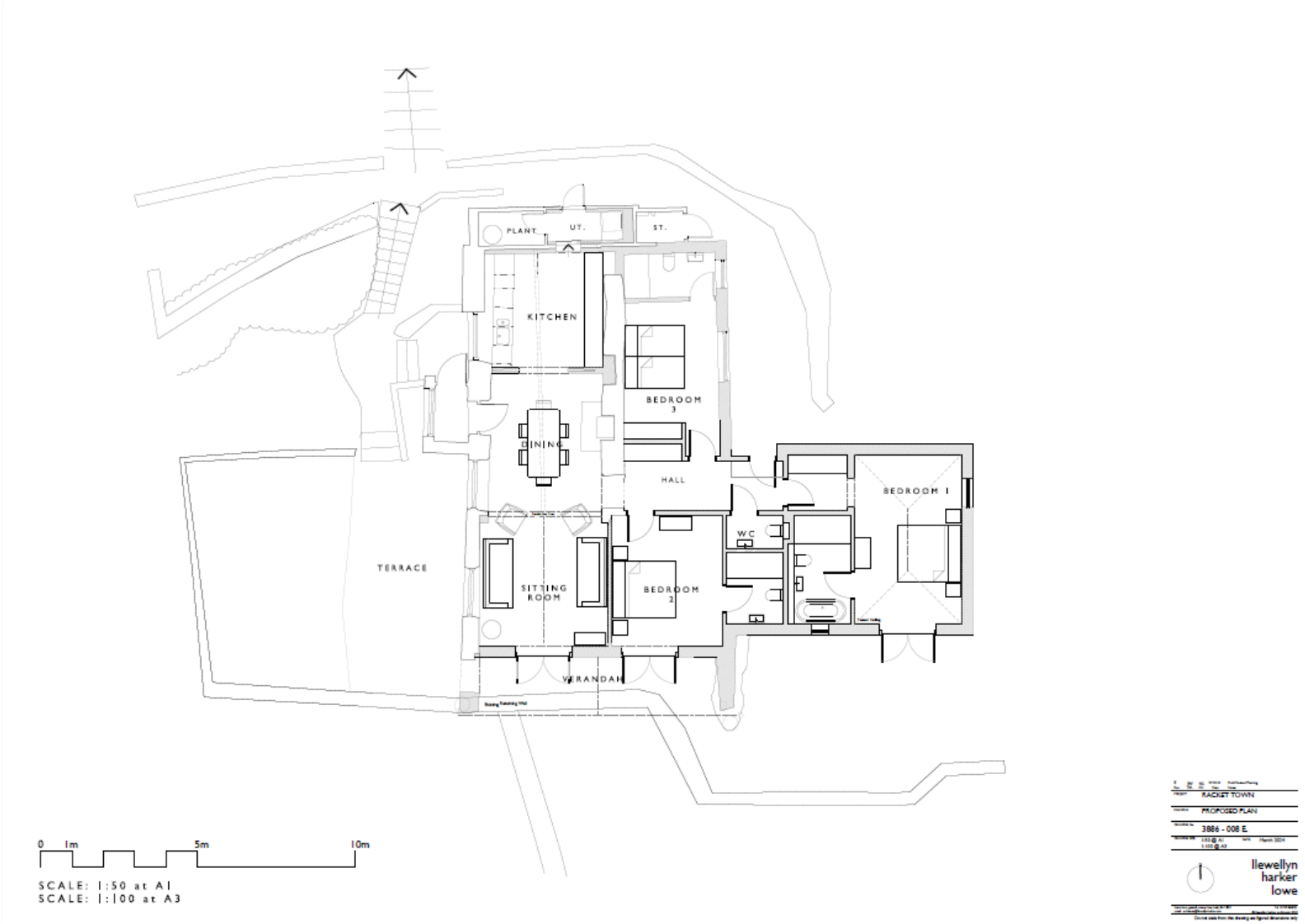

Figure 1. Proposed layout of the refurbishment

3.4 Project Administration

Site Name:	Racket Town, Tresco, Isles of Scilly, TR24 0QJ
OS Grid Reference:	SV 89286 14924
Client:	Tresco Estate
Planning Authority:	Cornwall Council
Report Reference Number:	P4E3404
Site proposals:	The applicant seeks planning consent to partially demolish and extend the property 'Racket Town.'
Survey Dates:	28th March 2024
Surveyor & Licence Numbers:	Caroline Davey BSc (Hons) MSc ACIEEM; bat licence no: 2022-10817-CL18-BAT; CL29/00037 (barn owl) held by Kim Jelbert BSc (Hons) MSc PhD MCIEEM (Registered Consultant RC224)

4.0 Methodology

This assessment has been carried out in accordance with the 'Guidelines for Preliminary Ecological Appraisal' produced by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2017); BS42020-2013 Biodiversity – Code of Practice for Planning & Development, as adopted by local planning authorities (British Standard, 2013); and the CIEEM Guidelines for Ecological Impact Assessment (CIEEM, 2018).

4.1 Desk Study

The desk study is a search of all ecological records and site designations held by the Environmental Records Centre for Cornwall and the Isles of Scilly (ERCCIS, to 2024) within a 1km radius of the site. The distance between the site boundary and nearby European sites was measured using MAGIC http://www.magic.gov.uk to determine if the site falls within a European site Zone of Influence.

4.2 Site Survey

Phase 1 Survey

The survey comprised an extended Phase 1 Survey of land within the planning application boundary referred to as the 'site'. The survey was undertaken on 28th March 2024 to identify the habitats present according to the UK Habitat Classification system (UKHab Ltd, 2023) and their associated plant species, and assess the potential of the site to support protected species and species of conservation concern.

The surveyor noted down the presence of invasive plant species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) and species listed as injurious (harmful) under the Weeds Act 1959 within the site and within c.7m of the site boundary (where access was available), but a detailed survey for these species was not undertaken. Survey data was digitised using QGIS.

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Update Preliminary Roost Assessment and Nesting Bird Survey

Racket Town was assessed for its suitability for supporting bats and birds. A high-power torch was used to illuminate all accessible areas of the building with potential to support roosting bats and roosting/ nesting birds. The ecologist searched for signs of bats including droppings, fur oil staining, urine staining, feeding remains, audible squeaking, bat-fly (Nycteribiid) pupal cases and odour; and for field signs of current use by nesting birds and barn owls, including liming, pellets, moulted feathers and signs of barn owl nesting (e.g. presence of adult or juvenile barn owls, eggs or egg fragments, nest debris and moulted feathers and down) and other bird species nests.

The assessment was carried out in accordance with the 'Bat Survey for Professional Ecologists - Good Practice Guidelines' produced by the Bat Conservation Trust (Collins, 2023).

4.3 Ecological Evaluation

The methods and standards for site evaluation within the British Isles are defined in 'A Nature Conservation Review' (Ratcliffe, 2009). They are broadly used across the United Kingdom to rank sites, so priorities for nature conservation can be attained. The criteria are size, diversity, naturalness, rarity and fragility, with secondary criteria of typicalness, potential value, intrinsic appeal, recorded history and the position within the ecological / geographical units.

The assessment judges features within the site in relation to other sites because a number of habitats may be of nature conservation importance when combined.

The legislative and planning policy context are important and have been given full consideration in this assessment.

There are also a number of other important considerations as follows:

- Designated Sites and Features e.g. Special Protection Areas (SPA), Special Areas of Conservation (SAC), Sites of Special Scientific Interest (SSSI; ecologically important hedgerows etc.);
- Biodiversity Value (use of Biodiversity Action Plans and local development plans);
- Potential Value;
- Secondary or Supporting Value;
- Social or Economic Value; and
- Legal Designation.

Based on the criteria above and professional judgement, the likely value of ecological features is determined within a geographical context in accordance with the CIEEM Guidelines for Ecological Impact Assessment (CIEEM, 2018). Value is assigned in decreasing order of importance as follows: International (Europe), National (UK), Regional (Southwest), County, District, Parish, Local, Zone of Influence and Negligible.

This evaluation method identifies 'important ecological features' (considered to be of Local value and above) which could potentially be affected by the proposed development.

Potential bat roosts identified during the visual inspection of the building were categorised as to their suitability in accordance with the Bat Conservation Trust's (BCT) Good Practice Guidelines (Collins, 2023) as detailed in Table 3 below:

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Table 3: Categorisation of bat roost suitability in accordance with the Bat Conservation Trust's (BCT) Good Practice Guidelines (Collins, 2023).

Suitability Category	Description
None	No habitat features on site likely to be used by roosting bats at any time of year.
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more features with potential to support individual bats opportunistically at any time of year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts such as maternity or hibernation roosts.

Defining and recording use by barn owl during the visual inspection of the building is categorised in accordance with Shawyer (2011) as detailed in Table 4 below:

Table 4: Categorisation of barn owl use.

Category	Description
Potential Nest Site (PNS)	Features with a hole of at least 80mm diameter or vertical slot of this width backed by a sufficiently large and dark chamber with a floor area normally greater than 250mm x 250mm.
Active Roost Site (ARS)	A place where breeding does not occur, but where the bird is seen or heard regularly, or its current or recent presence can be recognised by signs such as liming, pellets or moulted feathers. Regularity and timing of use is indicated by amount of evidence and its age.
Temporary Rest Site (TRS)	Small amounts of liming, pellets or moulted feathers beneath a perch indicative of occasional use.
Occupied Breeding Site (OBS)	A place where breeding is taking place or has done so in the recent past as indicated by the presence of a breeding pair with nest debris, eggs, egg shells, chicks or down present.

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4.4 Impact Assessment

Where the impact of the proposed scheme on an ecological receptor(s) can be determined without further survey or design information, an ecological impact assessment is undertaken within the Preliminary Ecological Appraisal (PEA) report. Where the impact of the scheme on an ecological receptor(s) cannot be determined, then this is clearly stated.

Where an impact (positive or negative) on the integrity of a defined feature (habitat, species or ecosystem) was identified, the impact significance has been described in the following terms: major, moderate, minor and negligible.

The likelihood of the impact occurring was described as: certain / near certain (probability estimated at 95% chance or higher), probable (probability estimated above 50% but below 95%), unlikely (probability estimated above 5% but below 50%) and extremely unlikely (probability estimated below 5%).

Reference has also been made to the extent and magnitude of impact (i.e., area affected) and duration (short-term impacts associated with construction and long-term impacts associated with the operational phase of the development).

The impact significance of the proposed development on the integrity of the site as a whole has been determined using the framework described above. A significant effect is an effect that either supports or undermines biodiversity conservation objectives for 'important ecological features' or for biodiversity in general (CIEEM, 2018).

Site integrity has been defined as follows: 'The integrity of a site is the coherence of its ecological structure and function, across its whole area that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified (CIEEM, 2018). Site integrity is dependent on the extent, magnitude and duration of impacts upon each ecological feature (habitats or species). The accumulative impact, across all features, is therefore used to determine overall impact significance on the integrity of the site, and in EIA terms. Available guidance and information, such as the distribution and status of the species or features, and professional judgment have been used to determine impact significance.

4.5 Mitigation Recommendations

Recommendations are provided using the Mitigation Hierarchy (British Standard, 2013; CIEEM, 2018). The Mitigation Hierarchy seeks to avoid impacts, then to mitigate unavoidable impacts, and, as a last resort, to compensate for residual impacts that remain after implementation of avoidance and mitigation measures.

Where an identified adverse impact cannot be fully mitigated, the residual impact remains. This residual impact in combination with similar impacts locally could constitute a cumulative impact. Due to the small scale and nature of the proposed development, only cumulative impact arising from potential development of adjoining land is considered within this assessment.

4.6 Biodiversity Net Gain

This report identifies potential biodiversity enhancements that can be included in the scheme which would contribute to a Biodiversity Net Gain (BNG). The proposed scheme is a classed as a 'minor' development and all eligible minor developments are now required to deliver a 10% BNG (introduced in April 2024). Further information is presented in section 6.4.

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4.7 Limitations

It is possible to undertake Phase 1 surveys at any time of year, with the optimal period between April – September. Many plant species remain visible all year round and can be readily identified from their vegetative characteristics. It is usually possible to classify habitats, notably hedgerow, scrub and urban habitats, year-round due to the nature of the vegetation present.

March is a sub-optimal time of year to undertake more detailed vegetation surveys, including invasive plant surveys and BNG baseline habitat condition assessments. This is because some species will not be visible (remaining quiescent below ground), and few will be in flower or with seed capsules present (important species identification features). Most of the habitats recorded at Racket Town are modified and the timing of the survey was not considered to be a significant limitation but, where any further surveys of specific habitats or species groups in the optimal period (April – September) is considered necessary to inform the EcIA, this is clearly stated in this report.

Weather conditions during the survey were in line with seasonal norms. There are no limitations to the survey associated with weather conditions.

Ecological features can change over time, particularly if site management/ use changes. Typically, habitat surveys are valid for 12 Months (until March 2025). A search for Tree Preservation Orders (TPO's) or Conservation Area status does not form part of this assessment.

4.8 Technical Competence

All survey work, reporting and mitigation recommendations have been undertaken by Caroline Davey BSc (Hons) MSc ACIEEM who holds the following protected species licence for bats: 2022-10817-CL18-BAT. Caroline has 13 years of experience as an ecological consultant, is an associate member of the Chartered Institute of Ecology and Environmental Management (CIEEM), has an Honours degree in Zoology and a Master's Degree in Environmental Analysis and Assessment.

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5.0 Assessment Results

5.1 Designated Sites and Local Conservation Initiatives

There are three statutory designated sites of international conservation importance and three statutory sites of national importance within a 1km radius of the site (Appendix 1).

Designated sites of international conservation importance within 1km of Racket Town are as follows:

- The Isles of Scilly RAMSAR site: This is a coastal designation encompassing marine and intertidal habitats surrounding the island of Tresco and it lies *c.* 0.7km east of Racket Town. RAMSAR sites are wetland sites of international importance. The Isles of Scilly site qualifies for this status because it supports 2.9% of the breeding population of lesser black gull (*Larus fuscus*).

- The Isles of Scilly Complex Special Area of Conservation (SAC): This is a coastal designation encompassing marine and intertidal habitats surrounding the island of Tresco and it lies *c.*0.4km west of Racket town at its closest point. SACs are internationally important sites designated for habitats and species of European importance. The Annex I habitats for which this site has been designated are sandbanks which are slightly covered by seawater at all times and mudflats and sandflats not covered by seawater at low tide and reefs. The qualifying Annex II species for selection of this site are shore dock (*Rumex rupestris*) and grey seal (*Halichoerus grypus*).

- The Isles of Scilly Special Protection Area (SPA): This is a coastal designation encompassing marine and intertidal habitats surrounding the island of Tresco and it lies *c.*0.4km west of Racket Town. SPAs are internationally important sites classified specifically for the protection of birds. The Isles of Scilly SPA has been designated for supporting lesser black gull, storm petrel (*Hydrobates pelagicus*) and its general assemblage of sea birds.

Designated sites of national conservation importance within 1km of Racket Town are:

- The Pentle Bay, Merrick and Round Islands Site of Special Scientific Interest (SSSI): This site lies *c.*0.8km east of Racket Town at its nearest point. This is a site of national nature conservation importance, designated for its transition form dunes to lichen-rich heathland and uninhabited islands important for breeding seabirds.

- Great Pool (Tresco) SSSI: This site lies *c*.0.1km south-west of Racket Town and is of national importance, designated for the largest freshwater pool on Scilly (1km across), protected from the sea by a narrow sandbank. The SSSI supports a range of wetland habitats and two notable vascular plant species: balm-leaved figwort (*Scrophularia scorodonia*) and Babington's leek (*Allium babingtonii*). The surrounding reed beds and willow carr are important for breeding and migrant birds.

- Castle Down SSSI: This site lies *c.*0.75km north-west of Racket Town. The site has been designated for its maritime heathland with a particularly important lichen flora. A range of rare oceanic heathland species including the only known European record of *Heterodermia propagulifera* together with *H. leucomelos* and *H. obscurata*. These *Heterodermia* communities are now very rare and comparable sites, outside Scilly, only occur in Brittany

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and Channel Islands. In addition, the short lichen rich heathland on the Downs supports an important breeding colony of Common Tern (*Sterna hirundo*).

Racket Town lies within the 'Zone of Influence' of three internationally important sites: The Isles of Scilly RAMSAR site, The Isles of Scilly Complex SAC and the Isles of Scilly SPA.

Racket Town does not lie within the recreational Zone of Influence of any European site that is considered to be vulnerable to recreational pressure associated with an increase in local population density (Cornwall Council, 2021).

Racket town is also within the SSSI impact risk zone of Great Pool SSSI, lying *c.* 0.1km north-east of the SSSI.

The proposed partial demolition and re-build of Racket Town is considered unlikely to have an impact on the nearby designated sites because of the separation distance and lack of hydrological and other pathways and no further mitigation is required.

In the absence of mitigation, the nature of the identified impacts on designated sites is considered to be **negligible.** See section 6.1 for mitigation measures.

5.2 UK Habitat Classification

A total of eight UK Habitat Classification (UKHab) habitat types (inclusive of notable secondary codes) were recorded within the site during the site visit. These are listed below, and their distribution is shown on Map 1 above:

- Other mixed woodland/plantation (w1h 29)
- Dense scrub/introduced shrub (h3 847)
- Modified grassland (g4)
- Non-native and ornamental hedgerow (h2b)
- Built up areas and gardens/introduced shrub (u1 847)
- Urban, artificial unsealed surface (u1c)
- Built linear feature/hedgebank (u1e 111)
- Buildings (u1b5)

Other mixed woodland/plantation (w1h 29), dense scrub/introduced shrub (h3 847) and built linear feature/hedgebank (u1e 111) are considered to be of notable ecological value and are described in section 5.3.

Modified grassland (g4), non-native ornamental hedgerow (h2b), built up areas and gardens/introduced shrub (u1 847), urban, artificial unsealed surface (u1c) and buildings are all of negligible or low ecological value and are briefly described below:

Modified grassland (g4)

A strip of modified grassland runs the length of the site along the eastern boundary (Figure 1). This is the field margin of the adjacent field, which has been fenced off to create a vehicular access to the property. For the most part, the grass is mown with a section of grassland in the south of the site, south of the house, with a longer sward. Grasses include abundant Yorkshire fog with frequent perennial rye grass (*Lolium perenne*), red fescue (*Festuca rubra*), cock's-foot (*Dactylis glomerata*) and common bent (*Agrostis capillaris*). Forbs include abundant ribwort plantain (*Plantago*

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lanceolata), with occasional daisy (*Bellis perennis*), white clover (*Trifolium repens*), alexanders (*Smyrnium olusatrum*), nettle and hogweed. Other species which are present but rare include common cat's ear (*Hypochaeris radicata*), common mouse ear (*Cerastium fontantum*), dandelion (*Taraxacum officinale*) and perennial sow thistle (*Sonchus arvensis*). A further small area of closely mown lawn is present within the garden at Racket Town.

The grassland is limited in area but provides shelter for a range of faunal species, particularly in the area south of the house where the sward has been left to grow longer and at the margins with scrub and woodland habitat. Overall, this habitat is considered to be of ecological value **'within the Zone of Influence.'**

Non-native and ornamental hedgerow (h2b)

Ornamental garden hedges are present along the western boundary, part of the southern boundary and create the boundary between the garden in the east of the site and the strip of modified grassland (Figure 2). All these hedges are single species, dense, well managed and trimmed to a uniform height. These hedges all comprise one of the following species: *Escallonia*, *Olearia* or garden privet (*Ligustrum ovalifolium*).

Non-native and ornamental hedgerows within the site provide shelter for a range of faunal species and potential nest sites for birds and are considered to be of ecological value '**within the Zone of Influence**.'

Built up areas and gardens/introduced shrub (u1 847)

Surrounding the house are beds of sub-tropical shrubs and flowers, typical of properties on Tresco (Figure 3). A range of ornamental shrubs, succulents and flowers are present creating a colourful garden with a range of height, texture and microclimates. Species here include occasional to locally frequent *Aganpanthus*, bear's breeches (*Acanthus mollis*), *Echium*, foxglove (*Digitalis purpurea*), aloe (*Aloe arborescens*), canary spurge (*Euphorbia mellifera*), giant herb robert (*Geranium maderense*), New Zealand Flax (*Phormium tenax*), tall Cape honey flower (*Melianthus major*), Rosemary (*Salvia rosmarinus*), New Zealand broadleaf (*Grisellinia littoralis*), tree house leek species (*Aonium spp.*) and Mexican fleabane (*Erigeron karvinskianus*).

Although the majority of the species in the garden are non-native, the shrubs and flowers provide a range of microclimates, foraging habitat and shelter for faunal species. The gardens are considered to be of ecological value '**within the Zone of Influence**.'

Urban, artificial unsealed surface (u1c)

The habitat immediately surrounding the house at Racket Town comprise areas of levelled gravel both east and west of the house (Figure 4). There are also steps and a hardstanding area adjacent to the road just north of the house.

This habitat is considered to be of '**negligible'** ecological value.

Buildings (u1b5)

The house at Racket Town has been described in detail in Section 5.4. The building is devoid of vegetation and is considered to be of **'negligible'** ecological value (Figure 5). The potential of the

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building to support protected species (roosting bats and nesting birds) was assessed; see Section 5.4.

Figure 1: Modified grassland (g4). Mown grassland in foreground, longer sward in background

Figure 2: Non-native and ornamental hedgerow (h2b)

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Figure 3: Built up areas and gardens/introduced shrub (u1 847)

Figure 4: Urban, artificial unsealed surface (u1c)

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Figure 5: Buildings (u1b5)

5.3 Notable Habitats

Other mixed woodland/plantation (w1h 29)

A small area of plantation woodland is present within the site boundary at Racket Town, in the north-east of the site (Figure 6). This woodland comprises a mix of three non-native tree/shrub species. These are Monterey pine (*Pinus radiata*), mature *Olearia* sp. and *Escallonia* sp. Ground flora is largely absent and comprises a carpet of dead pine needles with an occasional scattering of the following species: red campion (*Silene dioica*), agapanthus (*Agapanthus sp.*), navelwort (*Umbilicus rupestris*), montbretia (*Crocosmia x crocosmiiflora*) and three cornered leek (*Allium triquetrum*). This mix of non-native and native trees, shrubs and flowering plants is very typical of Tresco.

Other mixed woodland/mixed plantation provides potential nest sites for birds, foraging habitat for bats, foraging/shelter for invertebrates and the lesser white toothed shrew, and is considered to be of '**Local Value'** for biodiversity. Although this small patch of plantation woodland is limited in its diversity and comprises predominantly introduced species, it forms part of a much more extensive area of woodland north of Racket Town and contributes to the green infrastructure of the island. Furthermore, although non-native, Monterey pine trees are a traditional part of the landscape of Cornwall and the Isles of Scilly.

Dense scrub/introduced shrub (h3 847)

In the south of the site, south of the property and outside the formal gardens, but within the site boundary there is an area of unmanaged dense scrub/introduced shrub habitat (Figure 7). This comprises a mix of ornamental species that have spread from the garden in combination with some native scrub species. Escallonia (*Escallonia* sp.), fuschia (*Fuschia* sp.) and bramble (*Rubus fruiticosus*) are co-dominant with patches of locally dominant sea beet (*Beta vulgaris ssp. maritima*)

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and nettle (*Urtica diocia*). Cleavers (*Galium aparine*) is abundant; hogweed (*Heracleum sphondylium*) is frequent; red campion (*Silene dioica*) is locally frequent; and echium (*Echium sp.*), Yorkshire fog (*Holcus lanatus*) and montbretia (*Crocosmia x crocosmiiflora*) are occasional.

Dense scrub/introduced shrub habitat provides shelter for a range of faunal species and potential nest sites for birds and is considered to be of **'Local Value'** for biodiversity. Although introduced shrub habitat is not usually considered to have a notable ecological value, in the Isles of Scilly the range of ornamental and native plants growing together is unique and typical of the islands, and this mix of species creates an interesting and diverse habitat which can support a range of other faunal species.

Built linear features/hedgebank (u1e 111)

The northern boundary of the property comprises a traditional granite wall which is partially vegetated with a mix of native and non-native species including succulents, grasses, ferns, lichens and flowering plants (Figure 8). Bermuda buttercup (*Oxalis pes-caprae*) is abundant and deltoid leaved dewplant (*Oscularia deltoides*) is locally abundant. Navelwort, ribwort plantain, ivy (*Hedera helix*) and red fescue are frequent and three cornered leek is locally frequent. Occasional species include common polypody (*Polypodium vulgare*), bramble, red campion and wood false brome (*Brachypodium sylvaticum*). Rarely occurring species include broad buckler fern (*Dryopteris dilitata*).

This wall habitat has a rich lichen flora, is a traditional Cornish hedge, granite faced with an earth core. It is sparsely vegetated but is an important landscape feature in Cornwall and the Isles of Scilly, providing habitat for invertebrate species and is considered to be of **'Local Value'** for biodiversity.

Figure 6: Other mixed woodland/plantation (w1h 29)

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Figure 7. Dense scrub/Introduced shrub (h3 847)

Figure 8: Built linear features/hedgebank (u1e 111)

5.4 Notable Species

Notable species and species groups with potential to use the site are described below. Further information about wildlife legislation is provided at Appendix 3.

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Badger

Badger (*Meles meles*) is absent from the Isles of Scilly. The site is considered to be of '**negligible'** importance for badger. The impact of the works on badger is therefore **'negligible.'**

Hedgehog

Hedgehog (*Erinaceus europaeus*) (NERC Section 41 (2006); Schedule 6 WCA (1981) is absent from Tresco. The site is considered to be of **'negligible'** importance for hedgehog. The impact of the works on hedgehog is, therefore, **'negligible.'**

Bats (Roosting)

The ERCCIS desk study revealed records for two bat species within a 1km radius of the site (ERCCIS, 2024). These comprise fifty-three records for common pipistrelle (*Pipistrellus pipistrellus*) and two records for brown long-eared bat (*Plecotus auritus*).

All bat species are European Protected Species (EPS) and protected under the Conservation of Habitats and Species Regulations 2017 (as amended), Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 and Schedule 5 of the WCA 1981 (as amended). Some bat species are also identified as UK BAP priority species and protected under Section 41 of the NERC Act 2006.

In 2020 a preliminary roost assessment and two bat emergence surveys of Racket Town were carried out. During the preliminary roost assessment bat droppings were collected from the roof void. DNA analysis revealed that droppings were deposited by brown long-eared bat (Plan for Ecology, 2020 Ltd). During the emergence surveys a single common pipistrelle bat emerged from the soffit on the south-east projection of the building. The results confirm that in 2020 the building was used by at least one common pipistrelle bat as an occasional day roost, and by at least one brown long-eared bat as a likely occasional day roost (Plan for Ecology, 2020 Ltd).

An update Preliminary Roost Assessment (PRA) was undertaken of Racket Town as part of this ecological assessment. Racket Town was reassessed for its suitability for supporting roosting bats. The visual assessment was made on 28th March 2024. See Figure 9 for the aerial view of Racket Town.

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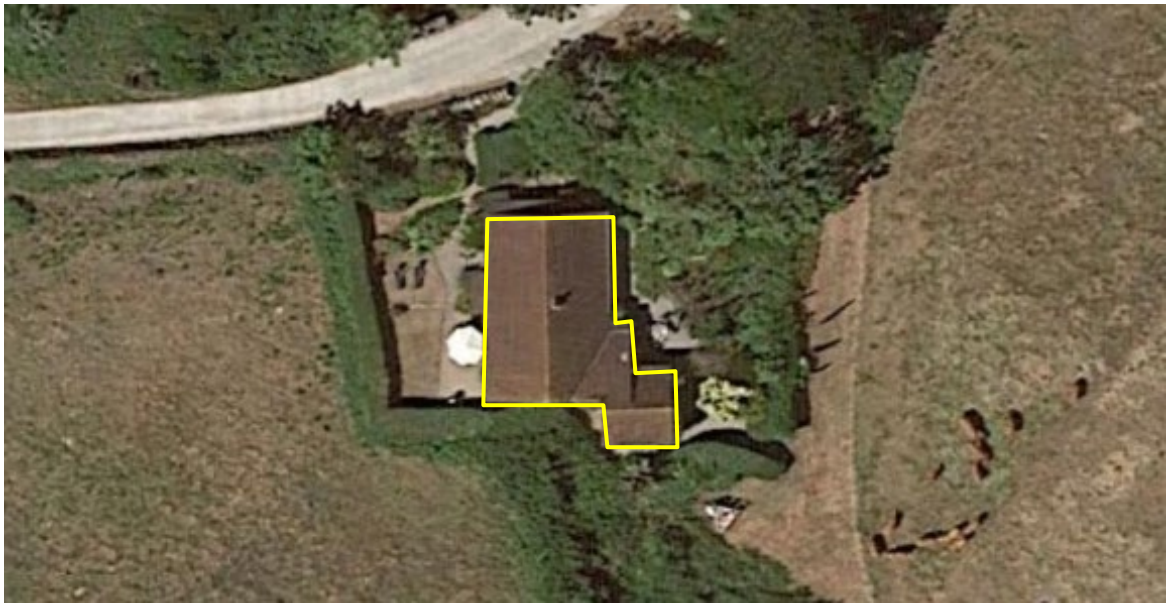

Figure 9: Aerial view of Racket Town (shown by the yellow outline)

Racket Town is a traditional island bungalow with a small porch, orientated north to south and set into the sloping hillside. The roof is pitched with interlocking composite roof tiles and ridge tiles. Guttering is plastic. The original part of the building was constructed from granite, and this can still be seen on the west elevation (Figure 10). The house was extended on its eastern side with a timber framed and boarded extension (Figure 11). All fascia boards and soffits are of timber construction.

There are some small gaps between the timber fascia/soffit and the wall close to the porch that could allow access for bats (Figure 12).

The walls of the south elevation are of timber construction which sit on a double course of concrete blocks. The upper half of the wall comprises timber shiplap (Figure 13). There are some gaps between the timber work on the soffit and fascia board and there is some mortar missing beneath a roof tile (Figures 14 and 15). There is a gap behind the fascia board on the south-west corner (Figure 16).

The gable end of Racket Town is on the north elevation (Figure 17). There is a further small flat roofed timber lean-to on this side of the building which houses the boiler. There is a gap behind the soffit of the gable end which could provide access to bats (Figure 18). There are further gaps behind the timber fascia of the boiler room that could provide access for bats (Figure 19).

Internally, the roof void has a fink truss style timber structure (Figure 20) and is lined with bitumen with rolled insulation between the joists. It is *c.* 1.5m to the apex. The roof is cold and draughty. There are numerous droppings present in the roof void. Many of these are large and likely to be white toothed shrew but a scattering of bat droppings on the rolled insulation were identified from the roof hatch (Figure 21).

As Racket Town still has numerous suitable features for roosting bats and as droppings were observed in the roof void, the building was assessed as being of **'moderate suitability'** for roosting bats and is considered to be a 'confirmed bat roost'.

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Figure 10: West elevation of Racket Town

Figure 11: East elevation of Racket Town

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Figure 12: Gap between timber fascia board and the wall at the porch (yellow arrow)

Figure 13: South elevation of Racket Town

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Figure 14: Gaps between fascia boards and soffit on the south elevation (yellow arrow)

Figure 15: Gap beneath roof tile on the south elevation (yellow arrow)

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Figure 16: Gap behind fascia on the south-west corner of Racket Town (yellow arrow)

Figure 17: North elevation of Racket Town

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Figure 18: Gap behind soffit on the north elevation allowing potential access for bats (yellow arrow)

Figure 19: Gap between timbers allow access into the boiler room on the north elevation (yellow arrow)

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Figure 20: Interior roof structure of Racket Town with fink style roof truss

Figure 21: Droppings in the roof void at Racket Town

Bats (foraging and commuting)

There are fifty-three records for common pipistrelle and two records for brown long-eared bat within a 1km radius of Racket Town (ERCCIS, 2024) and there is evidence that pipistrelle and brown long-eared bat roost in Racket Town (Plan for Ecology Ltd, 2020). It is, therefore, likely that the habitats

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surrounding Racket Town are used for foraging and commuting. The garden habitats, scrub, hedgerows, grassland and woodland all provide potential foraging and commuting habitat for bats.

Racket Town is assessed as being of **'low suitability'** for foraging and commuting bats due to its small size relative to bat species foraging territory.

Lesser white-toothed shrew (Scilly shrew)

The ERCCIS desk study revealed 10 records for lesser white-toothed shrew (*Crocidura suaveolens*) within 1km of Racket Town (ERCCIS, 2024). Lesser white-toothed shrew is listed on the GB Rd List as Near Threatened and included in the Cornwall Red Data Book (RDB). The garden habitats, scrub/introduced shrub and woodland may provide suitable habitat for the lesser white toothed shrew, which feeds on invertebrates, including beetles, worms and sand hoppers.

The site is considered to be of up to '**Local Value'** for lesser white-toothed shrew.

Reptiles

The ERCCIS desk study revealed one record for leather back sea turtle (*Dermochelys coriacea*) (Schedule 5 WCA, 1981; NERC Section 41 (2006) within 1km of Racket Town (ERCCIS, 2024).

There are no other records for reptiles within 1km of the site. The Isles of Scilly has one native introduced reptiles species, slow worm (*Anguis fragilis*) (Schedule 5 WCA, 1981; NERC Section 41 (2006), which is understood to be restricted to the islands of St Mary's and Bryher. Due to the likely absence of terrestrial reptiles on the island of Tresco, the site is considered to be of **'negligible'** Importance for this species group.

Amphibians

There is one record for palmate newt (*Lissotriton helveticus*) within 1km of the site (ERCCIS, 2024) and it is possible that the two other commonly occurring amphibian species: common toad (*Bufo bufo*) and common frog (*Rana temporaria*) (Section 41 NERC Act (2006); Schedule 5 WCA, 1981) are present in the area. Habitats on-site have potential to support these species during their terrestrial life phase; however, the site lacks standing water, a prerequisite for breeding amphibians.

The site is considered to be of value for amphibians **'within the Zone of Influence'.** Demolition of the building and construction of the new extension may have a short-term impact on individual amphibians during the construction phase but is unlikely to have any long-term impacts.

In the absence of mitigation, the nature of the identified impacts on amphibians is considered likely to be **short-term negative impact of likely occurrence, of minor significance within the Zone of Influence.** See section 6.3 for mitigation recommendations.

Birds

Two hundred and seventy bird species of conservation concern have been recorded within a 1km radius of the site (ERCCIS, 2024). Of the species recorded, those with some potential to breed within the site are listed in Table 5 below. The ornamental hedgerows, scrub/introduced shrub, garden/introduced shrub and plantation woodland are likely to be used by nesting birds during the breeding season (March – August/ September). None of the trees have any voids that are suitable for nesting barn owl and the building had no suitable access or nesting places for barn owl. All wild bird species are legally protected whilst nesting under the WCA 1981 (as amended).

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Evidence of nesting birds was found in the flat roofed boiler room on the north elevation of the building. Here two swallow (*Hirundo rustica*) nests were identified (Figure 21).

On site suitable bird nesting habitat include the plantation woodland, dense scrub/introduced shrub habitat, hedgerows, garden/introduced shrub habitat and the building itself.

Table 5: Bird species of conservation concern with potential to breed within the site.

Species Scientific	Species Venacular	International & National Designation	National & Local Status
Phylloscopus sibilatrix	Wood Warbler		England_NERC_S.41, BAP-2007, Bird-Red, Bird_RedList_GB_post2001-VU_Breeding;Cornwall RDB
Troglodytes troglodytes	Wren	Bern-A2	Bird-Amber
Delichon urbicum	House Martin	Bern-A2	Bird-Red, Bird_RedList_GB_post2001-VU_Breeding
Columba palumbus	Woodpigeon	BirdsDir-A2.1	Bird-Amber
Apus apus	Swift		Bird-Red, Bird_RedList_GB_post2001-EN_Breeding
Turdus philomelos	Song Thrush	BirdsDir-A2.2	Bird-Amber
Emberiza citrinella	Yellowhammer	Bern-A2	England_NERC_S.41, BAP-2007, Bird-Red
Cecropis daurica	Red-rumped Swallow	Bern-A2	
Hirundo rustica	Swallow	Bern-A2	
Passer domesticus	House Sparrow		England_NERC_S.41, BAP-2007, Bird-Red
Chloris chloris	Greenfinch	Bern-A2	Bird-Red, Bird_RedList_GB_post2001-EN_Breeding
Linaria cannabina	Linnet	Bern-A2	Bird-Red, Bird_RedList_GB_post2001-NT_Breeding
Prunella modularis	Dunnock	Bern-A2	Bird-Amber
Carduelis carduelis	Goldfinch	Bern-A2	
Anthus cervinus	Red-throated Pipit	Bern-A2	
Pyrrhula pyrrhula	Bullfinch		Bird-Amber
Streptopelia decaocto	Collared Dove	BirdsDir-A2.2	Bird_RedList_GB_post2001-NT_Breeding
Passer montanus	Tree Sparrow		England_NERC_S.41, BAP-2007, Bird-Red, Bird_RedList_GB_post2001-VU_Breeding
Corvus frugilegus	Rook	BirdsDir-A2.2	Bird-Amber, Bird_RedList_GB_post2001-NT_Breeding

Key:

WACA-Sch1_part1	Protected under Schedule 1 of the Wildlife and Countryside Act 1981
RedList_GB_post2001-CR_Breeding	British Red Data List – critically endangered breeding population
RedList_GB_post2001-EN_Breeding	British Red Data List – endangered breeding population
RedList_GB_post2001-NT_Breeding	British Red Data List – near threatened breeding population
RedList_GB_post2001-VU_Breeding	British Red Data List – vulnerable breeding population

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England_NERC_S.41	Protected under Section 41 of the Natural Environment and Rural Communities Act 2006
BAP-2007	Included in the UK Biodiversity Action Plan (2007)
Bird-Red	BTO list of globally threatened species
Bird-Amber	BTO list of species with an unfavourable conservation status in Europe
Cornwall RDB	Cornwall Red Data Book
BirdsDir- A2.1	Birds Directive Annex 2.1 lists birds which may potentially be hunted under national legislation within the geographical land and sea area to which the Directive applies.
Birds Dir – A2.2	Birds Directive Annex 2.2 lists birds which may potentially be hunted under national legislation only within certain specified Member States.
Bern-A2	Berne Convention on the Conservation of European Wildlife and Natural Habitats

Figure 21: Swallow nest in the flat roofed boiler room on the north elevation

The site also provides a small area of foraging habitat for birds year-round, with the hedgerows, scrub and grassland offering a source of berries, fruit and invertebrates. Habitat size and quality indicate that the site is likely to be of value for birds '**within the Zone of Influence'**.

The small extent of habitat change is unlikely to affect local populations, but breeding birds could be disturbed if vegetation clearance and/or partial demolition of the building is carried out during the nesting season (March – August/ September). In the absence of mitigation, the nature of the identified impacts on bird species is considered to be **short-term, negative, of likely occurrence, and of minor significance within the Zone of Influence.** See Section 6.3 below for mitigation measures.

Invertebrates

The ERCCIS desk study revealed records for ninety-three invertebrate species of conservation importance within a 1km radius (ERCCIS, 2024). Species which could potentially be present within the site are listed in Table 6. Most of the species that have previously been recorded are associated

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with the freshwater, marine and coastal habitats within 1km of Racket Town. Some invertebrate species have legal protection under Schedule 5 WCA 1981 and the NERC Act 2006.

Within the site, the hedgerows, trees, scrub/introduced shrub habitat, plantation woodland and modified grassland have potential to support a diversity of invertebrate species. The presence of significant populations of rare species or diverse invertebrate assemblages is unlikely because of the small size of the site, diversity of habitats and sub-optimal habitat quality. The site is considered to be of value for invertebrates **'within the Zone of Influence'**.

Two non-native invasive invertebrates, Australian flatworm (*Australoplana sanguinea*) and Anderson's land planarian (*Kontikia andersoni*) have been recorded locally within 1km of the site (ERCCIS, 2024). These are included on Schedule 9 of the WCA 1981, making it an offence to cause these species to spread in the wild. The flatworm is typically found in cool, dark, damp places e.g., in soil, leaf litter, at the bases of plants, or under logs, stones and other objects, and it could potentially be present within the site. Anderson's land planarian is associated with freshwater and as there are no ponds, lakes, streams or rivers on site; this species is unlikely to be present.

The proposed development will result in the loss and degradation of a small area of garden habitat, ornamental hedges and some scrub/introduced shrub and modified grassland and potential decline in hedgerow and scrub habitats from construction and operational activities. Habitat changes are unlikely to affect local populations. Earthworks could result in the spread of the invasive flatworm which could potentially have long-term impacts. In the absence of mitigation, the nature of the identified impact on invertebrates is considered to be **long-term, negative, of unlikely occurrence, and of minor significance within the Zone of Influence.** See Section 6.2 below for mitigation measures.

Table 6. Invertebrate species conservation concern with potential to be present within the site.

Species Group	Species Scientific	Species Venacular	International & National Designation	National & Local Status
flatworm (Turbellaria)	*Australoplana sanguinea*		WACA Sch 9 Pt 1	
harvestman (Opiliones)	*Nelima gothica*			Cornwall RDB
insect - beetle (Coleoptera)	*Cryptopleurum crenatum*			Notable
insect - beetle (Coleoptera)	*Atomaria scutellaris*			Cornwall RDB
insect - butterfly	*Danaus plexippus*	Monarch	CMS_A2	
insect - cockroach (Dictyoptera)	*Blatta orientalis*	Oriental Cockroach		RedList_GB_post2001-NE
insect - earwig (Dermaptera)	*Forficula lesnei*	Lesne's Earwig		Nationally Scarce; Cornwall RDB
insect - hymenopteran	*Stenamma debile*			Cornwall RDB
insect - hymenopteran	*Bombus rupestris*	Hill Cuckoo Bee		Notable-B;Cornwall RDB
insect - hymenopteran	*Andrena hattorfiana*	Large Scabious Mining Bee		Cornwall RDB
insect - hymenopteran	*Lasius umbratus*			Cornwall RDB
insect - moth	*Nothris congressariella*	Cornish Groundling		Cornwall RDB
insect - moth	*Spilosoma lutea*	Buff Ermine		England_NERC_S.41, BAP-2007

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Species Group	Species Scientific	Species Venacular	International & National Designation	National & Local Status
insect - moth	*Pediasia contaminella*	Waste Grass-veneer		Notable-B
insect - moth	*Oegoconia caradjai*	Straw Obscure		Notable-B
insect - moth	*Scrobipalpa ocellatella*	Beet Moth		Notable
insect - moth	*Agrochola lychnidis*	Beaded Chestnut		England_NERC_S.41, BAP-2007
insect - moth	*Dichomeris alacella*	Lichen Sober		Notable
insect - moth	*Anchoscelis litura*	Brown-spot Pinion		England_NERC_S.41, BAP-2007
insect - moth	*Eudonia lineola*	White-line Grey		Notable-B
insect - moth	*Scopula marginepunctata*	Mullein Wave		England_NERC_S.41, BAP-2007
insect - moth	*Hydraecia micacea*	Rosy Rustic		England_NERC_S.41, BAP-2007
insect - moth	*Acronicta rumicis*	Knot Grass		England_NERC_S.41, BAP-2007
insect - moth	*Dolicharthria punctalis*	Long-legged China-mark		Notable-B
insect - moth	*Xanthorhoe ferrugata*	Dark-barred Twin-spot Carpet		England_NERC_S.41, BAP-2007
insect - moth	*Arctia caja*	Garden Tiger		England_NERC_S.41, BAP-2007
insect - orthopteran	*Conocephalus fuscus*	Long-winged Cone-head		Cornwall RDB
insect - orthopteran	*Platycleis albopunctata*	Grey Bush-cricket		Nationally Scarce; Cornwall RDB
insect - stick insect (Phasmida)	*Clitarchus hookeri*	Smooth Stick-insect		RedList_GB_post2001-NE;Cornwall RDB
insect - stick insect (Phasmida)	*Acanthoxyla prasina subsp. geisovii*	Prickly Stick-insect		RedList_GB_post2001-NE;Cornwall RDB
insect - stick insect (Phasmida)	*Bacillus rossius*	Corsican Stick-insect		RedList_GB_post2001-NE;Cornwall RDB
insect - true fly (Diptera)	*Xanthandrus comtus*			Cornwall RDB
insect - true fly (Diptera)	*Volucella zonaria*	Hornet Hoverfly		Cornwall RDB
spider (Araneae)	*Cryptachaea veruculata*			RedList_GB_post2001-NE
spider (Araneae)	*Pardosa tenuipes*	Tall grass wolf spider		Nationally Scarce

Key:

RedList_GB_post2001-EN_Breeding	British Red Data List – endangered breeding population
RedList_GB_post2001-NT_Breeding	British Red Data List – near threatened breeding population
RedList_GB_post2001-VU_Breeding	British Red Data List – vulnerable breeding population
England_NERC_S.41	Protected under Section 41 of the Natural Environment and Rural Communities Act 2006
BAP-2007	Included in the UK Biodiversity Action Plan (2007)
Cornwall RDB	Cornwall Red Data Book
WACA Sch 9 Pt 1	Listed on Schedule 9, part 1, of the Wildlife and Countryside Act, 1981. Non-native invasive faunal species that may present a threat to native flora and fauna

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Vascular Plants

The desk study found records for sixty-four vascular plant species of conservation importance within a 1km radius of the site. Many of these species typically occur in heathland, acid grassland, wetland and sand dune habitats and are unlikely to be present within the site. It is possible that some species could occur in the grassland, garden, scrub and wall habitats as Racket Town lies in close proximity to habitats of conservation importance and Tresco gardens are unique in their species assemblage, supporting a range of native and non-native species. None of these species, however, were identified during the survey. Those with some potential to occur on site are listed in Table 7.

The mixed scrub/introduced shrub habitat and the modified grassland supported the most diverse range of native plants. The garden itself had the most diverse range of vascular plants but most of these are non-native ornamental plants. No plants of conservation importance were recorded although the survey was conducted in March and additional species are likely to be present in the spring and summer. The site is considered to be of value for vascular plant species '**within the Zone of Influence**'.

Table 7: Vascular plant species of conservation concern recorded within 1km of the site which could potentially occur within the site.

Species Scientific	Species Venacular	National & Local Status
Potentilla erecta	Tormentil	RedList_ENG_post2001-NT,RedList_GB_post2001-LC
Lavatera cretica	Smaller Tree-mallow	Nationally Rare
Calystegia soldanella	Sea Bindweed	RedList_ENG_post2001-VU,RedList_GB_post2001-LC
Allium ampeloprasum	Wild Leek	Nationally Scarce
Cynodon dactylon	Bermuda-grass	Nationally Rare, WL
Mentha suaveolens	Round-leaved Mint	Nationally Scarce, RedList_ENG_post2001-NT,RedList_GB_post2001-DD
Polycarpon tetraphyllum	Four-leaved Allseed	Nationally Rare
Scrophularia scorodonia	Balm-leaved Figwort	Nationally Scarce
Ornithopus pinnatus	Orange Bird's-foot	Nationally Rare
Hyacinthoides non-scripta	Bluebell	
Chenopodium murale	Nettle-leaved Goosefoot	RedList_ENG_post2001-EN,RedList_GB_post2001-EN
Briza minor	Lesser Quaking-grass	Nationally Scarce
Chamaemelum nobile	Chamomile	England_NERC_S.41, BAP-2007, RedList_ENG_post2001-VU,RedList_GB_post2001-VU
Trifolium suffocatum	Suffocated Clover	Nationally Scarce
Glaucium flavum	Yellow Horned-poppy	RedList_ENG_post2001-NT,RedList_GB_post2001-LC
Solidago virgaurea	Goldenrod	RedList_ENG_post2001-NT,RedList_GB_post2001-LC
Lotus subbiflorus	Hairy Bird's-foot-trefoil	Nationally Scarce
Trifolium glomeratum	Clustered Clover	Nationally Scarce
Chenopodium bonus-henricus	Good-King-Henry	RedList_ENG_post2001-VU,RedList_GB_post2001-VU
Anagallis arvensis subsp. foemina	Blue Pimpernel	Nationally Scarce
Viola kitaibeliana	Dwarf Pansy	Nationally Rare, RedList_ENG_post2001-NT,RedList_GB_post2001-NT
Trifolium occidentale	Western Clover	Nationally Scarce

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Species Scientific	Species Venacular	National & Local Status
Calystegia sepium subsp. roseata		Nationally Scarce
Stachys arvensis	Field Woundwort	RedList_ENG_post2001-NT,RedList_GB_post2001-NT
Centunculus minimus	Chaffweed	RedList_ENG_post2001-EN,RedList_GB_post2001-NT
Vicia sativa subsp. sativa	Cultivated Vetch	WL
Medicago polymorpha	Toothed Medick	Nationally Scarce
Jasione montana	Sheep's-bit	RedList_ENG_post2001-VU,RedList_GB_post2001-LC

Key:

RedList_GB_post2001-EN	British Red Data List - endangered species
RedList_GB_post2001-VU	British Red Data List - vulnerable species
RedList_GB_post2001-LC	British Red Data List – species of least concern
RedList_GB_post2001-DD	British Red Data List – data deficient
RedList_ENG_post2001-EN	England Red Data list of endangered species
RedList_ENG_post2001-NT	England Red Data list of near threatened species
RedList_ENG_post2001-VU	England Red Data list of vulnerable species
England_NERC_S.41	Section 41 of the Natural Environment and Rural Communities Act 2006
BAP-2007	Included in the UK Biodiversity Action Plan (2007)
Nationally Scarce	Occurring in 16-100 10 x 10km hectads of the OS national grid
Cornwall RDB	Cornwall Red Data Book
WL	British Red Data List -Waiting list for designation

Invasive Plants

In the UK, a number of non-native invasive plant species are listed on Schedule 9 of the WCA 1981 (as amended) or Schedule 2 of the Invasive Alien Species (Enforcement and Permitting) Order 2019, making it an offence to cause them to spread to the wild. The desk study revealed multiple records for eleven species, listed on these schedules, within a 1km radius of the site (ERCCIS, 2024). Of these species eight have some potential to be present; these are listed in Table 8 below. The remaining three species are freshwater species and as there are no ponds or wetlands within the site, they will not be present.

During the survey two Schedule 9 (WCA, 1981) species were recorded in multiple locations around the garden and in the scrub/introduced shrub habitat. These are montbretia and three cornered garlic (Map 1).

It is possible that other invasive species may be present at a more favourable time of year for botanical recording (April – September).

Table 8. Invasive plant species listed on Schedule 9 WCA 1981 and Schedule 2 IASO 2019 recorded within a 1km radius which could potentially be present within the site.

Species Scientific	Species Venacular	International & National Designation	National & Local Status
Crocosmia pottsii x aurea = C. x crocosmiiflora	Montbretia	WCA Sch 9 Pt 2	
Rhododendron ponticum	Rhodondendron	WCA Sch 9 Pt 2	
Fallopia japonica	Japanese Knotweed	WCA Sch 9 Pt 2	
Allium triquetrum	Three-cornered Garlic	WCA Sch 9 Pt 2	
Disphyma crassifolium	Purple Dewplant	WCA Sch 9 Pt 2	

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Species Scientific	Species Venacular	International & National Designation	National & Local Status
Carpobrotus edulis	Hottentot-fig	WCA Sch 9 Pt 2	
Cotoneaster simonsii	Himalayan Cotoneaster	WCA Sch 9 Pt 2	
Cotoneaster horizontalis	Wall Cotoneaster	WCA Sch 9 Pt 2	

Key:

WCA Sch 9 Pt 2	Wildlife and Countryside Act 1981 – Schedule 9
IASO Sch 2 Pt 2	Invasive Alien Species (Enforcement and Permitting) Order 2019 – Schedule 2

The proposed development will result in the loss and degradation of very minimal areas of ornamental hedgerow, scrub/introduced shrub habitat and some modified grassland from construction and operational activities. These works are likely to affect the diversity and abundance of vascular plants on-site. Site clearance and earthworks have the potential to spread invasive species within the site and off-site which could have long-term ecological impacts on vascular plant diversity and habitat quality.

In the absence of mitigation, the nature of the likely impact of development on vascular plants is considered to be **long-term in duration, of likely occurrence, and of minor significance within the Zone of Influence.** See Section 6.2 below for mitigation measures.

Non-Vascular Plants and Fungi

The ERCCIS desk study revealed records for forty-five species of conservation significance within a 1km radius of the site (ERCCIS, 2024) (Table 9). Most of these species are associated with habitats of higher ecological value, such as heathland, acid grassland and wetland habitats in close proximity to Racket Town and not associated with the site itself.

A detailed survey for non-vascular plants and fungi was outside the scope of the Phase 1 survey. The site lacks those features, such as metalliferous mining waste, ancient woodland and mature trees with potential to support the most diverse assemblages of lower plant species. The boundary wall is rich in lichens and the trees on site have some potential for this species group and the site is considered to be of value for non-vascular plants and fungi '**within the Zone of Influence'.**

Vegetation clearance and increased dust during construction will have an impact on lower plants present. Habitat degradation from operational activities is unlikely to have significant impacts. In the absence of mitigation, the nature of the likely impact on non-vascular plants is considered to be **short-term, negative, of unlikely occurrence, and of minor significance within the Zone of Influence.** See Section 6.2 below for mitigation measures.

Table 9. Non-vascular plants of conservation concern recorded within a 1km radius of the site

Species group	Species Scientific	Species Venacular	International & National Designation	National & Local Status
Fungus	*Clathrus ruber*	Red Cage		Cornwall RDB
Fungus	*Puccinia porri*	Allium Rust		Cornwall RDB
Fungus	*Coprinellus silvaticus*	Woodland Inkcap		Cornwall RDB
Lichen	*Heterodermia japonica*	Coralloid Rosette-Lichen	WACA-Sch8	
Lichen	*Pertusaria monogona*			Nationally Scarce

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Species group	Species Scientific	Species Venacular	International & National Designation	National & Local Status
Lichen	*Pertusaria pluripuncta*			Nationally Rare, RedList_GB_post2001-NT;Cornwall RDB
Lichen	*Teloschistes flavicans*	Golden Hair-Lichen	WACA-Sch8	England_NERC_S.41, BAP-2007, Nationally Scarce, RedList_GB_post2001-VU;Cornwall RDB
Lichen	*Lecidea sarcogynoides*			Nationally Rare, RedList_GB_post2001-VU;Cornwall RDB
Lichen	*Acrocordia macrospora*			Nationally Scarce
Lichen	*Pseudocyphellaria aurata*			England_NERC_S.41, BAP-2007, Nationally Rare, RedList_GB_post2001-CR;Cornwall RDB
Lichen	*Cladonia portentosa*		HabDir-A5	
Lichen	*Heterodermia leucomelos*	Ciliate Strap-Lichen	WACA-Sch8	England_NERC_S.41, BAP-2007, Nationally Rare, RedList_GB_post2001-EN;Cornwall RDB
Lichen	*Bacidia friesiana*			Nationally Scarce
Lichen	*Lobaria pulmonaria*	Lungwort Lichen	WACA-Sch8	
Lichen	*Cladonia firma*			Nationally Scarce
Lichen	*Roccella phycopsis*			Nationally Scarce, RedList_GB_post2001-NT;Cornwall RDB
Lichen	*Gyalecta flotowii*			Nationally Scarce, RedList_GB_post2001-NT;Cornwall RDB
Lichen	*Sarcogyne hypophaea*			Nationally Scarce
Lichen	*Rinodina beccariana*			Nationally Scarce
Lichen	*Ramalina portuensis*			Nationally Scarce
Lichen	*Lecanora argentata*			Nationally Scarce
Lichen	*Cladonia ciliata var. ciliata*		HabDir-A5	
Lichen	*Dirina massiliensis f. massiliensis*			Nationally Scarce, RedList_GB_post2001-NT;Cornwall RDB
Lichen	*Roccella fuciformis*			Nationally Scarce, RedList_GB_post2001-NT;Cornwall RDB
Lichen	*Cladonia ciliata var. tenuis*		HabDir-A5	
Lichen	*Gyalecta jenensis var. macrospora*			Nationally Rare, RedList_GB_post2001-DD;Cornwall RDB
Lichen	*Pertusaria excludens*			Nationally Scarce
liverwort	*Fossombronia maritima*	Sea Frillwort		Cornwall RDB
liverwort	*Telaranea murphyae*	Murphy's Threadwort		Nationally Rare;Cornwall RDB
liverwort	*Lophocolea semiteres*	Southern Crestwort		Cornwall RDB

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Species group	Species Scientific	Species Venacular	International & National Designation	National & Local Status
liverwort	*Sphaerocarpos texanus*	Texas Balloonwort		England_NERC_S.41, BAP-2007;Cornwall RDB
liverwort	*Riccia crystallina*	Blue Crystalwort		Nationally Rare;Cornwall RDB
Moss	*Leucobryum glaucum*	Large White-moss	HabDir-A5	
Moss	*Pogonatum aloides*	Aloe Haircap		Cornwall RDB
Moss	*Campylopus pilifer*	Stiff Swan-neck Moss		Cornwall RDB
Moss	*Tortula viridifolia*	Bristly Pottia		Cornwall RDB
Moss	*Microbryum starckeanum*	Starke's Pottia		Cornwall RDB
Moss	*Calyptrochaeta apiculata*	Southern Hookeria		Nationally Rare
Moss	*Tortula solmsii*	Solms' Screw-moss		Nationally Rare;Cornwall RDB
Moss	*Bryum donianum*	Don's Thread-moss		Cornwall RDB
Moss	*Campylopus pyriformis*	Dwarf Swan-neck Moss		Cornwall RDB
Moss	*Sematophyllum substrumulosum*	Bark Signal-moss		Nationally Rare;Cornwall RDB
Moss	*Fissidens crispus*	Herzog's Pocket-moss		Cornwall RDB
Moss	*Bryum dunense*	Dune Thread-moss		Cornwall RDB
Moss	*Leptophascum leptophyllum*	Vectis-moss		Nationally Rare;Cornwall RDB

Key:

HabDir-A5	EC Habitats Directive 1992 – Annex 5
England_NERC_S.41	Section 41 of the Natural Environment and Rural Communities Act 2006
BAP-2007	Included in the UK Biodiversity Action Plan (2007)
Nationally Scarce	Occurring in 16-100 10 x 10km hectads of the OS national grid
Cornwall RDB	Cornwall Red Data Book

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6.0 Mitigation Recommendations

Recommendations are provided using the Mitigation Hierarchy in accordance with BS42020-2013 (British Standard, 2013) and BS 8683-2021 (British Standard, 2021). The Mitigation Hierarchy seeks to avoid impacts, then to mitigate unavoidable impacts, and, as a last resort, to compensate for residual impacts that remain after implementation of avoidance and mitigation measures. The mitigation measures listed below should be secured through appropriate planning conditions.

6.1 Designated Sites

The proposed development site is considered to be sufficiently distant from designated sites for the proposed constructional activities and subsequent operational use not to impact any sites of nature conservation significance in the wider area.

6.2 Habitats

Habitat losses are summarised in Table 1 in the Non-Technical Summary. Of the habitats within the site, the Other mixed woodland/plantation (w1h 29), Dense scrub/introduced shrub (h3 847) and built linear feature/hedgebank (u1e 111) are considered to be of local ecological value. Mitigation recommendations for habitat loss and disturbance are provided below.

1. **Other mixed woodland/plantation (loss and degradation):** The current proposals retain this habitat. If it becomes necessary to remove any mixed plantation woodland, then the EcIA should be revised to reflect this, and any loss should be mitigated for by incorporating new woodland habitat of equivalent or greater ecological value to avoid an overall net loss.

2. Trees to be retained and protected according to the principles of the BS5837:2012 Trees in relation to design, demolition and construction. A 5m development free buffer separating woodland from the development is required to prevent degradation. The development free buffer must be fenced during the construction period to protect retained plantation woodland from degradation arising from construction.

3. **Dense scrub/introduced shrub habitat:** If the proposals require the removal of the dense scrub/introduced shrub habitat, new beds of mixed ornamental and native shrubs can be incorporated into the proposed landscaping scheme. Some of the modified grassland on the margins of the site could also be left to scrub over to re-create this habitat.

4. **Built linear feature/hedgebank:** Ensure construction activities do not result in degradation or loss of the boundary hedge. Ensure access to the property during the construction phase is from the east side and create a buffer of between 2-5m between the granite hedge and plant and material storage.

6.3 Species

The site proposals have potential to impact bats (roosting, foraging and commuting), breeding birds, amphibian species, lesser white toothed shrew, invertebrates, vascular and non-vascular plants. Impacts on these species/ species groups will be avoided and/or mitigated by following the recommendations detailed below.

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5. **Bats (roosting):** Racket Town is a confirmed bat roost and was reassessed as being of '**moderate suitability'** for supporting roosting bats. Two update bat emergence surveys are required to inform the development works at Racket Town.

6. A preliminary ground level roost assessment (PGLRA) of trees within the site was outside the scope of the assessment but will be required if any trees are to be felled, pruned or lit with artificial light.

7. **Bats (Foraging and commuting):** In accordance with the Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2023) the site is assessed as being of 'low suitability' for foraging and commuting bats. Small-scale habitat loss and disturbance is unlikely to affect local populations, but bat activity could be impacted by artificial lighting once the site is occupied. It is recommended that light levels along the boundary features are kept at <0.5lux during the construction and operational phases of the development to maintain dark foraging and commuting corridors. Further survey for foraging and commuting bats is not required.

8. **Birds:** Habitats within the site have potential to support breeding bird species of conservation significance, notably within woodland, dense scrub/introduced shrub habitat and within/on the exterior of the building. Two swallow nests were observed in the lean-to timber boiler room. Any works to buildings on site should be undertaken outside of the bird nesting season (i.e., between October-February), subject to there being no constraints associated with roosting bats. If building works have to be undertaken during the nesting season, they must be preceded with an inspection for nesting birds (to be undertaken by an ecologist). If an active bird nest is uncovered during works, works within 5m of the nest must stop until nesting activity has ceased. Works are most likely to be delayed between April and July. Replacement swallow nest boxes should be incorporated into the design of the new building.

9. **Lesser white-toothed shrew:** The habitats on site have potential to support the lesser white-toothed shrew. Any loss of 'other mixed woodland/plantation' and 'dense scrub/introduced shrub' habitat should be mitigated for by the planting of an equivalent area of habitat with native trees and shrubs.

10. **Amphibians, invertebrates and non-vascular plants:** Follow mitigation recommendations for habitats (section 6.2).

11. **Invertebrates:** Follow mitigation recommendations for habitats to maintain a range of niches for invertebrates (Section 6.2). Take precautions to avoid the spread of the Schedule 9 WCA 1981 species Australian flatworm and Anderson's land planarian. Prior to site clearance, ensure an ecologist checks for its presence under any leaf litter, and loose soil, rocks and stones within areas to be cleared. If found, this species will be disposed of humanely. An Invasive Species Control Plan is presented at Appendix 5.

12. **Vascular, non-vascular plants and fungi**: Follow recommendations for habitats (Section 6.2).

13. **Invasive plants**: Montbretia and three cornered garlic are present within the site in numerous locations. These species are listed on Schedule 9 WCA (1981) making it an offence to cause them to spread to the wild. There is potential for additional non-native invasive plant species to be present within the site that were not visible during the Phase 1

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survey, due to the sub-optimal time of the survey. An Invasive Species Control Plan is presented at Appendix 3.

14. Invasive species can spread, and new species can colonise the site in the time elapsed between the March 2024 survey and the start of construction. Therefore, a post-planning, preconstruction survey for plant species listed under Schedule 9 WCA 1981 will be required to ensure compliance with wildlife legislation.

6.4 Biodiversity Enhancements

Biodiversity Net Gain (BNG) is an approach to development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand. BNG is described as a measurable target(s) for development projects where impacts on biodiversity are outweighed by the mitigation hierarchy approach to first avoid, and then minimise, impact including through restoration and/ or compensation (Baker *et al.,* 2019).

BNG in England is a mandatory requirement introduced by the Environment Act 2021 and become law on 12th February 2024 for major applications and 2nd April 2024 for eligible minor applications. The Environment Act 2021 requires all eligible developments to achieve a minimum 10% BNG. Habitat losses and gains resulting from development are measured using the Biodiversity Statutory Metric for major applications or the Small Sites Metric for minor applications (Natural England, 2021, 2022, 2023; DEFRA, 2024) to achieve a minimum 10% BNG.

The biodiversity value of the site could potentially be enhanced by successfully implementing the following recommendations:

15. The newly developed building should incorporate bat and/or bird boxes, in addition to any mitigation required to mitigate impact on confirmed bat roosts. One bird box or bat box is recommended; ideally the boxes will be incorporated into the fabric of the building. Suitable products are available at https://www.nhbs.com, https://www.greenandblue.co.uk and https://www.wildcare.co.uk/. As two swallow's nests were identified within the lean-to of the building during the survey, it is recommended that continued access for swallows be maintained. If this is not possible, then artificial nesting bowls should be erected within a covered area (i.e., within a porch, lean-to, garage or shed) to continue providing nesting habitat for swallows. Eco Swallow Nest Bowl https://www.wildcare.co.uk/swallow-nest-bowl.html.

16. Any new residential units should incorporate bee bricks on a sunny aspect of the building and at a height of approximately 1m.

17. Maximise the value of the site for invertebrates, amphibians and lesser white-toothed shrew by providing piles of deadwood or stones and standing water features.

18. Plant native tree and shrub species as opposed to introduced ornamental species within any landscaped parts of the site post-development. There is opportunity to achieve a net gain in trees post-development.

19. There is opportunity to achieve a gain of habitat on-site by incorporating new Cornish hedges topped with native trees and shrubs within the site layout.

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20. The successful eradication of Schedule 9 (WCA, 1981) invasive plant species will enhance the biodiversity value of the site and help to protect semi-natural habitats within the area.

21. The provision of a log pile, within a hedgerow buffer will improve the site for reptiles, amphibians, invertebrates and non-vascular plants.

6.5 Further surveys and assessment

Two update bat emergence surveys are required to support this planning application. These have been commissioned and are scheduled for spring 2024.

Eligible minor developments must demonstrate a 10% BNG. A Biodiversity Metric and BNG report may be required.

6.6 Monitoring

Ecological monitoring of the site post-development may be required to satisfy any planning conditions. Ecological monitoring of the site post-development is likely to be required to ensure that the adopted mitigation measures, including any new habitat creation or bat mitigation, are successfully implemented.

6.7 Habitat Loss/ Gain Summary

A habitat loss/ gain summary balance table is provide within the Non-technical Summary (Table 1). This outlines the baseline statement of predicted change resulting from the proposed development.

7.0 Impact Assessment

Table 10: Assessment of Impact of the proposed development on features of ecological importance before and after mitigation.

Feature	Characterisation of unmitigated impact	Effect without mitigation	Mitigation & Enhancement (Points 1 – 21 Sections 6.0 – 6.4)	Significance of effect of residual impact after mitigation
Other woodland; mixed/plantation (w1h 29)	Degradation and loss of plantation woodland habitat	Trees to be retained and protected according to principles of the BS5837:2012 Trees in relation to design, demolition and construction. If any trees are to be removed an equal or greater number must be planted to avoid an overall net loss of biodiversity	1,2	Neutral – opportunity for enhancement
Dense scrub/introduced shrub (h3 847)	Loss of scrub/introduced shrub mosaic habitat from construction and	New beds of ornamental shrubs and scrub habitat to be incorporated into the proposed	3,18,19	Neutral – opportunity for enhancement

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Feature	Characterisation of unmitigated impact	Effect without mitigation	Mitigation & Enhancement (Points 1 – 21 Sections 6.0 – 6.4)	Significance of effect of residual impact after mitigation
	operational activities.	landscaping scheme		
Built linear feature/hedgebank (u1e 111)	Degradation and loss of Cornish hedge	Ensure construction activities do not impact the boundary hedge. Ensure access to the property during construction is from the east side and avoid storing plant and materials within 5m of the hedge.	4,19	Neutral
Bats (foraging, commuting)	Small loss of foraging habitat but this is unlikely to impact populations. Artificial lighting when the site is operational that could impact foraging and commuting activity.	Light levels to be kept <0.5lux along the boundaries of the site and minimised across the remainder of the site.	7,18,19	Neutral
Bats (roosting)	Potential impact on a known bat roost through construction works.	Two bat emergence surveys are required to be undertaken during the bat active season (May-September) to inform the planning application and potential licencing requirements	5,6,15	Neutral
Birds	Small loss of foraging and nesting habitat but this is unlikely to impact populations. Disturbance to active nests from construction and operational activities.	Trees to be retained and buffered from the development. Any removal or pruning of shrub habitat to be undertaken outside the bird breeding season. Precautionary measures to be implemented to protect individual animals and active nests from harm. Replacement swallows nests to be incorporated into the design of the new building	8,15,18,19	Neutral – opportunity for enhancement

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Feature	Characterisation of unmitigated impact	Effect without mitigation	Mitigation & Enhancement (Points 1 – 21 Sections 6.0 – 6.4)	Significance of effect of residual impact after mitigation
Amphibians	Small loss of habitat but this is unlikely to impact populations. Potential injury during construction.	Follow mitigation for habitats	1 – 4, 21	Neutral – opportunity for enhancement
Invertebrates	Small loss of foraging habitat and shelter but this is unlikely to impact populations.	Follow mitigation for habitats	11,16,18,19,21	Neutral – opportunity for enhancement
Vascular plants	Reduction in plant diversity from habitat loss and degradation. Spread of non-native invasive species.	Follow recommendations for habitats. Habitat enhancements will increase plant diversity. A pre-construction, post-planning walkover survey for invasive plants will be required. Implement the Invasive Species Control Plan given at Appendix 4.	1-4,18-21	Neutral – opportunity for enhancement
Non-vascular plants	Reduction in plant diversity from habitat loss and degradation.	Habitat enhancements will increase plant diversity.	1-4,12,19,21	Neutral – opportunity for enhancement

8.1 Residual Impacts

The residual impact of the proposed development is predicted to have a neutral impact, at a local scale on the ecology of the site, subject to the successful implementation of the mitigation outlined in this report. There is an opportunity to enhance the site and provide biodiversity gains.

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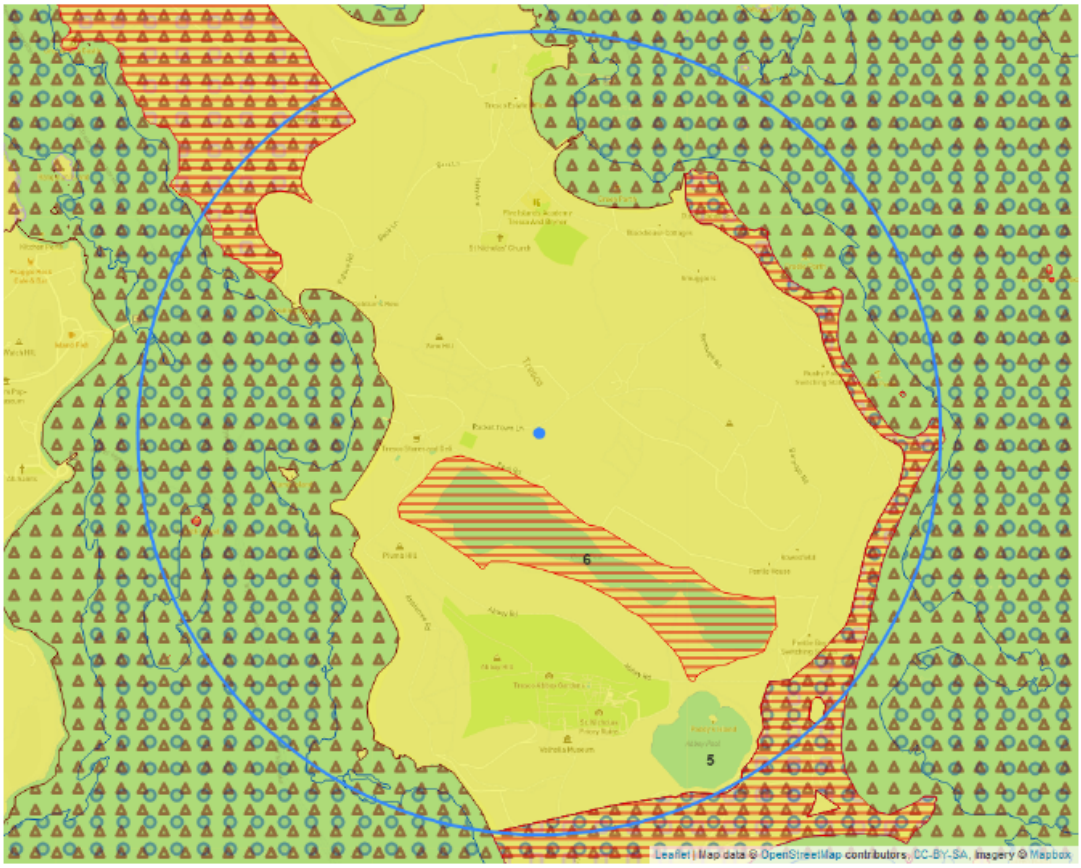
10.0 Appendix 1: Location of Site & Designated Sites

Statutory Sites Map



Location	Site Code	Site Type	Site Name	Colour
1	17	AONB	Isles Of Scilly	
2	UK11033	RAMSAR	Isles of Scilly	
3	UK0013694	SAC	Isles of Scilly Complex	
4	UK9020288	SPA	Isles of Scilly	
5	1000980	SSSI	Pentle Bay, Merrick and Round Islands	
6	1001100	SSSI	Great Pool (Tresco)	
7	1001225	SSSI	Castle Down (Tresco)	

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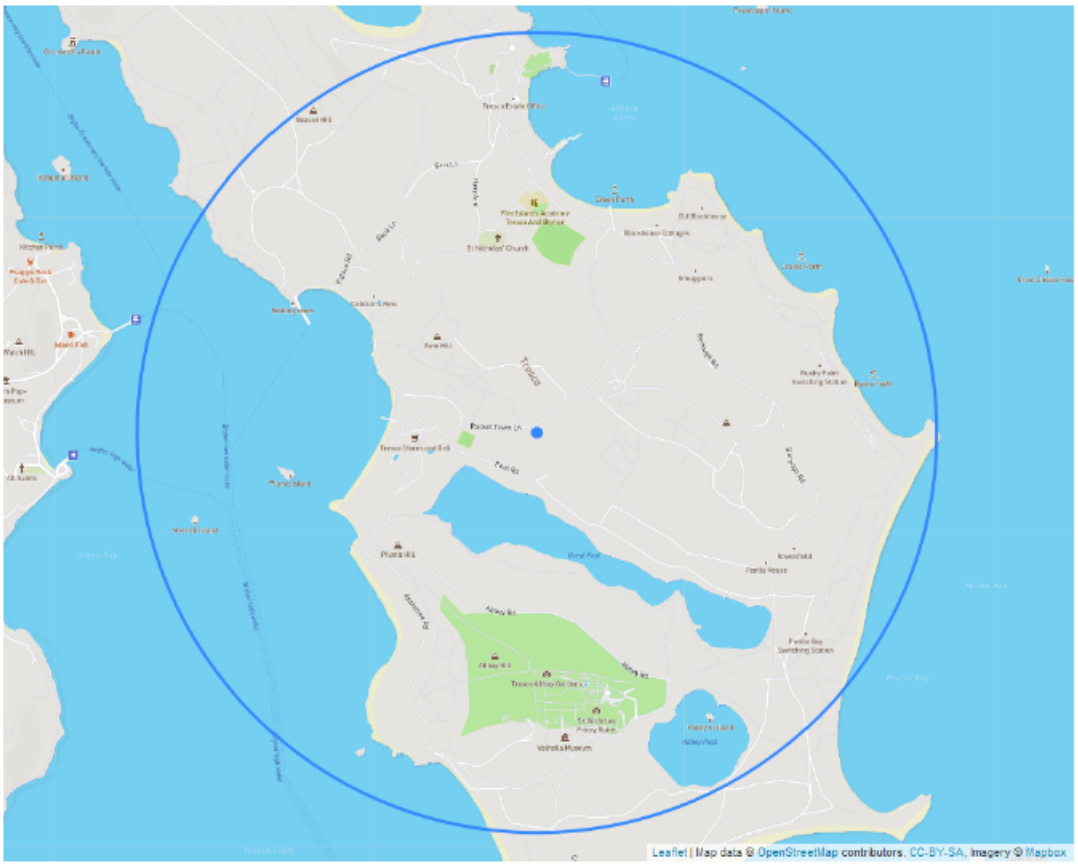
Non-Statutory Sites & Reserves Map



Location	Site Code	Site Type	Site Name	Colour

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11.0 Appendix 2: Legislation and Planning Policy

Protected Habitats, Species and Designated Sites

- **The Conservation of Habitats and Species Regulations (HM Government, 2017) (as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (HM Government, 2019))**, referred to here after as the '**Habitat Regulations**', encompasses Special Areas of Conservation (SACs) and provides additional protection for Special Protected Areas (SPA's), RAMSAR Sites and European Protected Species (EPS). Protection is afforded from direct and indirect impacts, particularly where mobile wildlife populations for which the SAC is designated may be significantly affected. A Habitats Regulations Assessment/Appropriate Assessment must be completed by the competent authority, based on sufficient information provided by the applicant, to meet Regulation 63 of the Habitats Regulations. The Waddenzee judgement ruled that a plan or project may be authorised only if a competent authority has made certain that the plan or project will not adversely affect the integrity of the site. A decision can only be reached "where no reasonable scientific doubt remains as to the absence of such effects". Competent authorities must be "convinced" that there will not be an adverse effect. Where doubt remains as to the absence of adverse effects, the plan or project must not be authorised, subject to the procedure outlined in the Habitats Regulations regarding imperative reasons of overriding public interest.
- **The Countryside and Rights of Way (CRoW) Act (HM Government, 2000, as amended)** The CROW Act places a statutory duty on Statutory Nature Conservation Organisations (SNCO) to have regard to biodiversity conservation and to promote conservation action by others. Section 74 of the Act requires the preparation and maintenance of lists of priority species and habitats. It also places a statutory duty on public bodies to conserve SSSIs and enhance their value, and provides SNCOs with the power to impose Management Schemes on owners of SSSIs. The CROW Act strengthens the legal protection for threatened species with regard to killing, injuring, disturbing or destroying places used for shelter and protection.
- **The Hedgerows Regulations (1997)** The Hedgerow Regulations 1997 were made under Section 97 of the Environment Act 1995 (HM Government, 1995) and took effect on 1 June 1997. They introduced arrangement for local planning authorities (LPAs) to protect important countryside hedgerows through a system of notification. Such hedgerows are frequently valuable because of their historical, ecological and landscape characteristics.

  Under the Hedgerow Regulations 1997, an offence occurs when:

  - A person intentionally or recklessly removes, or causes or permits another person to remove, a hedgerow in contravention of regulation 5(1) or (9); and when
  - A person contravenes or fails to comply with regulation 6(2).
  - A hedgerow is a boundary line of shrubs or trees and is 'important', and protected, under the Hedgerow Regulations 1997 if it meets a specific criterion (see Table 1 and Appendix 1). Cornish hedgerows do not necessarily meet the criteria of the Hedgerow Regulations 1997 but are typically of great historic, landscape and biodiversity value. The Hedge (and wall) Importance Test (HIT), developed by the Guild of Cornish Hedgers, is an alternative measure of value and is required to inform planning decisions impacting hedgerows in Cornwall (Cornwall Council, 2018).
- **The Natural Environment and Rural Communities (NERC) Act (HM Government,**

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2006) bestows a legal duty on public authorities to conserve biodiversity. The Section 40 duty requires Local Authorities to have regard to the purpose of conserving biodiversity. This particularly relates to Section 41 Habitats and Species of Principal Importance (sometimes called 'priority habitats' or 'priority species'.

- **The Protection of Badgers Act (1992)** protects badgers as specified below.
- **The Wildlife and Countryside Act (HM Government 1981, as amended)** encompasses the protection of wildlife (fauna and flora), SSSIs, SPAs, National Nature Reserves (NNRs) and RAMSAR Sites.

Birds: In Britain the nests (whilst in use or being built) and eggs of wild birds are protected against taking, damage and destruction under the Wildlife and Countryside Act 1981 (as amended) (HM Government, 1981).

Some species (i.e. barn owl) are also listed on Schedule 1 of the Wildlife and Countryside Act (HM Government, 1981 as amended); it is an offence to:

- Intentionally capture, injure or kill a Schedule 1 listed species;
- Intentionally or recklessly disturb a Schedule 1 listed species whilst nesting;
- Intentionally or recklessly disturb a dependent young Schedule 1 listed species.

European Protected Species (EPS) (Bat, dormouse, otter, water vole, sand lizard, smooth snake & great crested newt): EPS are listed on Annex IV(a) of the European Communities Habitats Directive.

In Britain protection of EPS is achieved through their inclusion on Schedule 2 of the Conservation and Habitats Regulations 2019 (as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (HM Government, 2019)), Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 12 of the Countryside and Rights of Way Act 2000 (HM Government, 1981, 2000 & 2010).

As a result of this statutory legislation, it is an offence to:

- Deliberately capture, injure or kill an EPS;
- Intentionally or recklessly disturb an EPS in its place of rest/ breeding Site;
- Intentionally or recklessly damage, destroy or obstruct access to a EPS place of rest/ breeding Site (even if the EPS is not occupying the resting / breeding place at the time);
- Possess or sell or exchange an EPS (dead or alive) or part of an EPS.

Reptiles (adder, common lizard, slow worm and grass snake): reptiles are protected under Schedule 5 (section 9(1) and 9(5)) of the Wildlife and Countryside Act 1981 (as amended). This legislation makes it an offence to kill and/ or injure reptiles, and sell or transport for the purpose of sale. Sand lizard and smooth snake are also EPS (see above legal protection of EPS).

Invasive plants: The WCA 1981 states that if any person plants or otherwise causes to grow in the wild any plant which is included in Part II of Schedule 9, he shall be guilty of an offence. Anyone convicted of an offence under Section 14 of the WCA 1981 may face a fine of £5,000 and/or 6 months imprisonment, or 2 years and/or unlimited fine or indictment. The following legislation is relevant to invasive plants:

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Schedule 2 of the Invasive Alien Species (Enforcement and Permitting) Order 2019: This regulation places restrictions on a list of species known as 'species of Union concern'. The new regulations make it an offence to keep, breed or release these animals and as a result, and revoke licences that RSPCA and others hold in England to rehabilitate some species. The transport of these animals is also prohibited under the new regulation.

Control of Pesticides Regulations (CoPR) 1986: CoPR 1986 require any person who uses a pesticide to take all reasonable precautions to protect the health of human beings, creatures and plants, safeguard the environment and in particular avoid the pollution of water. For application of pesticides in or near water, approval from the Environment Agency should be sought before use.

Environmental Protection Act 1990 (EPA 1990): EPA 1990 contains a number of legal provisions concerning 'controlled waste', which is set out in Part II. Material containing the propagules of species listed on Schedule 9 is classified as controlled waste and must be safely disposed of at an appropriately licensed landfill site in accordance with the Environmental Protection Act 1990 (Duty of Care) Regulations 1991. Section 33 (1a) and (1b) create offences to do with the deposit, treating, keeping or disposing of controlled waste without a license. Exemptions from licensing are available in some circumstances, and are set out in Schedule 3 to the Waste Management Licensing Regulations 1994 as amended, which makes it an offence to keep, treat or dispose of controlled waste in a manner likely to cause pollution of the environment or harm to human health. Anyone convicted is subject to a maximum fine of £20,000 and/or 6 months imprisonment and if prosecuted under the Crown court, this escalates to an unlimited fine and/or a maximum of two years imprisonment. Section 34 places duties on any person who imports, produces, carries, keeps, treats or disposes of controlled waste. Waste must be handled responsibly and in accordance with the law at all stages between its production and final recovery or disposal. Waste must be transferred to an authorized person i.e. either a registered carrier or exempted from registration by the Controlled Waste (Registration of Carriers and Seizure of Vehicle Regulations 1991). A waste transfer note must be completed and signed giving a written description of the waste, which is sufficient to enable the receiver of the waste to handle it in accordance with his or her own duty of care. The provisions concerning waste transfer notes are set out in the Environmental Protection (Duty of Care) Regulations 1991(as amended). Failure to comply with these provisions is an offence, with a penalty of a fine not exceeding £5000 up to an unlimited fine in Crown court.

Hazardous Waste Regulations 2005 (HWR 2005): HWR 2005 contains provisions about the handling and movement of hazardous waste. Consignment notes must be completed when any hazardous waste is transferred, which include details about the hazardous properties and any special handling requirements. If a consignment note is completed, a waste transfer note is not necessary. Material containing knotweed that has been treated with herbicide may be classified as hazardous waste.

Waste Management Licensing Regulations (WMLR 1994): WMLR state that failure to use a licensed operative could leave you liable to prosecution. The 'waste relevant objectives' are described in paragraph 4 of Schedule 4. These objectives require that waste is recovered or disposed of "without endangering human health and without using processes or methods which could harm the environment and in particular without risk to water, air, soil, plants or animals; or causing nuisance through noise or odours; or diversely affecting the countryside or places of special interest".

Statutory Designated Sites

Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) are of International nature conservation importance.

Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs) are of National importance. Development proposals with potential to affect a SAC, SSSI or NNR require permission from Natural England.

Local Nature Reserves (LNRs) are protected from development; the Local authority is responsible for LNRs.

Non-Statutory Designations

Non-statutory Sites include **County Wildlife Sites (CWS)**, **Site of Nature Conservation Interest (SNCI), Site of Importance for Nature Conservation (SINC), County Geology Sites (CGS)**, **Roadside Verge Audit Biological Sites** and **Ancient Woodlands**. CWSs, SNCI, SINC and CGSs are of at least county importance for wildlife/geology; all are given increased protection through the planning process.

Biodiversity Action Plans (BAPs): BAPs distinguish National and County level priority habitats and species for conservation. The list of habitats and species of principal importance under Section 41 NERC Act (2006) in England includes 56 habitats and 943 species first identified as priority habitats and species. The Local Authority has a duty to conserve habitats and species of principal importance; these habitats and species were previously identified as UK BAP priority habitats and species under Section 74 of the CRoW Act (2000).

Red Data Books & Lists: detail the status of species in relation to threat.

Planning Context

The local planning authority has a statutory obligation to consider impacts upon protected species resulting from development. Paragraph 99 ODPM Circular 06/2005 states: '*It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted. However, bearing in mind the delay and cost that may be involved, developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by the development. Where this is the case, the survey should be completed and any necessary measures to protect the species should be in place, through conditions and/or planning obligations, before the permission is granted*'.

National Policy: The National Planning Policy Framework (NPPF) was revised on 20 July 2021 and sets out the government's planning policies for England and how these are expected to be applied. This revised Framework replaces the previous National Planning Policy Framework published in March 2012, revised in July 2018 and updated in February 2019.

Chapter 15 of the NPPF (2021) 'conserving and enhancing the natural environment' sets out how the planning system should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

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b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Of note are the following paragraphs:

NPPF Paragraph 175 states that 'Plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries'.

NPPF Paragraph 179 states that 'To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. English National Parks and the Broads: UK Government Vision and Circular 2010 provides further guidance and information about their statutory purposes, management and other matters. For the purposes of paragraphs 176 and 177, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined. Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system. Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to specify the types of development that may be suitable within them'.

NPPF Paragraph 180 states that 'When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it

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of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest; c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate'.

NPPF Paragraph 181 states that 'The following should be given the same protection as habitats sites: a) potential Special Protection Areas and possible Special Areas of Conservation; b) listed or proposed Ramsar sites; and c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites'.

NPPF Paragraph 182 states that 'The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site'.

Local Policy

See https://www.scilly.gov.uk/sites/default/files/document/planning/Adopted%20Local%20Plan%202015-2030%20Website%20Version.pdf for policies relevant to the environment and biodiversity.

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12.0 Appendix 3: Invasive Species Control Plan

Control and eradication of species listed in Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) is required to prevent these species spreading to the wild and to prevent a legal offence being committed. Invasive plant species can be controlled by manual/ mechanical removal and/ or chemical treatment. Before embarking on the recommended control measures detailed below, the following recommendations should be observed and adhered to:

- Cordon off land within at least 7m of confirmed invasive plant stands by installing Heras fencing/ high visibility protective fencing and prevent vehicle movement, excavation works and disposal of landfill in this area. Invasive plant control must be implemented prior to construction according to the recommendations for each individual species provided below.
- Herbicides use within 5m of a watercourse has the potential to impact upon the water quality. In England, the Environment Agency requires a WQM1 notification to be submitted two weeks prior to the treatment. NB: The recommended control methods below do not appear to require herbicide usage within 5m of a watercourse. Only use approved herbicides https://www.hse.gov.uk/pesticides/ and carry out a COSHH Assessment prior to use.
- It is recommended that a fully qualified weed contracting company be employed to undertake this work; alternatively, the site owners/ applicant can carry out this work provided that the recommendations detailed in this report are followed.
- Always wear Personal Protective Clothing (PPE) in accordance with the herbicide instructions.
- Only use the herbicide in accordance with the manufacturer's instructions.
- On-site burning or burial may be required to dispose of the invasive plant material, though disposal at a registered landfill site is recommended. To undertake burning or burial operations, it is important to get permission from the Environment Agency and the local council.

Montbretia

- Plants should be removed by mechanical excavation to remove underground (corms/bulbs or root mass) and aerial parts of the plant; it is important that all parts of the plant material including the underground corms/ roots are removed. Plants in areas unsuitable for mechanical excavation, such as on hedgebanks, can be removed by hand digging to remove both the underground and aerial parts of the plant; corms/ bulbs should be crushed (achieved using a garden roller) and dried, then burnt on-site or preferably disposed of as controlled waste (latter recommended). NB. if waste invasive plant material is to be burnt on-site, the Environment Agency and the local council must be informed at least one week in advance, and a registered waste exemption or environmental permit will likely be required.
- All soils with potential to support montbretia and to be taken off-site must be disposed of at a registered landfill. Material containing the propagules of species listed on Schedule 9 is classified as controlled waste and must be safely disposed of at an appropriately licensed landfill site in accordance with the Environmental Protection Act 1990 (Duty of Care) Regulations 1991.
- It may be difficult to remove all of the underground corms/ roots resulting in some new growth later in the season; new growth should be treated with an appropriate Glyphosate

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herbicide (e.g., Roundup ProBiactive) by wiping/ targeted spraying of the leaves. Herbicide treatment should be carried out during the active growing season as outlined below; repeat treatments will likely be required. These species will be most conspicuous in July/August when in flower but are more likely to be concealed by dense vegetation in late summer. July is a good time of year to eradicate this species. Montbretia dies back in winter and remains quiescent (viable but not visible) below ground level.

- For further information see https://www.gov.uk/guidance/prevent-the-spread-of-harmful-invasive-and-non-native-plants.

Three cornered garlic

- Ideally, cut the plant back to ground level before seeding i.e. at the latest by mid-April and maintain it at this level before and during construction to prevent seeding. If there are no seeds, the cut material can be composted. If there are seeds, dry the material for 2 / 3 weeks and then compost. If the soil is to be moved as part of the proposed works, the three cornered leek bulbs, stems and leaves must be removed and disposed of to ensure the plant cannot spread to other sites.

Australian flatworm

Although not recorded on-site, this small invertebrate could be present under stones and logs. Therefore, precautionary measures will be taken prior to site clearance. Any logs and stones present within the area to be cleared will be checked by an ecologist for the presence of Australian flatworm and any found will be disposed of humanely.

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PLAN FOR ECOLOGY

Bat Survey Report

Site: Racket Town, Tresco, Isles of Scilly

Grid Reference: SV 89286 14924

12th July 2024

CIEEM REGISTERED PRACTICE 2024-2025

Plan for Ecology Ltd
Tremough Innovation Centre
Tremough Campus, Penryn, Cornwall, TR10 9TA
Tel: 01326 218839
www.planforecology.co.uk

Document Control:

Site Name:	Racket Town, Tresco, Isles of Scilly
OS Grid Reference:	SV 89286 14924
Report Author:	Naomi Scala BSc (Hons) MSc ACIEEM
Document Approved by:	Lucy Wright BSC (Hons) MSC PhD MCIEEM; bat licence no. 2024-11908-CL18-BAT (Level 2)
Client:	Tresco Estate
Report Reference Number:	P4E3397
Version:	01
Date:	12th July 2024

Declaration:

"The information, evidence and advice, which we have prepared and provided is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology & Environmental Management's (CIEEM) Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions."

Naomi Scala	[redacted]
Lucy Wright	

Report Lifespan:

Ecological features can change over time, particularly if site management/ use changes. At the time of writing, Cornwall Council considers Bat Survey Reports to be valid for 12 months (until June 2025), unless stated otherwise. Plan for Ecology Ltd considers phase 2 bat surveys to be valid for 24 months for planning purposes (until June 2026).

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1.0 Summary

Bat evidence?	Two common pipistrelle bat (*Pipistrellus pipistrellus*) day roosts (comprising five individuals and one individual respectively) confirmed during the emergence surveys;; and one brown long-eared bat (*Plecotus auritus*) occasional day roost (at least one individual) confirmed through DNA analysis of droppings.
Proposed works?	Partial demolition, refurbishment and extension of existing property.
Bat specific mitigation:	Works will not commence until an appropriate licence has been obtained from Natural England. The licence cannot be obtained until planning consent is in place. The named ecologist or an accredited agent must deliver an on-site toolbox talk to the contractors immediately prior to commencement of works. Works with potential to impact bats will be carried out under an ecological watching brief and scheduled for a time of year when bats are least likely to be negatively impacted. Two temporary Large Multi Chamber Woodstone bat boxes (or comparable product) will be installed onto a nearby tree to accommodate any bats uncovered during works. The existing common pipistrelle day roost located between roof/ridge tiles and the bitumen membrane at the southern gable end should be retained or re-created post-development. The access point should be protected, or re-instated post-development through installation of a bat slate slate and/or raised ridge tile in this location (over bitumen type 1F). The identified common pipistrelle day roost within the south-eastern projection will be lost to allow for the development. Loss of the roost site will be compensated by either a). spacing off of the fascia board on the new south-east wing by 25mm to create a gap behind for bats to roost within; or b). installation of a single Schwegler Bat Access panel with back plate within the fabric of the building. post-development. The brown long-eared bat day roost within the roof void should be retained, if possible, and alternative suitable access points incorporated with corresponding gaps in the bat safe membrane (bitumen type 1F) to allow the bats access to the void space. Alternatively, compensate loss by installing a bat box within the fabric of the modified building. Where bats can make contact with the roof membrane, this **must** comprise **bitumen type 1F** or a non-bitumen coated roofing membrane (NBCRM)

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	with a test certificate approved by Natural England. This is because modern synthetic membranes are harmful to bats and their use will not be permitted by Natural England. No exterior lighting will be installed close to the temporary and permanent replacement bat roosting features or access points.

2.0 Introduction

2.1 Background

Diana Mompoloki, on behalf of Tresco Estate, commissioned Plan for Ecology Ltd to undertake a Preliminary Bat and Bird Assessment (sometimes referred to as a Bat and Barn Owl Assessment) of Racket Town, Tresco, Isles of Scilly (OS Grid Ref: SV 8928 1492) in March 2020. The client proposes to refurbish and extend the property, including partial demolition of the existing building (south-east projection). Proposed site plans are provided at Appendix 1. Evidence of roosting bats in the form of bat droppings was found within the roof void. In addition, a number of external features with potential to support crevice dwelling bats were noted (Plan for Ecology Ltd, 2020a). Racket Town was assessed as being of 'moderate suitability' for roosting bats and further bat surveys were recommended. In accordance with the 'Bat Surveys for Professional Ecologists: Good Practice Guidelines' (Collins, 2016), the recommended further survey work comprised a minimum of two bat emergence or re-entry surveys during the bat active season (May to September inclusive), a static detector survey and DNA analysis of droppings. In May 2020 Diana Mompoloki, on behalf of Tresco Estate, commissioned Plan for Ecology Ltd to undertake the further survey work, the results of which are presented in the Bat Survey Report (Plan for Ecology Ltd, 2020b). For completeness, the results of the 2020 bat surveys are also summarised within this report. In 2024, Tresco Estate commissioned Plan for Ecology Ltd to update the bat survey work. A Preliminary Roost Assessment of the building was undertaken on 28th March 2024 (Plan for Ecology, 2024) and bat emergence surveys were undertaken on 22nd May and 20th June 2024. The results of these surveys are presented within this report.

This report describes and evaluates the use of the buildings by bats, and details mitigation recommendations to minimise impacts upon bats in accordance the 'Bat Surveys for Professional Ecologists - Good Practice Guidelines' produced by the Bat Conservation Trust (Collins, 2016; 2023) and UK Bat Mitigation Guidelines (Reason and Wray, 2023).

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2.2 Project Administration

Property Address:	Racket Town, Tresco, Isles of Scilly
OS Grid Reference:	SV 8928 1492
Client:	Tresco Estate
Planning Authority:	Council of the Isles of Scilly
Planning Reference Number:	Unknown
Report Reference Number:	P4E3397
Proposed work:	Partial demolition (south-east projection), refurbishment and extension of the property.
Visual Assessment Dates:	11th March and 25th June 2020 28th March 2024
Emergence Survey Dates:	11th and 25th June 2020 22nd May and 20th June 2024
Static Detector Survey Dates:	11th – 15th June 2020
Ecologists & Licence Number:	Naomi Scala BSc (Hons) MSc ACIEEM; Bat licence No. 2018-34120-CLS-CLS Caroline Davey BSc (Hons) MSc ACIEEM; bat licence no: 2022-10817-CL18-BAT; CL29/00037 (barn owl) held by Kim Jelbert BSc (Hons) MSc PhD MCIEEM (Registered Consultant RC224) Lucy Wright BSc (Hons) MSc PhD MCIEEM; bat licence no. 2024-11908-CL18-BAT Chloe Balmer MSci (Hons) ACIEEM; bat licence No: 2020-47040-CLS-CLS; Barn Owl licence No. 2022-10943-CL29-OWL. Holly Thomas FdSc Qualifying CIEEM member Katherine Biggs BSc (Hons) MSc ACIEEM: Bat licence No. 2016-22188-CLS-CLS

2.3 Legislation & Planning Policy

Planning: The local planning authority has a statutory obligation to consider impacts upon protected species resulting from development. Planning permission will not be granted with outstanding ecological surveys, and if applicable an appropriate mitigation plan.

Bats: In Britain protection of European Protected Species (EPS) such as bats is achieved through their inclusion on Schedule 2 of the Conservation and Habitats Regulations 2017 (as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (HM Government, 2019)), Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 12 of the Countryside and Rights of Way Act 2000 (HM Government, 1981, 2000, 2017, 2019).

As a result of this statutory legislation, it is an offence to:

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- Deliberately capture, injure or kill a bat;
- Intentionally or recklessly disturb a bat/s in its roost;
- Intentionally or recklessly damage, destroy or obstruct access to a bat roost (even if bats are not occupying the roost at the time);
- Possess or sell or exchange a bat (dead or alive) or part of a bat.

Works with potential to cause significant disturbance to roosting bats may require a European Protected Species (EPSL) licence, Bat Mitigation Class Licence (CL21) or Bat Earned Recognition Class Licence (WML-CL47) from Natural England before works can legally commence. Works likely to result in less significant disturbance may be carried out under a Bat Mitigation Method Statement. The magnitude of disturbance and, therefore, the requirement for an EPSL, Bat Mitigation Class Licence, Bat Earned Recognition Class Licence or method statement is assessed on a case-by-case basis by the bat ecologist. The Bat Mitigation Method Statement or appropriate licence application must be prepared and/or applied for by a suitably experienced and licenced bat ecologist. Where planning permission is required, the appropriate licence cannot be obtained until planning permission has been granted.

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3.0 Methodology

3.1 Summary Visual Assessment

A visual assessment of Racket Town was undertaken on 11th March 2020. A further visual inspection of the roof void was undertaken when collecting the static detector on 25th June 2020. An updated visual assessment was undertaken on 28th March 2024. The ecologists (Naomi Scala, Katherine Biggs and Caroline Davey respectively) assessed the suitability of the building and the surrounding habitat to support bats. A high-power torch was used to illuminate all accessible areas of the building with potential to support roosting bats. The ecologists searched for signs of bats including droppings, fur oil staining, urine staining, feeding remains, audible squeaking, bat-fly (Nycteribiid) pupal cases and odour.

The 2020 assessment was carried out in accordance with the 'Bat Survey for Professional Ecologists - Good Practice Guidelines' produced by the Bat Conservation Trust (Collins, 2016). Potential/ confirmed bat roosts identified during the visual inspections of the buildings were categorised as to their suitability in accordance with the 2016 guidelines (Collins, 2016) as described below:

Negligible: negligible features with potential to support roosting bats.

Low: one or more features with potential to support individual bats on an occasional basis. Unlikely to support large numbers of bats.

Moderate: one or more features with potential to support roosting bats but unlikely to be of high conservation status.

High: one or more features with potential to support large numbers of bats on a regular basis.

The update Preliminary Roost Assessment (PRA) undertaken in 2024 was carried out in accordance with the 'Bat Surveys for Professional Ecologists - Good Practice Guidelines' produced by the Bat Conservation Trust (Collins, 2023) (Table 1).

Table 1: Categorisation of bat roost suitability in accordance with the Bat Conservation Trust's (BCT) Good Practice Guidelines (Collins, 2023).

Suitability Category	Description
None	No habitat features on site likely to be used by roosting bats at any time of year.
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more features with potential to support individual bats opportunistically at any time of year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.

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Suitability Category	Description
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts such as maternity or classic hibernation roosts.

The desk study is a search of records of granted bat European Protected Species (EPS) licences within a 2km radius of the site shown on Natural England's MAGIC website https://magic.defra.gov.uk/.

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3.2 Roost Characterisation / Emergence Surveys

Bat emergence surveys of the building were undertaken on 11th and 25th June 2020, and updated on 22nd May and 20th June 2024; the survey dates, surveyors present, and the equipment used on each survey occasion are detailed in Table 2 below. An emergence survey involves an ecologist(s) counting the number of bats emerging from the building at dusk for a period of at least 1.75 hrs (or until low light levels prevent observation of emerging bats). The surveyor(s) record the calls of any bats that emerge using a bat detector and recording equipment; this enables identification of the species present and the location of bat access points.

The various types of bat detector use different methods of detecting; the Echo Metre Touch 2 and Elekon Batscanner Stereo detectors use heterodyne and real-time expansion; and the Elekon Batlogger M2 uses heterodyne, real-time expansion and frequency division. These methods of detection are described below:

- Frequency division: this method automatically and continuously records bat calls at all frequencies, and makes them audible to the human ear by dividing the call frequency by 10. Calls are played in real time and can be readily identified with sound analysis.
- Heterodyne: this method identifies bat calls echolocating at the frequency set by the operator but will fail to/ or only partially record bat calls outside this frequency.
- A real-time expansion bat detector digitally records ultrasonic bat calls and then plays them back at a slower rate and frequency to give an audible output.

In addition to surveyor observation and handheld bat detectors, on 22nd May and 20th June 2024, all surveyors used video recording equipment and infrared lamps in accordance with the interim guidance note on the use of night vision aids (BCT, 2022) and 'Bat Survey for Professional Ecologists - Good Practice Guidelines' produced by the Bat Conservation Trust (Collins, 2023). The Nightfox Whisker cameras are widely and successfully used to record bats emerging from buildings. The field of view at the start and end of the survey are shown in the images at Appendix 2.

Table 2: Racket Town - emergence survey metadata

Emergence survey date	Surveyors	Equipment	Sunset time	Start and end times
11th June 2020	Lucy Wright Chloe Balmer	EMT2 EMT2	21:34	21:19 – 22:34
25th June 2020	Lucy Wright	EMT2	21:38	21:33 – 22:53

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Emergence survey date	Surveyors	Equipment	Sunset time	Start and end times
	Chloe Balmer Katherine Biggs	EMT2 EMT2 & Elekon Batscanner Stereo		
22nd May 2024	Chloe Balmer	EMT2; Nightfox Whisker Camera & XB5 Pro Infrared Torch	21:15	21:00 – 22:45
	Lucy Wright	EMT2; Nightfox Whisker Camera & XB5 Pro Infrared Torch		
	Unmanned camera	Anabat Express; Nightfox Whisker Camera & XB5 Pro Infrared Torch		
20th June 2024	Naomi Scala	EMT2; Nightfox Whisker Camera & XB5 Pro Infrared Torch	21:38	21:23 – 23:08
	Holly Thomas	Batlogger M2; Nightfox Whisker Camera & XB5 Pro Infrared Torch		
	Unmanned camera	Anabat Chorus; Nightfox Whisker Camera & XB5 Pro Infrared Torch		

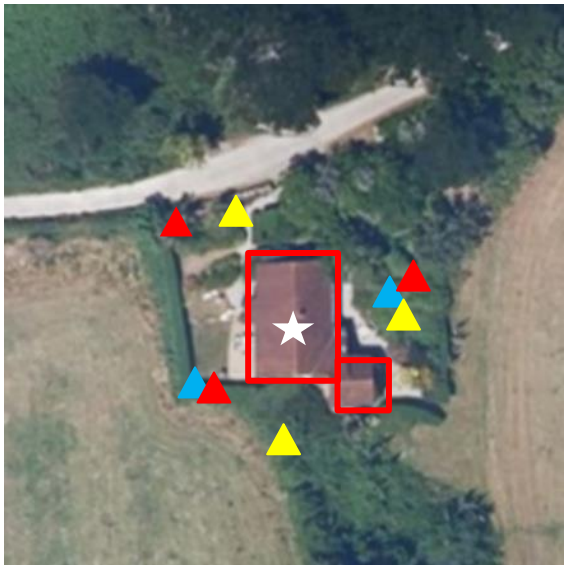

Figure 1: Emergence surveys – surveyor & camera locations. Racket Town is outlined in red. Blue triangles show surveyor locations on the first 2020 emergence survey, yellow triangles show surveyor locations on the second 2020 emergence survey. Red triangles show surveyor and/or camera locations on both the 2024 emergence surveys. The white star shows the location of the static detector within the roof void.

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3.3 Static Detector Survey

To provide more detailed information about bat activity, a static detector survey was carried out of the interior void of the building between the nights of 11th and 15th June 2020. A static bat detector (Anabat Express) was installed in the interior of the roof void (Fig. 1; white star). The detector was set to record continuously overnight (30 minutes prior to sunset until 30 minutes after sunrise) for a total of 5 nights (Table 5). The Anabat Express uses the frequency division method of detecting as described in Section 3.2 above.

3.4 DNA analysis

A sample of bat droppings was collected from the roof void of Racket Town just prior to the start of the second emergence survey on 25th June 2020. The sample was sent for DNA analysis to provide further information on the bat species present. DNA analysis was carried out by SureScreen Scientifics Ltd, Derbyshire, U.K.

3.5 Ecological Evaluation

The value of the buildings for roosting bats is determined following the framework provided by Reason and Wray (2023). This framework determines the appropriate value of a roost on a geographic scale, based on the relative rarity of the bat species using the site (based on the known distribution and population size in the U.K. and within the region in which the roost is located), as well as the type of roost (based on the results of the emergence/ re-entry and static detector surveys (where applicable)). Where more than one bat species is present within the site, each species is valued individually, and the highest value obtained is assigned to the site.

Table 3 (below) categorizes bat species by their distribution and rarity in England. Table 4 (below) assigns a value for each roost type for the different rarity categories (Tables 3 and 4 are adapted from Reason and Wray 2023).

Table 3: Relative rarity of bat species in England (adapted from Reason and Wray 2023)

Rarity (within range)	**Region**
	Southwest England & South Wales
Widespread	Common pipistrelle (*Pipistrellus pipistrellus*) Soprano pipistrelle (*Pipistrellus pygmaeus)* Brown long-eared (*Plecotus auritus*)
Widespread in many geographies, but not as abundant in all	Whiskered (*Myotis mystacinus)* Brandt's (*Myotis brandtii)* Daubenton's (*Myotis daubentonii)* Natterer's (*Myotis nattereri)* Noctule (*Nyctalus noctula)*
Rarer or restricted distribution	Lesser horseshoe (*Rhinolophus hipposideros)* Leisler's (*Nyctalus leisleri)* Nathusius' pipistrelle (*Pipistrellus nathusii)* Serotine (*Eptesicus serotinus)*
Rarest Annex II species and very rare	Greater horseshoe (*Rhinolophus ferrumequinum)* Bechstein's (*Myotis bechsteinii)* Barbastelle (*Barbastella barbastellus)* Grey long-eared (*Plecotus austriacus)*

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Table 4: Value of bat roosts (adapted from Reason and Wray, 2023)

Conservation status/ distribution	**Feeding perches; night-roosts; individual or very small occasional/ transitional/ opportunistic roosts**	**Non-breeding day roosts (small numbers of species)**	**Mating sites (excluding individual trees and larger swarming sites); small numbers of hibernating bats)**	**Larger transitional Roosts**	**Hibernation sites**	**Autumn swarming sites (largely, vesper species which hibernate underground)**	**Maternity sites**
Widespread all geographies	Site	Site	Site	Site/ Local	District/County	District/County	Unlikely to exceed District importance unless colonies are atypically large
Widespread in many geographies, but not as abundant in all	Site	Site	Site, dependent on local distribution	District	District/County importance dependent on size and number of species	County/Regional importance dependent on size; importance increased for larger sites that serve larger numbers/species	Unlikely to exceed County importance unless colonies are atypically large
Rarer or restricted distribution	Site (very well-used night roosts may be of District importance for some species)	Site/Local/ District, dependent on local distribution	Site/Local/ District, dependent on local distribution	District	District/ County importance dependent on size and local distribution	County/Regional importance on size and local distribution	County/ Regional importance on size and local distribution
Rarest Annex II species and very rare	Site (very well-used night roosts may be of District importance for some species)	Site/Local/ District, dependent on local distribution	Site/Local/ District, dependent on local distribution	District	County/ Regional importance on size and local distribution	County/ Regional importance on size and local distribution	County/ Regional importance on size and local distribution' increased value for assemblages.

3.6 Weather Conditions

- 11th June 2020: Dry with part cloud cover and a temperature of 15°C at the beginning of the survey; and 13°C, dry and clear at the end of the survey; in accordance with the Beaufort Scale, wind was no greater than a 'light breeze'.
- 25th June 2020: Dry with full cloud cover and a temperature of 16.5°C at the beginning of the survey; and 14°C, dry with part cloud at the end of the survey; in accordance with the Beaufort Scale, wind was no greater than 'light air'.
- 22nd May 2024: Dry with full cloud cover and a temperature of 14°C at the beginning of the survey; and 12°C, dry with full cloud cover at the end of the survey; in accordance with the Beaufort Scale, wind was no greater than 'light breeze'.
- 20th June 2024: Dry with no cloud and a temperature of 14°C at the beginning of the survey; and 13°C, no cloud and dry at the end of the survey; in accordance with the Beaufort Scale, wind was no greater than 'light air'.

Table 5: Bat Static Monitoring Survey - survey information and weather conditions

Survey period	Assessor(s)	Weather
11th – 15th June 2020	Chloe Balmer	Weather conditions in line with seasonal norms; no spells of heavy rain or high wind.

3.7 Impact Assessment

Where an impact (positive or negative) on the integrity of a defined feature (habitat, species or ecosystem) was identified, the impact significance has been described in the following terms: major, moderate, minor and negligible.

The likelihood of the impact occurring was described as: certain / near certain (probability estimated at 95% chance or higher), probable (probability estimated above 50% but below 95%), unlikely (probability estimated above 5% but below 50%) and extremely unlikely (probability estimated below 5%).

Reference has also been made to the extent and magnitude of impact (i.e., area affected) and duration (short-term impacts associated with construction and long-term impacts associated with the operational phase of the development).

The impact significance of the proposed development on the integrity of the site as a whole has been determined using the framework described above. A significant effect is an effect that either supports or undermines biodiversity conservation objectives for 'important ecological features' or for biodiversity in general (CIEEM, 2018).

Available guidance and information, notably on the distribution and status of the species, and characterisation of impacts on the species/ species group (Reason and Wray, 2023), along with professional judgment have been used to determine impact significance.

3.8 Mitigation Recommendations

Recommendations are provided using the Mitigation Hierarchy (British Standard, 2013; CIEEM, 2018). The Mitigation Hierarchy seeks to avoid impacts, then to mitigate unavoidable impacts, and, as a last resort, to compensate for residual impacts that remain after implementation of avoidance and mitigation measures.

3.9 Limitations

There are a number of visible features on the exterior of the building with potential to support roosting bats, which could not be fully inspected for evidence of bats. This limitation was addressed by undertaking bat emergence surveys, DNA and static detector surveys. In 2020, two surveyors were used for the first survey, although it was deemed necessary to include a third surveyor for the second survey in order to fully observe all elevations of the building. In 2024, two surveyors and an unmanned camera with bat detector were used to cover all elevations of the building.

The bat surveys were undertaken in accordance with best practice guidance; however, the results of these surveys represent only a snapshot of use at the time of survey.

The calls of four bat species are notoriously difficult to record: the long-eared bats (*Plecotus spp.)* and the barbastelle bat (*Barbastella barbastellus*) have a quiet echolocation call, and the horseshoe bats (*Rhinolophus hipposideros* & *R. ferrumequinum*) have highly directional calls. The long-eared, barbastelle and horseshoe species can be easily missed during bat detector surveys. Where applicable, we presume all *Plecotus spp.* recordings are those of brown long-eared bat (*Plecotus auritus*) because Cornwall is outside the known range of the grey long-eared bat (*Plecotus austriacus*).

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4.0 Bat Survey Results

4.1 Site Description and Habitat Assessment

Racket Town is located centrally on the island of Tresco, Isles of Scilly, *c*. 0.3 km east of New Grimsby beach, *c.* 4.5 km north-west of Hugh Town on St Marys and *c*. 4.4 km west of Higher Town on St Martin's, Isles of Scilly. The location is rural in character with the property next to an area of broadleaved woodland to the north and mixed farmland (pasture and arable with hedgerows) to the south, east and west. An area of reedbeds (Section 41 NERC Act (2006) / UK BAP Priority Habitat) is located *c.* 130 m south of the property. Great Pool (Tresco) Site of Special Scientific Interest (SSSI) is present 140 metres to the south of the site, Castle Down (Tresco) SSSI is present 800 metres to the north west of the site and Pentle Bay, Merrick and Round Islands SSSI is present 630 metres to the north east of the site. Buildings in the wider area comprise a mixture of period and modern properties, outbuildings and barns. In combination these features provide potential high-quality foraging and roosting habitat for bats.

4.2 Bat Visual Assessment and Desk Study Summary

The desk study search was undertaken on 11th July 2024. The desk study revealed no granted bat EPS licences within 2km of the site. Plan for Ecology Ltd are aware of several common pipistrelle bat roosts (day roosts and maternity roosts) within 2km of the site. A search of all ecological records and site designations held by the Environmental Records Centre for Cornwall and the Isles of Scilly (ERCCIS, to 2024) within a 1km radius of the site, undertaken as part of an Ecological Impact Assessment of the site in 2024 (Plan for Ecology Ltd, 2024), revealed records for two bat species within a 1km radius of the site. These comprised fifty-three records for common pipistrelle and two records for brown long-eared bat.

The visual assessment and inspection of the building for evidence of roosting bats was undertaken on 11th March & 25th June 2020; for full details and images of the Preliminary Assessment see Plan for Ecology Ltd (2020). The visual assessment was updated on 28th March 2024 (see Plan for Ecology Ltd, 2024).

The property 'Racket Town' is a single-story building of stone construction with a pitched roof and a small porch (Figs 2-4). The roof is of interlocking clay roof tiles with clay ridge tiles (Figs 2-4). There are wooden fascias and soffits; on the southwest corner the fascia is rotten. There is wooden cladding on the north and south elevations. There is a small projection off the south-eastern elevation, which is clad with ivy. There is a concrete chimney on the eastern elevation and gaps were observed under the lead flashing. Gaps beneath the lead flashing and a gap in the rotten wooden fascia board provide potential habitat for roosting bats/ provide potential bat access to the building interior.

Internally, the roof void supports a fink style traditional wooden roof structure, is bitumen lined, with rolled insulation between the joists. The void measures *c*. 1.5 m to the apex. Gaps at the wall tops with potential to permit bats access/ provide roosting locations were observed. During the initial visual assessment, *c*. 50 bat droppings were observed scattered throughout the roof void and a further cluster of *c.* 10 bat droppings were observed beneath, and on, the internal chimney breast. No fresh droppings were noted during the inspection on 25th June 2020. A scattering of bat droppings was observed on the rolled insulation during the update visual inspection on 28th March 2024 (Plan for Ecology Ltd, 2024).

External features were identified with potential to support roosting bats, and bat droppings were observed within the building interior. The property 'Racket Town' was assessed as being of **'moderate suitability'** for roosting bats.

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Figure 2: View of the west elevation of Racket Town.

Figure 3: View of the east elevation of Racket Town.

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Figure 4: View of the north elevation of the Racket Town.

Figure 5: View of the eastern elevation of the south-east projection of Racket Town.

4.3 Bat Emergence Surveys

2020 surveys:

During the first emergence survey on 11th June 2020, no bats were seen to emerge from the building.

During the second emergence survey on 25th June 2020, a single common pipistrelle was seen to emerge from the building, from a gap behind the soffit on the western face of the south-eastern projection (one access point) (Fig 7).

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Figure 7: West elevation (left) and aerial view (right) of the south-east projection, showing emergence location of a single common pipistrelle bat on 25th June 2020.

2024 surveys:

During the first emergence survey on 22nd May 2024, one common pipistrelle bat was observed to emerge from the apex of the southern gable end (one access point) (Fig. 8).

During the second emergence survey on 20th June 2024, five common pipistrelle bats emerged from the same access point as the first survey (from the apex of the southern gable end) (Fig. 8).

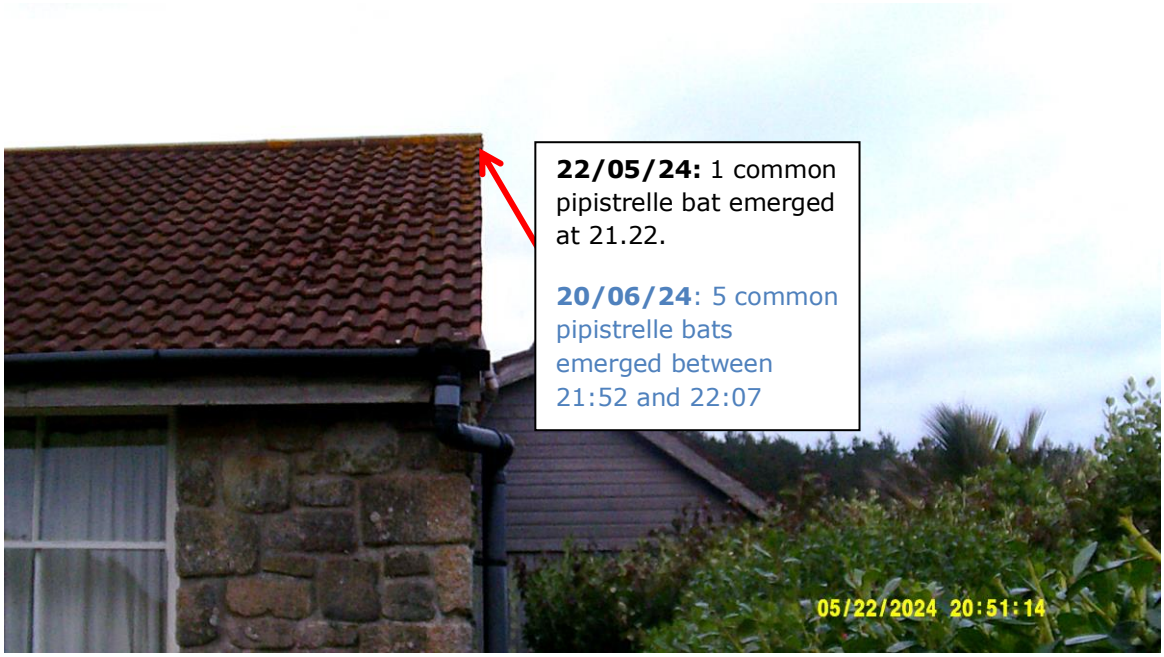

Figure 8: Southern gable end of Racket Town, showing emergence location of a single common pipistrelle bat on 22nd May and five common pipistrelle bats on 20th June 2024.

4.4 DNA Analysis

DNA analysis of droppings collected from the roof void of Racket Town confirmed the presence of brown long-eared bat.

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4.5 Static Monitoring Survey

A static detector survey of the roof void was undertaken between the nights of 11th and 15th June 2020. During the monitoring period no bat activity was recorded within the roof void.

4.6 Bat Species Evaluation

The combined survey results have shown that Racket Town supports three bat roosts; these are detailed in Table 6 below:

Table 6: Racket Town Bat Roosts: type, species, roost feature location, peak count and ecological importance.

Roost Type	Species	Peak Count	Roost Feature	Status*
Occasional day	Brown long-eared bat	1	Roof void (access point unknown but likely to be gaps at the wall tops).	Site
Day	Common pipistrelle	1	Gap behind the soffit on the western face of the south-eastern projection (Fig. 7)	Site
Day	Common pipistrelle	5	Beneath roof/ ridge tiles; accessed via a gap at the apex of the southern gable end (Fig. 8).	Site

*Roost status has been determined using Reason and Wray (2023)

The combined survey results have shown that Racket Town supports 1) a common pipistrelle bat day roost supporting at least one individual located beneath the soffit on the western face of the south-eastern projection (Fig. 7); 2) a common pipistrelle bat day roost supporting at least five individuals located between the roof/ ridge tiles and bitumen lining and accessed from a gap beneath a roof tile near the apex on the southern gable end (Fig. 8); and 3) a brown long-eared bat occasional day roost (comprising at least 1 individual) within the roof void, confirmed through DNA analysis of droppings.

The common pipistrelle bat: is a crevice dwelling bat species that typically roosts between slates/ tiles and the roofing felt, or beneath fascia boards/ soffits. This species is common and widespread throughout the UK. The population is considered to have increased since 1999 (BCT, 2023).

The brown long-eared bat: is both a crevice dwelling and void dwelling bat species, that benefits from being able to fly around in a void before emergence. The brown long-eared bat often roosts under hanging tiles, above soffits, in cavity walls and under ridge tiles. It is considered to be common but widespread in England and Wales. The population is considered to be unchanged since 1999 (BCT, 2023).

The brown long-eared bat occasional day roost and the common pipistrelle day roosts within Racket Town are considered to be of **low conservation significance** for these bat species.

Following the framework described by Reason and Wray (2023), as outlined in Section 3.5 above (Tables 3-4), the rarity of the bat species recorded on-site is 'widespread' for brown long-eared bat and common pipistrelle bat. The corresponding value for day roosts for small numbers of non-breeding brown long-eared and common pipistrelle bats (widespread species) is 'Site' level.

Racket Town is, therefore, considered to be of **Site** importance for roosting bats.

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5.0 Impacts and Mitigation Recommendations

5.1 Evaluation of Development Proposals and Impacts

The combined survey results have shown that Racket Town supports an occasional day roost for brown long-eared bat and a two day roosts for common pipistrelle bats; these are listed in Table 5 above. The client proposes to refurbish and extend the existing property, including demolition of the south-east projection, where one of the common pipistrelle day roosts is located.

In the absence of mitigation, the proposals have the potential to disturb, injure or kill bats and result in the loss of the identified roosts; the impact of this on the local bat populations is detailed in Table 7 below:

Table 7: Predicted impact of the proposed development on the local bat populations in the absence of mitigation.

Roost Type	Species	Peak Count	Predicted Impact
Occasional day	Brown long-eared bat	1	Long-term, near certain, negative, Site
Day	Common pipistrelle	1	Long-term, near certain, negative, Site
Day	Common pipistrelle	5	Long-term, near certain, negative, Site

In the absence of mitigation, the proposals have the potential to disturb, injure or kill common pipistrelle and brown long-eared bats and to result in the loss of all bat roosts listed in Table 7. In the absence of mitigation, the identified impact on roosting bats is considered likely to be **long-term in duration, of near certain occurrence, negative within the Site and of moderate significance**.

5.2 Bat Mitigation

To avoid, mitigate and compensate for potential impacts, an outline of the recommended mitigation is provided below (to be agreed with the client). The proposals have potential to have a significant impact on roosting bats; an appropriate licence must be obtained from Natural England before works can lawfully commence. The appropriate licence will set out the mitigation required to maintain the favourable conservation status (FCS) of the bat species using Racket Town, Tresco. The identified roosts should be retained wherever possible in the first instance. Where this is not feasible, alternative roost provision within the modified building must be provided.

Outline of recommended mitigation:

- Works will not commence until an appropriate licence has been obtained from Natural England. The named ecologist or an accredited agent must deliver an on-site toolbox talk to the contractors immediately prior to commencement of works and supervise all works with potential to impact roosting bats. If the licence application is to be delayed beyond May 2025, then an update emergence survey(s) of the building is likely to be required, to be undertaken between May-September. **NB**. This is a condition of the licence application and is not a planning requirement. The current level of survey effort is sufficient to inform a planning application. No further survey effort is required to inform the planning application. The licence cannot be obtained until planning consent is in place.

- Works will be scheduled for a time of year when bats are least likely to be impacted.

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- Works with potential to impact bats will be carried out under an ecological watching brief. A licensed bat ecologist will oversee works to the roof / roof voids/ fascias/ soffits etc. Prior to demolition of any parts of the building, the roof must be 'soft stripped' under an ecological watching brief; any common pipistrelles or brown long-eared bats uncovered will be relocated to temporary bat boxes installed onto nearby trees. NB: the bat boxes (x2 Large Multi Chamber Woodstone bat boxes or a comparable product) will be installed in advance of works commencing and in a location that will not be disturbed as a result of building works. See https://www.nhbs.com/ for product specification.

- The existing common pipistrelle day roost located between roof/ridge tiles and the bitumen membrane at the southern gable end should be retained or re-created post-development (if re-roofing is proposed). The access point (gap beneath end roof tile) should be protected, or re-instated post-development through installation of a bat slate slate (https://www.leadworx.co.uk/product-tag/bat-access-slate) and/or raised ridge tile in this location, featuring a 20mm x 50mm gap to allow the bats between the roof tiles and bat safe membrane (bitumen type 1F).

- The existing common pipistrelle day roost behind the soffit on the west elevation of the south-eastern projection will be lost to allow for the development. Loss of this roost will be compensated by creation of a new roost feature within the new south-east wing. This could either take the form of spacing off of fascia boards by 25mm to create a gap behind for bats to roost within, or installation of one Schwegler 1FE bat access panel with back plate (or comparable product) within the fabric of the building, to be located on a south or west elevation of the property post-development.

- The existing brown long-eared bat day roost within the roof void should be retained, if possible, which appears to be feasible within the constraints of the proposed development. The existing brown long-eared bat access points are unknown; but existing gaps at the wall tops that provide the potential access point(s) will likely be lost. Suitable bat access into the retained roof void will created by spacing off the fascia boards by 25mm to create a gap behind for bats to access at the wall tops, or installation of two bat slates onto each of the eastern and western aspects of the roof with a corresponding slit created in the bitumen felt underneath to enable brown long-eared bats to access the roof void below. Alternatively, two raised ridge tiles featuring a gap as described above with corresponding slit in the roof membrane can be used to provide access to the roof void. The roof must be lined with type 1F bitumen as opposed to a synthetic breathable membrane, which can be harmful to bats. If retention of the roof void is not possible, then alternative provision for roosting bats must be made within the modified building by installation of an appropriate bat box (e.g. Schwegler Bat Access panel with back plate) integrated within the fabric of the modified building or on the exterior of the building. Where bats can make contact with the roof membrane, this **must** comprise **bitumen type 1F** or a non-bitumen coated roofing membrane (NBCRM) with a test certificate approved by Natural England. This is because modern synthetic membranes are harmful to bats and their use will not be permitted by Natural England.

- No exterior lighting will be installed close to the temporary and permanent bat roost features or access points, and no bat roost features will be located close to proposed glazing so to avoid sources of potential light spill.

- Building contractors will be briefed prior to commencement of site works. Contractors will be notified about the potential presence of bats and informed that if a bat/s is/are uncovered during works, then work must stop immediately (as soon as it is safe to do so) and advice sought from the licensed bat ecologist/s (Plan for Ecology Ltd, 01326 218839).

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5.3 Residual Impacts

The residual impact of the proposed development on roosting bats is predicted to be **neutral at a site scale, subject to the successful implementation of the mitigation outlined in this report.**

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6.0 References

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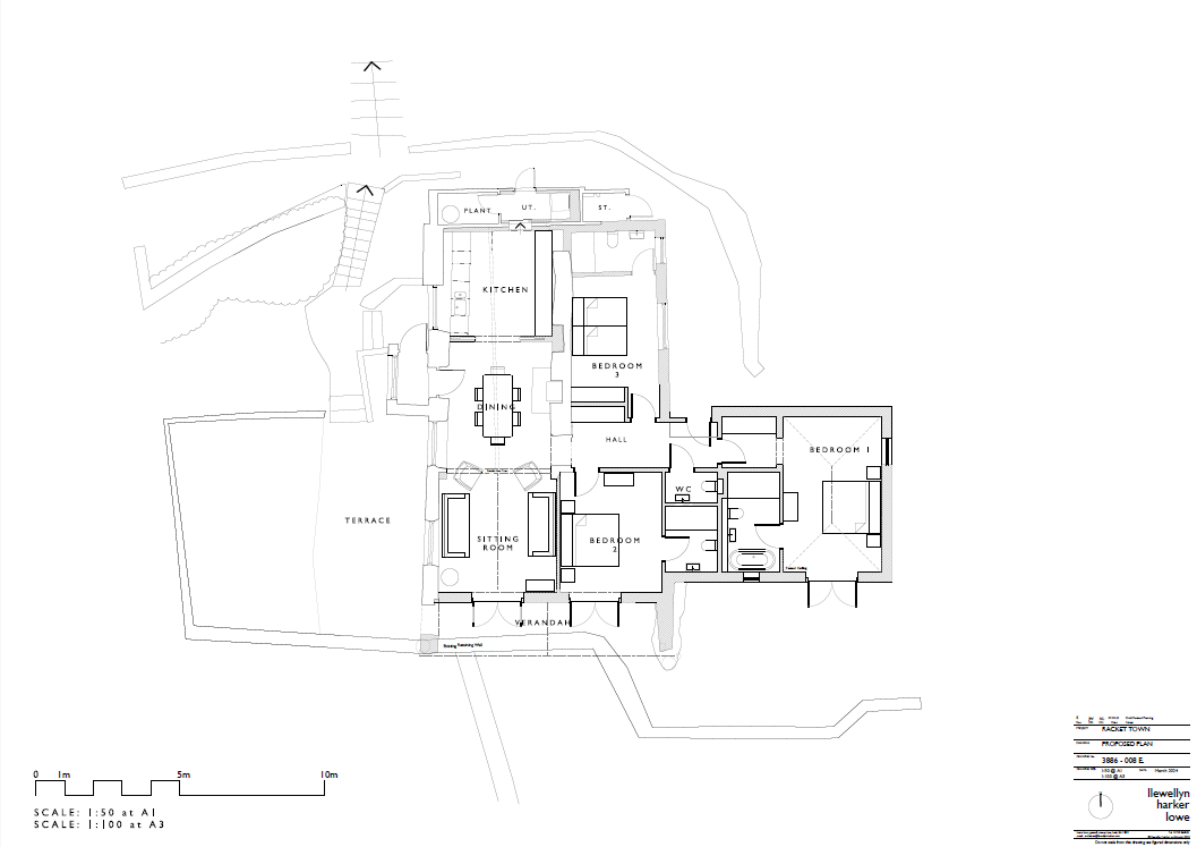
7.0 Appendix 1: Indicative Site Proposals



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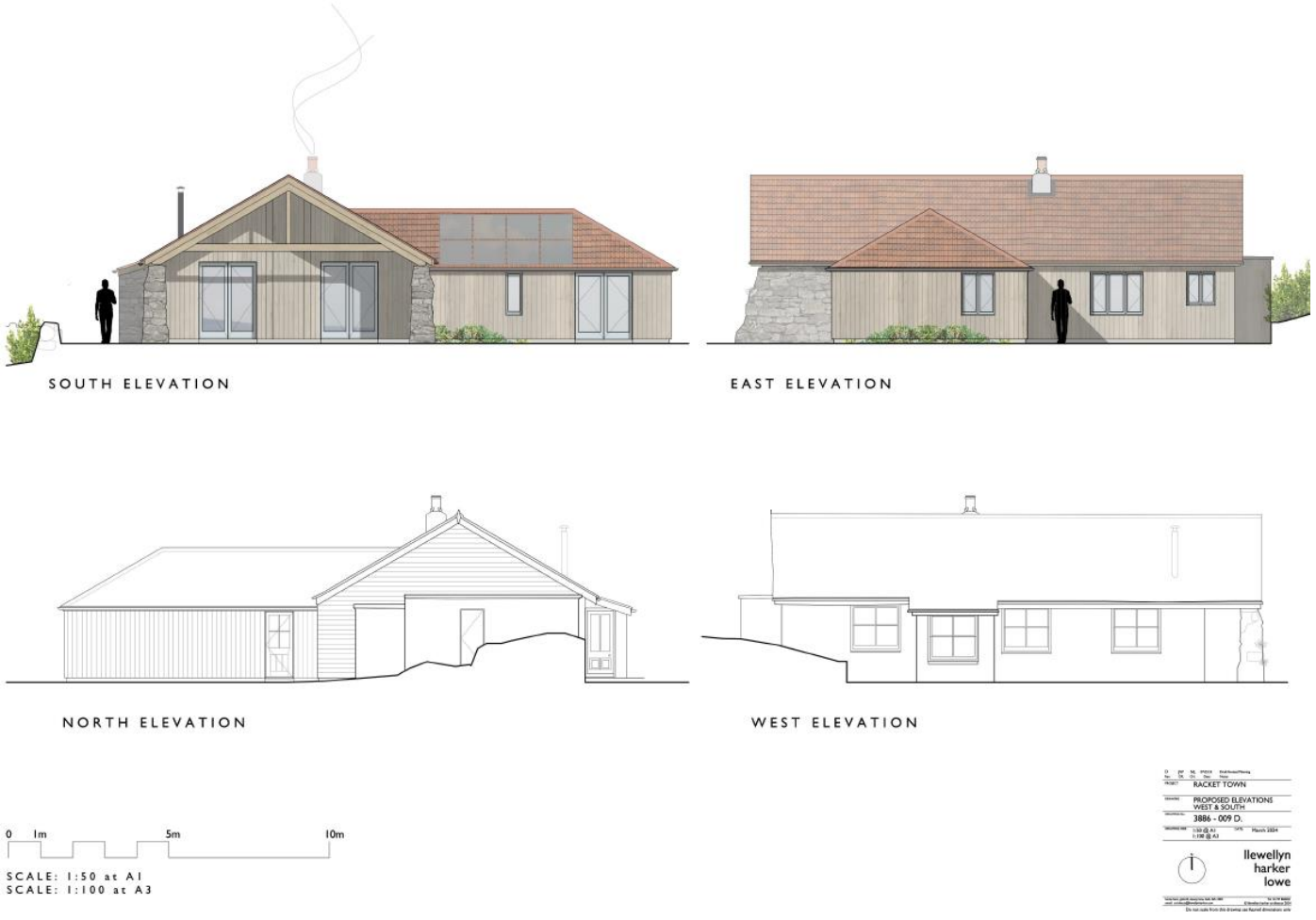

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8.0 Appendix 2: Start and End Images of Buildings Surveyed.

	
25.05.2024 – North & West Elevations (Start)	25.05.2024 – North & West Elevations (End)
	
25.05.2024 – East Elevation (Start)	25.05.2024 – East Elevation (End)
	
25.05.2024 – South apex & west elevation of projection (Start)	25.05.2024 – South apex & west elevation of projection (End)
	
20.06.2024 – East Elevation (Start)	20.06.2024 – East Elevation (End)

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20.06.2024 – South apex & west elevation of projection (Start)	20.06.2024 – South apex & west elevation of projection (End)
20.06.2024 – Images available on request	20.06.2024 – Images available on request

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RECEIVED
By Liv Rickman at 2:11 pm, Jul 15, 2024

APPROVED
By Lisa Walton at 4:12 pm, Jul 31, 2024

3886/JW/SWMP

15th July 2024

RACKET TOWN, TRESCO

SITE WASTE MANAGEMENT PLAN

Client:

Tresco Island Ltd.
Tresco Estate Office,
Tresco,
Isles of Scilly,
TR24 0QQ.

Declaration

The Client will be responsible for ensuring that the contents of this document are enacted, taking all reasonable steps to make certain that;

a) All waste from the site is dealt with in accordance with the Waste Duty of Care in Section 34 of the Environmental Protection Act 1990 and Environmental Protection (Duty of Care) Regulations Act 1991.

b) All materials will be handled efficiently, and waste managed appropriately.

1.0 Introduction

The Site Waste Management Plan (SWMP) has been prepared for works to take place during the extension and refurbishment of Racket Town, on Tresco, the Isles of Scilly.

2.0 Definition of the Works

The scope of works that this Site Waste Management Plan is applicable to, is internal alterations and refurbishment of the existing cottage, demolition of the existing south eastern wing, construction of a new single storey wing and other external alterations.

The Plan is specific to this project and has been prepared in line with DTI Guidance for Construction Contractors and Clients, and this revision has been updated in line with the estate Site Waste Management Procedures.

The contractor appointed to undertake the works will ensure a copy of the plan is kept in the site office at all times and will be available for inspection to those enforcing authorities as required, whilst carrying out their duties.

Once the contractor hands over the site, then the plan will be passed to the Client and a copy will be held at the company's office for a period of no less than two years.

In complying with the procedure for Site Waste Management, the contractor and the Client will take all reasonable steps to ensure that;

All waste from site is dealt with in accordance with the waste 'Duty of Care' in Section 34, Environmental Protection Act 1990 and the Environmental Protection (Duty of Care) Regulations 1991; and Material will be handled efficiently, and waste managed appropriately. Material re-use, recycling and recovery is maximised where reasonably practicable. The Plan will be reviewed, revised and refined as necessary. Any changes will be clearly communicated to those affected. Sufficient site security measures are in place to prevent the illegal disposal of waste from the site.

3.0 The Waste Hierarchy

1. Prevention.
2. Preparing for re-use.
3. Recycling.
4. Other recovery.
5. Disposal.

3.1 Prevention

Waste shall be minimised by careful ordering of materials to eliminate the generation of waste materials. This means that material quantities shall be checked prior to procurement. Discussion shall be had with suppliers to minimise packaging of materials. Where applicable materials shall be used in the most efficient manner to reduce the generation of waste. An example of this would using timber off cuts in applications where the shorter lengths could be used for another purpose. Subcontract suppliers shall be encouraged to use the most efficient means of production for off-site manufactured items.

3.2 Preparing for re-use

Surplus materials shall be set aside and stored in an orderly fashion. They shall be stored in such a way that they are protected from damage from the weather, site conditions or other detrimental factors in order to preserve their condition. A simple catalogue of surplus materials shall be kept in order to make an easy assessment of what is available on site. This catalogue or register shall be referred to prior to the ordering of any additional materials.

3.3 Recycling

Surplus materials that have been categorised as unsuitable for re-use shall be considered for recycling.
All waste materials shall be segregated into the appropriate categories. The waste materials shall then be assessed as to whether it should be sent the islands central recycling facility, or returned to storage for future use.

3.4 Disposal

During early stages of the development it is envisaged that there will be some material waste, from the initial demolition works. Waste materials will include blockwork / masonry, existing windows, roofing materials.

Site generated inert spoil from ground works shall be re-distributed within the development site to create landscape elements.
As the development progresses skips shall be located on site to accommodate waste before being removed to central processing.

4.0 Responsibilities

Waste management responsibilities lie with Tresco Island Ltd., and will be delegated to the Contractor at the time of appointment.

Tresco Island Management Team:

Owner:	Adam Dorrien Smith
CEO:	Nick Halliday
Project Coordinators:	Nick Halliday, Dean Whillis, Anna Wypyszynska

4.1 Contractor's Responsibilities:

To assist with the implementation of the SWMP, the Site Manager should be particularly concerned with training and communications of subcontractors and appointing trained and competent persons to check skips and vehicles, and to record waste types and amounts being produced on site.

4.2 Waste Minimisation

The contractor will be alerted to their responsibilities under the Environmental Protection Act 1990 and Hazardous Waste (England & Wales) Regulations 2005, and will not only comply with these regulations, but will actively look at waste reduction through re-cycling and using alternatives.

The works shall be carried out in such a way that, as far as is reasonably practicable, the amount of waste to be disposed of is minimised. The waste hierarchy will be applied throughout the duration of the project. Redundant equipment will be offered to the client to allow for reuse as spares where possible, or responsibly disposed of through authorised routes.

4.3 Waste Monitoring & Recording

Waste Transfer Notes shall be collated by the site manager as well as a register kept and managed on site, recording the quantities and types of waste generated by the construction activities.

4.4 Training

Every operative on site, including subcontractors will be given training and information on the SWMP as part of their induction. In addition, toolbox talks will be given reinforcing existing training and informing the workforce of the SWMP process.

The on-site training will include the following topics;

- The SWMP, roles and responsibilities, waste procedures on site, hazardous waste, duty of care / responsibilities, materials storage.

- The SWMP will be kept in the site office and be available for inspection.

4.5 Review of SWMP

At the end of the project the plan will be reviewed and analysed to produce a comparison between estimated and actual waste production.

5.0 Waste Handling:

The following approaches are proposed for various waste types:

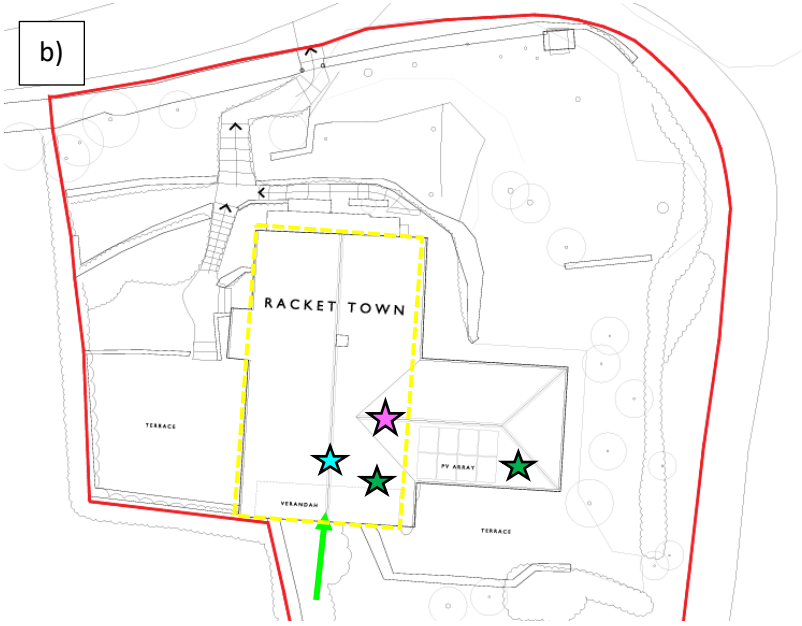
TYPE	APPROACH	% Recyclable
Concrete, Concrete work Block / inert masonry	To be crushed and reused as sub-base aggregate on site, Percentage recyclable 100%.	100
Timber and timber content sheet materials	To be distributed to Tresco Central Recycling Facility, distributed for use into mulch, timber particle sheets, chips for wood burning furnaces	100
Metals	To be distributed to Tresco Central Recycling Facility, for sorting and shipping to mainland for processing	100
Roofing materials; Slate	To be distributed to Tresco Central Stores, for use in future repair works	100
Glass	To be distributed to Tresco Central Recycling Facility, distributed for use for drainage and aggregate replacement on the Island	100
General waste materials; packaging, p'board & insulation off-cuts, cardboard	To be distributed to Tresco Central Recycling Facility, for sorting, compacting and shipping to mainland for processing	40

APPROVED
By Lisa Walton at 4:12 pm, Jul 31, 2024

Specification for mitigation and compensation
Site Name: Racket Town, Tresco, Isles of Scilly
Grid Reference: SV 89286 14924
Date: 2024.07.30

a). Aerial view of Racket Town showing location of bat roosts:

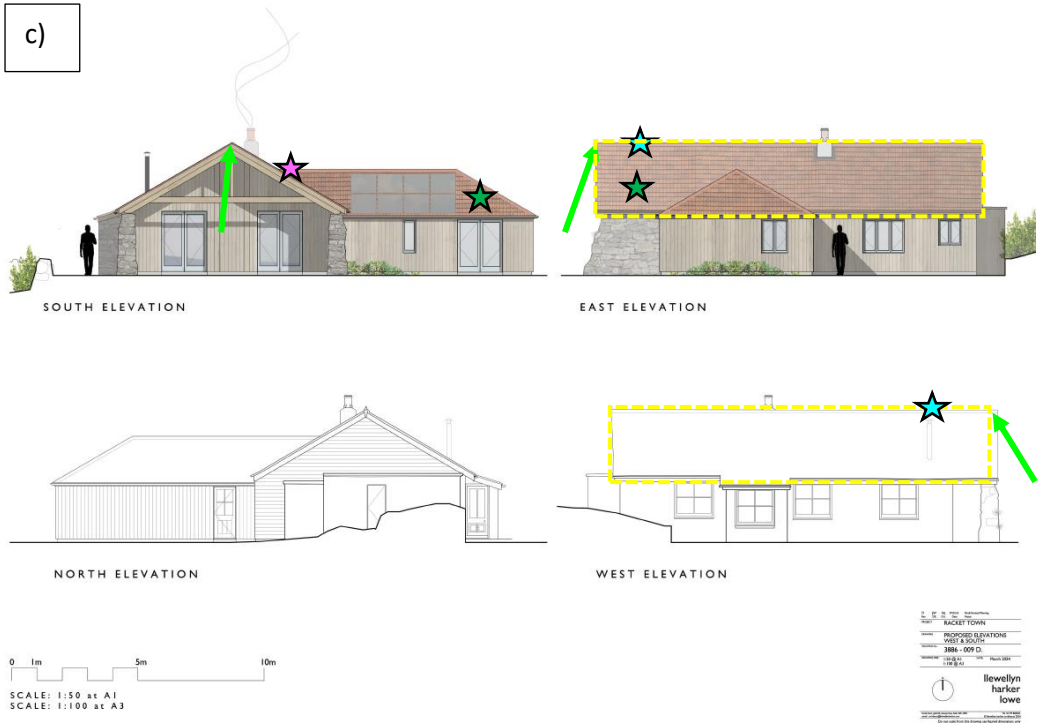
- The brown long-eared bat occasional day roost (dashed yellow line) will be retained. New access points will be installed.
- The common pipistrelle day roost within the south-eastern projection will be lost due to demolition (red arrow). Loss of the roost site will be compensated by installation of a raised ridge tile over bitumen type 1F. NB. whilst installation of a single Schwegler Bat Access panel with back plate within the fabric of the building post-development was considered as a mitigation option, the proposed new south-east wing will not be tall enough to provide a suitable location.
- The common pipistrelle day roost located between roof/ridge tiles and the bitumen membrane at the southern gable end will be retained with the access modified post-development. The existing access point (green arrow) will be re-instated post-development through installation of a raised ridge tile in this location (over bitumen type 1F).
- Two bat slates over bitumen type 1F will be installed as enhancement.



b). Proposed site plan showing location of proposed fabric works and location of mitigation features:

- Retained brown long-eared bat occasional day roost is shown by dashed yellow line. Suitable bat access into the retained roof void will be created by installation of a raised ridge tile with a corresponding slit created in the bitumen felt underneath to enable brown long-eared bats to access the roof void below (blue star).
- The common pipistrelle bat day roost located beneath the roof tiles and roof membrane at the south gable end will be retained with the access modified. The existing access point (green arrow) will be re-instated once works are complete through installation of a raised ridge tile in this location (over bitumen type 1F).
- The common pipistrelle day roost within the south-east projection will be lost. Loss of this roost will be compensated by installation of a a raised ridge tile over bitumen type 1F (pink star).
- Two bat slates over bitumen type 1F will be installed as enhancement (green stars), positioned to avoid PV panels.

c)



c). Proposed elevations showing location of proposed fabric works and location of mitigation features:

- Retained brown long-eared bat occasional day roost is shown by dashed yellow line. Suitable bat access into the retained roof void will be created by installation of a raised ridge tile with a corresponding slit created in the bitumen felt underneath to enable brown long-eared bats to access the roof void below (blue star).
- The common pipistrelle bat day roost at the south gable end will be retained with the access modified. The existing access point (green arrow) will be re-instated once works are complete by installation of a raised ridge tile in this location.
- The common pipistrelle day roost within the south-east projection will be lost. Loss of this roost will be compensated by installation of a raised ridge tile within the new south-east wing (pink star).
- Two bat slates over bitumen type 1F will be installed as enhancement (green star), positioned to avoid PV panels.

Mitigation and compensation:

Works will not commence until an appropriate licence has been obtained from Natural England. The named ecologist or an accredited agent must deliver an on-site toolbox talk to the contractors immediately prior to commencement of works and supervise all works with potential to impact roosting bats.

Works with potential to impact bats (i.e. soft-stripping of the roof and fascias/ soffits) will be scheduled for a time of year when bats are least likely to be impacted (March – October/ November subject to a minimum temperature of 8°C).

Works with potential to impact bats will be carried out under an ecological watching brief. A licensed bat ecologist will oversee works to the roof / roof voids/ fascias/ soffits etc. Prior to demolition of any parts of the building, the roof must be 'soft stripped' under an ecological watching brief; any common pipistrelles or brown long-eared bats uncovered will be relocated to temporary bat boxes installed onto nearby trees. NB: the bat boxes (x2 Large Multi Chamber Woodstone bat boxes or a comparable product) will be installed in advance of works commencing and in a location that will not be disturbed as a result of building works.

The common pipistrelle day roost located between roof/ridge tiles and the bitumen membrane at the southern gable end will be retained with the access modified post-development. The access point (gap beneath end roof tile) will be re-instated post-development through installation of a raised ridge tile in this location, featuring a 20mm x 50mm gap to allow the bats between the roof tiles and bat safe membrane (bitumen type 1F).

The common pipistrelle day roost behind the soffit on the west elevation of the south-eastern projection will be lost to allow for the development. Loss of this roost will be compensated by installation of a raised ridge tile over bitumen type 1F.

The brown long-eared bat day roost within the roof void will be retained. The existing brown long-eared bat access points are unknown; but existing gaps at the wall tops that provide the potential access point(s) will likely be lost. Suitable bat access into the retained roof void will be created by installation of a raised ridge with a corresponding slit created in the bitumen felt underneath to enable brown long-eared bats to access the roof void below. Two bat slates over bitumen type 1F will be installed as enhancement (green star), positioned to avoid PV panels.

The named ecologist will oversee all sensitive works. No exterior lighting will be installed close to the existing roosts or new roost features. Building contractors will be briefed prior to commencement of site works and notified about the potential presence of bats.

PLAN FOR ECOLOGY