



**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](mailto: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/24/067/HH      **Date Application Registered:** 12 September 2024

**Applicant:** Mr J Heneghan  
Coastguard's Retreat  
Buzza Road  
Hugh Town  
St Mary's  
Isles of Scilly  
TR21 0JQ

**Agent:** Ms Caroline Shortt  
Barc Architects Limited  
Hems Studio,  
86 Longbrook Street,  
Exeter,  
EX4 6AP

**Site address:** Coastguard's Retreat Buzza Road Hugh Town St Mary's Isles of Scilly  
**Proposal:** Renovation of existing dwelling to include ground floor extension in place of existing conservatory, dormer windows at first floor and external alterations

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: 04-SVY Rev H, Dated 5th September 2024
- Plan 2 Proposed Site Plan, Drawing Number: 05-SVY Rev G, Dated 5th September 2024
- Plan 3 Proposed Ground and First Floor Plan, Drawing Number: 10 Rev F, Dated 24th July 2024
- Plan 4 Proposed Lower Ground Floor Plan, Drawing Number: 09 Rev F, Dated 24th July 2024
- Plan 5 Proposed NE and SE Elevations, Drawing Number: 31 Rev F, Dated 24th July 2024
- Plan 6 Proposed NW and SW Elevations, Drawing Number: 30 Rev F, Dated 24th July 2024
- Plan 7 Design & Access Statement, Rev C, Received: Sep 12, 2024
- Plan 8 PRELIMINARY ROOST ASSESSMENT (PRA), Reference: 24-6-9, Dated: 15th July 2024
- Plan 9 BAT PRESENCE/ABSENCE SURVEYS (PAS), Reference 24-7-9, Dated 24th September 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 Policy OE1 and OE7 of the Isles of Scilly Local Plan (2015-2030).

#### **PRE-COMMENCEMENT CONDITION: Submission of Facing Materials and Finishes**

**C3** Prior to the commencement of the development, hereby approved, a schedule of external materials finishes and samples to be used on the development shall be submitted to and approved in writing by the Local Planning Authority including windows and doors, timber cladding, stone cladding, roof materials, and glazed balustrades. Thereafter the development shall be carried out in full accordance with the approved schedule and samples.

Reason: To safeguard the appearance of the building and the character of the area and to enable the Local Planning Authority to properly consider the development. It is considered necessary of this to be a pre-commencement condition as these details need to be agreed prior to the construction of the development and thus go to the heart of the planning permission.

**C4** No external lighting shall be installed onto the dwelling or anywhere within the site unless otherwise agreed in writing by the Local Planning Authority. This exclusion shall not prohibit the installation internal lighting or of sensor-controlled security lighting of 1,000 lumens or less, which shall be designed and shielded to minimise upwards light spillage.

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

#### **PRE-COMMENCEMENT CONDITION: Submission of Balcony Screen details**

**C5** Prior to the commencement of the development, hereby approved, details of a privacy screen on the balcony shall be submitted to and agreed in writing by the Local Planning Authority. The agreed screen shall be installed, prior to first use of the balcony, and shall be permanently retained as approved thereafter.

Reason: To protect the amenities of the locality, including the amenities of neighbouring residential properties in accordance with Policy LC8(1) of the Isles of Scilly Local Plan (2015-2030).

**C6** The development hereby approved shall be undertaken in accordance with the Preliminary Roost Assessment (PRA) (Reference: 24-6-9, Dated: 15th July 2024) and the Bat Presence/Absence Surveys (PAS) (Reference 24-7-9, Dated 24th September 2024).

Reason: To safeguard protected species and their habitats, in accordance with Policy SS2(g) and Policy OE2 of the new Isles of Scilly Local Plan (2015-2030).

#### **PRE-COMPLETION CONDITION: Submission of biodiversity enhancements**

**C7** Prior to the completion 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 and should be sourced either from the Isles of Scilly or from high-standard biosecure nurseries. 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, following completion of the development, in 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).

**C8** 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.

#### **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 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. If the proposal relates to a Listed Building you will not be able to apply for a non-material amendment and a new application for a revised scheme will be required. Please discuss any proposed amendments with the Planning Officer. 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](https://ecab.planningportal.co.uk/uploads/english_application_fees.pdf)
3. In accordance with the Town and Country Planning (fees for Application and Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2017 a fee is payable to discharge any condition(s) on this planning permission. The fee is currently £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](https://ecab.planningportal.co.uk/uploads/english_application_fees.pdf)
4. 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](mailto:buildingcontrol@cornwall.gov.uk).
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. Based on the information available this permission is considered to be one which will not require the approval of a biodiversity gain plan before development is begun because one or more of the statutory exemptions or transitional arrangements are considered to apply. These can be found in the legislation. The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that, unless an exception or a transitional arrangement applies, the planning permission granted for the development of land in England is deemed to have been granted subject to the condition ("the biodiversity gain condition") that development may not begin unless:
  - a. a Biodiversity Gain Plan<sup>2</sup> has been submitted to the planning authority, and
  - b. the planning authority has approved the plan.The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan in respect of this permission would be the Planning Department at the Council of the Isles of Scilly.

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:** 14 November 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 J Heneghan

## Please sign and complete this certificate.

This is to certify that decision notice: P/24/067/HH and the accompanying conditions have been read and understood by the applicant: Mr J Heneghan.

1. **I/we intend to commence the development as approved:** Renovation of existing dwelling to include ground floor extension in place of existing conservatory, dormer windows at first floor and external alterations at: Coastguard's Retreat Buzza Road Hugh Town St Mary's 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-COMMENCEMENT CONDITION(S)**

- C3 Prior to the commencement of the development, hereby approved, a schedule of external materials finishes and samples to be used on the development hereby approved shall be submitted to and approved in writing by the Local Planning Authority including windows and doors, timber cladding, stone cladding, roof materials, and glazed balustrades. Thereafter the development shall be carried out in full accordance with the approved schedule and samples.
- C5 Prior to the commencement of the development, hereby approved, details of a privacy screen on the balcony shall be submitted to and agreed in writing by the Local Planning Authority. The agreed screen shall be installed, prior to first use of the balcony, and shall be permanently retained as approved thereafter.

### **PRE-COMPLETION CONDITION**

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# 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](mailto: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-COMMENCEMENT 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-authorized 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](mailto: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**

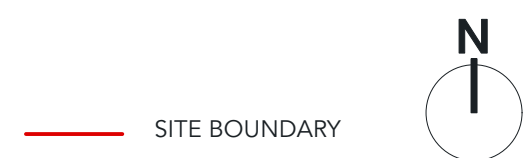
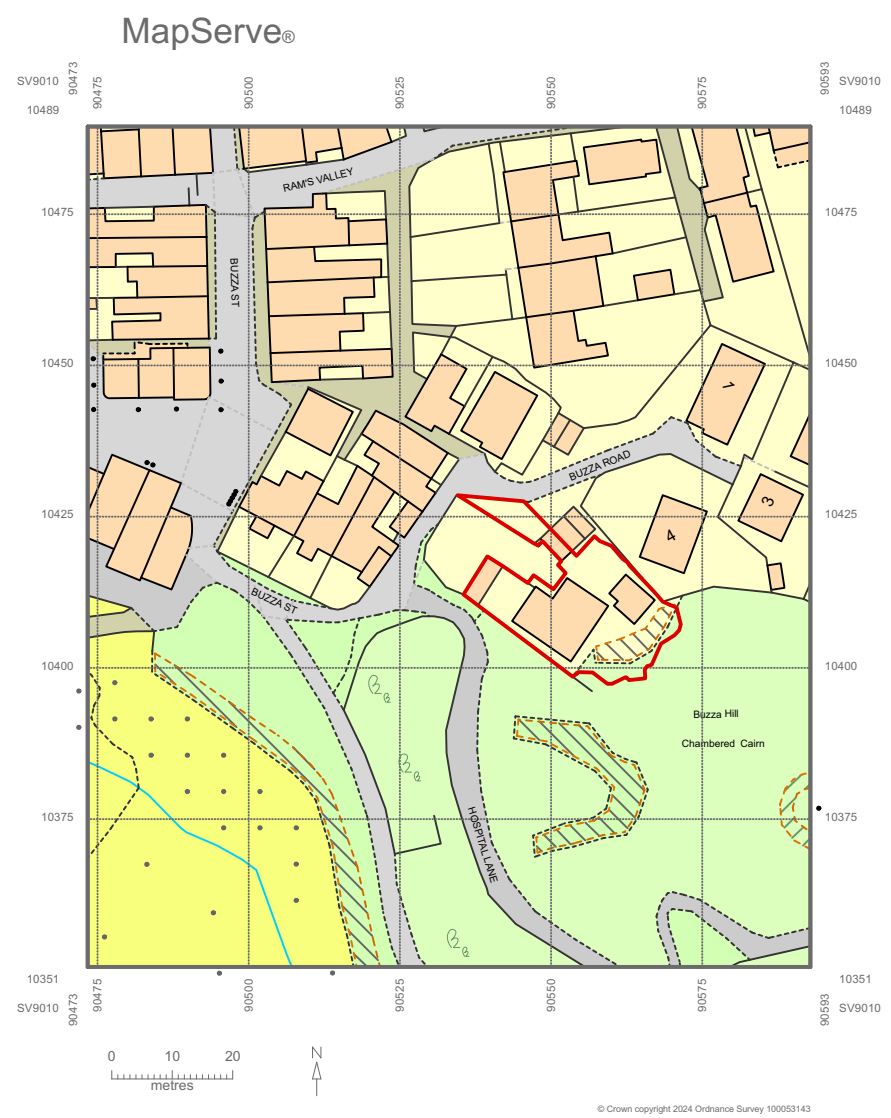
If you require a connection to utilities such as water and sewerage, you will need to contact South West Water on 08000831821. Electricity connections are made by Western Power Distribution who can be contacted on 08456012989.

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.



**RECEIVED**  
By A King at 11:31 am, Sep 12, 2024

**APPROVED**  
By Lisa Walton at 3:33 pm, Nov 14, 2024



**LOCATION PLAN**

SCALE: 1:250

**RECEIVED**  
By A King at 11:25 am, Sep 12, 2024

**APPROVED**  
By Lisa Walton at 3:33 pm, Nov 14, 2024



--- SITE BOUNDARY



**PROPOSED SITE PLAN**

SCALE: 1:100

**barc.** Coastguard's Retreat, TR21 OJQ  
Sketch Scheme Rev E

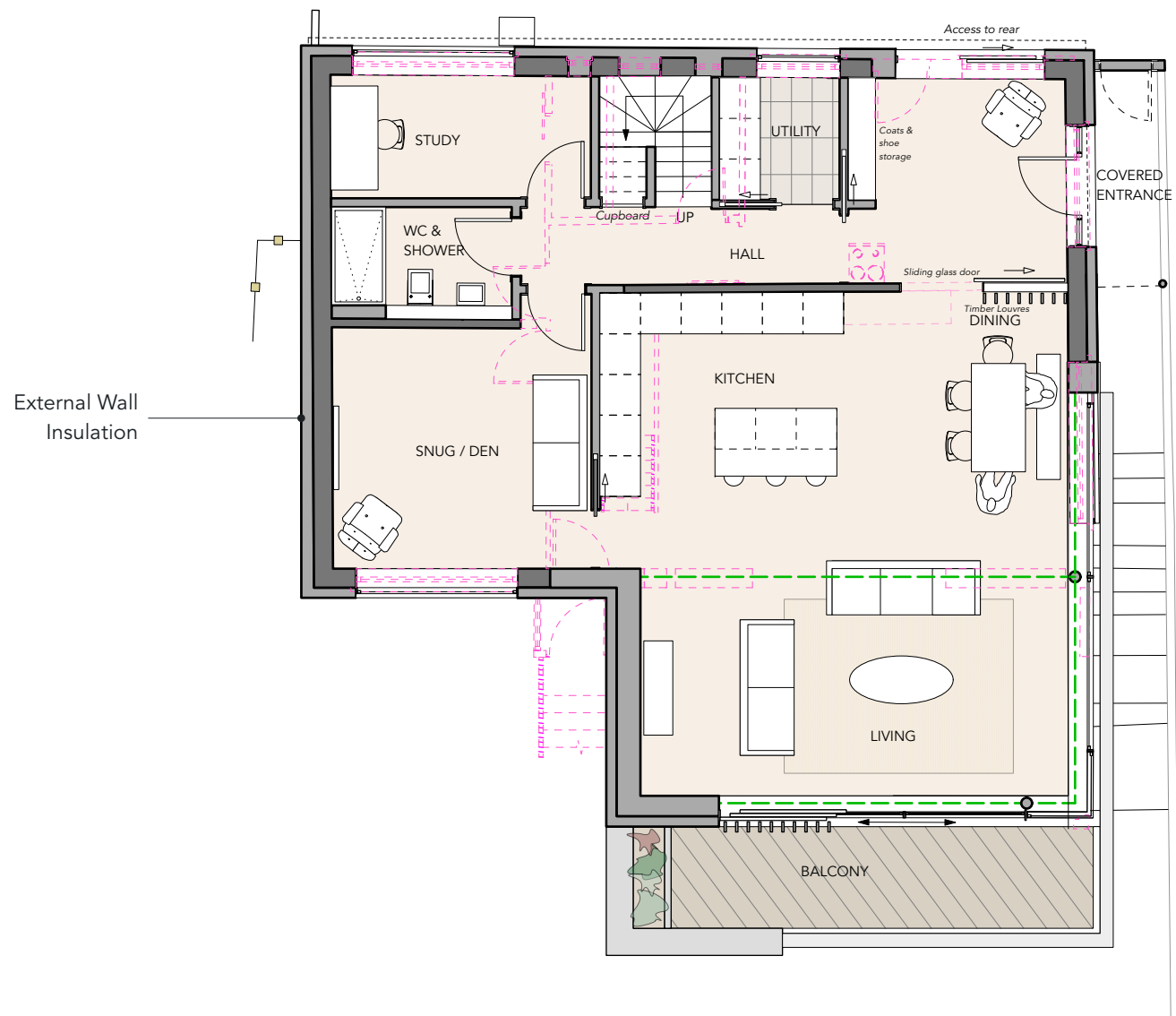
Date	5th September 2024	Project	1221	Dwg	05	Rev	G
Issue	Planning						

**RECEIVED**

By Liv Rickman at 4:13 pm, Aug 27, 2024

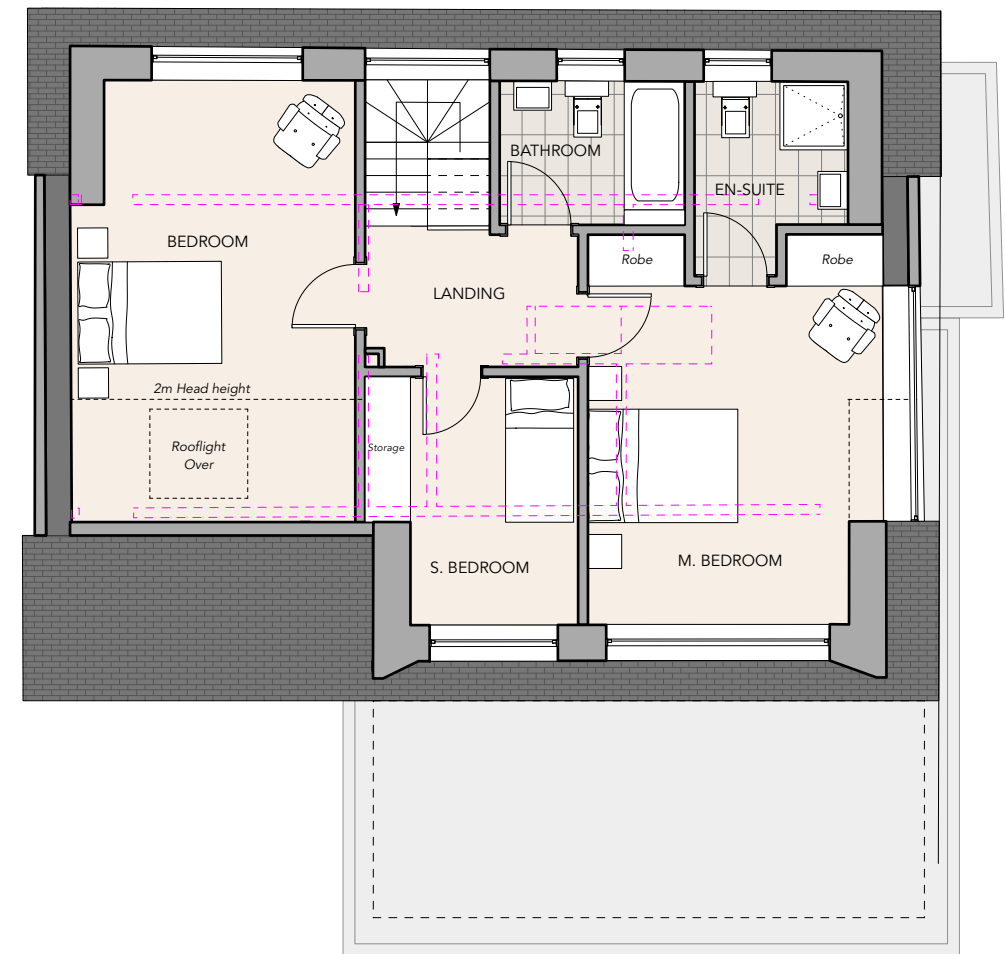
**APPROVED**

By Lisa Walton at 3:34 pm, Nov 14, 2024



**PROPOSED GROUND FLOOR PLAN**

SCALE: 1:100



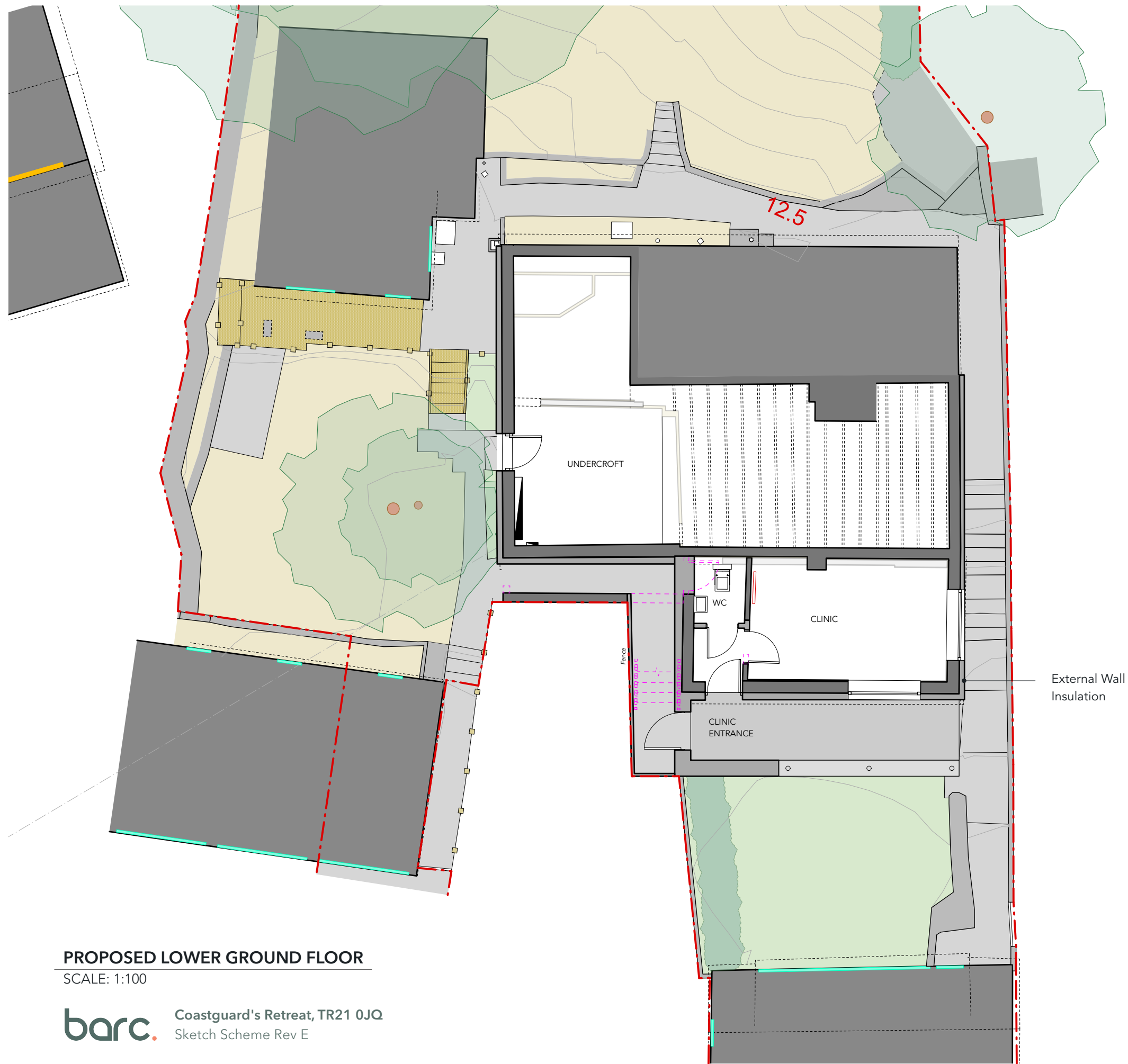
**PROPOSED FIRST FLOOR PLAN**

SCALE: 1:100



**RECEIVED**  
By Liv Rickman at 4:24 pm, Aug 27, 2024

**APPROVED**  
By Lisa Walton at 3:34 pm, Nov 14, 2024



External Wall  
Insulation

- EXISTING WALLS RETAINED
- NEW WALLS
- EXISTING DEMOLISHED
- SITE BOUNDARY
- EXISTING BUILDING OUTLINE



0 5 10m

**PROPOSED LOWER GROUND FLOOR**  
SCALE: 1:100

**barc.** Coastguard's Retreat, TR21 0JQ  
Sketch Scheme Rev E

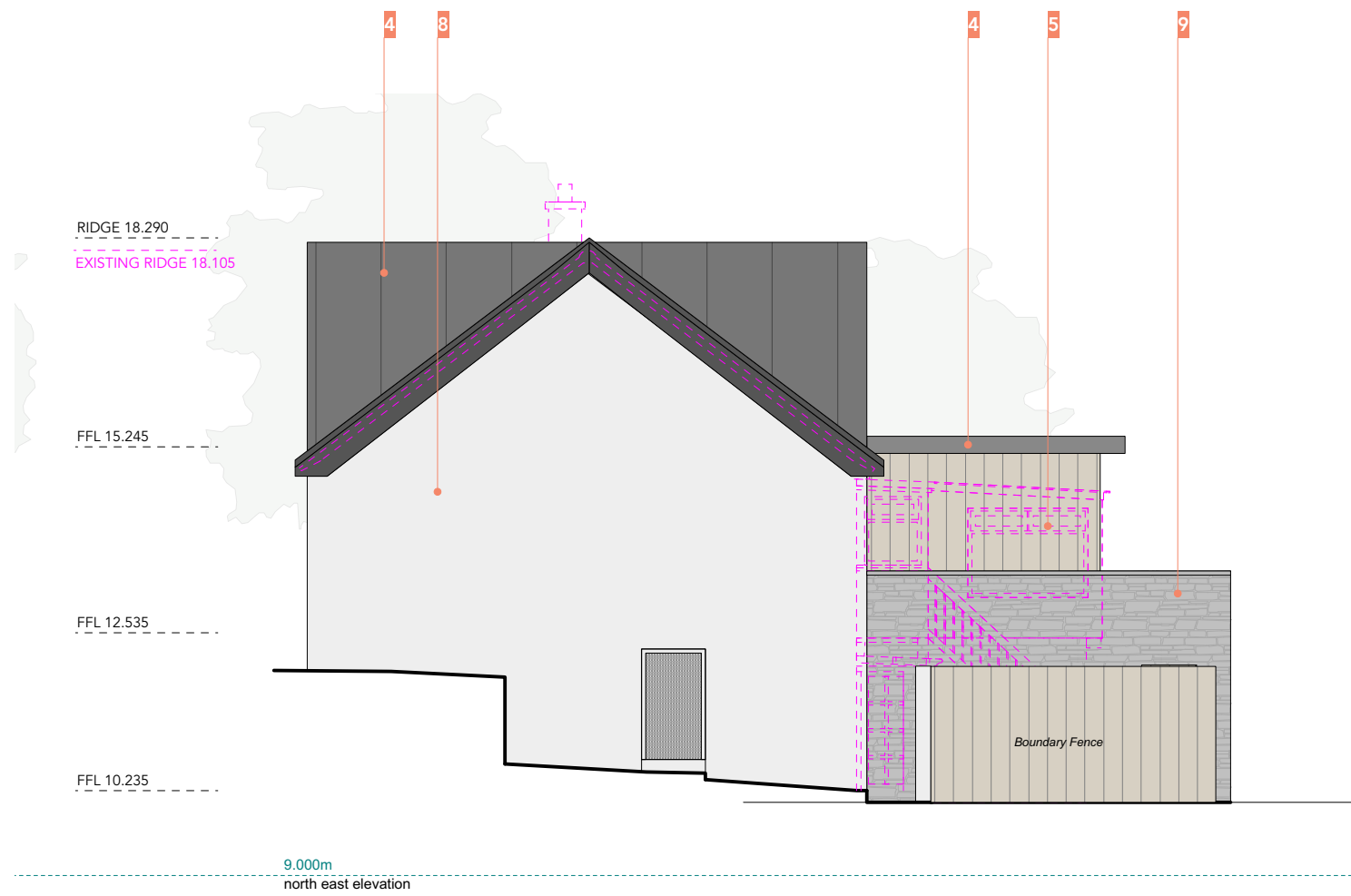
Date	24th July 2024	Project	Dwg	Rev
Issue	Planning	1221	09	F

**RECEIVED**

By Liv Rickman at 3:28 pm, Aug 27, 2024

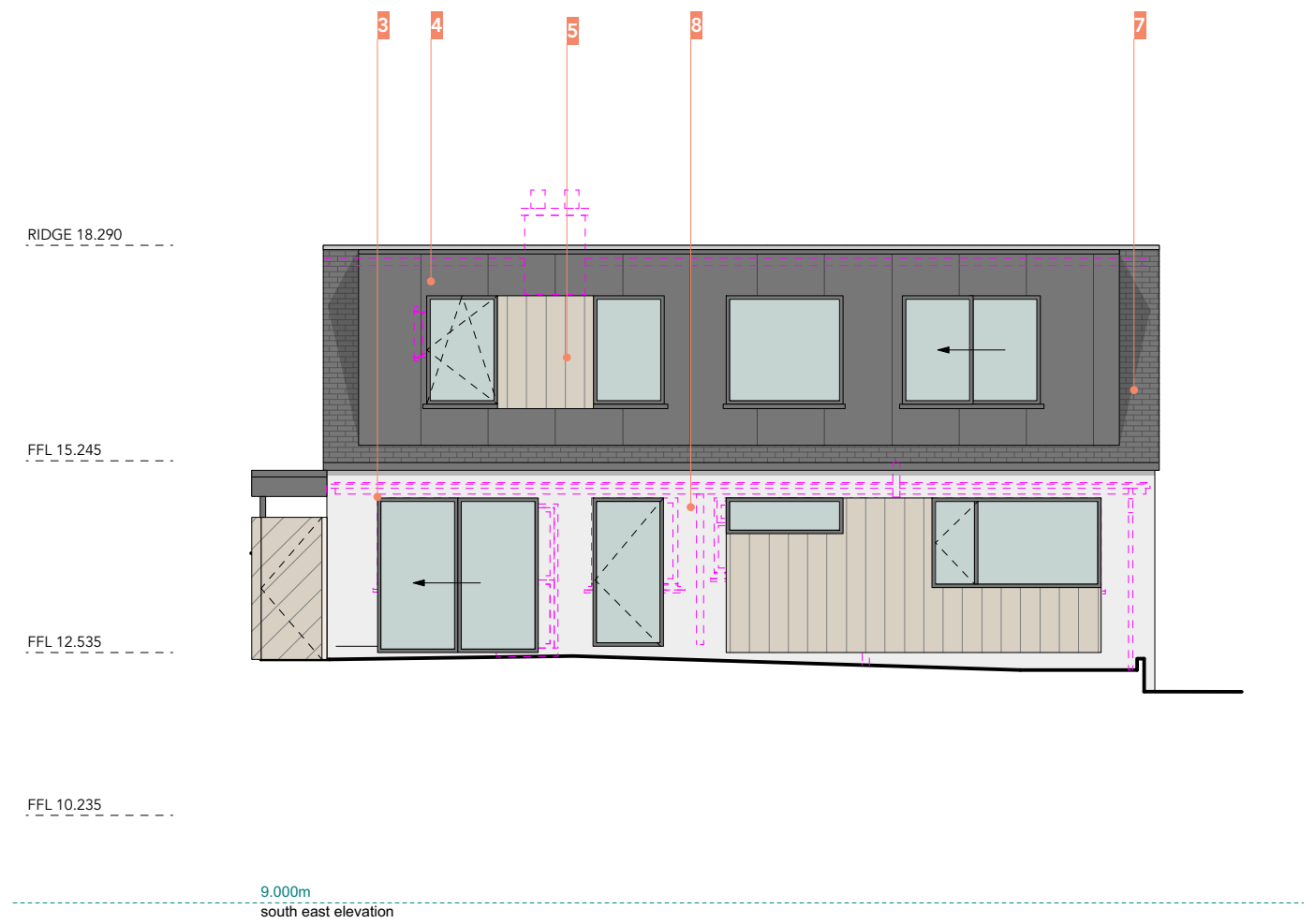
**APPROVED**

By Lisa Walton at 3:34 pm, Nov 14, 2024



**PROPOSED NORTH EAST ELEVATION**

SCALE: 1:100



**PROPOSED SOUTH EAST ELEVATION**

SCALE: 1:100

**Materials**

- 1 - Glass balustrade
- 2 - Grey aluminium
- 3 - Dark grey framed glazing
- 4 - Dark grey zinc to match roof tiles
- 5 - Vertical timber cladding
- 6 - Timber louvre privacy screen
- 7 - Slate tiles
- 8 - Painted render
- 9 - Stone cladding

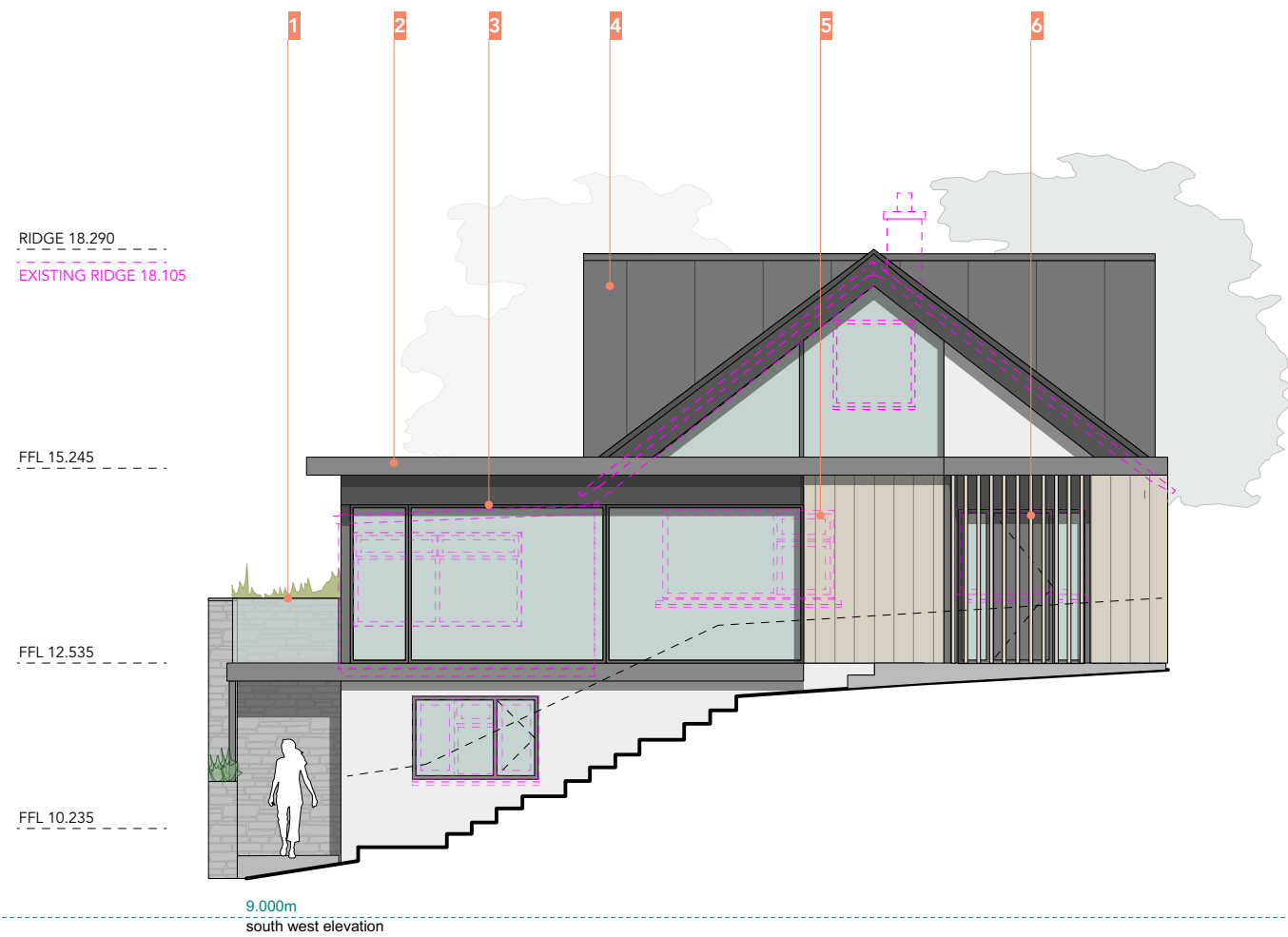


**RECEIVED**

By Liv Rickman at 4:12 pm, Aug 27, 2024

**APPROVED**

By Lisa Walton at 3:34 pm, Nov 14, 2024



**PROPOSED SOUTH WEST ELEVATION**

SCALE: 1:100



**PROPOSED NORTH WEST ELEVATION**

SCALE: 1:100

**Materials**

- 1 - Glass balustrade
- 2 - Grey aluminium
- 3 - Dark grey framed glazing
- 4 - Dark grey zinc to match roof tiles
- 5 - Vertical timber cladding
- 6 - Timber louvre privacy screen
- 7 - Slate tiles
- 8 - Painted render
- 9 - Stone cladding



Planning,  
Design and Access Statement

Coastguard's Retreat, St Mary's, Isles of Scilly, TR21 0JQ  
Rev C



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## 1.1 Project Overview

Applicant:	John and Nicola Heneghan
Location:	Coastguards Retreat, St Mary's, Isles of Scilly, TR21 0JQ
Current Land Use:	Residential dwelling
Access:	Road access via Buzza Street
Site Area:	Approximately 535 sq m
Proposal:	Replacement ground floor extension, dormer windows and remodelling of existing dwelling

These proposals for a householder application seek permission for the renovation and extension of the existing dwelling at Coastguard's Retreat, St Mary's. The project site is located within the Isles of Scilly National Landscape (AONB) and the proposals have been designed in accordance with relevant planning policy.

The design has been carefully developed with the Applicant to meet their needs for a house that achieves significantly improved energy performance standards and sustainability credentials, modernises the existing house to something of contemporary architectural merit, and takes better advantage of its setting and views with improved living accommodation. The proposals also seek to greatly improve accessibility and circulation throughout the house, allowing for an adaptable ground floor layout that can be easily altered to accommodate a fourth bedroom if the applicants experience mobility issues at a later date. Dormer windows at first floor utilise space within the buildings existing footprint allowing for improved ceiling heights and access.

## 1.2 Summary of Application

The enclosed documents are provided as follows:

- Application form
- Site location plan
- Proposed site plan, floor plans and elevations
- Preliminary ecological assessment
- This document including planning statement and design and access statement

## 2.1 Site Location & Appraisal



Coastguards Retreat is located within the settlement boundary for Hugh Town, overlooking Porthcressa Beach.

The existing house is of a bungalow design which has been raised up to manage the steep terrain of the site, with a low under-croft space beneath and 2 bedrooms within the roof-space. The building has been adapted overtime with an extension added to the front which is separate from the main house, and a lightweight conservatory added to the roof of this extension at a later point which is of a poor design. Steep external timber steps lead to a raised lightweight entrance porch at the front of the property however this is all in a state of disrepair and is unsafe for use, therefore the main entrance is currently at the rear. Given the adhoc nature of the various alterations to the building and the poor level of planning that went into them, the internal arrangement suffers from feeling cramped and difficult to circulate through. Additionally, the dwelling is of a severely poor thermal performance with high levels of drafts, damp and condensation affecting the clients enjoyment and well-being within their home.

The nearby listed buildings, Buzza Tower and Wahoonga are Grade II listed and are in close proximity to the site, however Coastguard’s Retreat does not feature in views of these buildings so the development proposal will generally not materially affect any heritage assets.

The site is in Flood Zone 1 ‘Low probability’ for surface water flooding and river and sea flooding (UK Gov ‘Flood Map for Planning’)



## 2.2 Site Images



Site photographs as of 2024

## 2.3 Site Context Images



Buzza Street Terrace on approach to site



Looking north on Buzza Street



The Lookout property, north of the site

### 3.1 Planning Policy

The Development Plan consists of:

- National Planning Policy Framework, Last updated December 2023 - NPPF
- Isles of Scilly Local Plan (2015 - 2030), adopted March 2021.

The site located within the Isles of Scilly National Landscape (AONB) AONB and is within the settlement boundary of Hugh Town (S1).

Policies deemed of particular relevance to this development from the Isles of Scilly Local Plan are as follows:

- LP:
  - Policy SS1 - Principles of Sustainable Development
  - Policy SS2 - Sustainable Quality Design and Place-Making
  - Policy OE1 - Protecting and Enhancing the Landscape and Seascape
  - Policy OE2 - Biodiversity and Geodiversity
  - Policy LC8 - Replacement Dwellings and Residential Extensions, Alterations and Ancillary Accommodation

### 3.2 Planning Appraisal

#### Introduction

These proposals are for householder development for the enlargement and renovation of an existing dwelling in Hugh Town on the island of St Mary's. The principle of development is supported by the development plan provided the proposals are of high design quality, do not result in an inappropriate scale, and accord with Local plan policies specific to local distinctiveness and sustainability targets. Additionally, the Isles of Scilly Design Guide 2006 provides further guidance on local design and has been utilised throughout the design process. The submitted proposals are believed to accord with the relevant policy as illustrated by the planning, design and access statement that follows.

#### Principle of Development

Whilst the site is located within the settlement boundary of Hugh Town (S1), these proposals do not materially change the nature of the development in the area and are in accordance with the strategic aims and objectives highlighted within the Local Plan. The proposed householder development incorporates significant sustainability measures in-line with policy SS1 and Policy SS2. The existing dwelling is located on the southern boundary of Hugh Town, which is generally characterised by variations of low-rise, pitched roof cottages and dwellings. The existing house is in keeping with the pattern of development. The proposals do not result in any increased footprint to the house or additional bedrooms, nor do they materially affect its scale in respect to the housing pattern/grain. The proposals only seek to provide a more comfortable internal arrangement and environmentally efficient dwelling. In this way, the proposals are felt to accord with Local Plan policies SS1, SS2 and LC8.

#### Design

The extent of gross internal area (GIA) increase, approx. 25 sq m or 16%, has been found within the buildings existing roof space with the proposed dormers and is commensurate to the Applicant's need. The ridge height of the dwelling has been increased by up to 300mm as a result of proposed thermal upgrades to the property. The scale and position

## 3.2 Planning Appraisal

of the proposed ground floor extension has been chosen to provide minimal intervention or additional footprint, whilst also maximising enjoyment of the expansive sea views towards the south. The Local Plan promotes local distinctiveness, quality and sustainability of design, and this has been regarded in the development of these proposals in the following key ways:

- The proposals incorporate a holistic design approach to the retained parts of the existing building and the new interventions in order to result in a high quality building with a consistent and individual design that is sympathetic and appropriate to its setting.
- The flat roof design of the ground floor extension is similar in scale and shape to the existing conservatory, with only a minor rise in overall height.
- The proposed dormer windows have been carefully positioned to provide appropriate internal space whilst still retaining the character of the existing building.
- Timber louvres in-front of glazing have been incorporated in specific areas of the elevations to improve privacy whilst still maximising natural light into the home.
- The proposed house is 'wrapped' in a simple palette of render and natural timber cladding, with localised use of stone facing in adjoining landscaping elements. Slate has been proposed as a new pitched roof covering and the dormers will incorporate colour matched zinc cladding for longevity within the coastal environment.
- (Measures to reduce carbon emissions and mitigate risks associated with climate change are covered below)

### Sustainability

By implementing renewable technologies and passive design techniques, the proposals will result in a significantly higher performing dwelling from a thermal and operational carbon perspective, with improved internal comfort conditions and lower running costs. The proposals implement sustainable design and construction measures (Policy SS2) as follows:

- 1) Importantly, the proposals have been developed to re-use the existing building, avoiding demolition where possible, and taking a retro-fit first approach.
- 2) The proposals include significant improvements to the thermal performance of the retained parts of the building through external wall insulation, replacement insulated floors, air-tightness and robust thermal detailing.
- 4) Biodiversity improvements and mitigation for protected species (if applicable) will be incorporated in the plans as per the recommendations of the Ecological Impact Assessment (to follow)
- 5) Though constrained by the existing positioning of the house, the design of the proposed scheme has been developed to maximise solar gain to the south westerly aspect.
- 6) It is intended that the proposed scheme will integrate a ground source heat pump (GSHP) serving low flow temperature underfloor heating, with allowance for a Demand Control Ventilation system.
- 7) A PV array is implemented to provide a renewable energy source and is proposed to sit upon the flat roof of the dormers, ensuring that it is both in an optimum position and out of view from the public.

Fig. 1 - Proposed location of pipework for GSHP



## 4.1 Use and Amount

The schedule of existing and proposed accommodation is as follows:

	Existing Dwelling (sqm)	Proposed Dwelling (sqm)
<b>Ground Floor</b>	~ 102	102
<b>First Floor</b>	~ 50	75
<b>Overall GIA</b>	<b>152 sqm</b>	<b>177sqm</b>
Number of Bedrooms	4	4
Occupants	2	2

There is an approximate gain of 25 sqm Gross Internal Area which represents a 16% increase. The alterations to the property result in no additional number of bedrooms, seeking to reorganise the internal layout to improve accessibility and comfort. The property will remain as a single private dwelling for two occupants.

## 4.2 Layout

The design proposal reorganises the internal layout of the dwelling, locating three of the bedrooms to the first floor with a shared bathroom. The main bedroom will benefit from the expansive sea views towards the south. All bedrooms will benefit from full floor to ceiling head height within the dormer spaces, increasing occupancy comfort.

At ground floor, the lightweight and low quality conservatory will be replaced with a contemporary flat roof extension and existing wall openings will be widened to accommodate an open plan living, kitchen, dining arrangement. A new entrance will be created on the southern side and the internal circulation will be reorganised to provide improved manoeuvrability throughout the home. The ground floor layout has been carefully crafted so that the snug can become an additional bedroom if the clients were to experience mobility issues in the future, thus allowing fully accessible living accommodation on a single floor.



*View from existing first floor single bedroom.*

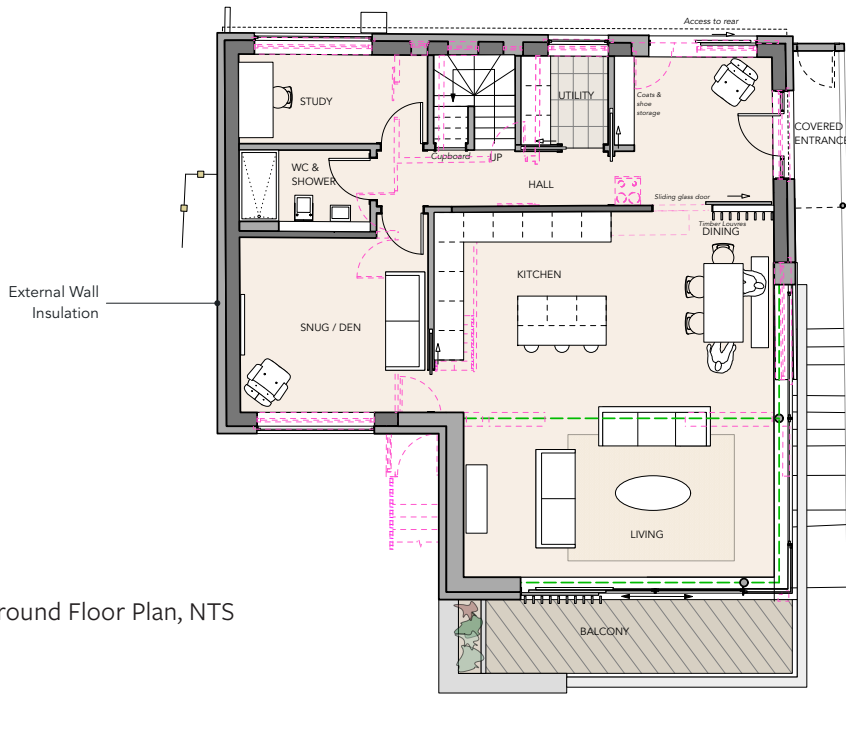
## 4.3 Scale

Through a comprehensive design process it has been assured that the proposed extension is subservient to the original building, as noted within the Isles of Scilly Design Guide: Extensions and Alterations (pg.77), with its character and overall scale retained. No increase to the footprint of the house is sought in these proposals.

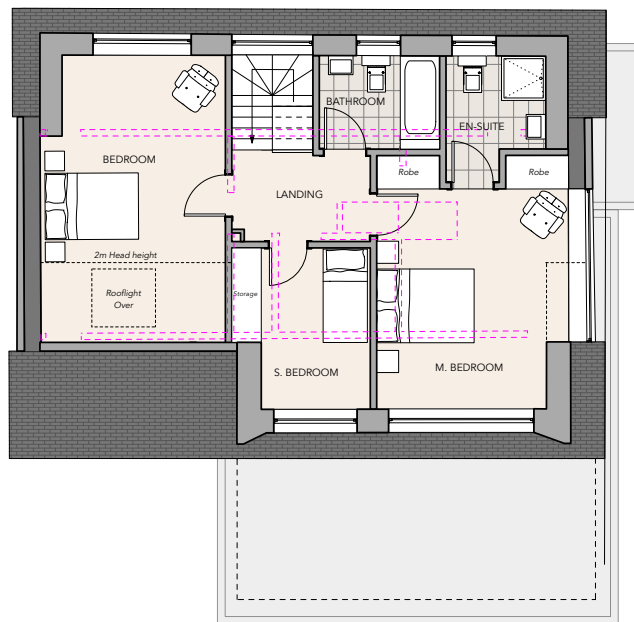
The proposal seeks to retain the existing pitched roof design to maintain the character of the dwelling, however due to its low thermal performance the proposal raises the ridge height by up to 300mm to accommodate the required thermal upgrades. This small raise in ridge height does not have any affect on the relationship between the house and any neighbouring buildings. The flat roof of the ground floor extension is up to 700mm higher than the existing polycarbonate roof of the conservatory and this is to accommodate a consistent internal ceiling height and a high level of thermal performance. Glazing has been proposed to the south-west and north-west elevations to maximise the views towards the sea. As the building is the final house in the row on Buzza Street, the glazing will not impede or cause overlooking to neighbouring properties as it is facing towards the ocean.



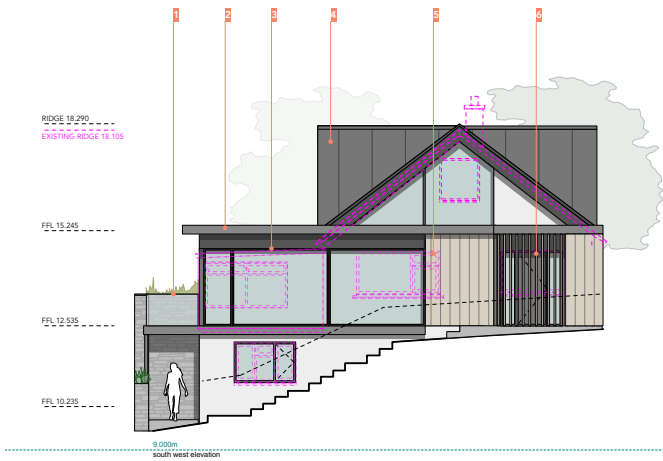
Careful consideration has been taken for the design, position and scale of the proposed dormer windows. The majority of the additional GIA has been found within the rear-facing dormer as this will not be seen by the public or neighbouring buildings. Whereas the front-facing dormer has been kept to a minimum and has been positioned to align with the ground floor extension to provide a cohesive appearance. The remaining expanse of pitched roof ties in to the character of the buildings context.



Proposed Ground Floor Plan, NTS



Proposed First Floor Plan, NTS



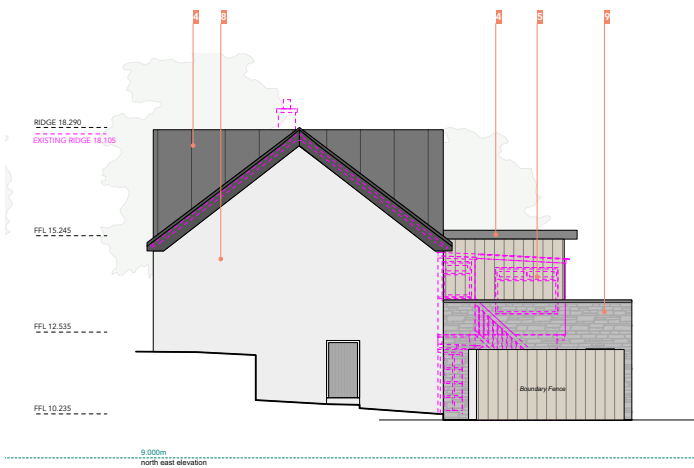
**PROPOSED SOUTH WEST ELEVATION**  
SCALE: 1:100



**PROPOSED NORTH WEST ELEVATION**  
SCALE: 1:100

**Materials**

- 1 - Glass balustrade
- 2 - Grey aluminium
- 3 - Dark grey framed glazing
- 4 - Dark grey zinc to match roof tiles
- 5 - Vertical timber cladding
- 6 - Timber louvre privacy screen
- 7 - Slate tiles
- 8 - Painted render
- 9 - Stone cladding



**PROPOSED NORTH EAST ELEVATION**  
SCALE: 1:100



**PROPOSED SOUTH EAST ELEVATION**  
SCALE: 1:100

**Materials**

- 1 - Glass balustrade
- 2 - Grey aluminium
- 3 - Dark grey framed glazing
- 4 - Dark grey zinc to match roof tiles
- 5 - Vertical timber cladding
- 6 - Timber louvre privacy screen
- 7 - Slate tiles
- 8 - Painted render
- 9 - Stone cladding

Proposed Elevations, NTS

## 4.4 Appearance

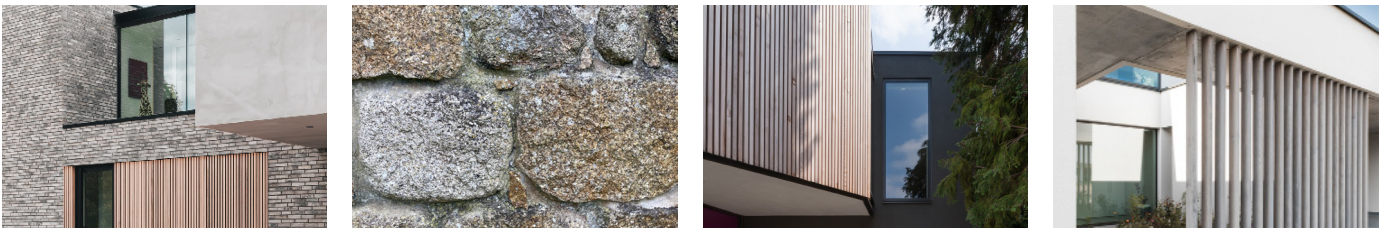
The elevation treatments of the proposed house have been developed using a palette of natural timber cladding, local stone cladding and mixed tones of render and zinc.



Proposed view of the house



Existing view of the house



Indicative material palette

## 4.5 Landscaping

The existing house sits in mature gardens which are not affected by these proposals.

## 4.6 Site Waste

The waste produced from the internal refurbishments will mainly consist of plaster, timber, floor finishes and some masonry. The removal of the conservatory will consist mainly of insulated panels, glass and grp roof sheets.

Where possible, timber will be retained to be used elsewhere. Concrete roof tiles will be stored safely for local reuse. Waste materials will be separated into categories then cut, bagged and stored within the boathouse structure at the front of the property. These materials will then either be locally reused, recycled or disposed of by a local waste management contractor according to required procedures.

## 5.1 Access - Site

Access to the site from Buzza Street is unchanged by these proposals.

## 5.2 Access - Dwelling

The position of the existing dwelling upon the hillside restricts completely step free access to the dwelling, however the proposal seeks to vastly improve upon the existing arrangements by repositioning the main entrance. This change, coupled with the internal alterations and repositioned central stair case, greatly improves accessibility and circulation throughout the home.

## 6.1 Drainage

An additional foul drainage connection will be made for the proposed WC at the lower ground floor level. The existing foul and surface water drainage arrangements for the remainder of the property will remain as existing.

## 7.1 Conclusion

In conclusion, it is felt that these proposals represent a well-considered application for householder development that accords with the relevant development plan policy. The proposals would result in a high quality adaptation of an existing building to meet the needs of the Applicant and that would take the opportunity to achieve significant environmental improvements.





**APPROVED**

*By Lisa Walton at 3:35 pm, Nov 14, 2024*

**RECEIVED**

*By Liv Rickman at 3:22 pm, Aug 27, 2024*

## PRELIMINARY ROOST ASSESSMENT (PRA)

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### COASTGUARD'S RETREAT, ST MARY'S, ISLES OF SCILLY



*Client: Nicola Heneghan*

*Our reference: 24-6-9*

*Planning reference: Report produced in advance of submission*

*Report date: 15<sup>th</sup> July 2024*

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

*Contact: ios.ecology@gmail.com*

# Executive Summary

## Bats – Results and Findings

The preliminary roost assessment (PRA) survey of the cottage component of the property concluded that there is **Moderate Potential** for use by bats.

The flat-roof extension on the property is considered to provide **Negligible Potential** for use by roosting bats.

## Bats – Further Survey Requirements

The following recommendation is provided in order to ensure a suitable baseline to inform a Planning Application, ensure legislative compliance and to avoid negative impacts to Protected Species:

- **Two further Presence/Absence Surveys (PAS)** should be undertaken to characterise and assess the potential use of the pitched-roof cottage by bats in order to meet the standard of survey required by Best Practice Guidance to support a Planning Application.

## Nesting Birds – Results and Findings

The property provides nesting habitat for house sparrow, both through bird boxes installed on the cottage and gaps in the soffit. Further potential nesting habitat is associated with the garden areas surrounding the property.

## Nesting Birds - Recommendations

Pre-emptive measures to remove and relocate nest boxes during the winter would minimise the risk of nesting birds being present when works commence.

Timing of works to avoid the breeding season is recommended as the optimal way to avoid impacts to nesting birds; alternatively pre-commencement inspections are recommended to ensure that nesting birds are not impacted by the proposed works.

## Other Ecological Receptors

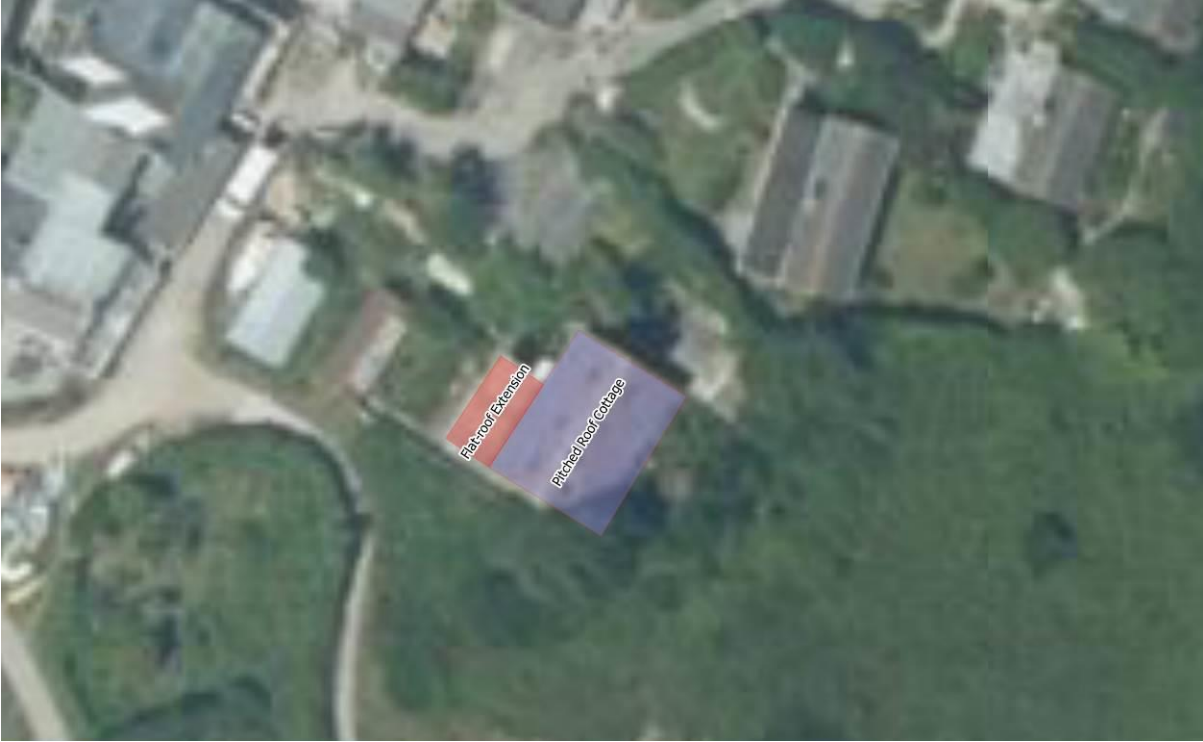
No further ecological impacts relevant to planning are identified.

## Report Status

As the requirement for two further PAS surveys is identified in accordance with the Best Practice Guidance, this report **does not provide a comprehensive baseline to inform Planning** until these surveys have been completed and their results used to inform appropriate mitigation measures.



## PRELIMINARY ROOST ASSESSMENT (PRA)

<b>Planning Authority:</b> Isles of Scilly	<b>Location:</b> SV 90548 10407	<b>Planning Application Ref:</b> Report produced in advance of application
<b>Planning application address:</b> Coastguard's Retreat, Hugh Town, St Marys		
<b>Proposed development:</b> The proposed works were identified by the client when instructing the PRA inspection and should accord with the proposals submitted for Planning including: <ol style="list-style-type: none"><li>1) Installation of dormer extensions into the existing roof;</li><li>2) Further external and internal renovation works.</li></ol>		
<b>Building references:</b> The building comprises two distinct elements which differ in structure and materials, and subsequently their potential to support roosting bats. These are identified in the map below. <ul style="list-style-type: none"><li>• Pitched-roof Cottage shown in the blue wash;</li><li>• Flat-roof Extension shown in the red wash.</li></ul>		
		
<b>Name and licence number of bat-workers carrying out survey:</b> James Faulconbridge (2015-12724-CLS-CLS)		

**Preliminary Roost Assessment date:**

The external visual inspection was undertaken on 9<sup>th</sup> July 2024 in accordance with relevant Best Practice methodology<sup>1</sup>.

**Local and Landscape Setting:**

Coastguard's Retreat is situated at the eastern end of Porthcressa Beach on the southern edge of Hugh Town in St Mary's, Isles of Scilly.

The Site is bounded to the north and west by residential development which continues – along with small-scale commercial properties – through Hugh Town to the north, north-east and north-west. Some of the proximate properties have associated areas of garden or green space, but the centre of Hugh Town is relatively densely developed.

To the east of the site, directly beyond the garden area, lie the vegetated habitats of Buzza Hill with allotments and further coastal grassland and pasture beyond.

The sandy beach of Porthcressa grades into a rocky coastline approximately 50m to the south-west of the site and extends to the west and south-east.

The desk study did not reveal any records of bats recorded roosting within the building historically. Five species of bat have been recorded on St Mary's. The species conclusively identified were common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*) and brown long-eared bat (*Plecotus auritus*). Leisler's bat (*Nyctalus leisleri*) and Nathusius pipistrelle (*Pipistrellus nathusii*) records were also returned though these species are not known to be resident on the island and are likely associated with vagrant or migratory individuals. Five records of common pipistrelle roosts are identified in relatively close proximity to the property – these relate to individual bats utilising features such as hanging slates around dormer windows or gaps behind fascias within Hugh Town to the south-east.

**Building Description***Pitched Roof Cottage*

The main cottage is a pitch-roofed dwelling which is rendered white externally. The property is a single storey high to the east but two storeys high to the west due to the change in level across the site.

The building has predominantly uPVC windows with timber door frames – the frames appear well-fitted in their apertures throughout the property.

The pitched roof is covered by interlocking tiles with ridge tiles. The structure of the tiles results in intermittent gaps which may permit access beneath but would also be capable of supporting individual bats as a roosting opportunity in their own right. The ridge tiles appear well-pointed. There are multiple skylights in the roof and, whilst many of these are tightly fitted with cement flashing at the junction with the tiles, there are access gaps beneath tiles associated with others.

Internally, the roof is largely converted to residential living space. An apex void above the tie-beam of the A-frame trusses can be viewed but not accessed due to the small size of the space at just 30-40cm at the tallest point. Well-fitted felting can be seen above the rafters with a ridge beam present. It is not clear if this void would be accessible to bats due to the limitations of access to inspect the extent of the void.

Similarly at the eaves of the upper floor residential space, there are boxed storage areas, some of which are finished and boarded out and used for routine storage whilst others are unfinished

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<sup>1</sup> Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London

with roofing felt visible above the rafters. Rodent droppings were recorded, but no evidence of bats was identified within these voids.

The rendered chimney is well-sealed at the junction with the roof with tightly fitted lead flashing.

A uPVC fascia is present on the gables, and there are minor gaps in both the north-eastern and south-western fascias which could potentially provide access for roosting bats. On the south-western gable, there is also a minor portion of missing pointing at the roof verge which could similarly provide an access features.

The soffit on the western aspect is partially obscured by the flat-roof extension described separately, and could not be fully inspected. However at the northern end, there is a visible gap and the presence of vegetation indicates it is used by nesting birds – likely house sparrow. This would imply access would also be possible for roosting bats.

#### *Flat-roof Extension*

A two-storey flat-roof extension is present on the western aspect of the cottage. The lower portion is rendered whilst the upper portion is uPVC clad – the finish in all instances is tight with no gaps noted. There is a uPVC fascia running along the apex of the wall with no gaps noted. The flat roof is clad with translucent panels which allow an abundance of light into the upper room.

The construction materials and condition of this building would not offer identifiable roosting opportunities for bats.

#### **Survey Limitations**

The following limitations on survey were noted:

- The internal voids at the eaves and apex of the cottage could not be fully inspected though all were accessed and visually assessed with regards to structure and condition;
- It was not possible to inspect at height features such as gaps in the verge or gable fascia;
- The soffit on the western aspect of the cottage could not be fully inspected due to the intervening flat-roof extension;
- There are locations within the building where evidence of bats, if present, would not have been apparent from a PRA survey, such as roosts which might be present between tiles and underfelting in the roof structure.

These are taken into account when concluding the assessments of building potential and are addressed by the recommendations for further surveys.

#### **Assessment of Potential for use by Roosting Bats**

The pitched-roof cottage is identified as providing **Moderate Potential** for use by roosting bats. This includes a range of features primarily associated with the roof structure.

This assessment also acknowledges the position of the property on the periphery of Hugh Town backing directly onto suitable foraging habitat associated with Buzza Hill and the countryside beyond.

The flat-roof extension is considered to provide **Negligible Potential** for use by roosting bats.

### **Recommendations and Justification (Bats):**

In accordance with the criteria outlined in the Best Practice Guidance<sup>2</sup>, the following surveys would be required to provide an appropriate evidence-base upon which to support a planning application:

- 2x Presence/Absence Surveys (PAS) with 2x surveyors.

The purpose of the PAS technique is to allow the building to be watched at dusk to observe bats emerging from concealed roosting locations. This uses the predictable emergence behaviour of bats to allow their presence to be detected in roosting locations which cannot be directly visually inspected.

The PAS surveys should be led by Licenced Bat Worker(s) between mid-May and mid-September. The survey would require two surveyors in order to achieve a comprehensive view of the relevant features. A minimum of three Night Vision Assistance (NVA) cameras would be required to cover the relevant features and allow the results of the surveys to be reviewed and confirmed in accordance with the Best Practice Guidance.

These surveys should be completed and submitted in support of a Planning Application in accordance with the guidance provided by Circular 06/05 (ODPM, 2005) which states that *“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”*.

For the avoidance of doubt, the current survey baseline is not sufficient to support a Planning Application with reference to the Circular 06/05.

The results of the survey would be used to inform the development of mitigation or Reasonable Avoidance Measures (RAMS) which would be submitted in support of the Planning Application.

### **Assessment of Potential for use by Nesting Birds**

The building is confirmed to support nesting house sparrows associated with boxes positioned on the eastern and northern aspect of the property, some of which were occupied at the time of survey. The soffit on the western aspect of the pitched-roof cottage is also likely to support nesting house sparrow.

Further potential nesting opportunities are associated with the garden and surrounding vegetation which may be directly or indirectly impacted by the proposed work including during erection of scaffolding and contractor presence.

### **Recommendations and Justification (Birds):**

In order to ensure legislative compliance, the contractors undertaking the works must ensure that nesting birds are not disturbed in accordance with requirements under the Wildlife and Countryside Act (1981).

#### *Pre-emptive Removal of Nest Boxes*

It is recommended that the nest boxes are removed from the building during the winter period (October – February inclusive) once it is confirmed that birds have ceased nesting. These should be installed in alternative locations around the property where they can remain undisturbed during the works.

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<sup>2</sup> Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London

It is recommended, subject to the results of the bat survey, that the gap in the soffit on the western aspect is also sealed during the winter period to prevent this feature from being re-used by nesting birds in the spring. This must only be undertaken if the recommended PAS surveys confirm that there are no roosting bats associated with this feature.

*Timing of Works*

The proposed works could be undertaken outside of the breeding season which runs from March – September inclusive, where practicable. This would provide the most robust means of avoiding risk of impact to nesting birds.

*Pre-commencement Inspection*

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

Care must also be taken to ensure that the works do not cause disturbance or damage to proximate nesting areas through indirect impacts including vibration, noise or contractor presence. This includes the shrubs and other vegetation associated with the garden areas.

**Signed by bat worker(s):**

**Date:** 15<sup>th</sup> July 2024



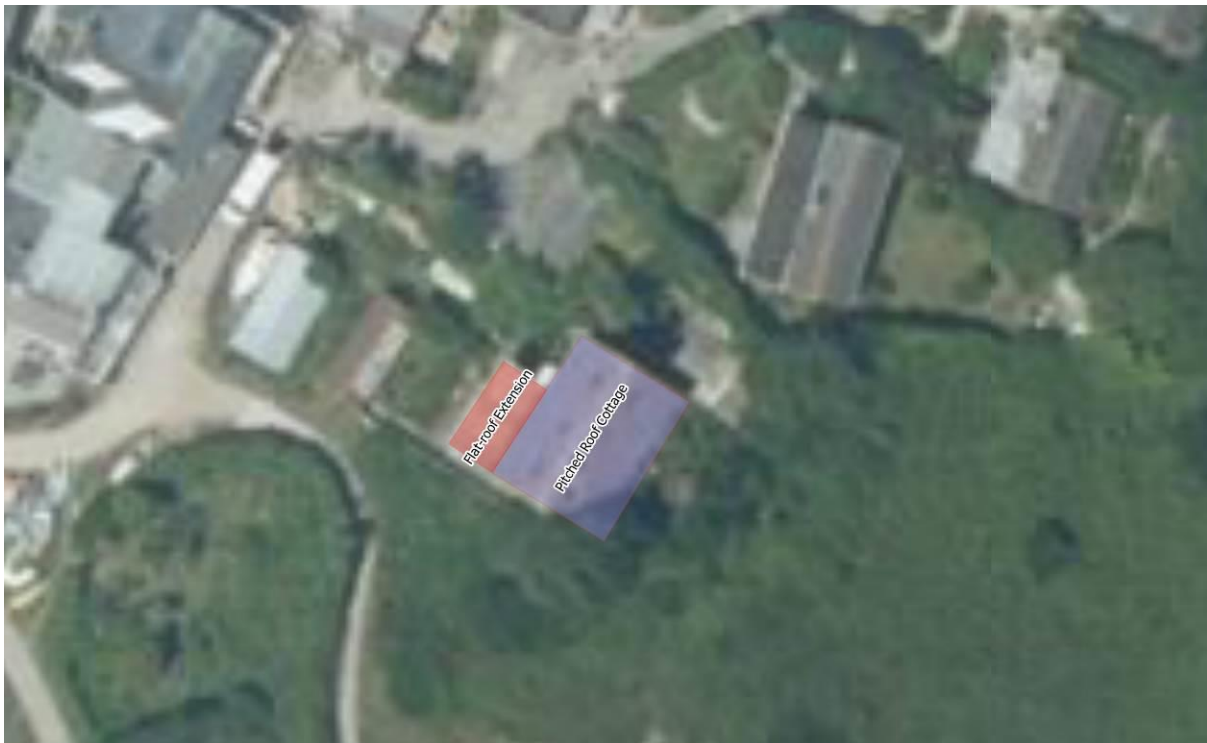
# APPENDIX 1

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## LOCATION PLAN AND PHOTOGRAPHS



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



**Map 02** – Showing the different elements of the building included within the survey scope due to either direct or potential indirect impacts arising from the proposals.





**Photograph 1:** Showing the internal boxed area at the eaves – this is an example of an un-finished void.



**Photograph 2:** Showing the small apex void as viewed from the small hatch



**Photograph 3:** Showing an example of the gap beneath a tile at the edge of the roof



**Photograph 4:** Showing an example of the gaps at the intersections between tiles

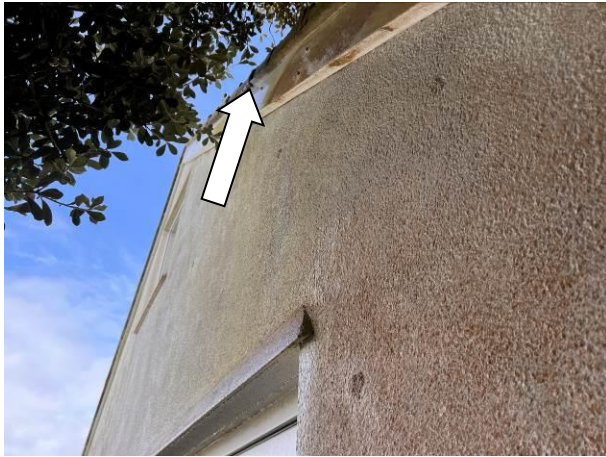


**Photograph 5:** Showing the rear of the property (eastern aspect) – one of the bird boxes is indicated



**Photograph 6:** Showing an example of a gap at the junction between the eaves soffit and the uPVC gable cladding.





**Photograph 7:** Showing the southern gable where the uPVC cladding is otherwise tightly fitted. The location of the missing pointing in the verge is indicated.



**Photograph 8:** Showing the flat-roof extension on the western aspect of the property. The fibreglass roof can be seen through the upper floor window.



**Photograph 9:** Showing the bird boxes on the northern gable



**Photograph 10:** Showing the gap in the soffit on the western gable with vegetation present indicating use as a nesting site.

**APPROVED**

*By Lisa Walton at 3:36 pm, Nov 14, 2024*

**RECEIVED**

*By Liv Rickman at 9:19 am, Sep 26, 2024*

## BAT PRESENCE/ABSENCE SURVEYS (PAS)

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### COASTGUARD'S RETREAT, HUGH TOWN, ST MARY'S, ISLES OF SCILLY



*Client: Duchy of Cornwall*

*Our reference: 24-7-9*

*Planning reference: P/24/067/HH*

*Report date: 24<sup>th</sup> September 2024*

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

*Contact: ios.ecology@gmail.com*

# Executive Summary

<b>Overview</b>
<p>A total of two Presence/Absence Surveys (PAS) were undertaken on the residential property known as Coastguard's Retreat in Hugh Town, St Mary's, Isles of Scilly.</p> <p>The results of these PAS surveys are compiled in this report which should be read alongside the Preliminary Roost Assessment (PRA) report for this site.</p>
<b>Results</b>
<p>The surveys did not identify any bats emerging from the property.</p> <p>The surveys recorded high levels of common pipistrelle bats foraging in the garden of the property close after sunset indicating the likelihood of a nearby but offsite roost. No other bat species were recorded.</p>
<b>Conclusion</b>
<p>The survey evidence accords with the Best Practice Guidance requirements to conclude 'Probable Absence' of bats.</p> <p>No further surveys are required and there is no requirement for a European Protected Species Mitigation Licence (EPSML).</p>
<b>Mitigation Strategy</b>
<p>A precautionary method of working would represent good practice during construction and renovation works – outline recommendations are provided in this report.</p> <p>Recommendations to enhance the provision of roosting habitat for local bat populations are provided in this report.</p>
<b>Planning Recommendations</b>
<p>The PRA and PAS reports together provide an appropriate ecological baseline for the purposes of assessing the Planning Application. No further surveys would be required.</p>

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# 1. Introduction

## 1.1. Background to Surveys

The scope of the survey includes the property known as Coastguard's Retreat which is situated at the eastern end of Porthcressa Beach on the southern edge of Hugh Town in St Mary's, Isles of Scilly.

The proposed works include the installation of dormer extensions into the existing roof; and further external and internal renovation works.

A Preliminary Roost Assessment (PRA) of the site undertaken in July 2024 identified Moderate Potential for use by roosting bats.

The PRA report stated that further PAS surveys would be required to provide an evidence base sufficient to identify the status of the building with regards to bats, and inform any mitigation measures required to ensure legislative compliance. This PAS report provides the results of the recommended surveys. It should be read alongside the PRA report to provide a comprehensive assessment of the site with regards to ecological receptors.

## 1.2. Survey Objectives

In accordance with the Best Practice Guidance<sup>1</sup>, the relevant aspects of the building were subject to two PAS surveys with two surveyors with Night Vision Aids (NVAs) positioned to observe those locations where potential access or roosting features were identified. An additional NVA was used to ensure full coverage of the western aspect of the property.

The overall objective is to provide a comprehensive baseline upon which to assess the potential impact of the proposed works on roosting bats.

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<sup>1</sup> Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London

## 2. Survey Methodology

### 2.1. Surveyor Details

The surveys were led by Darren Hart. Darren has undertaken Professional Bat Licence training and is a Level 2 Licenced Bat Worker with experience in undertaking emergence, re-entry and activity surveys.

Additional surveyors are experienced in undertaking emergence and re-entry surveys and worked under the supervision of the Licenced Bat Worker.

The NVA review, assessment and reporting were completed by James Faulconbridge, trading as IOS Ecology. James is a Level 2 Licenced Bat Worker with over 15 years' experience in undertaking ecological assessments to support Planning and Development.

### 2.2. Survey Methodology

The dusk emergence surveys were conducted following Best Practice methodology for bat surveys.

The two PAS surveys were carried out on the evenings of 26<sup>th</sup> August 2024 and 12<sup>th</sup> September 2024 – scheduled three weeks apart in accordance with Best Practice guidance.

The dusk emergence surveys commenced from approximately 15 minutes before sunset and continued until 90 minutes after sunset. The surveys were undertaken with regard for the appropriate weather conditions ( $\geq 10^{\circ}\text{C}$  at sunset, no/light rain or wind).

Frequency division bat detectors were used to detect and record all bat passes. The surveyor recorded metadata including the time the pass occurred, the behaviour observed (foraging/commuting) and where possible, the species of bat observed. Results from the bat detector recordings were analysed using BatSound/Analog sonogram analysis computer software.

Night Vision Aids (NVAs) were used at each surveyor position and an additional location to ensure comprehensive coverage – these comprised three Nightfox Whisker infra-red cameras with additional infra-red torches. The footage from these NVAs was watched back to verify or amend the survey results confirmed in the field.



### **2.3. Survey Validity and Update**

Bats are transient in their use of roosting habitats, and apparently minor changes in condition or use of the building can affect suitability. However in the absence of significant changes in condition or building use, the nature and character of the site suggest that the PAS survey can be considered valid for a period of 12 months after the survey was completed, until September 2025.

## 3. Results

### 3.1. Surveyor Positions

In order to ensure that the building received a survey effort in line with the Best Practice Guidance appropriate to its potential (as identified in the PRA survey) two surveyor positions and an additional NVA position were identified. These are identified in Map 01 below.



**Map 01** – showing surveyor (S1 and S2) and the additional NVA positions (NVA3) around the property. See PRA report for details of building references and components of the structure which provide potential roosting or access features.

### 3.2. PAS Survey 1

#### 3.2.1. Survey Conditions

The first dusk survey was undertaken on 26<sup>th</sup> August 2024. The survey commenced at 8:05pm, approximately 15 minutes before sunset at 8:20pm. It was completed at 9:50pm.

The temperature throughout the survey was 17°C. The evening was mild with a fresh breeze and a clear sky with 5% high cloud cover. There was no precipitation.

#### 3.2.2. Survey Results

The survey did not identify any emergence activity.

#### 3.2.3. Bat Activity Results

The majority of activity was recorded by the surveyor in position S1 to the east of the property. On this aspect, the land rises sharply at the end of the garden

and overhanging vegetation creates a sheltered microclimate which is likely to provide good quality foraging habitat. The first bat was recorded by the surveyor S1 at 8:44pm when it was observed flying into the site from the north. This foraging activity continued until the end of the survey.

Activity levels on the western aspect observed by surveyor S2 were much lower with the first bat recorded at 8:56pm and intermittent foraging observed until the end of the survey.

### **3.3. PAS Survey 2**

#### **3.3.1. Survey Conditions**

The second dusk survey was undertaken on 16<sup>th</sup> September 2024. The survey commenced at 7:20pm, approximately 15 minutes before sunset at 7:35pm. It was completed at 9:05pm.

The temperature at the beginning of the survey was 16°C falling to 15°C by the end of the survey. The evening was dry with a clear sky and a very gentle easterly breeze.

#### **3.3.2. Survey Results**

The survey did not identify any emergence activity.

#### **3.3.3. Bat Activity Results**

The majority of activity was recorded by the surveyor in position S1 to the east of the property, consistent with the previous PAS 1. The first bat was recorded by the surveyor S1 at 7:53pm when it was observed flying into the site from the south. This activity continued intermittently with periods of more intensive foraging until the end of the survey.

Activity levels on the western aspect observed by surveyor S2 were lower, often observing the same bats as the surveyor in position S1 when the bats briefly appeared above the roofline in the course of foraging. Occasional additional foraging and commuting bats were also recorded throughout the survey.

### **3.4. Summary and Evaluation**

#### **3.4.1. Overview**

The surveys did not identify any bats emerging from the building – this is sufficient to conclude ‘Likely Absence’ in accordance with the Best Practice Guidance.

The high levels of foraging activity relatively close to sunset on both survey occasions indicates the likelihood of a roost nearby offsite. The rear garden to the east of the property provides high quality foraging habitat.

### 3.4.2. Requirement for Further Surveys

No further surveys are required to provide an appropriate ecological baseline in accordance with the Best Practice Guidance.

## 3.5. Limitations and Constraints

### 3.5.1. Seasonal Timing

The surveys were undertaken within the main active season in 2024 and spaced more than three weeks apart – this conforms with the recommended survey timings within the Good Practice Guidelines.

### 3.5.2. Survey Conditions

The weather conditions were optimal with no precipitation or other adverse conditions which might be expected to affect bat behaviour.

### 3.5.3. Visibility and Coverage

The surveys were comprehensive with regards to surveyor visibility with the exception of a very minor section on the north-western corner of the property which was not directly visible to surveyor S2. This aspect was therefore the focus of the NVA3 camera and the footage from this unit was reviewed back carefully to rule out any emergence from this location.

### 3.5.4. NVA Footage

The NV camera Field of Vision (FOV) covered the areas under survey – see Appendix 2 for example screenshots from the footage.

## 4. Mitigation Strategy

### 4.1. EPSML Requirement

The project does not require a European Protected Species Mitigation Licence (EPSML) to proceed.

### 4.2. Precautionary Method of Works

As individual bats can be exploratory or make transient use of roosting opportunities, it is important that contractors undertaking the proposed works are aware of the low risk for bats to be encountered - works should therefore proceed with appropriate caution and vigilance.

A Precautionary Method of Works (PMW) is outlined in Appendix 1 of this document and should be followed by contractors undertaking works.

### 4.3. Timing of Works

#### 4.3.1. Bats

The results of the PRA/PAS surveys do not indicate that there is a requirement for seasonal constraints on the timing of works with regards to bats.

#### 4.3.2. Nesting Birds

Assessment of potential for nesting birds, and appropriate mitigation measures, are provided in the PRA report. These recommendations are not repeated here, for brevity.

### 4.4. Habitat Enhancement / Mitigation

The proposals would not directly affect any confirmed roosts, commuting routes or foraging habitat – therefore no habitat creation or enhancement is required.

If the applicant wished to provide enhancement measures, the installation of a bat box within the grounds of the property would have a high likelihood of occupation given the location in optimal habitat. The box should be positioned on a gable wall or tree facing the perimeter of the garden at a height of at least 3m. An open-based box design would ensure that it would not require cleaning. The location and aspect would be optimal for bats such as common pipistrelle which is the dominant species present on the island and the most likely species to use the environs for foraging and roosting.

A suitable box could be purchased or constructed following freely available plans. Kent Bat Box style boxes are slim and easy to construct from appropriate timber using the plans provided at: <http://www.kentbatgroup.org.uk/kent-bat-box.pdf>



## Appendix 1 - Precautionary Method Statement with regards to Bats

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

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

### **Relevant Legislation regarding Bats**

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

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

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

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

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

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

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

Contractors should be aware of **where bats are most likely to be found in respect to the existing building**. The generic recommendations relating to each type of feature are outlined below – locations where these features occur are listed in the PRA report:

#### **Fascias / Soffits**

There are occasional gaps where the fascias or soffits meet the walls - where these are to be removed or impacted as part of the proposed works, they should be carefully removed and the gaps behind them exposed in such a way that, in the unlikely event that bats are present, they are not injured or killed by the action.

Once these areas are fully exposed, they can be visually inspected by contractors. Any cavities exposed by this action should also be carefully inspected and features dismantled by hand where necessary until absence of bats can be confidently confirmed.

#### **Damaged/Lifted Tiles**

There are locations where there are minor gaps beneath individual tiles or at the junction between two tiles.

Where these tiles are to be removed as part of the proposed works, the tiles around any lifted/damaged sections should be removed carefully and the undersides inspected in such a way that, in the unlikely event that bats are present, they are not injured or killed by the action. Extra care should be taken when removing the first run(s) of tiles around the gables and eaves.

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

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

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

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

## Appendix 2 – NVA Screenshots



NVA S1 – showing footage from the Nightfox Whisker at surveyor position S1.



NVA S2 – showing footage from the Nightfox Whisker at surveyor position S2.



**NVA 3** – showing footage from the Nightfox Whisker at NVA 3 – the angled FOV was selected to maximise the coverage whilst taking into account the limitations of the available vantage points for the camera.