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PRELIMINARY ROOST ASSESSMENT (PRA)

HIGH STEPS, HUGH TOWN, ST MARY'S, ISLES OF SCILLY



Client: Steve Cowsls

Our reference: 24-12-3

Planning reference: Produced in advance of submission

Report date: 1st February 2025

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Executive Summary

Bats – Results and Findings

The preliminary roost assessment (PRA) survey concluded that there was **negligible bat roosting potential** in relation to the structures to be impacted by the proposed works.

Whilst a negligible potential is concluded, it is noted that there is a small chance of opportunistic/transient use of individual discreet features. This potential is not sufficient to justify further surveys, but should be taken into account in accordance with the precautionary principle.

This judgement was reached in accordance with the survey methodologies and evaluation criteria outlined in the Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th edition.¹

Bats – Further Survey Requirements

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

Bats – Recommendations

Standard good practice and vigilance should be observed by the contractors undertaking the works in acknowledgement that bats are transient in their use of roosting opportunities and may explore potential locations, especially if the condition of structural features were to change. A specific methodology is provided in Appendix 1.

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

Nesting Birds – Results and Findings

No obvious nesting habitat for breeding birds was identified associated with the property, though there is potential for individual bird species to find isolated opportunities if the structural condition of the property were to change.

Nesting Birds - Recommendations

Contractors undertaking the works should be vigilant to the potential presence of nesting birds if conditions or opportunities change between the time of the survey and the commencement of works.

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

PRELIMINARY ROOST ASSESSMENT (PRA)

Planning Authority: Isles of Scilly	Location: SV 90130 10624	Planning Application ref: Report produced in support of application
Planning application address: High Steps, Hugh Town, St Mary's, Isles of Scilly		
Proposed development: The proposals for the property were outlined by the client upon instruction of the survey and should correspond with the details included in the Planning Application submitted alongside this report. These involve: <ul style="list-style-type: none"> • The replacement of existing dormer windows on the northern pitch of the roof; • Installation of new dormer windows on the southern pitch of the roof. 		
Building references: The building is a detached dwelling identified in the plans provided in Appendix 2. The main property, identified in the Plan as 'High Steps', is distinguished from the 'Rear Lean-to' which is also present.		
Name and licence number of bat-workers carrying out survey: James Faulconbridge (2015-12724-CLS-CLS)		
Preliminary Roost Assessment date: The visual inspection was undertaken on 30 th January 2025 in accordance with relevant Best Practice methodology ² .		
Local and Landscape Setting: The property is situated on Jerusalem Terrace within the residential area of Hugh Town in St Mary's in the Isles of Scilly. The land use immediately surrounding the property comprises dense residential development with small gardens as well as associated access roads. Beyond the adjacent residential development, the land to the west of the property comprises green space associated with the Garrison and Star Castle – this is a mosaic of amenity and semi-improved grassland, elm woodland, conifer trees, heathland and coastal grassland. The shoreline of Town Beach is situated 60m to the north-east with the coastline then extending north-west and south-east of this point. 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 (<i>Pipistrellus pipistrellus</i>), soprano pipistrelle (<i>Pipistrellus pygmaeus</i>) and brown long-eared bat (<i>Plecotus auritus</i>). Leisler's bat (<i>Nyctalus leisleri</i>) and Nathusius pipistrelle (<i>Pipistrellus nathusii</i>) 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. Six records of common pipistrelle roosts are identified in relatively close proximity		

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

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 east as well as small maternity and non-breeding summer roosts. There is a single record of a brown long-eared bat utilising a roosting feature in a pine tree in the Garrison woods to the west.

Building Description(s):

The following description will provide an overview of the construction and structural condition of the property with a focus on features which, by their design or condition, could provide suitable roosting opportunities for bats.

The property is a detached dormer bungalow with accommodation built into the existing roofspace.

The exterior of the property is rendered and in good condition with no gaps or cracks in the covering. uPVC doors and windows are well-fitted within their apertures throughout.

uPVC soffits run along the eaves and the gable of the property – these appear to be well-fitted throughout. Minor potential gaps occur where the soffit meets the wall on the western gable, though these were inspected with close-focusing binoculars and appear to be superficial. Guttering runs close to the terminal tiles along the eaves of the property and obstructs the potential for a direct fly-in access at these locations.

There is a flat-roof bay window on the front of the property – this feature appears to be well-sealed and offers no roosting opportunities for bats.

The roof is dry-laid natural slate – this is in good condition throughout with no lifted, cracked or damaged tiles noted. The ridge is well-pointed throughout. A single skylight is present on the northern aspect.

Existing dormers are present on the northern aspect of the property – these have gently sloping roofs covered with natural slate in the same manner as the main roof. The sides of the dormers are covered with hanging tiles which appear to be well-fitted and in good condition. Potential minor niches which could potentially support roosting bats are noted where the lead flashing which lines the joint between the dormer and the main roof is occasionally slightly lifted; and in the location where the fascia overtops the hanging tiles on the side of the dormer. There is also a minor gap within the soffit on the north-west corner of the eastern dormer. The majority of these were inspected with a video endoscope and no evidence of current or recent occupation by bats could be seen. These potential features are likely to be technically capable of supporting a single roosting bat on an opportunistic basis at best; however the structural position and poor fly-in would reduce their suitability.

Internally, there is a minor sealed apex void which could not be accessed for inspection; however the external inspection provides high confidence that no access to this feature can be gained by bats due to the absence of suitable features.

There is a storage space built into the eaves of the property which is accessed via hatches in the side walls of the upper floor rooms. These are largely unfinished internally and used for regular storage; panel-insulation is installed in the adjoining wall between the void and the internal accommodation. These areas were fully accessed and inspected – no evidence of bats or rodents was identified. The roofing felt above the timber trusses is in good condition throughout. There are exposed breeze-block walls at the gables though the pointing here appears to be good. No light (indicating potential direct access for bats) could be seen at the eaves.

There is a lean-to porch which spans the gap between the southern aspect of the property and a stone wall behind. This has translucent uPVC roof panels and is light and airy. No potential roosting opportunities for use by roosting bats could be identified associated with this portion of the structure.

Potential roosting features associated with the property therefore appear to be restricted to:

- The lead flashing lining the joint between the dormer and the main roof where it is occasionally slightly lifted;
- The fascia where it overtops the hanging tiles on the sides of the dormers; and
- A minor gap within the soffit on the north-west corner of the eastern dormer.

Survey Limitations

No other significant constraints on access or inspection were noted.

Assessment of Potential for use by Roosting Bats

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

This assessment of potential takes into account:

- The characteristics of the minor features noted;
- Their structural position within the building and the nature of a potential fly-in route;
- The absence of any evidence of occupation by bats, as ascertained via a video endoscope inspection; and
- The central location of the property within the highly built-up area of Hugh Town with abundant equivalent features in the immediate environs.

Recommendations and Justification (Bats):

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

Standard good practice and vigilance **must be observed** by the contractors undertaking the works in acknowledgement that bats are transient in their use of roosting opportunities and may explore potential locations. The potential for individual common pipistrelle bats to make use of minor opportunities associated with identified features should be taken into account during works.

At the discretion of the Planning Authority, a compliance condition could be included in any Planning Application approval requiring that works proceed in line with the PMW requirements outlined in Appendix 1 of this report. This is in order to ensure that roosting bats are not impacted by the proposed works.

The proposals would not affect any confirmed roosts, commuting routes or foraging habitat – therefore no habitat creation is required with regards to bats.

It is recommended that a bat box could be installed on the eastern or western gable of the property to provide an enhancement in the availability of roosting habitat on the islands. This should be positioned close to the apex, to avoid risk of predation by cats, and securely attached with due regard to the weather conditions and wind exposure experienced in this location during the winter months. A Kent Bat Box or similar design would be suitable for this location – the box selected should be suitable for use by common pipistrelle, the species most likely to use a roost in this location.

Assessment of Potential for use by Nesting Birds

The property and its immediate environs do not appear to offer suitable nesting habitat for breeding birds due to a relative lack of vegetation and the tightly sealed nature of the existing structure.

Recommendations and Justification (Birds):

Contractors undertaking the works should be vigilant to the potential presence of nesting birds if conditions or opportunities change between the time of the survey and the commencement of works.

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).

Survey Validity and Update

The data supporting this PRA are considered to provide an appropriate baseline for a planning application submitted within 12 months from the date of survey.

It is recommended that if there are significant changes in building condition, or if a Planning Application is not submitted by February 2026, then an updated walkover survey should be undertaken in order to identify any changes in the ecological assessment of the Site and update/amend the assessment accordingly.

APPENDIX 1

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PRECAUTIONARY METHOD STATEMENT WITH REGARDS TO BATS

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

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

Relevant Legislation regarding Bats

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

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

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

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

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

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

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

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

Lead Flashing

Minor lifted sections occur within the lead flashing where the dormers meet the roof tiles below.

Locations where the flashing is lifted should be exposed carefully such that if any bats were present behind the lifted element, they would not be crushed or otherwise injured by the operation. Contractors should satisfy themselves that no bats are present before proceeding with works in these areas.

Fascias

There are minor superficial gaps where the fascias meet the hanging tiles on the sides of the dormers. A minor gap also exists in the north-western corner of the eastern dormer.

They should be carefully removed and the gaps behind them exposed in such a way that, in the highly unlikely event that bats are present, they are not injured or killed by the action. Contractors should satisfy themselves that no bats are present before proceeding with works in these areas.

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

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

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

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

APPENDIX 2
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LOCATION PLAN AND PHOTOGRAPHS



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



Map 02 - Showing the property indicated by the red wash with the rear lean-to indicated by the blue wash.



Photograph 1: Showing the well-fitted dry-laid natural slate tiles



Photograph 2: Showing the front aspect of the property with one of the dormers present in the northern pitch visible



Photograph 3: Showing an example of the well-fitted soffits



Photograph 4: Showing the rear southern pitch of the roof with the lean-to structure visible



Photograph 5: Showing an example of the minor lifted flashing where the existing dormer meets the roof



Photograph 6: Showing the side of the dormer – the fascia overtopping the hanging tiles is indicated



Photograph 7: Showing the interior of the loft conversion – the sealed apex void is visible



Photograph 8: Showing an example of the eaves storage with well-fitted roofing felt visible above the timber trusses