



IMPORTANT – THIS COMMUNICATION AFFECTS YOUR PROPERTY

COUNCIL OF THE ISLES OF SCILLY

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

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

PERMISSION FOR DEVELOPMENT

Application No: P/25/037/FUL **Date Application Registered:** 14th April 2025

Applicant: Neil Godden
Rock House
Higher Town
St Martin's
Isles Of Scilly
TR25 0QL

Site address: Rock House Higher Town St Martin's Isles Of Scilly TR25 0QL
Proposal: To remove asbestos cement tiles on shared roof of Rock House and Rock Cottage, reroof with dry laid and nailed Riverstone Slate, renew fascia and soffit boards and replace aged rainwater goods (Listed Building)

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**
 - **Plan 2 Site Plan**
 - **Design, Access and Heritage Statement**
 - **Preliminary Ecological Appraisal (PEA) by IOS Ecology, Ref: 25-2-1 dated 20 February 2025**
 - **Bat Presence/Absence Survey (PAS) by IOS Ecology, Ref: 25-6-5 dated 24 June 2025**
- 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, OE2 and OE7 of the Isles of Scilly Local Plan (2015-2030).
- C3 The materials used in the construction of the development hereby approved shall be as detailed within the permitted application particulars and shall be retained permanently as such.**
Reason: To safeguard the historic fabric and the architectural character and appearance of the listed building.
- C4 With respect to nesting birds, the development, hereby approved, should be carried out in accordance with the recommendations as set out in the Preliminary Ecological Appraisal**

(PEA) by IOS Ecology, Ref: 25-2-1 dated 20 February 2025, particularly in respect to the timing of the works. Any works affecting the roof should be undertaken outside the breeding season which runs from March-September (inclusive) unless a documented pre-commencement inspection has first taken place to establish no nests are present. In the unlikely event that a bird nest is present, once works commence, it must be left undisturbed until any chicks have fledged, at which point works can proceed.

Reason: In the interests of protecting birds and their habitats in accordance with Policy OE2 of the Isles of Scilly Local Plan (2015-2030).

- C5** The bird nesting enhancement opportunities set out on Page 7 of the Preliminary Ecological Appraisal (PEA) by IOS Ecology, Ref: 25-2-1 dated 20 February 2025, should be carried out either as part of the re-roofing works, or installed within the first 6 months following the completion of the development to ensure appropriate habitats for nesting birds are provided. Reason: In the interests of enhancing biodiversity at this site, in accordance with Policy SS2(2) g) of the Isles of Scilly Local Plan (2015-2030).

- C6** With respect to bats, the development, hereby approved, should be carried out in accordance with the recommendations as set out in the Bat Presence/Absence Survey (PAS) by IOS Ecology, Ref: 25-6-5 dated 24 June 2025, particularly in respect to the outline recommendations for the precautionary method of working (Appendix 1). Reasons: In the interests of protecting bats and their habitats in accordance with Policy OE2 of the Isles of Scilly Local Plan 2015-2030).

- C7** The bat habitat enhancement opportunities, set out on page 9 of the Bat Presence/Absence Survey (PAS) by IOS Ecology, Ref: 25-6-5 dated 24 June 2025, should be carried out either as part of the re-roofing works, or within 6 months following the completion of the development, to ensure appropriate habitat opportunities for bats can be provided. Reason: In the interests of enhancing biodiversity at this site, in accordance with Policy SS2(2) g) of the Isles of Scilly Local Plan (2015-2030).

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 creative way, in accordance with paragraph 39 of the National Planning Policy Framework 2024.
2. **BATS:** Bats and their roosts receive strict legal protection under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2010 (as amended). All work must stop immediately if bats, or evidence of bat presence (e.g. droppings, bat carcasses or insect remains), are encountered at any point during this development. Should this occur, further advice should be sought from Natural England and/or a professional ecologist.
3. **BIODIVERSITY NET GAIN:** 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 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 Council of the Isles of Scilly.
4. **BUILDING CONTROL:** 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.
5. **COMMENCEMENT NOTICE:** Under Section 93G of the Town and Country Planning Act 1990 (as amended), this decision notice informs you that a 'commencement notice' must be served on the Local Planning Authority - subsections (2) and (3) are set out below:
 - (2) Before the development is begun, the person proposing to carry it out must give a notice (a "commencement notice") to the local planning authority specifying the date on which the person expects the development to be begun.
 - (3) Once a person has given a commencement notice, the person:
 - may give a further commencement notice substituting a new date for the date previously given, and

- must do so if the development is not commenced on the date previously given

The notice should be provided to the Local Planning Authority a minimum of seven (7) days before the development commences. Failure to provide the commencement notice could lead to the Local Planning Authority serving notice on them to require information to be provided, and if that is not provided within 21 days, they will be guilty of an offence, as below:

(5) Where it appears to the local planning authority that a person has failed to comply with the requirements of subsection (2) or (3)(b), they may serve a notice on any relevant person requiring the relevant person to give the authority such of the information prescribed under subsection (4)(a) as the notice may specify.

(7) A person on whom a notice under subsection (5) is served is guilty of an offence if they fail to give the information required by the notice within the period of 21 days beginning with the day on which it was served.

(9) A person guilty of an offence under subsection (7) is liable on summary conviction to a fine not exceeding level 3 on the standard scale.

PLEASE NOTE: The requirement under Section 93G of the Town and Country Planning Act 1990 (as amended) is separate from any requirements under the Community Infrastructure Levy Regulations 2010 (as amended) or any requirements for serving notices secured through the signed Section 106 Legal Agreement.

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: 27 June 2025



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 Neil Godden

IMPORTANT: Please sign and complete this **Commencement Certificate**.

Anyone intending to begin development under a granted planning permission (including permissions varied under Section 73) is required to notify the local authority of the Commencement Date.

What if plans change?

If development does not start on the stated date, a new notice must be submitted with the revised date.

What happens if you don't comply?

The local planning authority (LPA) can serve a notice requiring the information. Failure to respond within 21 days is an offence, punishable by a fine of up to £1,000, unless the person has a reasonable excuse.

Why is this important?

It gives LPAs better oversight of when development begins, helping with enforcement, monitoring, and infrastructure planning.

Relation to other notices:

This is separate from Building Control commencement notices, though similar in purpose.

This is to certify that decision notice: P/25/037/FUL and the accompanying conditions have been read and understood by the applicant: Neil Godden.

1. **I/we intend to commence the development as approved:** To remove asbestos cement tiles on shared roof of Rock House and Rock Cottage, reroof with dry laid and nailed Riverstone Slate, renew fascia and soffit boards and replace aged rainwater goods (Listed Building) at: Rock House Higher Town St Martin's Isles Of Scilly TR25 0QL **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.



COUNCIL OF THE ISLES OF SCILLY

Planning Department

Old Wesleyan, Garrison Lane, St Mary's, Isles of Scilly, TR21 0JD

☎01720 424455

✉planning@scilly.gov.uk

THIS LETTER CONTAINS IMPORTANT INFORMATION REGARDING YOUR PERMISSION – PLEASE READ IF YOU ARE AN AGENT DEALING WITH IS ON BEHALF OF THE APPLICANT IT IS IMPORTANT TO LET THE APPLICANT KNOW OF ANY PRE-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 unauthorised 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 - £86 per application
- Other permissions - £298 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). 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 £44 for householder type applications and £298 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.

If the scale of change is not considered to be 'non-material' you may be able to make a 'minor material amendment' which would require to you apply to vary the conditions (providing the change is not contrary to a specific condition). The fee for a householder variation of condition application would be £86, for other non-major (other than householder) development applications the fee would be £586 and for major development the fee would be £2,000.

Appealing Against the Decision

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

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

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

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

Building Regulations

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

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

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

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

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

Registering/Altering Addresses

If you are building a new dwelling, sub dividing a dwelling into flats or need to change your address, please contact the Planning Department by email: planning@scilly.gov.uk 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 0800 0831821. 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.

Location Plan

Site Address: Rock House, Cruther's Neck, Higher Town, St Martin's, TR25 0QL

RECEIVED

By Tom.Anderton at 3:06 pm, Mar 21, 2025



Date Produced: 20-Mar-2025

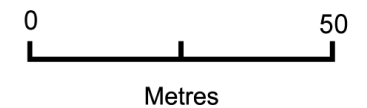
APPROVED

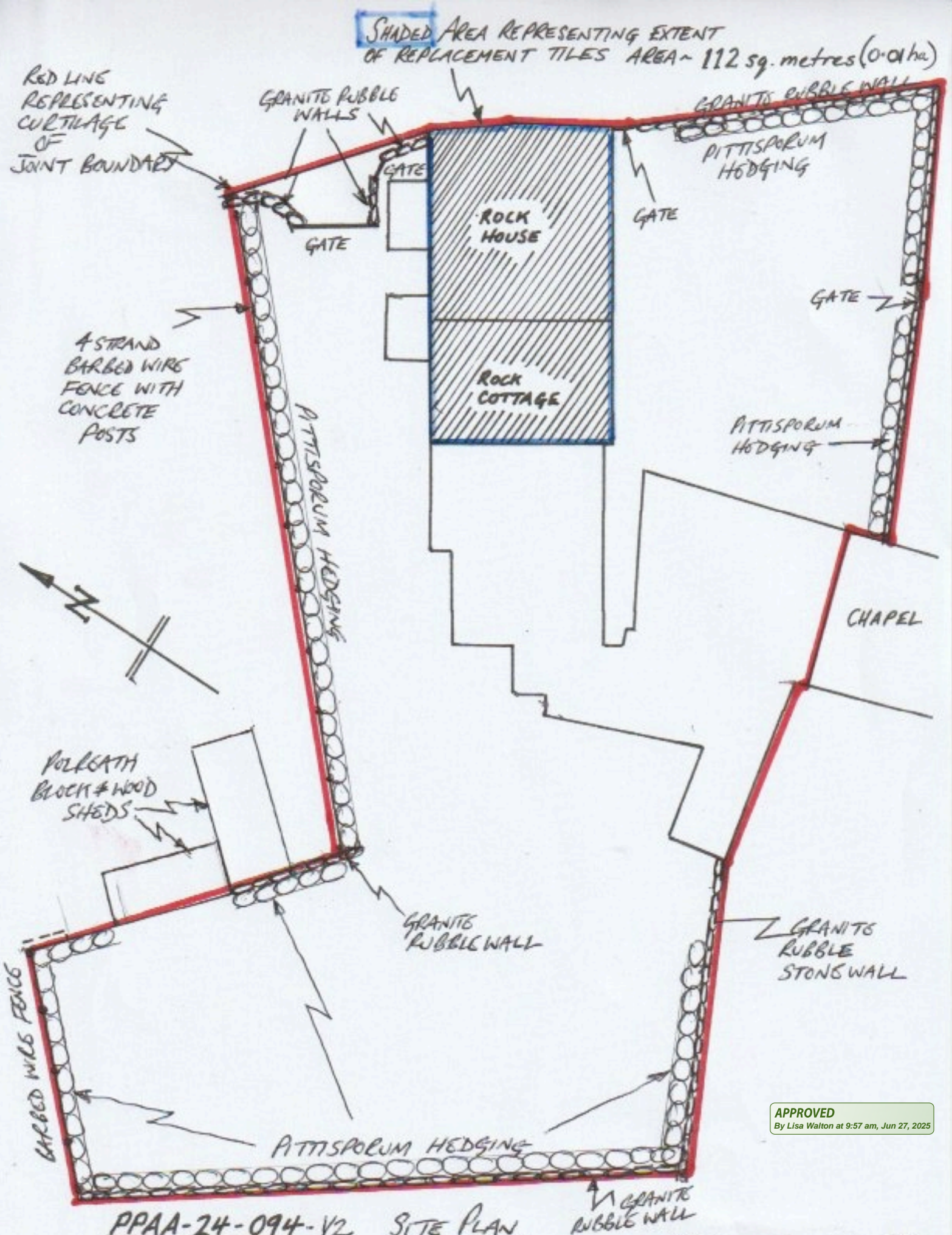
By Lisa Walton at 9:56 am, Jun 27, 2025

Scale: 1:1250 @A4



Planning Portal Reference: PP-13857673v1





APPROVED
By Lisa Walton at 9:57 am, Jun 27, 2025

PPAA-24-094-V2 SITE PLAN

SKETCH-RHO7 - CURTILAGE OF JOINT BOUNDARY
WITH REPLACEMENT ROOF SHADED

NEIL GODDEN 09 APR 2025

RECEIVED

By Liv Rickman at 1:31 pm, Apr 10, 2025

APPROVED

By Lisa Walton at 9:57 am, Jun 27, 2025

RECEIVED

By Tom.Anderton at 1:53 pm, Jun 25, 2025

BAT PRESENCE/ABSENCE SURVEYS (PAS)

ROCK HOUSE & ROCK COTTAGE, HIGHER TOWN, ST MARTIN'S, ISLES OF SCILLY



Client: Neil & Nicky Godden

Our reference: 25-6-5

Planning reference: P/25/037/FUL

Report date: 24th June 2025

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

Contact: ios.ecology@gmail.com



Executive Summary

Overview
<p>A total of two Presence/Absence Surveys (PAS) were undertaken on the semi-detached residential properties known as Rock House and Rock Cottage in Higher Town, St Martin'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>
Results
<p>The surveys did not identify any bats emerging from the property.</p> <p>The surveys recorded individual common pipistrelle bats in flight on both occasions – these were foraging or commuting individuals in the garden and local environs but were not associated with the building itself. No other bat species were recorded.</p>
Conclusion
<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>
Mitigation Strategy
<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>
Planning Recommendations
<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 semi-detached properties of Rock House and Rock Cottage. The survey scope does not include outbuildings or extensions which would not be directly or indirectly impacted by the proposals.

The proposed works include the replacement of the existing roof covering and works to repair or replace the chimneys.

A Preliminary Roost Assessment (PRA) of the site undertaken in February 2025 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 Guidance¹, 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.

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

¹ 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 survey, 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.

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

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 25th May 2025 and 23rd June 2025 – scheduled over 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/Analook sonogram analysis computer software.

Night Vision Aids (NVAs) were used at each surveyor position – these comprised two 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 June 2026.

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) there were two surveyor positions at the north-eastern and south-western corners of the property. Each surveyor had an NVA occupying the same survey position.

3.2. PAS Survey 1

3.2.1. Survey Conditions

The first dusk survey was undertaken on 25th May 2025. The survey commenced at 9:00pm, approximately 15 minutes before sunset at 9:17pm. It was completed at 10:47pm.

The temperature at the beginning of the survey was 14°C dropping to 13°C by the end. The evening was mild with a fresh breeze and 10% high patchy 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

One common pipistrelle bat was recorded foraging briefly in the garden to the east of the property at 9:48pm before flying offsite to the north-east. A second individual was recorded flying from the south-west along the eastern aspect of the property and continuing offsite to the north-east at 10:10pm.

No further bat activity was recorded.

3.3. PAS Survey 2

3.3.1. Survey Conditions

The second dusk survey was undertaken on 24th June 2025. The survey commenced at 9:20pm, approximately 15 minutes before sunset at 9:38pm. It was completed at 11:08pm.

The temperature throughout the survey was 16°C. The evening was dry and overcast with a light breeze and high patchy cloud. There was no precipitation.

3.3.2. Survey Results

The survey did not identify any emergence activity.

3.3.3. Bat Activity Results

One common pipistrelle was recorded flying in from the north and foraging around the north-eastern side of the property at 9:58pm before continuing offsite to the west. Further foraging activity was recorded intermittently but infrequently in the garden to the west of the property throughout the remainder of 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.

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 2025 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.

3.5.4. NVA Footage

The NV camera Field of Vision (FOV) covered the key areas under survey – see Appendix 2 for example screenshots from the footage. There were minor aspects which could not be covered by the cameras due to the space available or obstructions to the FOV. This constraint is addressed by three factors:

- 1) The NVAs focussed on the aspects where the key PRFs were identified – the areas outside of the FOV had lower suitability features;

- 2) Surveyors were positioned to ensure that the areas not covered by the NVAs were most proximate to their survey position and were carefully monitored in the field;
- 3) The NVAs were positioned at opposite corners of the property such that, in the event that a bat appeared from an aspect of the property outside of the FOV, it's exit would be recorded by the NVAs and could be cross-referenced with notes in the field, triggering further surveys if necessary.

The results of the survey, combining the results of the NVAs and the surveyor records allow high confidence that the results are robust.

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 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 positioned below the eaves on either aspect of the property would have a high likelihood of occupation given the location in good quality habitat towards the edge of the settlement.

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

There are occasional gaps where the fascias 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.

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 located at the survey position at the south-western corner.



NVA S2 – showing footage from the Nightfox Whisker located at the survey position at the north-eastern corner.

Design & Access & Heritage Statement

Rock



Photo Image RH04 - Easterly aspect of Rock House and Rock Cottage - Image taken by Johnathan Taylor 2017 - copyright Historic England.

House & Rock Cottage, Higher Town, St Martin's, Isles of Scilly TR25 0QL

IN SUPPORT OF PLANNING APPLICATION PPA-24-094

PROPOSED DEVELOPMENT:

This application is predominantly for the change out of roof slates from Asbestos cement tiles to a natural slate tile taking the opportunity at the same time to install new fascia boards where necessary and install new rainwater goods to replace the end of life goods currently installed . This is a joint application between Rock Cottage and Rock House as they share the same GV2 listing record (1141208) with Historic England and share the same roof over the length of the main building that is to be affected.

We consider that the works will enhance the appearance of both properties.

CURRENT POSITION

Roof Tiles

Rock House and Rock Cottage have a shared roof comprising of Asbestos cement tiles. It is probable that the roof was installed circa or pre 1984 when Asbestos cement tiles were phased out. The tiles are now aged and decaying. Evidence of this is provided by the quantity of newer individual replacement newer tiles indicated by their colour difference to the main roof; A quantity of tiles are curling at their edges i.e. developing gaps to the adjacent tiles; and most older tiles have now discoloured and faded to a greyish-white at the edges of each tile indicating age (and possible asbestos surface exposure). See photo image RH01 below:



Photo image RH01 - Northerly face of East end of Rock House roof showing Asbestos cement tiles and repair tiles, with discolouration, curling, lifting, and breakage.

Rainwater Goods

Rainwater landing on the main roof is captured in typical guttering and downpipes. Guttering runs the length of both sides of the main building and is fitted via brackets to the white painted wooden fascia board. All components of the presently installed system are of PVC. The guttering is connected to a white painted fascia. The half round gutters appear of three different ages indicated by their different colours due to a number of replacement repairs over the years. The newest black guttering found on the outbuilding roofs is in fairly good condition while the older grey guttering is of two ages: the oldest grey has its colour leached to a white and both have issues around leaking from joints due to gasket hardening and plastic brittleness. The levels of the grey guttering is also problematic. There are two downpipes serving the guttering and they are located at the south west end of the main building. The most westerly grey down pipe provides water via the westerly outbuildings black guttering to the rainwater collection tank. The most southerly down-pipe discharges directly onto the southerly outbuilding roof and this water is collected in the black guttering serving the outbuilding roof. At the end of this run domestic waste pipe is connected to the guttering and transfers water from the roof, through the outbuilding, to the rainwater collection tank. The end of the grey down-pipe from the main roof has shattered due to brittleness.



Photo image RH02 - Southern End and Easterly Face of Rock Cottage showing broken downpipes and 3 different ages and colours of rainwater goods



Photo Image RH03 - Westerly Face of South End of Rock Cottage showing 3 different ages and colours of rainwater goods

Fascia and Soffit boards

The Fascia boards and soffit boards are 19mm thick timber. It is uncertain of their age. It is probable they are the same age as the older grey/white guttering. They are painted white and this is peeling with fixing rust marks evident (see Photo image - RH001) It is not possible to determine the extent of decay or rot until scaffolding is installed as part of the tile replacement.

PROPOSED WORKS

It is intended to replace the Asbestos Cement Roof Tiles with Riverstone Natural Slate Tiles. These shall be dry laid and nailed. The Dark grey clay wet laid ridge tiles will be replaced like for like. New lead flashings will be fitted.

The roof timbers are in good condition and therefore remain structurally sound. We have been advised that the replacement of Asbestos cement tiles with the intended Riverstone slate tiles will not affect the structural integrity of the newly installed roof.

The aged rainwater goods will be removed and the fascia and soffit boards and their fixings inspected for decay. Problematic areas will be removed. New white painted boards and fixings shall be applied where necessary. Undamaged boards shall be, as far as possible, retained in situ, cleaned and repainted white to match finishes on any replacements.

It is intended to fit new black PVC half round gutters and downpipes on new black PVC brackets screwed to the fascia boards. These rainwater goods are installed on all other buildings surrounding the methodist chapel.

Essential minor repairs will be undertaken to the pointing of the chimney stacks while the roof scaffolding is in place

The works, if permission is granted, will be undertaken by Gareth Clemens Roofing Ltd. He has undertaken a range of roof works on St.Martin's including Duchy, listed and non-listed buildings.

It is envisaged the completed installation will be similar to finished installation at GV2 listed Ashdown Farmhouse at Lower town in St.Martins (See Photo Image RH05)

Access

The site is as drawn on Sketch XXX

Access to the installation site is via the concreted cul-de-sac access path leading from the area outside of the post office to the rock above signal row, passing directly North of the installation site. Entry to the west of the property is via a 5 bar farm gate into the west garden of Rock House. Entry to the East of the property is via the North Rock House garden gate and/or the Easterly Garden gate serving Rock Cottage

Materials and Access Equipment will arrive on St.Martin's via Higher Town Quay from where it will be transferred to the property and laid down alongside the top western boundary fence on the inside of the garden of Rock House.

Scaffolding will be installed and inspected by qualified scaffolders at the commencement of works and will remain until the works are completed where the scaffolding will be uninstalled and returned to the external letdown area before being shipped off island via Higher Town Quay.

Scaffolding will predominantly be installed for the duration of the works along the Easterly and Westerly Faces of Rock House and Rock Cottage all within the curtilage of the properties. Scaffolding may also necessarily be required to be installed on the Northside of Rock house to access the North chimney stack for lead work and the Northerly facing eaves for repointing between the wall and tiles. Pedestrian Access will be retained at all times other than for safety reasons when transferring materials. Barriers and Signage will be in place at these junctures. Vehicular access for the Methodist Church will be retained via the Northerly track which joins Cruthers Neck to the Rock.

Waste

The carefully removed Asbestos cement tiles shall be deposited directly into a covered/lidded skip. All other waste other than that which has a potential upcycling or recycling use will also be skipped. All skips shall be transferred via a licensed waster carrier and disposed of appropriately. The skip containing the redundant Asbestos cement tiles shall be transferred via a licensed waste carrier to the mainland where it will be finally disposed at a hazardous waster that can accept such material. The named details of the carriers and waste sites shall be finalised and made available following the granting of planning and listed permission which will enable a works contract to be issued.

Any removed leadwork, removed timber and unused timber, and offset Riverstone tiles shall be retained and stored within the curtilage of Rock House by the applicant for upcycling.

Any plastics e.g the decayed PVC rainwater goods shall be appropriately recycled.

HERITAGE STATEMENT

The National Planning Policy Framework, Para. 128 requires “applicant(s) to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential of the proposal on their significance”.

Rock Cottage and Rock House were listed in a batch with other properties during a brief visit by members of Historic England to St.Martins 1992. The List Entry is 1141208 and is dated 14DEC1992. The full listing has no photographs taken at the time of listing (see Photo Image RH04). The details of the Listing identifies:

GV II

House, now 2 dwellings. 1822 inscription to front door lintel; remodelled and extended in later C19. Roughly coursed granite rubble; gabled slate roof; brick ridge and end stacks. 3-unit single-depth plan extended to double-depth plan in later C19. 2 storeys; 4-window range. Granite lintels over late C19 plank door to left of centre and late C20 half-glazed door to right of centre and horned 2/2-pane sashes. Blocked doorway to right gable end and similar sashes to rear. Interior remodelled in mid C20. Included as a dated example of Scillonian house and for group value with the Methodist Chapel (q.v.).

It has not been possible to find documented evidence of the history of rock house and rock cottage however in conversation with older islanders allegedly the house was built to house farm labourers working for Polreath Farm. This was single depth and had a thatched roof. It was eventually sold onward where it was extended. In the 1950s the now blocked in doorway of the North wall was the entry to a sweet shop. From the 1980s, until about the turn of the 21st century the houses were used as a rental property for divers. The Houses have since been returned to domestic occupancy. Little improvement has been made over the last few decades to update the properties to be suitable for a standard of living as may be expected for modern lives. The work identified here is to commence ensuring the house can be dry from above and have the capability to be sufficiently warm to allow a more natural ventilation to take place as a Scillonian house would have been intended to be. The 1822 date given in the listing preposes that Rock House and Rock Cottage predate the Methodist chapel to which they have been added as group value.

Assessment of the surroundings of the proposed development

The Historic England website has no detailed information in relation to Rock Cottage and Rock House. The few photographs taken and shown on the official listing are dated 2001 and 2017. They show only the easterly aspect, and for Rock House, only the upper storey and roof. The 2017 photograph clearly shows failed tile repair around the central chimney stack. As it is the upper storey and roof which is evident, enhancing the roof with natural slate can only be a positive gain.

Removing the asbestos-cement tiles and re-roofing in natural slate, will help to transform the property and should be regarded as a positive planning gain. The Methodist Chapel, for which Rock Cottage and Rock House is associated with for group value is tiled with dry laid natural slate with wet laid dark grey clay ridge tiles.

The proposed works are similar to other island properties. The Riverstone dry laid natural slate solution is also recently installed under full listed planning permission at Ashvale Farm House in Lower Town St. Martin's, which is also a GV2 listed building (HELN - 1141203).



Photo Image RH05 - Dry laid and nailed Riverstone Natural Slate roof on St.Martins GV2 Listed Building - Ashdown Farmhouse - HELN 1141203

Riverstone slate has previously been accepted as a suitable indigenous alternative on buildings of historical significance across the county of Cornwall e.g Kresson Kernow. Riverstone slate has exceptional weather resistance and a design lifecycle of 75-100 years, far surpassing other natural slates due to its absence of deleterious minerals.

Impact on listed buildings and scheduled ancient monuments

Rock Cottage and Rock House are GV2 listed. The present roof covering comprising of Asbestos cement tiles is not in any form original to the 1822 dated building other than its presence at the 1992 date of listing. It is probable that prior to any installation of Asbestos cement, the roof was of natural slate, as is common on many Scillonian houses throughout the islands of this age. The methodist chapel, also GV2 listed, for which these properties have 'group value' is of a dry laid and nailed natural slate with dark grey wet laid clay ridge tiles. It is therefore in keeping with the group that returning Rock House and Rock Cottage to a natural slate roof would be a positive benefit to the intent of the listing as well as providing a positive image of the property especially as it is the upper floor and roof that are visible to visitors to the area.

There are no other listed buildings in the visible vicinity and therefore other than the methodist chapel, none are affected by the proposed development.

In terms of the GV2 group listing. There are other non-listed buildings in the direct environs surrounding the methodist chapel. These dwellings have a variety of tiled roofs i.e. roman clay tiles, fibre cement tiles, and natural slate tiles. The proposed works will have negligible impact upon these properties.

Impact on the Conservation Area

A Conservation Area is an area of special architectural or historic interest. The character or appearance of which is desirable to preserve or enhance (Section 69 of The 1990 Planning (Listed Buildings and Conservation Areas) Act).

The removal of the Asbestos cement tiles from the roof and off the islands to a licensed hazardous waste site on the mainland will be a positive enhancement to the conservation area in terms of potentially hazardous pollutant removal and visually in respect of the intended use of inert natural materials. Ecology

Ecological Assessment

We have had undertaken a Preliminary Roost Assessment undertaken by James Faulconbridge of IOS Ecology. The report 25-2-1 dated 20FEB2025 is included as part of this application.

Ideally roof work will be undertaken during the summer months avoiding excessively wet and windy periods. Consequently it is intended to have 2 spaced presence surveys undertaken prior to any works and where appropriate follow the outcomes of these and the mitigation routes identified within the report. It is intended to have an ecologist present during any opening and revealing to minimise any impact on fauna and habitat. The intended roofing contractor (Gareth Clemens Roofing Ltd) is aware of the preliminary roost assessment and has worked with the ecologist from IOS Ecology on previous occasions on the islands.

APPROVED

By Lisa Walton at 9:58 am, Jun 27, 2025

RECEIVED

By Tom.Anderton at 3:06 pm, Mar 21, 2025

PRELIMINARY ROOST ASSESSMENT (PRA)

ROCK HOUSE & ROCK COTTAGE, HIGHER TOWN, ST MARTIN'S, ISLES OF SCILLY



Client: Neil & Nicky Godden

Our reference: 25-2-1

Planning reference: Produced in advance of submission

Report date: 20th February 2025

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 Rock House and Rock Cottage concluded that the property has **Moderate 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 property by bats in order to meet the standard of survey required by Best Practice Guidance.

Nesting Birds – Results and Findings

Sparrows are likely to find suitable nesting habitat associated with gaps behind the fascias, and additional minor niches may occur elsewhere within the roof structure. Adjacent vegetation within the garden may also provide nesting habitat, and may be disturbed as a result of the proposed re-roofing works.

Nesting Birds - Recommendations

Works should take place with due regard to the presence of nesting birds – no further surveys are required to inform Planning but works should be timed to avoid the nesting season or include pre-commencement inspections.

Nesting opportunities could be retained or re-created in situ. Alternatively, nest boxes could be erected either on the dwelling or within the garden to replace nesting habitats impacted by the re-roofing works. Guidance on suitable specifications is provided.

Other Ecological Receptors

No further ecological impacts relevant to planning are identified.

Report Status

As the requirement for further PAS surveys is identified in accordance with the Best Practice Guidance, this report **does not provide a comprehensive baseline to inform Planning or ensure legislative compliance during works** until this survey has been completed and the results used to inform appropriate mitigation measures.

PRELIMINARY ROOST ASSESSMENT (PRA)

Planning Authority: Isles of Scilly	Location: SV 92909 15484	Planning Application ref: Report produced in advance of application
Planning application address: Rock House & Rock Cottage, Higher Town, St Martin's, Isles of Scilly		
Proposed development: The proposed works were identified by the client when instructing the PRA inspection and should accord with the proposals taken forwards including: <ul style="list-style-type: none">1) Replacement of the existing roof covering;2) Works to repair or replace chimneys.		
Building references: The property comprises the semi-detached dwellings known as Rock House and Rock Cottage which are identified in the maps provided in Appendix 1.		
Name and licence number of bat-workers carrying out survey: James Faulconbridge (2015-12724-CLS-CLS)		
Preliminary Roost Assessment date: The external visual inspection was undertaken on 5 th February 2025 in accordance with relevant Best Practice methodology ¹ . An additional visit to inspect the roof space of Rock Cottage was conducted on 5 th March 2025.		
Local and Landscape Setting: The Application Site is situated within Higher Town – this is the eastern-most and largest settlement on the island of St Martin's in the Isles of Scilly. The settlement comprises a small number of detached and terraced houses along with chalets, small-scale agricultural buildings and outbuildings. There is no external street lighting within the settlement with night-time lighting arising from residential light spill e.g. through windows. The conurbation is structured around three roads linked in the centre by a triangular junction. The southern arm comprises a single terraced row of cottages and a farmhouse, known as Signal Row. The western arm of Higher Town comprises scattered detached houses and some terraced components running along a ridgeline with the land falling away to the south. Rock House lies relatively centrally within the north-western portion which is the most built-up area of the town. The land immediately surrounding the property includes further residential properties with associated gardens; and discreet pockets of shrubs and trees. Beyond Higher Town to the south-east is a contiguous landscape of small, hedgerow-bound fields with the shoreline of Par Beach beyond. To the south-west is the peninsula of Cruther's Hill which is dominated by gorse, bracken and heather.		

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

To the north-west of the property, the landscape is dominated by small, bounded fields under active cultivation for bulbs and flowers; whilst permanent pasture demarked into small fields by stone walls dominate to the north-east. The northern portion of the island which is not subject to agricultural management presents a mosaic of habitats dominated by heathland with grassland, dunes, beaches and the strandline as the coastline is reached.

Six records of common pipistrelle roosts are identified in relatively close proximity to the property – these relate to individual bats in two separate day-roosts associated with a building 100m to the east; and both day and maternity roosts associated with buildings in the vineyard approximately 350m to the south-east.

Building Descriptions

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.

Main Property – Rock House and Rock Cottage

Rock House and Rock Cottage together comprise a two-storey semi-detached dwelling constructed of granite blocks.

The property in general is in good condition – minor gaps are noted in the pointing between the granite blocks but these appear predominantly superficial.

Timber window and door frames are generally well-fitted within their apertures though minor gaps were noted in places – these are largely superficial and relatively exposed without providing additional access to more suitable features for bats.

The roof covering comprises synthetic slate-style tiles. Across the main span of the roof, these appear to be well-fitted. Ridge tiles are generally well-pointed though occasional minor gaps occur.

Three chimneys are present within the span of the roof under consideration – one at each gable whilst the third is positioned at the intersection between the two semi-detached properties. The eastern-most two are brick-built and partially rendered whilst the western-most is fully rendered. The pointing and rendering appear to be in good condition with flashing at the intersection between the chimney and the main roof in good condition, with the exception of lifted flashing on the north-eastern aspect of the chimney on the gable which could potentially provide access or roosting opportunities.

The main external features which may be suitable for use by roosting bats, or providing access to further roosting opportunities, occur at the eaves and gable where the walls and roof meet. These include gaps between the timber fascia board and the irregular granite blockwork on both eaves; missing pointing providing the potential for access beneath the terminal tiles at the verge of the north-eastern gable (where there is no fascia); and gaps behind the fascia board on the south-western gable.

Internally, there is tar paper (Rock House) or underfelted (Rock Cottage) beneath the tiles which is mostly intact but tears in places could permit movement between the internal loft space and the space beneath the tiles.

The internal timbers are in good condition with insulation present between the joints. The granite gable and internal dividing walls are well-pointed though gaps occur above the apex stones. The upper rooms of the property are built above the eaves line at the edges which means that the eaves are not directly visible from the loft space. The potential for roosting or access associated with gaps around the fascias visible externally cannot therefore be assessed internally.

No evidence of bats was identified internally (such as droppings, urine splashing or fur

rubbing).

Porch

The single-storey porch is situated on the north-western aspect of the property. A rendered lower wall supports a glass and timber upper portion. A monopitch roof sloping away from the property is covered with a translucent sheet material.

No potential roosting features are identified associated with the structure of the porch itself, though there are minor gaps beneath the lead flashing where the porch adjoins the main property.

Water Tanks

A flat-roof structure with water tanks on top is present on the north-western aspect. There is a superficial crack in the stonework though this is not considered sufficient to support a roosting feature for bats in its current condition. No other potential roosting features were identified associated with this part of the structure.

Summary

The following potential roosting opportunities for bats are identified associated with the structures to be **directly impacted** by the proposals:

- Gaps behind the fascia on both eaves and on the south-western gable – these may provide roosting opportunities in their own right, or access to further roosting opportunities associated with gaps beneath the tiles or above the wall plate;
- Gaps in missing pointing on the north-eastern gable – these could provide roosting opportunities in their own right, or access to further roosting opportunities associated with the wall plate or terminal tiles;
- Gap in the flashing at the base of the chimney on the north-eastern gable which could provide a potential roosting opportunity;
- Minor gaps beneath missing pointing in the ridge.

The following potential roosting features which might be **impacted indirectly** by the proposed works eg. through presence of scaffolding include:

- Minor gaps between timber window frames and their apertures;
- Minor missing pointing in the granite stonework of the property;
- Minor gaps behind flashing where the porch and main property adjoin.

Survey Limitations

The following limitations on survey were noted:

- The eaves of the roof structure could not be inspected internally due to the construction of the upper rooms above the eaves line of the property;
- It was not possible to inspect at height features such as gaps behind fascias and missing pointing at the gables;
- 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 associated with the wall plate or beneath roof tiles.

These limitations 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 property is identified as providing **Moderate Potential** for use by roosting bats.

Recommendations and Justification (Bats):

In accordance with the criteria outlined in the Best Practice Guidance², the following surveys would be required to provide an appropriate evidence-base upon which to support a planning application or demonstrate legislative compliance when undertaking the proposed works:

- 2x Presence/Absence Survey (PAS) with 2x surveyors and 2x Night Vision Assistance (NVA) cameras.

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 the detection of roosting locations which cannot be directly visually inspected.

The PAS survey should be led by suitably qualified bat surveyor between mid-May and mid-September. The survey would require two surveyors in order to achieve a comprehensive view of the relevant features. Two 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

Species such as house sparrows are likely to find nesting opportunities associated with the fascia gaps at the eaves and gable of the property. Further minor opportunities may also be found elsewhere within the structure.

The property is set within a garden including mature shrubs – these may provide suitable nesting habitat for birds and could be disturbed during works, for example through the erection of scaffolding and the removal of tiles.

It is confirmed that the building and associated vegetation is likely to provide **suitable habitat** for use by nesting birds.

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).

Timing of Works

Works affecting the roof should be undertaken outside of the breeding season which runs from

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

March – September inclusive, where practicable. This would provide the most robust means of avoiding risk of impact to nesting birds.

Pre-commencement Inspection

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

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

Enhancement Opportunities

The proposed works are likely to involve the removal of nesting habitats for sparrows in the absence of appropriate mitigation measures. It is recommended that retention in situ is designed into the scheme where practicable. Alternatively the installation of communal nest boxes supporting several pairs of birds could ensure continuity of nesting habitat. Consideration would need to be given to the location and aspect of these boxes to minimise disturbance and risk of predation, as well as avoid nuisance to residents.

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

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

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

APPENDIX 1

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 property within the local environs – Rock House is shown in the red wash with Rock Cottage show in the yellow wash. The attached water tanks (blue wash) and porch (green wash) would not be impacted by the proposals.



Photograph 1: Showing north-eastern gable and south-eastern aspect of the property



Photograph 2: Showing the north-western aspect of the property with the porch visible. The minor lifted flashing at the join is indicated.



Photograph 3: Showing the water tank on the flat-roof structure.



Photograph 4: Showing the north-eastern gable. Gaps beneath the chimney flashing and where pointing is missing at the verge are indicated.



Photograph 5: Showing the eaves on the north-eastern aspect with an example of the gap behind the fascias indicated.



Photograph 6: Showing a window on the south-western aspect with minor gaps around the timber frame indicated.



Photograph 7: Showing the south-western gable of Rock Cottage



Photograph 8: Showing the south-western gable of Rock Cottage with the gaps behind the fascia indicated.



Photograph 9: Showing the interior of the loft space with insulation visible above the joists



Photograph10: Showing an example of a tear in the tar paper which lies between the rafters and the battens/tiles above.