BAT PRESENCE/ABSENCE SURVEYS (PAS)

SOUTH HILL,
SOUTHARD, BRYHER, ISLES OF SCILLY

Client: *Philip Spence*

Our reference: *25-8-1*

Planning reference: *P/25/061/HH*

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IOS Ecology

Executive Summary

Overview
One Presence/Absence Survey (PAS) was undertaken on the residential property known as South Hill at Southard, Bryher, Isles of Scilly. The results of this PAS survey is documented in this report which should be read alongside the Preliminary Roost Assessment (PRA) report for this site.
Results
The survey did not identify any bats emerging from those aspects of the property which are to be directly impacted by the proposals. A small day roost of common pipistrelle bats was confirmed on an adjacent part of the building but this is physically separated from the proposed site of works. The surveys also recorded individual common pipistrelle bats in flight – these were foraging or commuting individuals within the garden and local environs.
Conclusion
The survey evidence accords with the Best Practice Guidance requirements to conclude 'Likely Absence' of bats within those aspects of the structure which would be directly impacted by the proposed scope of works. Detailed consideration of the implications of a roost in another part of the structure is given. It is concluded that no further surveys are required and there is no requirement for a European Protected Species Mitigation Licence (EPSML) provided the works are designed and implemented in a way which secures avoidance of impacts to the confirmed roost.
Mitigation Strategy
Works must be undertaken in accordance with the Precautionary Method of Works provided as an appendix to this report in order both to secure avoidance of impacts to the confirmed roost and to exercise due vigilance to the unlikely event of encountering bats during works. Recommendations to enhance the provision of roosting habitat for local bat populations are provided in this report.
Planning Recommendations
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.

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1. Introduction

1.1. Background to Surveys

The scope of the survey includes the relevant aspects of the property known as South Hill on Bryher, Isles of Scilly.

The proposed works include the extension to the first floor of an existing single-storey component of the property.

A Preliminary Roost Assessment (PRA) of the site undertaken in August 2025 identified Low Potential for use by roosting bats in relation to those parts of the structure which would be directly impacted by the proposed works. Potential roosting features on adjacent structural components of the property were also noted.

The PRA report stated that a further PAS survey would be required to provide an evidence base sufficient to identify the status of the proposed works area of the building with regards to bats, and inform any mitigation measures required to support a Planning Application and ensure legislative compliance. This PAS report provides the results of the recommended survey. 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[1], the relevant aspects of the building were subject to one PAS survey with surveyors and 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 surveys, NVA review, assessment and reporting were completed by James Faulconbridge, trading as IOS Ecology. James is a Level 2 Licensed 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 dusk emergence survey commenced approximately 15 minutes before sunset and continued until 90 minutes after sunset. The survey was undertaken with regard for the appropriate weather conditions (≥10°C at sunset, no/light rain or wind).

Frequency division bat detectors were used to detect and record all bat passes. The surveyors 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.

NVAs were used at each surveyor position to ensure comprehensive coverage – these comprised one Nightfox Whisker infra-red camera; and a Guide Track IR35 thermal imaging camera. The footage from these NVAs was watched back to verify or update 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 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 to the north-east and south-west of the building as shown in Map 01 below.

Map 01 – showing the NVA positions in relation to the property.

3.2. PAS Survey 1

3.2.1. Survey Conditions

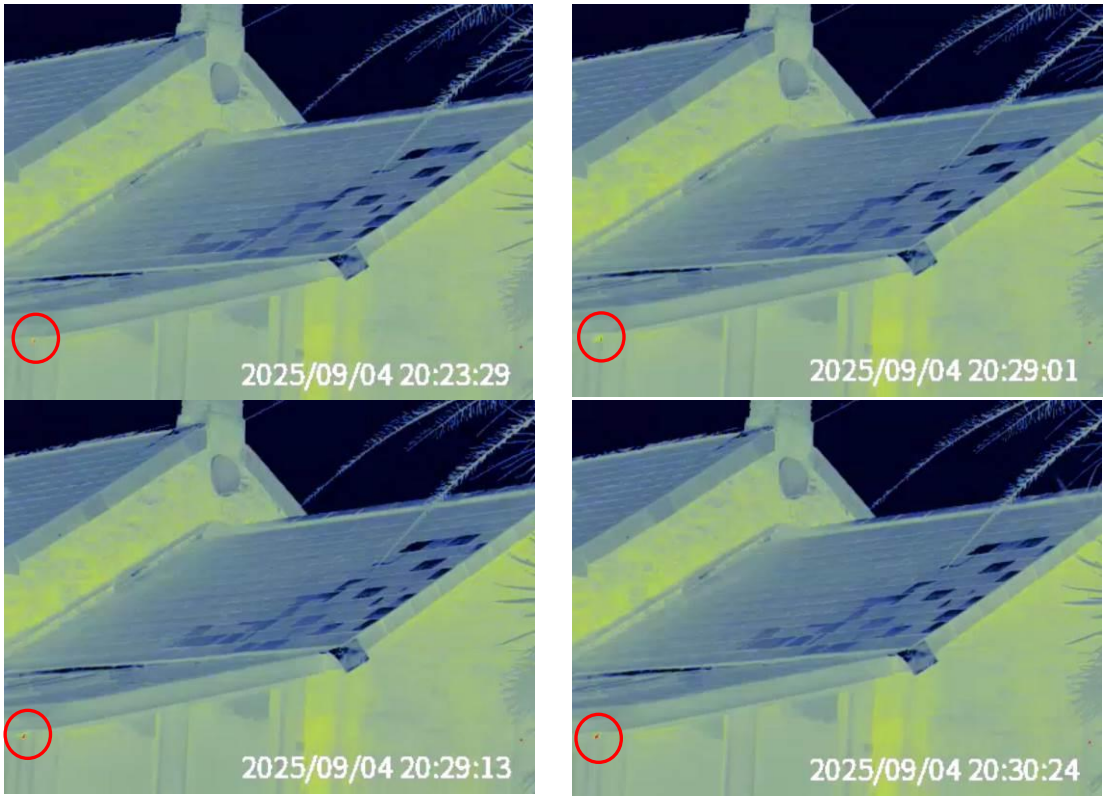
The dusk survey was undertaken on 4th September 2025. The survey commenced at 7:50pm, approximately 15 minutes before sunset at 8:05pm. It was completed at 9:35pm.

The temperature during the survey was 14°c throughout the survey. There was patchy high cloud with a light breeze following a showery day. There was no precipitation during the dusk survey.

3.2.2. Survey Results

The survey did not identify any emergence activity from the Single Storey Extension or the Two Storey Cottage of South Hill – these are the two structural components which would be directly impacted by the proposed works.

Four common pipistrelle bats were confirmed emerging from a roost in the south-western corner of the Mono-Pitch Extension. This is a later addition to the building and is structurally distinct both in terms of design and materials. The first bat was confirmed emerging at 8:23pm – 18 minutes after sunset – with a further three bats emerging between 8:29pm and 8:30pm.



Photos 01 - 04 – screenshots from the video files showing the confirmed emergence from the south-western corner of the mono-pitch extension.

Further foraging by one to two bats at a time was confirmed within the garden area from 8:30pm until the end of the survey.

3.2.3. Conclusion

The survey did not identify any bats emerging from those aspects of the building which are to be directly impacted by the development proposals. These structures were identified as providing Low Potential to support roosting bats during the PRA survey. This is sufficient to conclude 'Likely Absence' from those structures in accordance with the Best Practice Guidance.

The presence of a common pipistrelle day roost within a gap in the soffit/fascia in the south-western corner of the mono-pitch extension was confirmed.

3.3. Consideration of Proximate Roost

3.3.1. Overview

The presence of a confirmed roost within the overall building structure requires careful consideration to identify whether:

- Further surveys would be required in light of this finding;
- Works would require a European Protected Species Mitigation Licence (EPSML) to proceed; or
- Further construction-phase measures are required to control risk and avoid impacts to protected species.

These are given full consideration below and the recommended approach is subsequently identified.

3.3.2. Physical Characteristics

The proposed works would involve the raising of the existing single-storey extension to the first floor and tying in with the existing two-storey cottage. These are granite buildings with synthetic slate-tiled roofs and drop tiles at the gable.

The mono-pitch extension is predominantly timber and glazing to form a garden room and is a later addition to the property. Whilst contiguous, it is structurally distinct and the materials and potential roosting features differ accordingly.

Photo 05 – Showing the structure with distinct components indicated; the single-storey extension is outlined in red - this roof would be raised to first floor level and tied in with the existing two-storey cottage outlined in green. The confirmed common pipistrelle day roost is located in the mono-pitch extension and indicated by the yellow circle.

The works would not directly impact upon the mono-pitch extension and the confirmed roost is located at the south-western corner, physically separated from the proposed area of works.

3.3.3. Requirement for Further Surveys

The assessment of Low Potential was restricted to those aspects of the building to be directly impacted by the works. The presence of additional features of higher potential, such as those at the eaves of the mono-pitch extension, were noted during the PRA but not considered significant when prescribing proportionate surveys to inform the development proposals.

In this instance, the confirmation of the roost within the mono-pitch extension is not considered to warrant a review of the recommended survey requirements identified in the PRA report. Whilst the mono-pitch extension is contiguous with the proposed development area, the nature of the materials and potential roosting features offered does not confer a higher potential for use of the identified Low Potential features on the relevant structures.

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

3.3.4. Requirement for an EPSML

The separation of the confirmed roost from the working area would permit the avoidance of impacts during works.

Appropriate management and design of the construction phase would avoid licensable impacts such as destruction/disturbance/modification of roosts or the killing/injuring of bats.

Provided that avoidance of impacts is secured, an EPSML would not be required for these works.

3.3.5. Recommended Approach

In this instance, the approach recommended can be summarised as follows:

- **No further surveys are required** – the conclusion of Likely Absence from the structures to be impacted by the proposed works can be considered sound;
- **No EPSML is required** provided licensable impacts would be avoided;
- **Adherence to a Precautionary Method of Works is essential** - avoidance of impacts to be secured through appropriate design and management of the construction phase.

3.4. Limitations and Constraints

3.4.1. Seasonal Timing

The survey was undertaken within the main active season in 2025. This is therefore considered to conform with the recommended survey timings within the Good Practice Guidelines.

3.4.2. Survey Conditions

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

3.4.3. Visibility and Coverage

The surveys were comprehensive with regards to surveyor visibility.

3.4.4. NVA Footage

The NV camera Field of View (FOV) fully covered the areas of the building under consideration – 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 – discussion of this conclusion is provided in Section 3.3.4 above.

4.2. Precautionary Method of Works

The proposed approach to avoid an EPSML is contingent on works being designed and undertaken in a way that the confirmed roost in the mono-pitch extension is not impacted by the proposed works. This would need to be secured through a Precautionary Method of Works (PMW).

Additionally - 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 within the structures to be directly impacted. Works should therefore proceed with appropriate caution and vigilance.

A PMW is outlined in Appendix 1 of this document and must be followed by contractors undertaking works.

4.3. Planning Recommendations

It is recommended that, if the LPA are minded to grant approval of this application, the requirement for compliance with the PMW is secured by condition.

This condition should be compliance only rather than requiring submission of further documentation to discharge prior to commencement, as no additional information would be required.

4.4. Timing of Works

4.4.1. Bats

It is recommended that works avoid the main maternity season as a precautionary measure. This would involve works taking place between mid-September and mid-May.

Works should also avoid times when bats might be in torpor and therefore more susceptible to disturbance. The evidence gathered by static recordings across the Isles of Scilly by the local Bat Group do not indicate routine hibernation by common pipistrelles during normal weather conditions in the winter due to the unusually mild climate; however if undertaken in the winter, works should avoid times when the overnight temperature drops below 8^{o}c.

4.4.2. 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.

4.5. 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 associated with property would have a high likelihood of occupation given the location in optimal habitat on the edge of the settlement. An ideal location would be on the southern gable of the new structure 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

The purpose of this Method Statement is to ensure that proposed works can proceed:

a) Securing avoidance of impacts to the confirmed roost in the mono-pitch extension;

b) With due vigilance to the potential presence of bats within the structures to be directly impacted, in acknowledgement that bats can be exploratory or use discrete roosting sites on a transient or occasional basis.

All contractors must read this Method Statement and a copy should be retained on site at all times for the duration of works.

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 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 components of the granite cottage and single-storey extension under development.** The generic recommendations are outlined below - locations where these features occur are listed in the PRA report**:**

Method of Works – Construction Area
Fascias and Drop Tiles There are occasional gaps where the fascias meet the walls or where drop tiles are present on the gable - where these are to be 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. **Inter-Building Cavity** There is a cavity which runs just below the roofline where the single-storey extension meets the two-storey cottage. This void should be exposed carefully through removal of the tiles by hand in such a way that, in the unlikely event of a bat roosting below them, the bat is not crushed or injured. Once this void is fully exposed, it should be carefully inspected until absence of bats can be confidently confirmed before works proceed.

Contractors should be aware of **the confirmed roost in the mono-pitch extension and the measures necessary to protect this feature from damage, disturbance or obstruction during works.** The recommendations are outlined below:

Method of Works – Protection of Confirmed Roost
Contractor Awareness All site staff should be made aware of the location of the roost and the requirement to avoid any works that could cause direct or indirect impacts or disturbance. This could be achieved through site induction or through the addition of signs or marker tape if multiple contractors are involved throughout the lifespan of the project. **Timing of Works** Works should avoid the main maternity season (mid-May to mid-September) and periods of cold winter weather (overnight temperatures below 8°C), when bats are more susceptible to disturbance. **Exclusion Zone** No scaffolding or materials storage are to be placed directly against or within 2m of the south-western corner of the mono-pitch extension where the roost is present. This is to protect not only the roost entrance but the drop zone below and around the roost where bats will fly when emerging or before re-entry at dawn. **Scaffolding Design** Where scaffolding is required in the vicinity of the roost, it should be designed to avoid physical attachment within the above Exclusion Zone and must not obstruct the flight lines used by emerging bats. **Lighting** Artificial lighting should be avoided in the immediate vicinity of the roost. Any site lighting required should be directed away from the roost area and be fitted with cowls or hoods to prevent light spill. **Noise and Vibration** Works generating high levels of vibration or noise should be kept to a minimum duration in the vicinity of the roost. **Obstruction**: The roost access point and the drop zone around it, as defined by the Exclusion Zone above, must remain unobstructed at all times. No covering, sealing, or temporary works should impede entry or exit points. **Ecological Oversight** If works unavoidably approach the roost location, they should proceed under ecological direction and oversight to ensure compliance with legal protections.

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:

In the Event of Encountering a Bat
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 Guide Track IR35 at surveyor position S2.