

PRELIMINARY ROOST ASSESSMENT (PRA)

BELONGING AND INCLUSION HUB, CARN GWAVEL, ST MARY'S, ISLES OF SCILLY



Client: Council of the Isles of Scilly

Our reference: 25-9-2

Planning reference: Report produced in advance of submission

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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 directly or indirectly by the proposed works.

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.

It is noted that other features within the structure do provide potential roosting features for individual bats - these features would not be directly impacted by the proposed works either during construction or following completion, but should be taken into consideration to ensure avoidance during construction.

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. This includes measures to avoid disturbance or accidental damage to adjacent structural features which have potential to support roosting bats. A methodology is provided in Appendix 2.

Nesting Birds – Results and Findings

Species such as house sparrow may find suitable nesting habitat associated with gaps behind eaves tiles on the eastern aspect of the existing structure, and additional minor niches may occur elsewhere within the roof structure.

Landscaping and vegetation within the redline footprint, and in close proximity, are likely to provide nesting habitat during the breeding season, and may be destroyed or disturbed as a result of the proposed works.

Nesting Birds - Recommendations

Works should take place with due regard to the presence of nesting birds – either through timing of works to avoid the nesting season or through a pre-commencement inspection.

Long term reductions in the availability of nesting opportunities is not identified; however nest boxes could be erected either on the retained or proposed structures to create new nesting habitat for common garden bird species. Guidance on suitable specifications is provided.

PRELIMINARY ROOST ASSESSMENT (PRA)

Planning Authority: Isles of Scilly	Location: SV 91077 10361	Planning Application ref: Report produced in advance of submission
Site address: Carn Gwavel Wellbeing Centre, St Mary's, Isles of Scilly.		
Building references: <p>The scope of the survey is dominated by the building referred to as the main structure; the lower roof and under-boarded porch of the entrance/reception differ in structure and are therefore identified separately in the map provided in Appendix 1 and referred to subsequently in this report.</p> <p>Further attached buildings within the wider Carn Gwavel complex were not included in the scope of the assessment.</p>		
Name and licence number of bat-workers carrying out survey: James Faulconbridge (2015-12724-CLS-CLS)		
Preliminary Roost Assessment date: <p>The visual inspection was undertaken on 18th November 2025 in accordance with relevant Best Practice methodology¹.</p>		
Local and Landscape Setting: <p>The property is located at the south-eastern edge of the Carn Gwavel complex which includes multiple school buildings along with sports facilities. The complex is situated between Hugh Town and Old Town in St Mary's, Isles of Scilly.</p> <p>The immediate setting of the buildings is within an area of high-quality habitat for foraging bats. This includes mature elms; areas of wet woodland; and tree lines bounding areas of open green space including the sports field. To the immediate north-east lies Lower Moors, a topogenous mire with associated marshy grassland and willow scrub which has been identified as an important foraging habitat for bats on St Mary's based on field recordings and observations by the Isles of Scilly Bat Group.</p> <p>The data search identified a record of a common pipistrelle bat which was taken into care after being found grounded within the Carn Gwavel Sports Hall in 2023 and a common pipistrelle roost was subsequently confirmed in an adjacent building to the north in 2024. Whilst being part of the overall Carn Gwavel complex, the confirmed roost is in a structurally isolated part of the complex and would not be directly or indirectly impacted by the current proposals.</p> <p>A data search of records held by the Isles of Scilly Bat Group revealed information on five species of bat 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 believed to be itinerant or migratory individuals present during the summer period only.</p>		

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

Six records of common pipistrelle roosts are identified in relatively close proximity to the property – the closest of these is the common pipistrelle roost to the north within the Carn Gwavel complex with further records relating to individual bats utilising features such as gaps behind drop tiles and fascias in properties within Hugh Town to the west and Old Town to the east.

Building Description

The scope of the survey includes the portions of the Carn Gwavel complex which house the Children's Services department and the main reception area along with a meeting room. The scope of the building inspection, including identification of structurally distinct elements, is illustrated in the map provided in Appendix 1 and are described separately below. Further buildings within the complex were outside of the scope of the survey and are not discussed further in this report.

Overview

The main structure is a single-storey building which is rendered and painted externally to a good standard. The uPVC windows are well-fitted in their apertures throughout the structure.

The majority of the roof has an irregular profile characterised by a staggered ridge line whereby the eastern roof pitch rises to an apex that then drops to a short vertical section before the western pitch begins. The exception to this general structure is the entrance to the reception/entrance on the eastern side of the building which includes an open-fronted, under-boarded canopy with a flat roof and a lower, inset roof which then extends to the main ridge.

External Inspection – Main Structure

The main section structure has an asymmetrical pitched roof with concrete roof-tiles. On the eastern aspect, these tiles appear well fitted with no obvious defects and are heavily mossed. There are minor gaps noted beneath individual tiles on the western pitch, especially around locations where the roof lights are present – however the slope of the roof would significantly restrict the drop-zone for any bats accessing roosting opportunities in this location. The ridge is well pointed throughout and no suitable gaps were noted in verge pointing at the gable.

Gaps beneath the terminal tiles at the eaves on both the eastern and western aspects are largely blocked by tight guttering fixed to a well-fitted fascia throughout – no gaps or potential features were noted.

There are both hanging and drop tiles on the vertical pitch which links the irregular roof pitches. Hanging tiles are well-fitted where present on the western aspect, however the drop tiles at the apex here are damaged in a number of locations and these missing tiles would permit access to minor roosting features. Occasional minor gaps also occur where the flashing is slightly lifted in some places between the hanging and drop tiles.

External signage attached on the southern gable provides gaps behind which could potentially offer transient roosting opportunities for bats.

Internal Inspection

The only accessible voids are those within the main roof space. The entrance lobby has a suspended ceiling and the void above could not be accessed for inspection. No voids are present associated with the flat-roof element of the entrance porch.

Internally, the loft space is built around a modern timber truss system. The timbers are in good condition. Fibreglass insulation is present between the ceiling joists. A black plastic-lined insulating underfelt/DMP is present throughout; this appears intact with no obvious tears. Gaps occur only where sheets overlap, but overall the membrane is well fitted and the roof structure appears well sealed.

Light is visible at the eaves, indicating potential access points though the lack of a clear drop

zone is noted externally. Additional penetrations for services, including pipework and roof-level vents, are also present and could offer access opportunities. No bat droppings or other evidence of occupation were identified during the inspection.

Internal gable ends consist of blockwork walls that appear well pointed, with no evident cavities. Light tunnels leading to roof lights are boxed neatly and offer no roosting opportunities.

External Inspection - Porch

The open-fronted under-boarded entrance porch is well-sealed with no potential roosting features identified on the underside. Guttering is mounted directly to the porch timbers without a fascia.

The lower section of the porch roof is a shallow-sloping flat roof that ties into the gable walls on either side. Lifted flashing occurs at these junctions, presenting potential access features, though this appears superficial and the dimensions only likely to be suitable to support individual bats at best.

Above the flat-roof element of the porch, a low-sloping roof bridges the gap between the flat-roof component and a vertical tiled element to join the higher apex. This section of the roof is clad with concrete roof tiles that appear well fitted but heavily mossed. At the junction between the roof tiles and the vertical hanging tiles on the upper section, there are gaps beneath the flashing. Further gaps and minor damage are present at the apex where drop tiles run along the ridge, offering potential access for bats into the roof structure similar to those noted on the western aspect of the main structure.

Survey Limitations

The following limitations on survey were noted:

- There are locations within the building where evidence of bats, if present, would not have been apparent from a PRA survey, such as roosts associated with the wall plate or beneath roof tiles;
- Access to the full loft was partially restricted by the truss layout and infrastructure such as water tanks.
- Access to inspect features at height, such as the drop tiles on ridgeline, was not possible due to the structure; the lack of access equipment; and available vantage points.

These limitations and constraints are taken into account when concluding the assessments of the buildings below.

Assessment of Potential for use by Roosting Bats

Direct Impacts

The potential impacts to the existing building are restricted to:

- a flat-roof link tying in the new building on a small portion of the eastern aspect of the existing Main Structure; and
- the attachment of a pergola walkway at the eaves line along the remainder of this aspect.

The survey did not identify any suitable roosting opportunities (such as gaps behind fascias or flashing or access beneath roof tiles) on the eastern aspect of the structure which is to be directly impacted. These are therefore considered to offer **Negligible Potential** for use by roosting bats.

Indirect Impacts

The proposal to tie into the existing roof requires consideration of the potential that a roost could exist within the loft space which could be accessed from structural features on other aspects which would not themselves be directly impacted. This could potentially result in disturbance to an internal roost during construction works.

Potential access features which were identified within the broader structure generally offer roosting opportunities in their own right rather than representing access features which would permit bats to occupy larger or more significant roosting opportunities within the loft space. The thick insulating underfelting identified in the loft space would significantly restrict access to the loft space from identified access opportunities. No evidence of roosting bats was identified within the loft space.

In consideration of these characteristics, there is **negligible potential** of a loft-space roost which might be directly or indirectly impacted by the proposed tying-in works.

Adjacent Features

The overall building does offer suitable roosting opportunities for bats, primarily on the western aspect or associated with the porch. These would not be directly or indirectly impacted by the proposed works, provided basic controls on siting of scaffolding and contractor operations are put in place.

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 features associated with adjacent structural elements of the building means that these features must not be impacted during works. This would require due care to avoid disturbance or accidental damage. Recommendations to ensure legislative compliance are provided in Appendix 2.

The proposals would not affect any confirmed roosts, commuting routes or foraging habitat – therefore no habitat creation is required with regards to bats. This takes into account the likelihood of bat box occupation in this location, given the high level of human presence around both the existing and proposed building on the aspects within the redline boundary.

Assessment of Potential for use by Nesting Birds

Species such as house sparrows may find nesting opportunities associated with gaps under eaves tiles along the eastern aspect of the main structure – the guttering which largely blocks entry for bats would not similarly restrict house sparrows. Further minor opportunities may also be found elsewhere within the building.

There is landscaping within the broader redline of the project which includes shrubs and small trees which may provide further nesting opportunities both within the redline and in close proximity.

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 structure and clearance of vegetation should be undertaken outside of the breeding season which runs from March – September inclusive, where practicable. This would provide the most robust means of avoiding risk of impact to nesting birds.

Nesting Bird Survey

If this is not possible, then a pre-commencement nesting bird survey should be undertaken by a suitably qualified person prior to works commencing to ensure that no nesting birds are present within the works area.

In the event that a bird's nest is identified in pre-commencement inspections, 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 retained vegetation.

Enhancement Opportunities

The proposed works are not anticipated to impact on the availability of suitable nesting habitats in the long term once the construction works are complete. Compensation measures are not therefore considered necessary to address loss of nesting habitat.

The installation of communal nest boxes supporting several pairs of birds could however ensure enhancement of nesting habitat within the local environs. Consideration would need to be given to the location and aspect of boxes to minimise disturbance and risk of predation, as well as avoid nuisance to users of Carn Gwavel.

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.

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 November 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

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 main structure in the red wash and the lower roof and under-boarded porch of the entrance/reception area in the blue wash. Reproduced in accordance with Google's Fair Use Policy.



Photograph 1: Showing the eastern aspect of the existing structure where the new building would tie in.



Photograph 2: Showing the under-boarded porch which is inset within the main structure – this would not be directly or indirectly affected by the proposals.



Photograph 3: Showing an example of the damaged drop tiles on the western ridge of the main structure.



Photograph 4: Showing an example of the tightly-fitted fascia along the eastern aspect of the building.



Photograph 5: Showing an example of the uPVC windows whose frames are well-fitted within the apertures.



Photograph 6: Showing the interior of the loft space – this image includes the cover of the water tank below, whereas the majority of the loft space has insulation between the joists.

APPENDIX 2

PRECAUTIONARY METHOD STATEMENT WITH REGARDS TO BATS

The purpose of this Method Statement is to ensure that the 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.*

Construction activities including scaffolding have potential to obstruct, disturb or damage adjacent structures if not planned appropriately. Contractors should therefore be aware of **where bats could occur in structures adjacent to the works site**.

There is low potential for individual bats to use transient roosting opportunities in the following locations:

- Behind drop tiles on the western ridge and above the porch/entrance on the eastern ridge;
- Behind lifted flashing where the porch/entrance roof ties in with the main structure to the north and south;
- Beneath lifted tiles on the western pitch of the roof, where these occur.

The proposed works can approach, but must not impact upon or obstruct the following locations in order for the assessment and working methodology outlined in this report to be valid:

- No works affecting the southern gable of the building;
- No works affecting the western aspect of the building;
- No works affecting the porch/entrance.

Care should be taken during works to ensure that these structures are not disturbed, obstructed, or damaged. This involves careful design of scaffolding installation and may include a contractor briefing to ensure that those working on the project understand the requirement. Other measures such as a temporary signs, tape or physical barrier should be installed if deemed necessary.

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.