



'COLOSSUS'

Pilot's Retreat, St Mary's, Isles of Scilly. TR21 0PB

Tel: 01720 423361

Email: carmen@colossus-scilly.co.uk

www.colossus-scilly.co.uk

Planning Department
Council of the Isles of Scilly
Town Hall, St Mary's
Isles of Scilly
TR21 0PB

12th November 2018



Dear Mrs Walton and or Mr Dryden

Ref: Planning Permission P/18/052/FUL

Thank you for our Permission for Development letter dated 27th June 2018.

I am writing to request an amendment to the Planning condition 'C6 Pre-Commencement Condition Submission of two Further Bat Surveys'.

Our Bat Survey was carried out by the Isles of Scilly Wildlife Trust on 5th October 2018. A copy of which you have had already and I will refer to the points made in their survey. Please note the IOS WLT did not give us an opportunity to respond to the points made in their survey or to discuss their points with them.

Firstly I would like to highlight that the RSPB website states that bats roosting in houses prefer south facing crevices and they suggest that all bat boxes are placed at least 5 metres high in a location with a clear flight path. Added to this www.acerecology.co.uk who are professional licensed ecologists state that '*British bats are entirely insectivorous and so their droppings only contain the indigestible parts of their insect prey. This content gives their droppings a crumbling texture which then allows them to be differentiated from mouse droppings which look similar but become very hard when dry.*' Also www.centralplainsbatremoval.com state when identifying bat species '*it is the fact that they accumulate in piles that really help bat faeces to stand out.*' However the IOS WLT only spotted one mammal dropping on a beam and one on a board which is more indicative of mice/rodent.

With all this in mind we would like to discuss the IOS Wildlife Trust Bat Survey in more detail.

WLT report 3.1-4: our neighbours Mr and Mrs Sims spend many hours outside during the Bat Active season eating al fresco. They are happy to confirm in writing to you that bats are often seen whilst they eat outside the bats travel up church road circle

around The Jackman's house 'Westward Ledge' and then go down behind the lower houses to the elm trees around the church area. They confirmed that the small bats they have spotted **do not** fly up as high as Cadwallon or 2 Matthews Field. We believe the reason for this is that there are telegraph poles and cables to front and rear of 2 Matthews Field and as stated previously, bats need a clear flight path to their roost entry points.

IOS WLT Survey 3.5: Photo 1 - crevice is on the North elevation of 2 Matthews Field, which is the opposite elevation to those which bats prefer according to the RSPB. Also for reasons as stated in point 3.1-4 above. **We can confirm this crevice will not be affected by our build proposals.**

IOS WLT Survey 3.5: Photo 2 - crevice is on the North West elevation and is less than 2.5 metres from ground level therefore is not a preferred height or elevation direction for bats and is unlikely to have been used by bats according to the RSPB. Also the cable in this crevice is mobile and the cable is normally in the centre. As a result, this crevice is highly unlikely to be used by bats. Also for reasons as stated in point 3.1-4 above. **We can confirm this crevice will not be affected by the build proposals.**

IOS WLT Survey: Photos 3, 4A and 4B - are on the West elevation. For reasons as stated in point 3.1-4 above. **We can confirm these crevices will not be affected by the build proposals.**

IOS WLT Survey: Photo 5 are on the West elevation and are the result of totally new repairs when the chimney was removed during the 2018 summer months. They were created by the use of adhesive under the tiles. The new tiles are obvious to see in the photo shown. **Therefore these crevices have never been used by bats and will not be affected by the build proposals.**

IOS WLT Survey: Photo 6 is the only crevice on the South elevation which, according to the RSPB, is preferred by bats, it was the result of damage incurred during the demolition work of the chimney. **It is new damage and could never have been used by bats and it will not be affected by the build proposals.**

IOS WLT Survey: Photo 7 is on the East elevation - the RSPB recommend bat boxes are erected at LEAST 5 metres above ground level and with a clear flight path. This crevice is only 2.5 metres from ground level and does not have a clear flight path from any direction. **With this in mind it is doubtful that this crevice was ever used by bats. We can also confirm this crevice will not be affected by the build proposals.**

IOS WLT Survey: Photo 8 is on the East elevation and is brand new due to repair work completed during the 2018 summer months therefore bats could not have lived in this crevice as there has not been time for them to roost and none were witnessed during the repairs. **We can confirm this crevice will not be affected by the build proposals.**

IOS WLT Survey: Photo 9 is on the East elevation and it was recently disturbed by repairs untaken due to the ingress of water in this area. You can clearly see the newly laid roof tiles in the image and replaced section of soffit board too. **No bats**

were encountered while works were undertaken during the recent repair works (bat active season).

IOS WLT 3.6: states 'mammal droppings were found on a beam and board near the loft hatch entrance'. These mammal droppings were **NOT conclusively proved** as being from a bat. Therefore these could be from mice/rodents.

IOS WLT 5.2: these points have all been addressed above

Continuing:

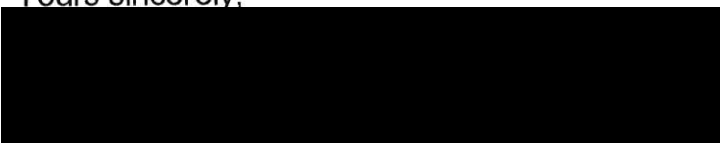
We feel that having to wait at least 9 months or more to start work on our build proposals is totally unreasonable given the lack of hard evidence of bats being present or ever having roosted there. As we are building on the east and south elevations only, none of the west facing crevices will be affected by the work.

Of the east facing crevices found by the IOS WLT survey report that will be effected by the build, two of these crevices have come about from our recent repairs all done in spring/summer 2018 and thus no bats could of possibly used these either. The only hole on the east side which is left in doubt should not be effected by the build as most of the work will be above it. We believe, however, that this crevice was never used by bats but regardless it can be left in tact and undisturbed until the two further bat surveys have taken place in 2019 and by then the vast majority of the work will have been completed before the bats commence roosting again.

Condition 6 will seriously affect our finances and life as it will delay our build start date which has the knock on effect with persons interested in buying our current residence of Colossus. It means that we are unable to settle our crippling short term mortgage and our accountant has advised that we would be unable to claim back £12,000 in stamp duty as we would be classed as being second home owners which was never our intention. Also there is no point starting works on the ground floor renovations until the first floor extension is completed as we will be partially removing the existing roof and if we suffer inclement weather this would ruin any newly plastered walls/kitchen/electrics etc.

Lastly, as stated in the IOS WLT bat survey 'there are currently no bats in No 2 Matthews Field' (as they do not roost in the winter months). We would like to be able to commence our proposed extension while bats are definitely not in the building and could have the works completed by May 2019 before bats commence roosting again. As you have read above our proposed works **WILL NOT** affect the crevices as was suggested by the IOS WLT bat survey. If required we are more than happy to build in mitigation methods prior to the next bat roosting season and/or meet with you on site to show you the points above. These mitigation methods should negate the need for further bat emergence surveys. We feel there is no reason not to be able to continue with our building plans once all other pre-commencement conditions have been discharged.

Yours sincerely,



Todd and Carmen Stevens

Appendix 1

Variation to C6: In light of the additional information submitted by the applicants in letter dated 12.11.18 and that the IOS Wildlife Trust Survey did not positively identify the presence of any bats during their Primary Ecological and Roost Assessment, the development, hereby permitted, be begun in accordance with the approved details as Condition 2 and that two further bat emergence surveys are carried out in the bat active season (March-September) to ascertain the presence of bats and in the event of bats being found, appropriate mitigation measures shall be carried out in accordance with details to be submitted and approved, in writing, by the Planning Authority.