PRELIMINARY ECOLOGICAL ASSESSMENT

TOWN HALL,
ST MARY'S, ISLES OF SCILLY

Client: *Council of the Isles of Scilly*

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Executive Summary

Overview

The Town Hall situated in Hugh Town, St Mary's was subject to a Preliminary Ecological Assessment (PEA) and Preliminary Bat Roost Assessment (PRA) in February 2022. This report outlines the results of the PEA and should be read in conjunction with the accompanying PRA.

Proposals

The proposed works were identified in the RIBA Stage 3 report for the project dated December 2021. There are extensive internal and external proposals involved in the creation of a new home for the Isles of Scilly Museum. This involves renovation and modification to existing structures; demolition of minor existing structural elements; and the construction of new extensions to the building.

Ecological Assessment

There are no vegetated habitats which would be affected by the proposed development; the most proximate areas of habitat and green space are described in the PEA report in order to inform the siting of recommended biodiversity enhancement measures only.

The proposals have the potential to impact on nesting birds – two nests were identified in the attic of the Town Hall building and the buildings have further potential to support nests of other common bird species.

The proposals have the potential to impact on roosting bats – the PRA details the full range of potential features identified and these are summarised in the PEA document. No roosting bats were confirmed following the PRA, but further surveys would be required to confirm presence or likely-absence relating to potential roosting opportunities.

No other impacts to protected species, habitats or offsite designated sites are identified.

Recommendations

Recommendations provided in this PEA report will ensure that impacts to protected species are avoided. Enhancement measures will provide a minor net gain as a result of the new development proposals. These measures are not fully characterised in this draft of the PEA report, pending the results of the further bat surveys, but they include:

- Further Presence Absence Surveys (PAS) for bats to be conducted in May/June 2022;
- Timing of development works to avoid impacts to nesting birds;
- Incorporation of habitat boxes into the proposals including nesting birds; roosting bats; and solitary bee nest boxes.

Report Status

The survey data provided in this report and the associated PRA report **is not sufficient** in itself to provide an ecological baseline to support planning.

In conjunction with the forthcoming PAS report, and any recommendations outlined therein, the ecological baseline is anticipated to be complete.

Table of Contents

Executive Summary 2
Table of Contents 3
1. Introduction 4
1.1. Project Overview 4
2. Site Location and Description 5
2.1. Site Location 5
2.2. Site Description 5
2.3. Local Landscape Setting 5
2.4. Relevant Designations 6
2.5. Planning Context 7
3. Survey Methodology 8
3.1. Desktop Survey 8
3.2. Vegetation and Habitat Assessment 8
3.3. Bats 8
3.4. Birds 8
3.5. Other Protected Species 9
3.6. Surveyor Competence 9
3.7. Survey Dates 9
3.8. Zone of Influence 9
3.9. Assessment of Ecological Value 9
4. Results 10
4.1. Onsite Habitats 10
4.2. Offsite Habitats 11
4.3. Bats 13
4.4. Birds 14
4.5. Other Protected Species 14
5. Evaluation 15
5.1. Proposals 15
5.2. Assessment of Ecological Impacts 15
6. Recommendations 17
6.1. Introduction and Scope 17
6.2. Further Survey Requirements 17
6.3. Timing of Works 17
6.4. Landscaping 18
6.5. Habitat Boxes 18
6.6. Precautionary Method of Working 20
6.7. Survey Validity and Update 20

1. Introduction

1.1. Project Overview

The site is the existing Town Hall building and associated extension located off The Parade in Hugh Town, St Mary's in the Isles of Scilly.

The proposals relate to a suite of works required to provide a new home for the Isles of Scilly Museum with the addition of a performance space and supporting facilities that create a combined heritage and cultural centre for the Islands. This includes renovation of existing structures, partial demolition of some elements and the construction of new extensions.

The proposed works considered in this assessment were identified in the RIBA Stage 3 report for the project dated December 2021.

Map 01 – Site location indicated by the red circle. Reproduced in accordance with Google's Fair Use Policy.

2. Site Location and Description

2.1. Site Location

The Site comprises several contiguous buildings in a central location in Hugh Town, St Mary's, Isles of Scilly. The National Grid Reference for the centre of the site is SV 90321 10507 (see Map 1).

2.2. Site Description

The site is approximately 0.06 hectares (ha) in size and is dominated by buildings with a small area of hardstanding to the south-west. The site is bounded by other buildings and hardstanding on all aspects.

2.3. Local Landscape Setting

The Site is set relatively centrally within Hugh Town. The Parade runs immediately to the north with Silver Street to the south and Ingram's Opening to the east. The immediate western boundary comprises adjacent buildings. A cottage and small associated garden and outbuilding are also present on the eastern aspect.

The central location of the Site within Hugh Town means that the dominant local land use is buildings and hardstanding. Buildings are predominantly residential with small-scale commercial businesses also represented. This densely built environment extends around 300m to the west and around 500m to the east. Some of these adjacent properties have associated areas of garden or green space, but the centre of Hugh Town is relatively densely developed.

The location of the Site is within the narrowest part of Hugh Town with Town Beach and Porthcressa lying 75m to the north and 50m to the south respectively.

The closest areas of green space are the Parade Gardens lying 10m to the north-east; and the grassed area adjacent to Porthcressa Beach lying 15m to the south. Both of these areas are dominated by close-mown amenity grassland with ornamental planting, reflecting their popularity with visitors and fundamentally municipal function. The closest areas of semi-natural habitat are associated with the Garrison approximately 250m to the west; and the land around Buzza Tower approximately 250m to the south-east.

Roads immediately bound the Site to the north and south. The eastern boundary has an attached cottage with a small outbuilding along with a tarmacked parking area. The buildings of Spanish Ledge and others directly abut the Site along its western aspect.

Map 02 – Showing the landscape and habitats immediately surrounding the site. Reproduced in accordance with Google's Fair Use Policy.

2.4. Relevant Designations

The Site itself is not subject to any statutory or non-statutory designations of relevance to the consideration of ecological value or impacts.

There are four statutory designated sites of conservation importance situated within a 1km radius of the site. Details of these designations are provided below:

- **Isles of Scilly SAC Complex –** Situated 75m to the north and 50m to the south of the Site, the SAC is designated for its nationally important numbers of Grey Seal and the nationally rare Shore Dock. Annex 1 habitats that are the primary reason for site selection include mudflats; inter-tidal sandflats; reefs and sub-tidal sandbanks.

- **Isles of Scilly SPA Complex –** Situated 75m to the north and 50m to the south of the Site, the SPA designated for its internationally important seabird assemblage of 13 species including internationally important numbers of Lesser Black-backed Gull and nationally important numbers of European Storm Petrel and European Shag.

- **Lower Moors SSSI –** Situated 650m east of the proposed development lies Lower Moors SSSI – this is a topogenous mire, whereby seasonal fluctuations of freshwater from rainfall cause the partial breakdown of plant material, which then turns to peat. The site has several, small shallow open water areas which are known to be important feeding areas for passage and over-wintering migrants and waders.

- **Peninnis Head SSSI –** Situated 615m south-east of the proposed development lies Peninnis Head SSSI, designated primarily for its geology including prominent granite cliffs and tors but it also supports maritime heathland, maritime grassland and scrub habitats together with populations of rare plant and lichen species.

2.5. Planning Context

2.5.1. National Planning Context

The National Planning Policy Framework (NPPF)[1] sets out the government's requirements for the planning system in England. A number of sections of the NPPF are relevant when taking into account development proposals and the environment.

Paragraphs 7 to 10 of the NPPF identify that "*the purpose of the planning system is to contribute to the achievement of sustainable development*." The general impetus of the NPPF in relation to ecology and biodiversity is for development proposals to not only minimise the impacts on biodiversity but also to provide enhancement. Paragraph 170 states that "*Planning policies and decisions should contribute to and enhance the natural and local environment and minimise impacts on and providing net gains for biodiversity*." A number of principles are set out, including the principle that where harm cannot be adequately avoided then it should be adequately mitigated, or, as a last resort, compensated for.

In addition to the NPPF, the Office of the Deputy Prime Minister (ODPM) circular 06/0511[2] provides guidance on the application of law relating to planning and nature conservation. Paragraph 98 states "*the presence of a protected species is a material consideration when a planning authority is considering a development proposal, that if carried out, would be likely to result in harm to the species or its habitat*." Whilst Paragraph 99 states "*it is essential that the presence or otherwise of a protected species, and the extent that they may be affected by the proposed development, is established before planning permission is granted*."

2.5.2. Local Planning Context

The following policies are most relevant to this assessment:

- **Core Policy 1** - Environmental Protection;
- **Policy OE2** - Biodiversity and Geodiversity.

The following planning guidance documents are also of relevance:

- The Isles of Scilly Local Development Framework Supplementary Planning Document Biodiversity and Geological Conservation[3].

[1] Ministry of Housing, Communities & Local Government. (2019). National Planning Policy Framework. OGL
[2] Office of the Deputy Prime Minister. (2005). Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System. ODPM Circular 06/2005
[3] https://www.scilly.gov.uk/sites/default/files/IslesofScillyBiodiversity&GeodiversitySPD.pdf

3. Survey Methodology

3.1. Desktop Survey

A full desktop study was undertaken for the presence of bats based on the list of roosts and other records held by the Isles of Scilly Bat Group. A full records centre search was not undertaken for other ecological groups, as it was not considered necessary given the limited scale of impacts and the nature of the on-site and surrounding habitats. The desk study also included accessing the Multi-Agency Geographic Information for the Countryside (MAGIC)[4] database in order to establish the presence of statutory designated sites, including all internationally and nationally designated sites such as Special Protection Areas (SPAs), Special Areas of Conservation (SACs), RAMSAR sites and Sites of Special Scientific Interest (SSSIs) within 1km of the site.

Other resources used include aerial photography to identify the presence of habitats in close proximity to the site. This assists in the assessment of the potential of the site and its surrounding habitat to support protected species.

3.2. Vegetation and Habitat Assessment

An assessment was made of all areas of vegetation within the site based on the standardised Phase 1 survey methodology[5]. This involved a walkover survey to identify broad vegetation types, which were then classified against Phase 1 habitat types, where appropriate.

A list of characteristic plant species for each vegetation type was compiled and any invasive species encountered as an incidental result of the survey are noted.

3.3. Bats

3.3.1. Preliminary Bat Roost Assessment (PRA)

The PRA comprised a survey of the building for bats, signs of bats and features potentially suitable for use by roosting bats, and an assessment of the surrounding habitat in terms of its suitability for commuting and foraging bats.

This survey is reported fully in the separate PRA report, but the conclusions of the assessment are referenced here to provide a holistic assessment of the ecological value of the Site in the PEA report.

3.4. Birds

The assessment of breeding and wintering birds on the site was based on the suitability of habitat present, evidence of nesting such as old or currently active

[4] http://defra.magic.gov.uk
[5] JNCC (2010). Handbook for Phase 1 Habitat Survey: A technique for environmental audit – Field manual

nests and the presence of bird species that may potentially nest within the available habitat.

3.5. Other Protected Species

An assessment of potential and suitability for other protected species was made based on the habitats present both on- and offsite; the local status of these species; and the background records.

No further protected species survey methodologies were required to support a comprehensive Ecological Assessment at this site.

3.6. Surveyor Competence

The surveys were undertaken by James Faulconbridge MRes MCIEEM trading as IOS Ecology. James is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM); he is a Licenced Bat Worker (Class Licence Level 2) and has over 14 years' experience undertaking a range of ecological surveys and assessing the factors that affect ecology in relation to construction and the built environment.

3.7. Survey Dates

The PRA and PEA surveys were both undertaken on 24th February 2022.

3.8. Zone of Influence

The Zone of Influence (ZOI) is the area within which the ecological impacts arising from a proposed development are likely to be significant. Due to the nature of the proposed development the ZOI is identified as the site and the habitats which immediately bound it.

The sensitivity and value of offsite statutory and non-statutory sites mean that the potential for impacts arising from the proposed development should be considered within a wider ZOI. Therefore, scoping for direct and indirect impacts to designated sites is conducted within a ZOI of 1km of the Survey Site.

3.9. Assessment of Ecological Value

The ecological values provided within this report are based around both the professional judgement of the author and current published relevant guidance, including "Guidelines for Ecological Impact Assessment in the United Kingdom."[6]

[6] CIEEM (2016). Guidelines for Ecological Impact Assessment in the UK and Ireland. 2nd Edition. Chartered Institute of Ecology and Environmental Management. Winchester.

4. Results

4.1. Onsite Habitats

4.1.1. Building

The central focus of the Site is the town hall which comprises the original Town Hall structure; a more modern extension on the western aspect; a plant room on the eastern aspect; and a porch on the southern aspect.

The building could provide potential habitat for bats and nesting birds. A description of the elements of the structure insofar as they relate to bats and nesting birds is therefore provided in the associated PRA report but as the structure is not identified as supporting further species or vegetation, it is not given further consideration as a habitat in its own right.

4.1.2. Hardstanding

The footprint of the proposed development includes an area of hardstanding to the south-east of the buildings. This is tarmacked and in regular use – it is not identified as providing any suitable habitat.

Photo 01 – Showing the main town hall building with the plant room to the right; the rear porch and the more modern extension to the left. The area of hardstanding included in the proposed development is the hatched area enclosed by bollards visible to the right.

4.2. Offsite Habitats

The most proximate habitats were visited and are briefly described to inform potential enhancement measures. These offsite habitats will not be directly impacted by the proposed development.

The locations of these offsite habitats are identified in Map 03.

4.2.1. Parade Gardens

This is an area dominated by amenity grassland lawn with ornamental, predominantly non-native planting around the peripheries. It is highly managed and largely municipal in character; however it will provide limited resource for pollinators and foraging habitat for common bird species.

4.2.2. Ornamental Planting along Parade

To the north of the Site is an area of attractive, sprawling ornamental planting growing along a wall and creeping across into the garden and pavement. This is likely to provide limited ecological value due to its small size and relative isolation from other habitats; however the abundance of flowers will provide resource for pollinators.

4.2.3. Tourist Information Centre

The Tourist Information Centre (TIC) was completed in 2013 with a sloping sedum roof. The range of species growing here will provide pollinator resource during the flowering season.

4.2.4. Porthcressa Lawn

This is an area of closely-mown lawn which is popular with visitors due to its proximity to Porthcressa and the TIC. The species composition reflects its coastal location but it is highly managed and subject to high levels of visitor pressure. Its ecological functionality of relevance to this assessment is likely to be limited to pollinator resource during the summer season.

Map 03 – Showing the Site indicated with the red line in relation to proximate offsite habitats including Parade Gardens (purple wash); ornamental planting along Parade (orange wash); the lawns and ornamental planting along Porthcressa (aqua wash) and the sedum-roofed Tourist Information building (green wash).

Photo 02 – Showing the Parade Gardens

Photo 03 – Showing the ornamental planting along the north side of The Parade.

Photo 04 – Showing the lawn with picnic benches along Porthcressa.

Photo 05 – Showing the sedum roof of the Tourist Information Centre.

4.3. Bats

4.3.1. Background Data

The desk study showed that no species of bat had previously been recorded roosting within the building.

A data search revealed information on five species of bat recorded on St Mary's. The species conclusively identified were common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*) and brown long-eared bat (*Plecotus auritus*). Leisler's bat (*Nyctalus leisleri*) and Nathusius pipistrelle (*Pipistrellus nathusii*) records were also returned though these species are not known to be resident on the island.

Three records of common pipistrelle roosts are identified in relatively close proximity to the property – these relate to individual bats utilising features such as hanging slates around dormer windows.

4.3.2. PRA Results – Roosting Potential

The separate PRA document details the assessment and results in full; however a summary is presented below. The following assessments of potential are identified for roosting bats:

- The front porch of the Town Hall has **negligible potential** to support roosting bats;
- The main hall and rear porch have **low potential** to support roosting bats;
- The 1970's extension and plant room have **moderate potential** to support roosting bats.

No direct evidence of roosting bats was identified during the PRA survey; however limitations on accessibility including the presence at height of many of the features means that the assessment relates primarily to potential rather than evidence.

This judgement was reached in accordance with the survey methodologies and evaluation criteria outlined in the Bat Surveys for Professional Ecologists: Good Practice Guidelines.[7]

4.3.3. Foraging and Commuting

The Site itself is unlikely to provide significant foraging or commuting habitat for bats; however nearby habitats such as the strandline of Porthcressa Beach and Town Beach, as well as the ornamental and municipal habitats detailed in 4.2 are

[7] Collins, J. (ed.) 2016 Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). The Bat Conservation Trust, London.

likely to provide low-moderate value foraging resources for local common pipistrelle bats.

4.4. Birds

During the site visit, two old nests were identified in the attic of the main Town Hall building. Their location at a relatively inaccessible position just above the eaves precluded an inspection to confirm the point of entry, but it is assumed that this entry is still viable.

In addition to nesting evidence confirmed internally, there is potential nesting habitat associated with the roof structure for species such as gull species and pigeons. Discreet opportunities for other species such as sparrow or robin may also occur.

Aside from nesting opportunities, there is negligible further habitat associated with the Site due to the lack of vegetation or other food sources.

4.5. Other Protected Species

The PEA survey did not identify suitable habitat for other protected or notable species.

5. Evaluation

5.1. Proposals

The proposed works were identified in the RIBA Stage 3 report for the project dated December 2021. There are extensive internal and external proposals involved in the creation of a new home for the Isles of Scilly Museum. This involves renovation and modification to existing structure; demolition of minor existing structural elements; and the construction of new extensions to the building.

5.2. Assessment of Ecological Impacts

5.2.1. Statutory and non-statutory Sites

The proposed development would not impact directly or indirectly upon any offsite statutory sites.

The proposals would certainly increase the number of visitors to the re-developed site itself, but these are likely to be primarily existing visitors to the islands rather than representing a significant draw to additional visitors. As such, any increase in recreational pressure on offsite statutory sites would be negligible.

5.2.2. Habitats

The assessment did not identify any vegetated habitats within the site and thus, the proposals would not result in any loss or deterioration.

There may be an increase in recreational pressure on offsite adjacent habitats as outlined in Section 4.2 but the existing high visitor pressure arising from their central location within Hugh Town along with their largely municipal character means that any increase in visitors is unlikely to have a significant impact upon their ecological value.

The project is centred around remodelling the existing buildings and as such, there is no scope to create new habitats as part of the redevelopment works.

5.2.3. Bats

The following proposed works, identified from schedule of works identified in Appendix 2 of the RIBA Stage 3 report, are of significance in the context of this assessment:

- Demolition of the existing plant room on the eastern aspect;
- A new café/bar extension to be constructed on the eastern aspect of the Town Hall resulting in the existing external wall of the town hall being internal to the new structure and the creation of a new roofline parallel with the town hall eaves on this aspect;

- Insulation to be installed between rafters in the attic of the Performance Space;
- The 1970's extension will be re-profiled and re-roofed with a new zinc roof on one aspect and a slate tiled roof on another;
- New timber cladding throughout the 1970's extension involving removal of existing coverings and flashing;
- New windows to be incorporated into the 1970's extension;
- Existing town hall building to be re-pointed following inspection and cleaning of the masonry;
- Removal of the slates from the roof of the Town Hall to upgrade the thermal performance before being restored with new flashing;
- A roof lantern will be incorporated into the roof of the existing Town Hall.

Potential roosting opportunities identified would be damaged, disturbed or destroyed as a result of the proposed redevelopment works. Further surveys would therefore be required in order to identify if bats were utilising these features. Any impacts to roosting bats could be characterised.

No impacts to foraging or commuting resources for bats are identified.

5.2.4. Birds

The site provides various suitable habitats for use by common nesting bird species, primarily associated with the roofs of the structures.

The proposed works, including some elements of the scheme identified in 5.2.3 above, would result in the damage or destruction of nests if measures are not taken to avoid this.

In the long term, it is likely that the new structure would offer broadly equivalent nesting habitat though additional habitat boxes can be installed to secure this and offer a net enhancement.

No impacts to foraging resource for birds are identified.

5.2.5. Other Protected Species

The assessment did not identify the presence of, or suitable habitat for, other protected species. No further impact assessment is therefore provided.

6. Recommendations

6.1. Introduction and Scope

The following recommendations are based upon the results identified through the PEA and PRA assessments. However a comprehensive overview of recommendations relating to bats cannot be determined until the PAS surveys have been completed and the results analysed.

Where appropriate, outline measures are provided but where further detail remains to be developed, this is identified in the text.

6.2. Further Survey Requirements

In accordance with the criteria outlined in the Best Practice Guidance, further surveys would be required to provide an appropriate evidence-base to fully characterise impacts to protected species and thus support a planning application.

- The structural features identified as offering low potential for use by roosting bats should be subject to a single Presence/Absence Survey (PAS);

- The structural features identified as offering moderate potential for use by roosting bats should be subject to two PAS surveys.

These surveys should be completed and submitted in support of a Planning Application in order to accord with the guidance provided by Circular 06/05 (ODPM, 2005) as outlined in Section 2.5.1 of this report.

The results of the recommended surveys would be used to inform the development of mitigation or Reasonable Avoidance Measures (RAMS) which would be submitted in support of the Planning Application to allow the development works to proceed.

6.3. Timing of Works

6.3.1. Nesting Birds

The roof structures and attic spaces offer suitable nesting habitat for breeding 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)[8].

The most reliable means of ensuring nesting birds are not impacted by the works is for development works affecting relevant areas to be conducted outside the bird breeding season of March to September inclusive. Development works can

[8] HMSO (1981). Wildlife and Countryside Act 1981 (as amended). HMSO, London.

be undertaken outside of the breeding season without constraints relating to breeding birds.

If development activities are commenced prior to the beginning of the nesting season, and this activity is sustained with ongoing contractor presence, then birds are likely to be dissuaded from establishing nests. In this way, works begun during the winter can proceed into the spring/summer with a minimal risk of causing disturbance or damage.

If works are scheduled to commence during the breeding season, a nesting bird survey would need to be carried out by a suitably qualified person prior to commencement.

Careful observation of any potential nesting sites would be required to ensure that the parent birds are not visiting a nest and provisioning the young. Nests are only protected if they are active (i.e. being used to rear young) or in the process of being built.

- Where active nests are identified, works affecting these areas must be delayed until the chicks have fledged the nest.
- Once it is confirmed that nests are absent or no longer active, the relevant features should be dismantled carefully and by hand as a precaution.

6.3.2. Bats

The results of the PAS surveys recommended in Section 6.2 would identify any requirement for timing of works constraints relating to bats.

If no roosts are identified then it is likely that works would only need to observe seasonal restrictions with regards to breeding birds as identified in Section 6.3.1 above. However if bat roosts are confirmed, there may be timing of work restrictions applicable to specific areas of the structures in order to minimise or avoid impacts to roosting bats.

6.4. Landscaping

The proposals do not include any new landscaping areas, nor are any of the roof structures suitable for the incorporation of a green roof or similar feature.

There are therefore no landscaping recommendations relating to the project; however as no habitat impacts are identified, there is no requirement for replacement or compensation works.

6.5. Habitat Boxes

As there is no scope for landscaping or habitat creation within the new development, as outlined in Section 6.4, the focus of biodiversity enhancement measures are centred around the provision of habitat boxes which can be installed on the new structure.

Where stand-alone boxes are selected, these should be fixed following the manufacturer's recommendations and using the fixings provided. Care must be taken to ensure that the boxes are secure and stable in high wind conditions.

Depending on their siting within the building, these boxes could be identified using Interpretation Boards for visitors to the new museum.

6.5.1. Bird boxes

A total of **10 bird boxes** should be installed on the new building, with more included where appropriate. The locations would need to have due regard to public hygiene or public nuisance concerns, for example avoiding locations where droppings could impact upon food service areas.

The precise specification for enhancement should be developed in order to maximise the ecological provision whilst avoiding any material impact upon the aesthetics or character of the new building. The species targeted should be those which are confirmed to breed on the island and are present within the more developed location of the site. Suitable options are outlined below:

- Swallow nest boxes could be incorporated in higher locations – these should be in a location with a good 'fly in' for parents provisioning the nest and in a location with minimal risk of disturbance;
- House sparrows nest communally and nest boxes could accommodate this, either through the installation of a single purpose-built nest box comprising several individual chambers with separate entrances, or the installation of 3+ nest boxes in close proximity.
- Nest boxes suitable for hole-dwelling species such as blue tits, or open-fronted boxes for species such as blackbird and robin also have a good likelihood of occupation if they were positioned close to areas of offsite green space as identified in Map 03.

Any boxes should be either integrated into the construction design, or mounted securely at a height of at least 3m above the ground in areas without high levels of public presence which could cause disturbance.

Boxes can be sourced online, or can be constructed on-site using methodology and specifications provided by the RSPB. There are many examples of integrated box designs to minimise the aesthetic impact and these could be considered where appropriate. A valuable resource is 'Designing for biodiversity: A technical guide for new and existing buildings'[9] – this is published by the Bat Conservation Trust (BCT) in conjunction with RIBA and covers habitat box provision specifications for both bats and birds.

[9] 'Designing for biodiversity: A technical guide for new and existing buildings' (RIBA Publishing 2013, 2nd edition)

6.5.2. Bat boxes

Detailed measures to support roosting bats would be specified following the results of the PAS surveys recommended in Section 6.2 – this would determine the number, location and specification of boxes and their role as either compensation/mitigation or biodiversity enhancement.

- If the PAS results do not identify any roosting bats, then the new boxes would represent enhancement and the specification of the boxes should be tailored to use as day roosts by individual or small numbers of common pipistrelle bats as these are the most likely species and habitat use for the site.

- If roosts are confirmed then the boxes would form mitigation/compensation and as such the specification of the boxes should be tailored to the species and roost type to be impacted.

6.5.3. Solitary Bee Boxes

The proximity of the site to suitable foraging resource for pollinators including solitary bees would suggest that incorporation of nest boxes would have a high probability of occupation if correctly sited. It is recommended that **3 solitary bee boxes** are installed on the new structures.

Solitary bees are very unlikely to sting and therefore do not represent a public safety concern; however to avoid any perception of risk, it is recommended that any boxes installed should be situated away from areas of high public presence. This could be achieved through height or by situating them away from the main accessible areas.

Boxes should be positioned close to areas of offsite green space as identified in Map 03 and facing either east or south in a sunny location at a height of between 1 – 4m above ground level.

6.6. Precautionary Method of Working

The results of the PAS surveys for bats will identify any requirements for precautionary methods of working and reasonable avoidance measures to avoid or minimise the risk of impacts to roosting bats.

This may include measures such as care during removal of specified items, contractor inductions and other procedural measures to ensure legislative compliance during works.

6.7. Survey Validity and Update

The data provided in this report and the associated PRA report is not sufficient in itself to provide an ecological baseline to support planning.

In conjunction with the PAS report, and any recommendations outlined therein, the ecological baseline is anticipated to be complete.

The survey was completed in February 2022 – the nature and character of the site means that the assessment is considered valid until August 2023. If Planning Permission is not applied for by this date, the survey should be updated.