PRELIMINARY ECOLOGICAL ASSESSMENT

STEAMSHIP HOUSE,
HUGH TOWN, ST MARY'S, ISLES OF SCILLY

Client: *rlt architects*

Our reference: *22-11-1*

Planning reference: *Report produced in advance of submission*

Report date: *26th November 2022*

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

Contact: *ios.ecology@gmail.com*

Executive Summary

Overview
The property known as Steamship House was subject to a Preliminary Ecological Assessment (PEA) and Preliminary Roosting Assessment (PRA) in November 2022. This report outlines the results of these surveys.
Proposals
The proposals involve renovation and refit works to re-purpose the existing sales offices for residential use. These would largely involve internal works - external works would be restricted to the construction of an additional storey on the flat-roof two-storey office building which comprises the northern portion of the property.
Ecological Assessment
The survey site is dominated by the contiguous building structures which comprise Steamship House. No significant areas of vegetation were identified associated with the Site and therefore consideration of ecological value is restricted to those species which could utilise the building as a habitat resource, namely roosting bats and nesting birds. The building offers Moderate Potential for use by roosting bats and Low Potential for use by nesting birds. The Site itself is not subject to any statutory or non-statutory nature designations and no impacts to external designated sites are identified as a result of the proposals.
Recommendations
The following recommendations are outlined in the report in order to provide a suitable baseline to inform Planning and to ensure that no Protected Species are negatively impacted as a result of the proposed works: • Two further PAS surveys should be undertaken on the pitched-roof single-storey element of the structure (Building B) and the double-storey flat-roof element of the structure (Building C); • Works should take place with due regard to the low potential for nesting birds to be present – no further surveys are required to inform Planning but works should be timed to avoid the nesting season or include pre-commencement inspections.
Report Status
As the requirement for PAS surveys is identified in accordance with the Best Practise Guidance, this report **does not provide a comprehensive baseline to inform Planning** until these surveys have been completed and their results used to inform appropriate mitigation measures.

Table of Contents

1. Introduction

1.1. Project Overview

The site is located on the main Hugh Street in Hugh Town, St Mary's in the Isles of Scilly. The site is dominated by a contiguous building complex including three distinct construction styles. The buildings enclose a small courtyard which is dominated by concrete with individual ornamental plants.

The proposals involve renovation and refit works to re-purpose the existing sales offices for residential use. These would largely involve internal works - external works would be restricted to the construction of an additional storey on the flat-roof two-storey office building which comprises the northern portion of the property.

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 National Grid Reference for the centre of the Site is SV 90248 10567 (see Map 1). The site is approximately 0.02 hectares (ha) in size.

2.2. Local Landscape Setting

The Site is set relatively centrally within Hugh Town. Hugh Street runs immediately to the south with further thoroughfares to the north and east. The immediate western boundary is occupied by adjacent buildings.

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 250m to the west and around 600m to the east. Some of the properties in the local environs have associated areas of garden or green space, but the centre of Hugh Town is relatively densely developed.

The Site is within the narrowest part of Hugh Town with Town Beach and Porthcressa lying 35m to the north and 120m to the south respectively. The closest areas of semi-natural habitat are associated with the Garrison approximately 200m to the west; and the land around Buzza Tower approximately 300m to the east.

Map 02 – Showing the landscape and habitats immediately surrounding the Site (indicated by the blue line/wash). Reproduced in accordance with Google's Fair Use Policy.

2.3. 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 90m to the north of the Site and continuing along the coastline to the north and south, 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 90m to the north of the Site and continuing along the coastline to the north and south, the SPA is 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 750m 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 720m 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.

2.4. Planning Context

2.4.1. 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

[1] Ministry of Housing, Communities & Local Government. (2019). National Planning Policy Framework. OGL

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*."

2.4.2. 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].

[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 small scale of the site; and the current and historic land use.

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, and historic OS maps revealing earlier land use. 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.

3.3. Bats

3.3.1. Preliminary Bat Roost Assessment (PRA)

The PRA comprised an assessment of the Site's potential to provide roosting opportunities for bats. This included consideration of all potential roosting features (PRFs) which could provide roosting opportunities for bats in accordance with the relevant Best Practice Guidance[6].

In order to ensure that the assessment was both targeted and relevant, those areas of the building which are not to be directly or indirectly impacted by the proposals – such as the pitched tiled roof and associated loft space – were not included in the scope of the survey.

[4] http://defra.magic.gov.uk
[5] JNCC (2010). Handbook for Phase 1 Habitat Survey: A technique for environmental audit – Field manual
[6] Collins, J. (ed.) 2016 Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). The Bat Conservation Trust, London.

Consideration was also given to the potential value of the Site as a foraging and commuting habitat for bats.

3.4. Birds

The assessment of breeding birds on the Site was based on the suitability of habitat present, evidence of nesting such as old or currently active 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 the 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 26th November 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."[7]

[7] 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

Map 03 – Showing the broad Phase 1 Habitat designations associated with the Site. Reproduced in accordance with Google's Fair Use Policy.

4.1.1. J3.6 - Buildings

The Site is dominated by a contiguous building complex which includes both single-storey and two-storey components with a combination of flat and pitched roofs.

The buildings could provide habitat for bats and nesting birds. A description of the elements of the structure insofar as they relate to potential habitat for bats and nesting birds is therefore provided in Sections 4.2 and 4.3.

As the structures are not identified as supporting further species or vegetation, they are not given further consideration as a habitat in their own right in this section.

4.1.2. J4 – Bare Ground

There is an enclosed courtyard within the building complex – this is dominated by concrete with individual ornamental plants. These are not considered to represent a habitat which requires further consideration in the context of this ecological evaluation.

Photo 01 – Showing the courtyard and individual ornamental plants which comprise the extent of vegetation within the Site.

4.2. Bats

4.2.1. Background Data

The desk study showed that no species of bat had previously been recorded roosting on the Site or associated with properties bounding the Site.

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.

4.2.2. PRA Results – Roosting Potential

The buildings within the Site were differentiated by their construction and style for the purposes of assessing their potential to support roosting bats. These delimitations are identified in Map 04.

Map 04 – Showing the structurally distinct components of the contiguous building complex within the Site boundary (indicated by the blue line). The two-storey pitched-roof component (A) is shown in red; the single-storey pitched-roof component (B) is shown in green; and the two-storey flat-roof component (C) is shown in lilac. Reproduced in accordance with Google's Fair Use Policy.

Two-storey pitched roof component (Building A)

The oldest component of the building complex is the two-storey Steamship House which is situated on the frontage of Hugh Street. It is constructed from granite block with a pitched, slate-tiled roof. A small, flat-roof extension on the northern corner of this building is also functionally included within the Building A classification.

The proposals would not affect the exterior of this building, with works restricted to interior redevelopment. No works affecting the existing loft space are proposed. The interior of the building is maintained to a good standard and in regular use, precluding roosting by bats in existing rooms.

Inspection of both the building itself and the proposed redevelopment works identify that works would not indirectly impact upon potential roosting features associated with this component of the structure. For clarity and brevity, no further consideration is given to this element of the building complex.

Single-storey pitched roof component (Building B)

Building B is a single-storey structure which links the other two structural components. At the time of survey, it was in current use as an office. It is block-built with wooden window and door frames which appear well-fitted. Where the building abuts adjacent built structures A and C, there is lead flashing which appears to be well-fitted without offering cavities or roosting opportunities behind.

The roof is gently-sloping fibreglass atop plyboard supported by a timber frame – insulation is present between the joists. A loft-hatch was present allowing inspection of the immediate vicinity whilst being too small to permit surveyor access to the void for a comprehensive inspection.

There is a fascia board running along the eaves of the building – this is well-sealed in places but in other locations, especially along the eastern aspect, there are gaps sufficient to permit access for bats, and allow access to the roof void.

Two-storey flat-roof component (Building C)

The most northerly component of the building complex is a two-storey, flat-roof building which was used as offices at the time of survey. It is rendered externally – the coating is generally in good condition and where there are gaps, cracks or missing sections, they do not appear to offer roosting opportunities. Windows include both wooden and uPVC units – all appear well-fitted and do not offer roosting opportunities.

There is a fascia running along the top of the walls and, though generally well-fitted, there are gaps along the eastern aspect which would permit access for bats. This could provide for both transient roosting opportunities behind the fascia, and access further roosting opportunities within the flat-roof structure.

Photo 02 – Showing the pitched-roof single-storey building (B) in the foreground, with the two-storey, flat-roofed building (C) in the background.

Photo 03 – Showing the gently-pitched fibreglass roof of Building B from an elevated viewpoint. Building C is present in the background and on the left-hand side.

Photo 04 – Showing the typical well-sealed flashing where Building B connects with Buildings A and C at either side

Photo 05 – Showing the view into the loft space of Building B as seen from the small hatch

Photo 06 – Showing an example of the gap behind the fascia board on Building B which is likely to provide potential access for bats to the internal roof void.

Photo 07 – Showing the northern and eastern facades of Building C. The flat-roof Building B can be seen on the left-hand side with Building A behind.

Photo 08 – Showing an example of the cracks/damage which occur occasionally in the render of Building C – these do not appear to offer roosting opportunities. Both the uPVC and wooden windows are largely well-fitted with no gaps noted.

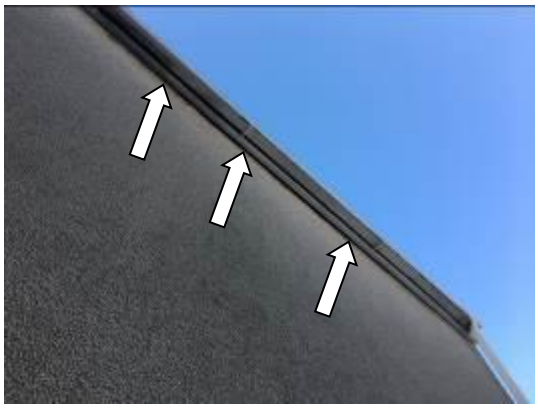

Photo 09 – Showing the fascia board at the top of the walls on Building C – gaps occur in places, predominantly on the eastern aspect.

Photo 10 – Showing the fascia on the southern aspect of Building C with a gap visible on the south-eastern corner.

Photo 11 – Showing the northern aspect of Building A which directly faces Buildings B and C. The hanging tiles are tightly fitted and no gaps were noted on this aspect.

4.2.3. 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 gardens and ornamental/municipal habitats are likely to provide low-moderate value foraging resources for local common pipistrelle bats.

4.3. Birds

No active bird nests were recorded at the time of survey, and limited nesting opportunities were noted associated with the structures.

There is potential nesting habitat associated with the roof structure for birds 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.

4.4. Other Protected Species

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

5. Evaluation

5.1. Proposals

The proposals involve renovation and refit works to re-purpose the existing sales offices for residential use. These would largely involve internal works - external works would be restricted to the construction of an additional storey on the flat-roof two-storey office building which comprises the northern portion of the property.

These proposals were identified in the document "2634 – Steamship House, Hugh Town, Isles of Scilly: Feasibility Study" produced by rlt architects dated September 2021 with further details clarified by the client.

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.

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.

5.2.3. Bats

The following overall assessments are reached with regards to the buildings surveyed:

- **Building A** was not subject to detailed inspection as no direct or indirect impacts are identified;
- **Building B** has **moderate potential** to support roosting bats associated with access to the roof void behind fascia boards. This assessment takes into account limitations of access due to the size of the loft hatch and the roof void;
- **Building C** has **moderate potential** to support roosting bats associated with gaps behind the fascia boards and potential access to voids associated with the flat roof structure.

This judgement was reached in accordance with the survey methodologies and evaluation criteria outlined in the Bat Surveys for Professional Ecologists: Good Practice Guidelines.[8]

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

If roosts are present associated with these structures, uncontrolled works have the potential to destroy roosts and kill/injure bats occupying the roosts at the time of work.

5.2.4. Birds

The overall likelihood of breeding birds utilising nesting opportunities associated with the site is considered to be low, although potential nesting habitat is noted.

The proposals are unlikely to impact the long-term suitability or availability of nesting habitats – therefore the impacts of the proposed works are likely to be restricted to potential killing or injuring individual breeding birds if works take place during the breeding season.

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. Bats

In accordance with the criteria outlined in the Best Practice Guidance, further surveys would be required to provide an appropriate evidence-base upon which to support a planning application.

- Buildings B and C are identified as having **Moderate Potential** to support roosting bats and should therefore be subject to **two PAS surveys** in order to meet Best Practice Guidance[9].

The PAS surveys should be led by Licenced Bat Worker(s) between May and September with at least one survey between May and August. The two surveys should be at least two weeks apart.

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 these 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.

6.2. Nesting Birds

6.2.1. Timing of Works

Works to the buildings can proceed without impediment between October – March inclusive.

If works proceed during the breeding season (April – September inclusive), a nesting bird survey would need to be carried out by a suitably qualified person prior to clearance. 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 must be delayed until the chicks have fledged the nest.

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

- Once it is confirmed that nests are absent or no longer active, the works can proceed.

6.2.2. Nest Boxes

Bird boxes should be installed on the new building if appropriate. The locations would need to have due regard to public hygiene or public nuisance concerns.

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 such as the new extension on the northern portion of the building complex – 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.

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'[10] – this is published by the Bat Conservation Trust (BCT) in conjunction with RIBA and covers habitat box provision specifications for both bats and birds.

6.3. Other Ecological Receptors

No further impacts to other ecological receptors are identified – no further recommendations are therefore provided.

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