

PRELIMINARY ROOST ASSESSMENT (PRA)

RICHARD HAND HAULAGE,
PORTHMELLON INDUSTRIAL ESTATE, ST MARY'S,
ISLES OF SCILLY



Client: Richard Hand Haulage

Our reference: 23-1-1

Planning reference: Produced in advance of submission

Report date: 16th January 2023

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Executive Summary

Bats - Results and Findings

The preliminary roost assessment (PRA) survey concluded that there was **negligible potential** for use of the office unit attached to Richard Hand Haulage on Porthmellon Industrial Estate by roosting bats. This assessment relates solely to the single-storey office unit; it does not provide a comprehensive assessment of the wider warehouse building.

Whilst a negligible potential is concluded, it is noted that there is a small chance of opportunistic/transient use of individual discreet features. This potential is not sufficient to justify further surveys or significant constraints to works, but should be taken into account in accordance with the precautionary principle.

This judgement was reached in accordance with the survey methodologies and evaluation criteria outlined in the Bat Surveys for Professional Ecologists: Good Practice Guidelines 3rd edition¹

Bats - Further Survey Requirements

No further surveys are recommended – the PRA conclusion does not require further survey 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. A specific methodology is provided in Appendix 1.

A Planning Condition requiring compliance with the Precautionary Method of Works (PMW) outlined in Appendix 1 could be attached to a Decision Notice. If so, it is recommended that this should be compliance only – no further information would be required as the methodology outlined in the PMW is comprehensive.

If the applicant wishes to provide biodiversity enhancement, a bat box could be erected on the southern gable of the warehouse unit. Guidance on suitable specifications is provided.

Nesting Birds - Results and Findings

There is evidence of nesting birds, specifically house sparrow, nesting within the roof structure of the office unit. Whilst this is not evident in a location to be specifically impacted by the proposals, the potential for nesting birds should be considered.

Nesting Birds - Recommendations

Works should take account of the minor residual risk of species such as sparrow making use of nesting opportunities during the breeding season.

There is no requirement to replace nesting habitat for breeding birds as the confirmed nesting features will be retained post-completion.

¹ Collins, J. (ed.) 2016 Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). The Bat Conservation Trust, London.

PRELIMINARY ROOST ASSESSMENT (PRA)

Planning Authority: Isles of Scilly	Location: SV 90882 10646	Planning Application ref: Report produced in support of application
Planning application address: Richard Hand Haulage, Porthmellon Industrial Estate, St Mary's, Isles of Scilly		
Proposed development: The proposed works were identified by the client and accord with the documentation submitted in support of the application. These involve: 1) The extension of the existing office unit to provide a reception space to the north of the existing building. Impacts to existing structures would be restricted to the northern face of the existing office unit.		
Building references: The building components are identified in the plans provided in Appendix 2.		
Name and licence number of bat-workers carrying out survey: James Faulconbridge (2015-12724-CLS-CLS)		
Preliminary Roost Assessment date: The visual inspection was undertaken on 14 th January 2023 in accordance with relevant Best Practice methodology ² .		
Local and Landscape Setting: The building is located to the south-eastern edge of Porthmellon Industrial Estate in St Mary's in the Isles of Scilly. The land use immediately surrounding the building is densely developed on all sides, with a range of light-industrial and commercial properties with associated hardstanding and access features. A treeline runs along the south-eastern edge of the main warehouse unit, but the office unit under consideration in this assessment faces directly onto the internal access road of the estate. Beyond the confines of the small industrial estate, there is abundant suitable habitat to the south-east. Approximately 140m to the south-east is Lower Moors SSSI – a topogenous mire with areas of elm woodland and scrub as well as a series of pools and marshy grassland. Records from the Local Bat Group indicate that this is an important foraging resource for bats on the island. The shoreline of Porthmellon Beach lies approximately 100m to the northwest of the site and the strandline here may provide a valuable foraging resource for bats. There are three records of bat roosts within 500m of the property – all relate to common pipistrelle roosts utilising features such as hanging slates around dormer windows in Hugh Town to the west and south-west of the site.		

² Collins, J. (ed.) 2016 Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). The Bat Conservation Trust, London.

Building Description(s):

The main building in the site is a double-height warehouse with roller-shutter doors which is used for storage of vehicles, deliveries and as a general workshop space. On the north-western aspect is a single-storey extension which houses an existing office. The proposals relate solely to the extension of the office unit. As direct and indirect impacts are restricted to this unit, the description will focus only on this unit. The assessment does not therefore represent a comprehensive assessment of the wider premises.

Office Unit

The office unit is single-storey with a single-pitch gently-sloping roof. It is attached to the larger warehouse structure to the south.

The unit is clad with hit & miss boarding. The potential cavities which could be created by the boarding above windows and doors are not present as these are filled with timber. There are two missing boards on the northern aspect below the window – however any potential fly-in access to these is blocked by a cluttered environment dominated by an oil tank and associated services. A video endoscope was used to inspect behind these boards and it was found to be densely cobwebbed with associated debris indicating no recent or current occupation by bats. Aside from this feature, there were no identified access features behind the boarding.

There is a wooden fascia board running along the eaves on each aspect – this creates multiple gaps where it joins the hit & miss boarding – however they are open at the top and do not provide the apex niche characters favoured by common pipistrelle. The roof sheets which lap over the edge of the fascia on the eastern and western aspects is tightly fitted with no gaps.

The roof is constructed of corrugated sheet material – the peaks in the corrugations are blocked in places but in others, light can be seen throughout the length. Where gaps were open, these were inspected fully with a torch and endoscope. No evidence of use by bats or other species could be determined and the construction means that the features do not provide the apex niche characters favoured by common pipistrelle. The flashing where the roof sheets join the main warehouse structure were tight and well-fitted.

The aluminium-framed windows are well-fitted with a gap noted under the sills – this gap was inspected and found to be densely cobwebbed indicating no current or recent occupation by bats.

Survey Limitations

It was not possible to fully inspect the sealed void as it is only partially open and visible from the warehouse. This constraint is taken into account in the assessment - minor residual risk can be controlled through an appropriate Precautionary Method of Works (PMW) which is provided in Appendix 1.

There were no other significant limitations to access or survey inspection which might affect the evidence base or subsequent conclusions of this survey.

Assessment of Potential for use by Roosting Bats

No evidence of current or historic use by bats was identified during the survey and an overall **negligible potential** was determined; however it is noted that there is a small residual risk of opportunistic/transient use of the features noted.

This assessment relates only to the office unit – the wider warehouse unit was outside of the scope of this assessment.

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.

The proposed works involve very limited impacts to existing structures – this is restricted to the removal of the existing northern wall of the office unit to allow it to be extended. The existing roof would remain in situ, only modified such as is necessary to allow new roofing sheets to be settled below existing sheets to allow continuous run-off of rain.

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. The potential for individual common pipistrelle bats to make use of minor opportunities associated with listed features should be taken into account during works. These features are:

- The minor gap beneath the sill of the window;
- The gaps created by the intersection between the fascia board and the hit & miss boarding;
- Accessible voids behind the hit & miss boarding on the northern aspect;

At the discretion of the Planning Authority, a compliance condition could be included in any Planning Application approval requiring that works proceed in line with the PMW requirements outlined in Appendix 1 of this report. This is in order to ensure that roosting bats are not impacted by the proposed works.

If the applicant wishes to provide biodiversity enhancement, the position of the south-eastern gable of the warehouse facing onto a treeline would offer an ideal location to install a bat box. This should be positioned above 3m from the ground to minimise the risk of predation. An open-based box design would ensure that it would not require cleaning. The location and aspect would be optimal for bats such as common pipistrelle which is the dominant species present on the island and the most likely species to use the environs for foraging and roosting. The proximity of the gable to existing vegetation would secure a vegetated fly-in/out habitat.

A suitable box could be purchased or constructed following freely available plans. Kent Bat Box style boxes are slim easy to construct from appropriate timber using the plans provided at:

<http://www.kentbatgroup.org.uk/kent-bat-box.pdf>

Assessment of Potential for use by Nesting Birds

Nesting material was visible beneath the roofing sheets on the western aspect of the office unit – this is likely to reflect use by house sparrows. The evidence was restricted to the southern portion of this aspect, closest to the warehouse, and this location should not be impacted by the proposed works. However care must be taken to avoid accidental or incidental disturbance during works.

No evidence of nesting birds was identified associated with the northern face of the office unit which would be directly impacted; however appropriate care should be taken to ensure that no birds are nesting prior to works taking place. This could be achieved either through timing of works, or a pre-commencement inspection.

Recommendations and Justification (Birds):

Works affecting the roof 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.

If this is not possible, then contractors should visually inspect gaps around the eaves, beneath roofing sheets and above fascias before they are affected by the works, in order to confirm that no nests are present. In the unlikely event that a bird nest is present, 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. The situation of the confirmed nesting location at the periphery of a building which is in regular use as a workspace with frequent vehicle movements and human presence would suggest a relatively high degree of habituation, but novel disturbances created by the proposed works may be perceived as a greater threat by nesting birds.

There is no requirement to mitigate for loss of nesting habitat for breeding birds as the existing confirmed nesting features would not be directly affected by the proposals and should remain suitable post-completion.

Signed by bat worker(s):

Date: 16th January 2023



APPENDIX 1

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PRECAUTIONARY METHOD STATEMENT WITH REGARDS TO BATS

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

Contractors should be aware of **where bats are most likely to be found in respect to the existing office unit:**

Hit & Miss Boarding

Inspection of the building indicates it is highly unlikely that bats will access voids behind the hit & miss boarding – however this cannot be ruled out comprehensively especially if structural conditions changes.

Boards should be removed carefully, in such a way that if any bats are present behind the boards, they are not killed or injured. Particular attention should be paid to the points where boards attach to the battens – common pipistrelles often seek apex cavities where they are in a crevice surrounded on the sides and the top, with open access only in a downwards direction. The underside of boards should be checked for the potential presence of bats before being put aside.

Fascia board

There are gaps created where the fascia board attaches over the hit & miss boarding at the top of the wall – this is open at the top and doesn't create an apex cavity which significantly reduces its suitability for use by bats. However as a precaution, these cavities should be visually inspected using a torch prior to the board being removed. If any bats are present, or suspected, works should pause and the Named Ecologist contracted to review the situation. If no bats are present, the board can be removed and works can continue.

uPVC Window Frames

There is a minor gap below the aluminium window frame which should be fully inspected visually before works commence in order to confirm that no bats are present.

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.

APPENDIX 2

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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 warehouse unit (blue) with the office unit shown in red. Reproduced in accordance with Google’s Fair Use Policy.



Photograph 1: Showing the office unit – the northern face would be removed to allow the building to be extended over the footprint of the existing oil tank (visible to the far right).



Photograph 2: Showing the gap behind the fascia board at the eaves – however this is open at the top with no apex cavity which would reduce its suitability for use by roosting bats.



Photograph 3: Showing that the potential gaps in the hit & miss have been sealed above the window.



Photograph 4: Showing the very minor cavity below the sill of the aluminium window frame.



Photograph 5: Showing the accessible portion of the void as seen from the warehouse – the CLS internal structure and insulation boards are visible.



Photograph 6: Showing view along the corrugated roof sheet from the interior of the warehouse – the light is visible at the end in some instances only.