



**IMPORTANT – THIS COMMUNICATION AFFECTS YOUR PROPERTY**

## **COUNCIL OF THE ISLES OF SCILLY**

Old Wesleyan Chapel, Garrison Lane, St Mary's TR21 0JD  
Telephone: 01720 424455 – Email: [planning@scilly.gov.uk](mailto:planning@scilly.gov.uk)

Town and Country Planning Act 1990  
Town and Country Planning (Development Management Procedure) Order 2015

### **PERMISSION FOR DEVELOPMENT**

|                        |  |                                     |   |
|------------------------|--|-------------------------------------|---|
| <b>Application No:</b> | <b>P/23/105/FUL</b>  | <b>Date Application Registered:</b> | <b>20th December 2023</b>   |
| <b>Applicant:</b>      | <b>Mr Dorrien-Smith<br/>Tresco Estate<br/>Office,<br/>Tresco,<br/>Isles Of Scilly,<br/>TR240QQ</b> | <b>Agent:</b>                       | <b>Mr Joseph Withers<br/>Llewellyn Harker Lowe Architects<br/>Home Barn,<br/>Gattrell,<br/>Steway Lane,<br/>Northend,<br/>Bath,<br/>BA1 8EH</b> |

**Site address:** Bottom Staff Annexe Back Lane Norrad Tresco Isles of Scilly  
**Proposal:** Demolition of existing building and construction of new single storey building providing 11 staff accommodation units with shared facilities.

In pursuance of their powers under the above Act, the Council hereby **PERMIT** the above development to be carried out in accordance with the following Conditions:

- C1** The development hereby permitted shall be begun before the expiration of three years from the date of this permission.  
Reason: In accordance with the requirements of Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).
- C2** The development hereby permitted shall be carried out in accordance with the approved details only including:
- Plan 1, Location Plan, Drawing Number: 4300/001
  - Plan 2, Proposed Roof Plan, Drawing Number: 4300/009 REV A
  - Plan 3, Proposed Site Plan, Drawing Number: 4300/010 REV C
  - Plan 4, Proposed Unit Plan Drawing Number: 4300/013 REV A
  - Plan 5, Proposed Floor Plans Drawing Number: 4300/014
  - Plan 6, Proposed Elevations, Drawing Number: 4300/015
  - Plan 7, Preliminary Bat and Bird Assessment; Plan for Ecology, Ref: P4E2937 (Bat and Bird Avoidance Measures and Biodiversity Enhancements)
  - Plan 8, Design and Access Statement
  - Plan 9, Bat Survey Report, Plan for Ecology, Ref: P4E3047 (Bat Mitigation Measures in section 5.2, page 17/18)

**These are stamped as APPROVED**

Reason: For the clarity and avoidance of doubt and in the interests of the character and appearance of the Conservation Area, Area of Outstanding Natural Beauty and Heritage Coast in accordance with Policies OE1 and OE7 of the Isles of Scilly Local Plan (2015 - 2030).

**C3** Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (As Amended), (or any order revoking or re-enacting that Order) prior to installation, details of external illumination shall be submitted to and approved, in writing, by the Local Planning Authority. The lighting shall thereafter be installed in accordance with the agreed details.

Reason: In the interests of amenity and to protect the Isles of Scilly Dark Skies and wildlife in accordance with SS2, OE2, OE4 of the Isles of Scilly Local Plan 2015-2030.

#### **PRE-COMMENCEMENT CONDITION: Biodiversity Enhancement Measures**

**C4** Prior to the first occupation of the development, hereby approved, details of measures to promote biodiversity enhancements shall be submitted to and approved in writing by the Local Planning Authority, this shall include details of any bat boxes and/or bird nesting opportunities appropriate to species found on the Isles of Scilly. Appropriate local guidance from the Isles of Scilly Wildlife Trust, for example, should be sought to inform the type, number and positioning of suitable bat and bird boxes. The measures approved shall be installed, prior to the first breeding/nesting season following completion of the development and shall be retained as such thereafter.

Reason: To promote measures to biodiversity and habitat opportunities on the Isles of Scilly and in accordance with the requirements of Policies SS1(d) and SS2(g) of the Isles of Scilly Local Plan (2015-2030).

#### **PRE-COMMENCEMENT CONDITION: Site Waste Management Plan**

**C5** Prior to the commencement of the development, hereby approved, a scheme including details of the sources of all building materials and the means/location of disposal of all waste arising from building works, shall be submitted to and agreed in writing with the Planning Authority. The development shall thereafter proceed in strict accordance with the approved scheme only.

Reason: This is a pre-commencement condition that requires details that were not submitted as part of the application but are required to fully understand the impact upon landscape and management of waste, to be submitted to and agreed in writing by the Local Planning Authority. This is to ensure adequate consideration is given to the minimisation of unnecessary waste generation, and adherence to the waste hierarchy, in accordance with the requirements of Policy SS2 (2) and Policy OE5 of the Isles of Scilly Local Plan 2015-2030.

#### **PRE-COMMENCEMENT CONDITION: Sustainable Design Measures**

**C6** Prior to the commencement of the development, hereby approved, a detailed scheme indicating the sustainable design measures to be incorporated into the proposal shall be agreed in writing with the Local Planning Authority and should include water conservation and harvesting measures to seek to ensure the development achieves a water consumption standard of 110 litres of water per person per day as well as energy generation/minimisation measures. The sustainable design scheme shall be implemented in strict accordance with the details as agreed prior to the occupation of the development hereby permitted and be retained as approved thereafter.

Reason: This is a pre-commencement condition that requires details that were not submitted as part of the application but are required to ensure the accommodation is as sustainable as possible. In accordance with the requirements of Policy SS2 (2) and Policy OE5 of the Isles of Scilly Local Plan 2015-2030.

#### **PRE-COMMENCEMENT CONDITION: Construction Environmental Management Plan**

**C7** No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:

- The parking of vehicles of site operatives;
- Loading and unloading of plant and materials;
- Storage of plant and materials used in constructing the development;
- Wheel washing facilities;
- Measures to control the emission of dust and dirt during construction;
- A scheme for reducing/re-using/recycling/disposing of waste resulting from

**demolition and construction works.**

**On completion of the development any contractors compound, temporary access and all plant, machinery, fencing, lighting and any other equipment or structures used as part of the construction process shall be removed from the site and, where appropriate, the land reinstated to its former condition within three months.**

Reason: This is a pre-commencement condition that requires details that were not submitted as part of the application but are required to fully understand the impact upon the Islands natural environment designation and to ensure that the construction of the development is adequately controlled in accordance with Policy SS2 and OE2 of the Isles of Scilly Local Plan (2015-2030).

**C8 No construction plant and/or machinery shall be operated on the premises before 0800 hours on Mondays through to Saturdays nor after 1800 hours. There shall be no works involving construction plant and/or machinery on a Sunday or Public or Bank Holiday.**

Reason: In the interests of protecting the residential amenities of neighbouring properties.

**C9 The occupation of the dwellings, hereby approved, shall be limited to a person or persons solely or mainly employed, or last employed, as staff in connection with Tresco Estate, or a widow or widower of such a person, and to any resident dependants.**

Reason: To ensure that the dwellings are occupied only by a person or persons employed as staff on the site in accordance with Policy LC4 of the Isles of Scilly Local Plan (2015-2030).

**Further Information**

1. In dealing with this application, the Council of the Isles of Scilly has actively sought to work with the applicants in a positive and proactive manner, in accordance with paragraph 38 of the National Planning Policy Framework 2023.
2. Fire Safety: Access and Facilities for the Fire Service as detailed in B5 AD B Volume 2 will be required. You will be required to provide reasonable facilities for the Fire Service. In most circumstances this will mean providing vehicular access for fire appliances. It is important to remember that failure to do so may prevent the applicant from obtaining a completion certificate under the Building Regulations but more importantly, the lives of the occupiers will be put at risk.
3. Non-Material Amendments: In accordance with the provisions of Section 96A of the Town and Country Planning Act which came into force on 1st October 2009, any amendments to the approved plans will require either a formal application for a non-material amendment or the submission of a full planning application for a revised scheme. If the proposal relates to a Listed Building you will not be able to apply for a non-material amendment and a new application for a revised scheme will be required. Please discuss any proposed amendments with the Planning Officer.
4. Discharge of Conditions: In accordance with the Town and Country Planning (fees for Application and Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2017 a fee is payable to discharge any condition(s) on this planning permission.
5. BATS: The Applicant is reminded of the provisions of the Wildlife and Countryside Act 1981 and the E.C. Conservation (Natural Habitats) Regulations Act 1994, the Habitat and Species Regulations 2012 and our Natural and Environment and Rural Communities biodiversity duty. This planning permission does not absolve the applicant from complying with the relevant law protecting species, including obtaining and complying with the terms and conditions of any licences required, as described in part IV B of Circular 06/2005. Care should be taken during the work and if bats are discovered, they should not be handled, work must stop immediately, and a bat warden contacted. Extra care should be taken during the work, especially when alterations are carried out to buildings if fascia boards are removed as roosting bats could be found in these areas. If bats are found to be present during work, they must not be handled. Work must stop immediately, and advice sought from licensed bat wardens. Call The Bat Conservation Trust's National Bat Helpline on 0845 1300 228 or Natural England (01872 245045) for advice.
6. Building Control: Please ensure that all building works accord with the Building Regulations and that all appropriate approvals are in place for each stage of the build project: [buildingcontrol@cornwall.gov.uk](mailto:buildingcontrol@cornwall.gov.uk)

Signed:



**Chief Planning Officer**

*Duly Authorised Officer of the Council to make and issue Planning Decisions on behalf of the Council of the Isles of Scilly.*

**DATE OF ISSUE:** 23<sup>rd</sup> April 2024



# COUNCIL OF THE ISLES OF SCILLY

Planning Department  
Town Hall, The Parade, St Mary's, Isles of Scilly, TR21 0LW  
☎0300 1234 105  
✉planning@scilly.gov.uk

Dear Mr Dorrien-Smith

## Please sign and complete this certificate.

This is to certify that decision notice: P/23/105/FUL and the accompanying conditions have been read and understood by the applicant: Mr Dorrien-Smith.

1. **I/we intend to commence the development as approved:** Demolition of existing building and construction of new single storey building providing 11 staff accommodation units with shared facilities at: Bottom Staff Annexe Back Lane Norrad Tresco Isles Of Scilly  
**on:** .....
2. I am/we are aware of any conditions that need to be discharged before works commence.
3. I/we will notify the Planning Department in advance of commencement in order that any pre-commencement conditions can be discharged.

You are advised to note that Officers of the Local Planning Authority may inspect the project both during construction, on a spot-check basis, and once completed, to ensure that the proposal has complied with the approved plans and conditions. In the event that the site is found to be inaccessible then you are asked to provide contact details of the applicant/agent/contractor (delete as appropriate):

**Name:** \_\_\_\_\_ **Contact Telephone Number:** \_\_\_\_\_  
**And/Or Email:** \_\_\_\_\_

Print Name: \_\_\_\_\_

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

Please sign and return to the **above address** as soon as possible.

For the avoidance of doubt you are reminded to address the following condition(s) as part of the implementation of this permission. Although we will aim to deal with any application to discharge conditions as expeditiously as possible, you are reminded to allow up **to 8 weeks** for the discharge of conditions process.

## **PRE-COMMENCEMENT CONDITION(S)**

- C4 Prior to the first occupation of the development, hereby approved, details of measures to promote biodiversity enhancements shall be submitted to and approved in writing by the Local Planning Authority, this shall include details of any bat boxes and/or bird nesting opportunities appropriate to species found on the Isles of Scilly. Appropriate local guidance from the Isles of Scilly Wildlife Trust, for example, should be sought to inform the type, number and positioning of suitable bat and bird boxes. The measures approved shall be installed, prior to the first breeding/nesting season following completion of the development and shall be retained as such thereafter.
- C5 Prior to the commencement of the development, hereby approved, a scheme including details of the sources of all building materials and the means/location of disposal of all waste arising from building works, shall be submitted to and agreed in writing with the Planning Authority. The development shall thereafter proceed in strict accordance with the approved scheme only.
- C6 Prior to the commencement of the development, hereby approved, a detailed scheme indicating the sustainable design measures to be incorporated into the proposal shall be agreed in writing with the Local Planning Authority and should include water conservation and harvesting measures to seek to ensure the development achieves a water consumption standard of 110 litres of water per person per day as well as energy generation/minimisation measures. The sustainable design scheme shall be implemented in strict accordance with the details as agreed prior to the occupation of the development hereby permitted and be retained as approved thereafter.
- C7 No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:
- The parking of vehicles of site operatives;
  - Loading and unloading of plant and materials;
  - Storage of plant and materials used in constructing the development;
  - Wheel washing facilities;
  - Measures to control the emission of dust and dirt during construction;
  - A scheme for reducing/re-using/recycling/disposing of waste resulting from demolition and construction works.

On completion of the development any contractors compound, temporary access and all plant, machinery, fencing, lighting and any other equipment or structures used as part of the construction process shall be removed from the site and, where appropriate, the land reinstated to its former condition within three months.



# COUNCIL OF THE ISLES OF SCILLY

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Planning Department

Old Wesleyan, Garrison Lane , St Mary's, Isles of Scilly, TR21 0JD

☎01720 424455

✉[planning@scilly.gov.uk](mailto:planning@scilly.gov.uk)

**THIS LETTER CONTAINS IMPORTANT INFORMATION  
REGARDING YOUR PERMISSION – PLEASE READ  
IF YOU ARE AN AGENT DEALING WITH IS ON BEHALF OF THE  
APPLICANT IT IS IMPORTANT TO LET THE APPLICANT KNOW  
OF ANY PRE-COMMENCEMENT CONDITIONS**

Dear Applicant,

This letter is intended to help you advance your project through the development process. Now that you have been granted permission, there may be further tasks you need to complete. Some aspects may not apply to your development; however, your attention is drawn to the following paragraphs, which provide advice on a range of matters including how to carry out your development and how to appeal against the decision made by the Local Planning Authority (LPA).

**Carrying out the Development in Accordance with the Approved Plans**

You must carry out your development in accordance with the stamped plans enclosed with this letter. Failure to do so may result in enforcement action being taken by the LPA and any un-authorised work carried out may have to be amended or removed from the site.

**Discharging Conditions**

Some conditions on the attached decision notice will need to be formally discharged by the LPA. In particular, any condition that needs to be carried out prior to development taking place, such as a 'source and disposal of materials' condition, an 'archaeological' condition or 'landscaping' condition must be formally discharged prior to the implementation of the planning permission. In the case of an archaeological condition, please contact the Planning Department for advice on the steps required. Whilst you do not need to formally discharge every condition on the decision notice, it is important you inform the Planning Department when the condition advises you to do so before you commence the implementation of this permission. Although we will aim to deal with any application to discharge conditions as expeditiously as possible, you are reminded to allow up to **8 weeks** for the discharge of conditions process.

**Please inform the Planning Department when your development or works will be commencing. This will enable the Council to monitor the discharge and compliance with conditions and provide guidance as necessary. We will not be able to provide you with any written confirmation on the discharge of pre-commencement conditions if you do not formally apply to discharge the conditions before you start works.**

As with the rest of the planning application fees, central Government sets a fee within the same set of regulations for the formal discharge of conditions attached to planning permissions. Conditions are necessary to control approved works and development. Requests for confirmation that one or more planning conditions have been complied with are as follows (VAT is not payable on fees set by central government). More information can be found on the Council's website:

- Householder permissions - £43per application
- Other permissions - £145 per application

### **Amendments**

If you require a change to the development, contact the LPA to see if you can make a 'non material amendment' (NMA). NMA can only be made to planning permissions and not a listed building consent. They were introduced by the Government to reflect the fact that some schemes may need to change during the construction phase. The process involves a short application form and a 14 day consultation period. There is a fee of £43 for householder type applications and £293 in all other cases. The NMA should be determined within 28 days. If the change to your proposal is not considered to be non-material or minor, then you would need to submit a new planning application to reflect those changes. Please contact the Planning Department for more information on what level of amendment would be considered non-material if necessary.

### **Appealing Against the Decision**

If you are aggrieved by any of the planning conditions attached to your decision notice, you can appeal to have specific conditions lifted or modified by the Secretary of State. All appeal decisions are considered by the Planning Inspectorate – a government department aimed at providing an unbiased judgement on a planning application. From the date of the decision notice attached you must lodge an appeal within the following time periods:

- Householder Application - 12 weeks
- Planning Application – 6 months
- Listed Building Consent – 6 months
- Advertisement Consent - 8 weeks
- Minor Commercial Application - 12 weeks
- Lawful Development Certificate – None (unless for LBC – 6 months)
- Other Types - 6 months

Note that these periods can change so you should check with the Planning Inspectorate for the most up to date list. You can apply to the Secretary of State to extend this period, although this will only be allowed in exceptional circumstances.

You find more information on appeal types including how to submit an appeal to the Planning Inspectorate by visiting <https://www.gov.uk/topic/planning-development/planning-permission-appeals> or you can obtain hard copy appeal forms by calling 0303 444 5000. Current appeal handling times can be found at: [Appeals:](#)

[How long they take page.](#)

### **Building Regulations**

With all building work, the owner of the property is responsible for meeting the relevant Planning and Building Regulations. Building Regulations apply to most building work so it is important to find out if you need permission. This consent is to ensure the safety of people in and around buildings in relation to structure, access, fire safety, infrastructure and appropriate insulation.

The Building Control function is carried out on behalf of the Council of the Isles of Scilly by Cornwall Council. All enquiries and Building Control applications should be made direct to Cornwall Council, via the following link [Cornwall Council](#). This link also contains comprehensive information to assist you with all of your Building Control needs.

Building Control can be contacted via telephone by calling 01872 224792 (Option 1), via email [buildingcontrol@cornwall.gov.uk](mailto:buildingcontrol@cornwall.gov.uk) or by post at:

Building Control  
Cornwall  
Council Pydar  
House Pydar  
Street Truro  
Cornwall  
TR1 1XU

Inspection Requests can also be made online:

<https://www.cornwall.gov.uk/planning-and-building-control/building-control/book-an-inspection/>

### **Registering/Altering Addresses**

If you are building a new dwelling, sub dividing a dwelling into flats or need to change your address, please contact the Planning Department who will be able to make alterations to local and national databases and ensure postcodes are allocated.

### **Connections to Utilities**

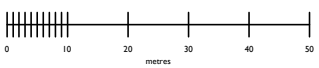
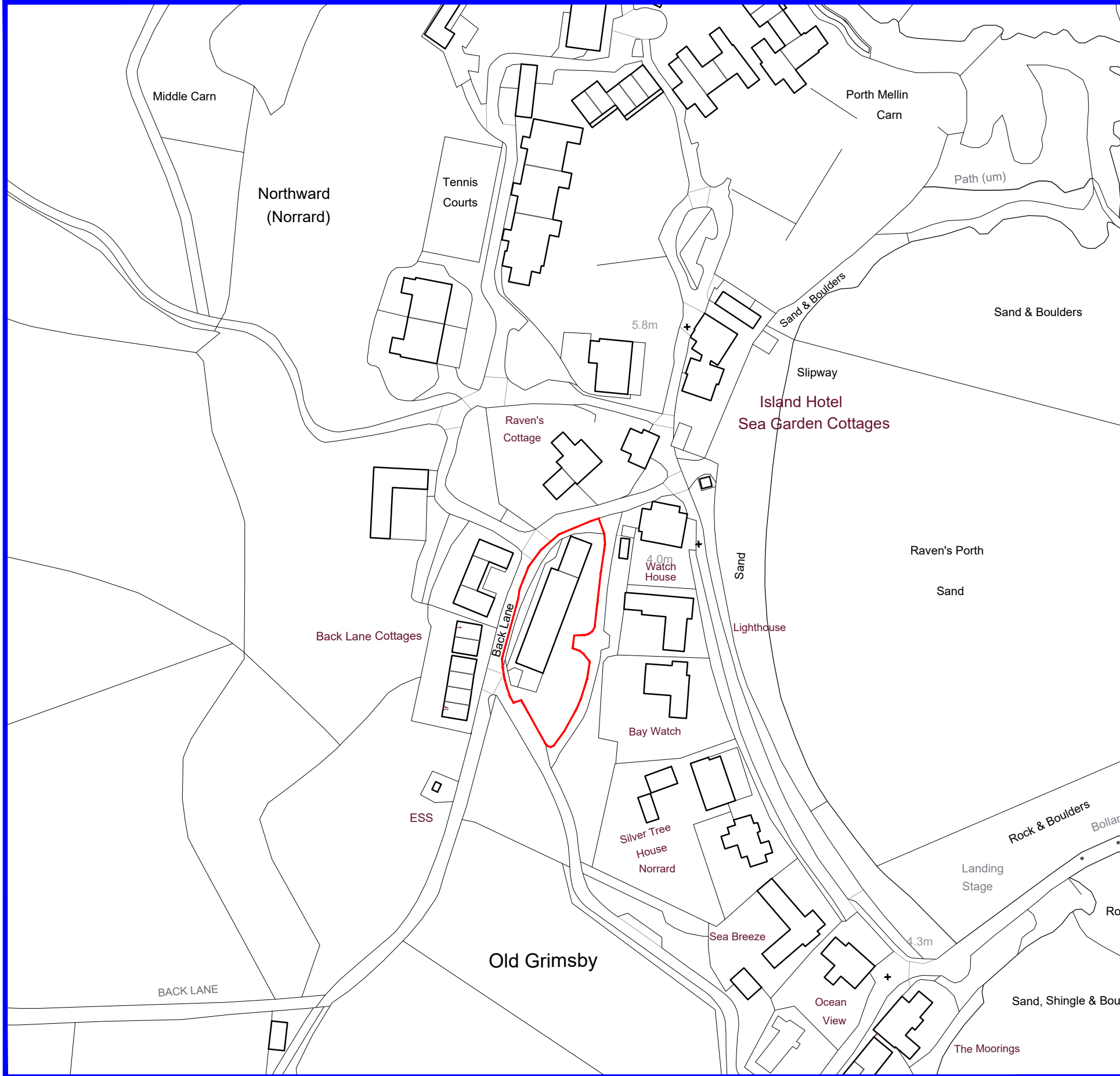
If you require a connection to utilities such as water and sewerage, you will need to contact South West Water on 08000831821. Electricity connections are made by Western Power Distribution who can be contacted on 08456012989.

Should you require any further advice regarding any part of your development, please contact the Planning Department and we will be happy to help you.



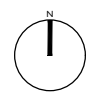
**APPROVED**  
 By Lisa Walton at 2:20 pm, Apr 23, 2024

OWNERSHIP BOUNDARY EXTENDS BEYOND MAP

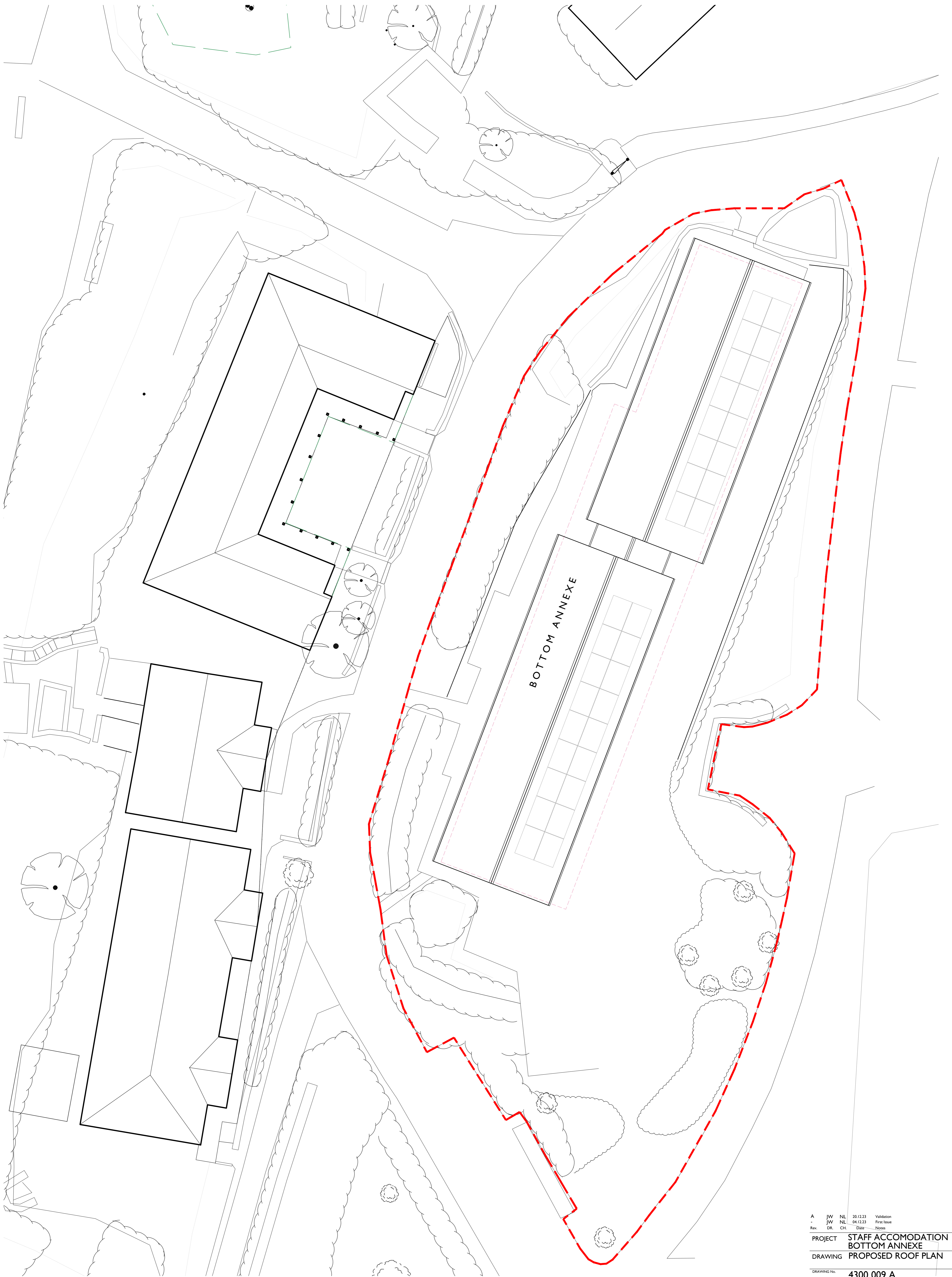


**RECEIVED**  
 By A King at 2:16 pm, Dec 20, 2023

| Rev                             | JW | NL   | 04.12.23 | First Issue |
|---------------------------------|----|------|----------|-------------|
| DR                              | CH | Date | Notes    |             |
| PROJECT STAFF ACCOMODATION      |    |      |          |             |
| BOTTOM ANNEXE                   |    |      |          |             |
| DRAWING SITE LOCATION PLAN      |    |      |          |             |
| DRAWING No. 4300 001            |    |      |          |             |
| SCALE 1:1250 @ A3 DATE: Nov '23 |    |      |          |             |



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0 1m 10m 20m

SCALE: 1:100 at A1  
SCALE: 1:200 at A3

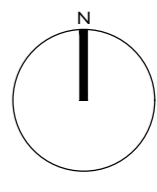
**APPROVED**  
By Lisa Walton at 2:21 pm, Apr 23, 2024

**RECEIVED**  
By A King at 2:17 pm, Dec 20, 2023

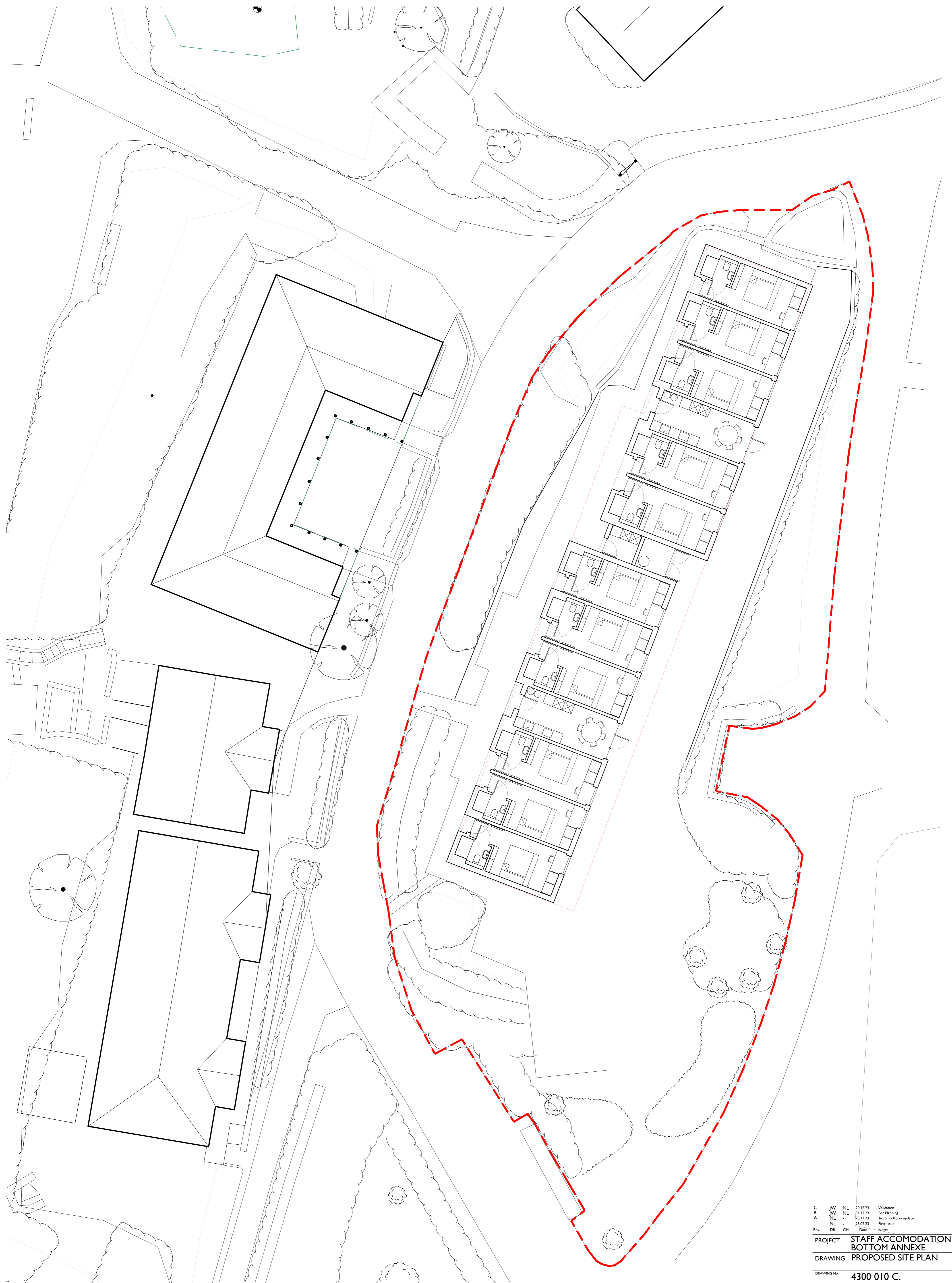
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| Rev.        | JW | NL                 | 20.12.23 | Validation  |
| -           | JW | NL                 | 04.12.23 | First Issue |
| DR.         | CK | DR                 | Date     | Notes       |
| PROJECT     |    | STAFF ACCOMODATION |          |             |
| DRAWING     |    | BOTTOM ANNEXE      |          |             |
| DRAWING No. |    | 4300 009 A.        |          |             |

SCALE: 1:100 @ A1  
1:200 @ A3

DATE: Dec '23



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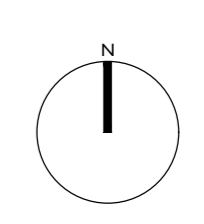
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SCALE: 1:100 at A1  
SCALE: 1:200 at A3

**APPROVED**  
By Lisa Walton at 2:21 pm, Apr 23, 2024

**RECEIVED**  
By A King at 2:17 pm, Dec 20, 2023

|             |     |                                     |               |                      |
|-------------|-----|-------------------------------------|---------------|----------------------|
| C           | JW  | NL                                  | 20.12.23      | Validation           |
| B           | JW  | NL                                  | 04.12.23      | For Planning         |
| A           | NL  | -                                   | 28.11.23      | Accommodation update |
| -           | NL  | -                                   | 28.02.23      | First Issue          |
| Rev.        | DR. | CHK                                 | Date          | Notes                |
| PROJECT     |     | STAFF ACCOMODATION<br>BOTTOM ANNEXE |               |                      |
| DRAWING     |     | PROPOSED SITE PLAN                  |               |                      |
| DRAWING No. |     | 4300 010 C.                         |               |                      |
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|             |     | 1:200 @ A3                          |               |                      |



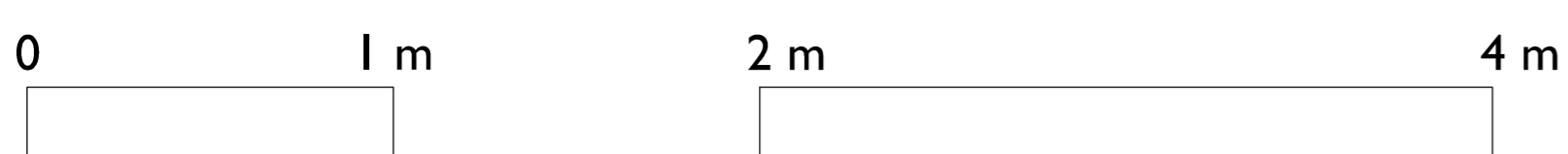
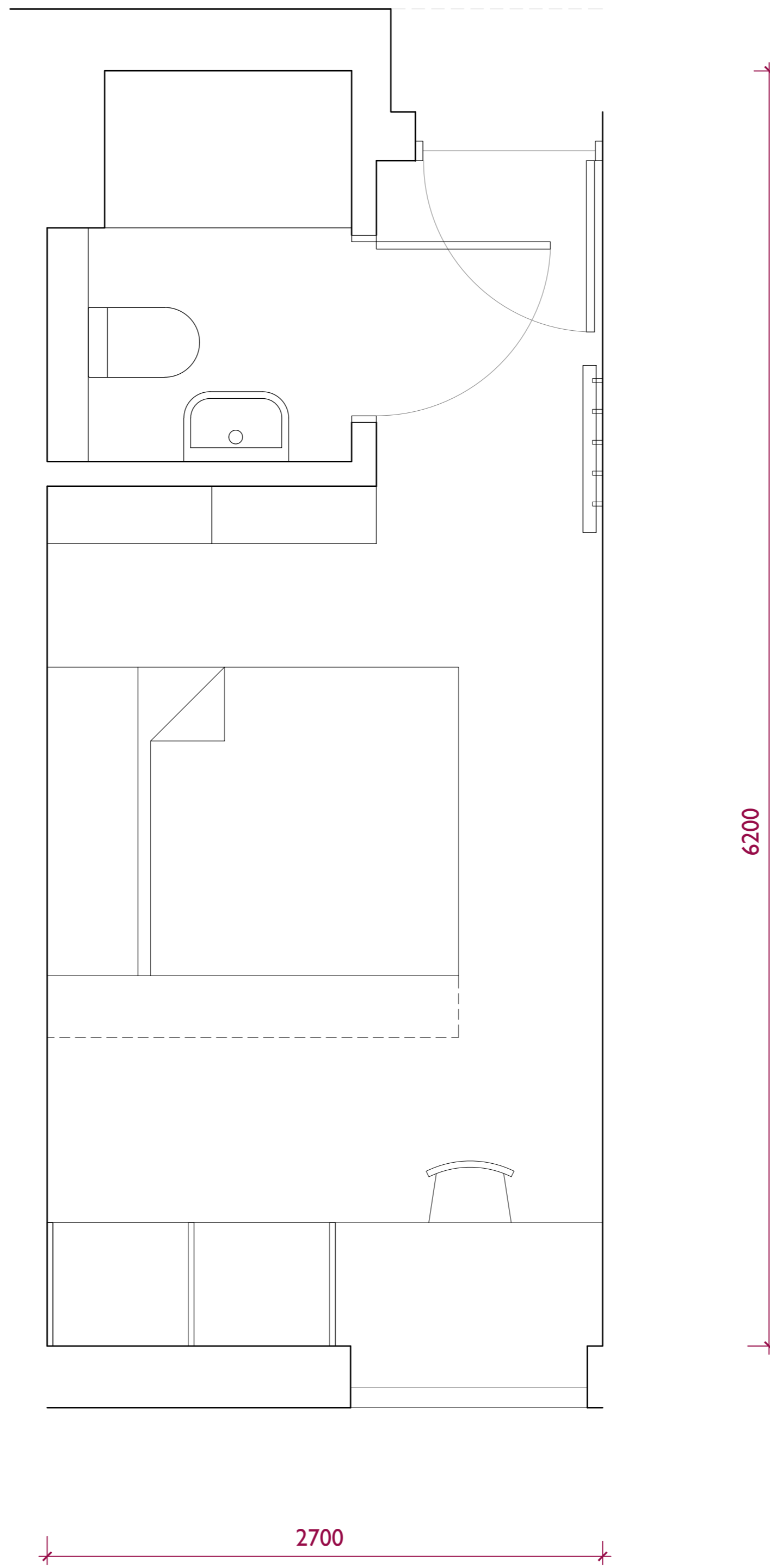
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**RECEIVED**

By Liv Rickman at 2:38 pm, Dec 19, 2023

**APPROVED**

By Lisa Walton at 2:31 pm, Apr 23, 2024



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SCALE: 1:40 at A3

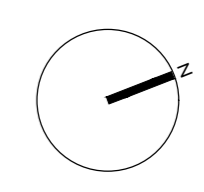
| Rev. | DR. | CHK. | Date     | Notes        |
|------|-----|------|----------|--------------|
| A    | JW  | NL   | 04.12.23 | For Planning |
| -    | NL  | -    | 28.11.23 | First Issue  |

PROJECT STAFF ACCOMODATION  
BOTTOM ANNEXE

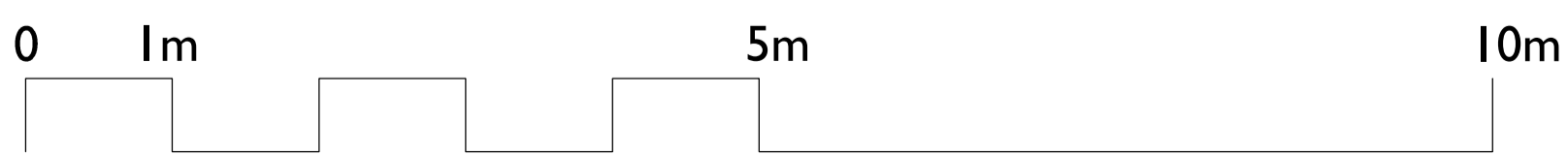
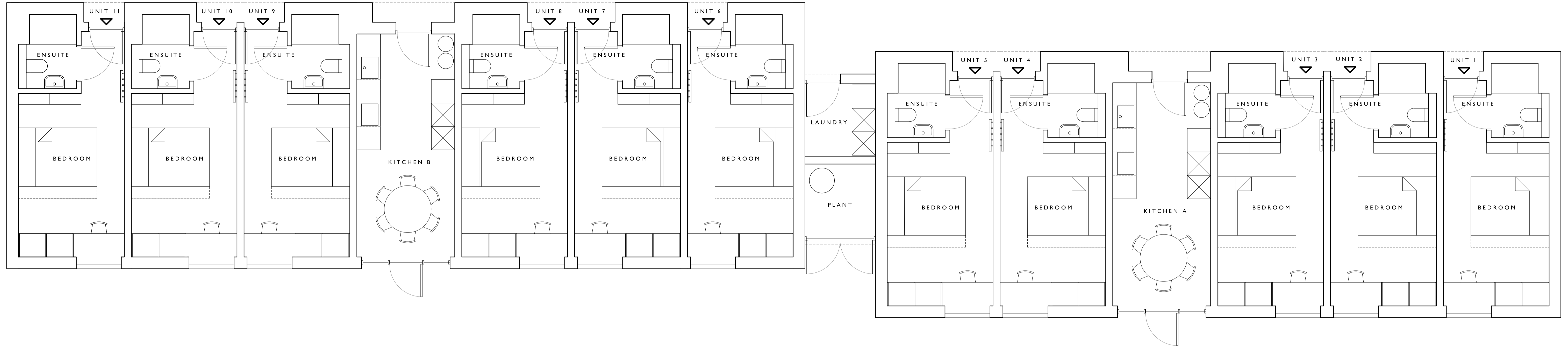
DRAWING PROPOSED  
UNIT PLAN

DRAWING No. 4300 013 A.

SCALE 1:20 @ A1  
1:40 @ A3 DATE: Nov '23



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SCALE: 1:50 at A1  
SCALE: 1:100 at A3

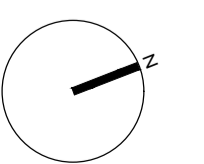
**APPROVED**  
By Lisa Walton at 2:31 pm, Apr 23, 2024

**RECEIVED**  
By Liv Rickman at 2:36 pm, Dec 19, 2023

| Rev. | JW   | NL   | 04/23/23 | First Issue |
|------|------|------|----------|-------------|
| DR.  | CHK. | Date | Notes    |             |
|      |      |      |          |             |

PROJECT STAFF ACCOMODATION  
BOTTOM ANNEXE  
DRAWING PROPOSED  
FLOOR PLANS  
DRAWING No. 4300 014

SCALE: 1:50 @ A1  
1:100 @ A3 DATE: Nov '23



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PROPOSED WEST ELEVATION



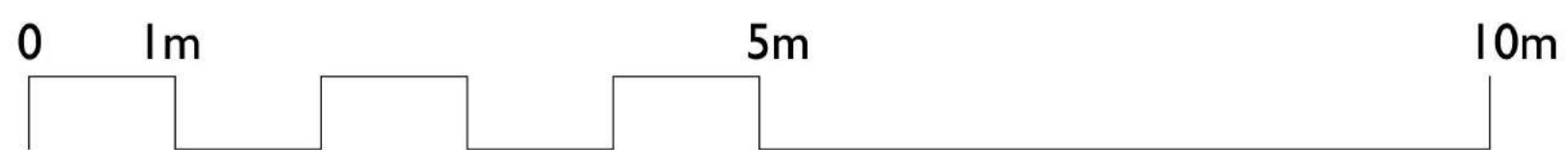
PROPOSED NORTH ELEVATION



PROPOSED SOUTH ELEVATION



PROPOSED EAST ELEVATION

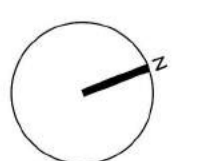


SCALE: 1:50 at A1  
SCALE: 1:100 at A3

**APPROVED**  
By Lisa Walton at 2:32 pm, Apr 23, 2024

**RECEIVED**  
By Liv Rickman at 2:33 pm, Dec 19, 2023

| Rev.  | JW  | NL   | 30.11.23 | First Issue   |
|---|-----|------|----------|---------------|
| DR.   | CH. | Date | Notes    |               |
| PROJECT STAFF ACCOMODATION<br>BOTTOM ANNEXE |     |      |          |               |
| DRAWING PROPOSED<br>ELEVATIONS              |     |      |          |               |
| DRAWING No. 4300 015                        |     |      |          |               |
| SCALE: 1:50 @ A1<br>1:100 @ A3              |     |      |          | DATE: Nov '23 |



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**APPROVED**

*By Lisa Walton at 2:32 pm, Apr 23, 2024*



## **Preliminary Bat & Bird Assessment and Adjacent Habitat**

Site:

Bottom Annexe, Tresco, Isles of Scilly

Grid Reference: SV 89252 15730

11<sup>th</sup> May 2023

Version 1



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### Document Control:

|                                 |   |
|---------------------------------|---|
| <b>Site Name:</b>               | Bottom Annexe, Tresco, Isles of Scilly  |
| <b>OS Grid Reference:</b>       | SV 89252 15730  |
| <b>Report Author:</b>           | Caroline Davey BSc. (Hons) MSc; ACIEEM, bat licence no: 2022-10817-CL18-BAT; (Accredited agent under CL29/00037 (barn owl) held by Kim Jelbert BSc. (Hons) MSc. PhD. MCIEEM (Registered Consultant RC224) |
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| <b>Client:</b>                  | Tresco Estate   |
| <b>Report Reference Number:</b> | P4E2937   |
| <b>Version:</b>                 | 01  |
| <b>Date:</b>                    | 11 <sup>th</sup> May 2023   |

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### Declaration:

"The information, evidence and advice, which we have prepared and provided is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology & Environmental Management's (CIEEM) Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions."

|                       |  |  |
|-----------------------|--|--|
| <b>Caroline Davey</b> |  |  |
| <b>Nicola Dyer</b>    |  |  |

### Report Lifespan:

Ecological features can change over time, particularly if site management/ use changes. Typically, preliminary bat and bird assessments are valid for at least 12 months (until March 2024).





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## Summary

|   |   |
|---|---|
| <b>Bat evidence?</b>                    | <p>The Bottom Annexe on Tresco, Isles of Scilly, was visually inspected for evidence of roosting bats on 24<sup>th</sup> March 2023. Evidence of bats was found within the roof void of the building in the form of several bat droppings. External features were also noted on the building with potential to support roosting bats and/or permit bats access to the building interior.</p> <p>The Bottom Annexe was assessed as being of '<b>moderate suitability</b>' for roosting bats.</p>   |
| <b>Bat mitigation recommendations?</b>  | <p>A minimum of two bat emergence or re-entry surveys and a static detector survey of the building are required to inform the planning application and subsequent building works. DNA analysis of bat droppings from the roof void will also be required. Bat emergence/ re-entry surveys and static detector surveys can only be undertaken between May and September, and at least one of the emergence/ re-entry surveys should be undertaken between May and August, in line with best-practice guidelines.</p>   |
| <b>Bird evidence?</b>                   | <p>No evidence of nesting birds, including barn owl, were noted within the Bottom Annexe. The building is assessed as being of '<b>negligible suitability</b>' for barn owls.</p>   |
| <b>Bird mitigation recommendations?</b> | <p>Works to the building and any clearance of vegetation around the building should be undertaken between October and February, when birds will not be nesting, or, alternatively, preceded with a thorough search for nesting birds (to be undertaken by an ecologist) immediately prior to works commencing.</p> <p>There is opportunity to make provision for nesting birds within the fabric of the new building or on the building exterior to enhance the value of the site for birds, post-development. No further surveys for birds are recommended.</p>  |
| <b>Habitats &amp; vascular plants?</b>  | <p>There are no habitats of ecological importance in the immediate vicinity of Bottom Annexe.</p> <p>A Nationally Scarce species, balm-leaved figwort (<i>Scrophularia scorodonia</i>) was identified on site in several locations. If vegetation clearance of the introduced shrub areas around Bottom Annexe becomes necessary, translocation of this plant to a site nearby is recommended.</p> <p>Two invasive plants, three-cornered leek (<i>Allium triquetrum</i>) and montbretia (<i>Crocsmia crocosmiiflora</i>) (Schedule 9, Wildlife and Countryside Act, 1981, as amended), have been identified on site. If these areas are to be disturbed the works must be informed with a post planning, pre-construction invasive plant method statement.</p> |



## Introduction

### 1.1 Background

Tresco Estate commissioned Plan for Ecology Ltd to undertake a Preliminary Bat and Bird Assessment (sometimes referred to as a Bat and Barn Owl Assessment) and a habitat assessment of adjacent habitats at Bottom Annexe, Tresco, Isles of Scilly. (Grid Ref: SV 89252 15730) in February 2023. The client proposes to demolish the existing building and construct new accommodation in its place.

### 1.2 Project Administration

|  |   |
|--|---|
| <b>Property Address:</b>               | Bottom Annexe, Tresco, Isles of Scilly  |
| <b>OS Grid Reference:</b>              | SV 89252 15730  |
| <b>Client:</b>                         | Tresco Estate   |
| <b>Planning Authority:</b>             | Cornwall Council  |
| <b>Planning Reference Number:</b>      | Unknown   |
| <b>Report Reference Number:</b>        | P4E2937   |
| <b>Proposed work:</b>                  | Demolition and re-build   |
| <b>Survey Date:</b>                    | 24 <sup>th</sup> March 2023   |
| <b>Ecologist &amp; Licence Number:</b> | Caroline Davey BSc. (hons) MSc; ACIEEM, bat licence no: 2022-10817-CL18-BAT; (Accredited Agent under CL29/00037 (barn owl) held by Kim Jelbert BSc. (Hons) MSc. PhD. MCIEEM (Registered Consultant RC224) |

### 1.3 Legislation & Planning Policy

**Planning:** The local planning authority has a statutory obligation to consider impacts upon protected species resulting from development. Planning permission will not be granted with outstanding ecological surveys, and if applicable an appropriate mitigation plan.

**Bats:** In Britain, the protection of European Protected Species (EPS) such as bats is achieved through their inclusion on Schedule 2 of the Conservation and Habitats Regulations 2019 (as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (HM Government, 2019)), Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 12 of the Countryside and Rights of Way Act 2000 (HM Government, 1981, 2000 & 2010).

As a result of this statutory legislation it is an offence to:

- Deliberately capture, injure or kill a bat;
- Intentionally or recklessly disturb a bat/s in its roost;
- Intentionally or recklessly damage, destroy or obstruct access to a bat roost (even if bats are not occupying the roost at the time);
- Possess or sell or exchange a bat (dead or alive) or part of a bat.



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Works with potential to cause significant disturbance to roosting bats may require a European Protected Species (EPSL) licence or Bat Mitigation Class Licence (CL21) from Natural England before works can legally commence. Works likely to result in less significant disturbance may be carried out under a Bat Mitigation Method Statement. The magnitude of disturbance, and therefore the requirement for an EPSL, Bat Mitigation Class Licence or Method Statement, is assessed on a case by case basis by the bat ecologist. Bat licences and Method Statements must be prepared and/or applied for by a suitably experienced and licenced bat ecologist. Where planning permission is required, the appropriate licence cannot be obtained until planning permission has been granted.

**Birds:** In Britain, the nests (whilst in use or being built) and eggs of wild birds are protected against taking, damage and destruction under the Wildlife and Countryside Act 1981 (as amended) (HM Government, 1981). The barn owl (*Tyto alba*) is listed on Schedule 1 of the Wildlife and Countryside Act (HM Government, 1981); this legislation makes it an offence to:

- Intentionally capture, injure or kill a barn owl;
- Intentionally or recklessly disturb a barn owl whilst nesting;
- Intentionally or recklessly disturb a dependent young barn owl.



## 2.0 Methodology

A suitably qualified and experienced ecologist assessed the suitability of Bottom Annexe and the surrounding habitat to support bats and birds. A high-power torch was used to illuminate all accessible areas of the building with potential to support roosting bats and roosting/ nesting birds. The ecologist searched for signs of bats and birds including droppings, staining, feeding remains, bird nests, barn owl pellets and liming.

The assessment was carried out in accordance with the 'Bat Survey for Professional Ecologists - Good Practice Guidelines' produced by the Bat Conservation Trust (Collins, 2016).

The habitats immediately adjacent to Bottom Annexe were mapped according to the Phase 1 Habitat Survey/ UK Habitat Classification nomenclature. The survey identified the habitats present and their associated plant species (JNCC, 2010), and assessed the potential of the site to support protected species. The surveyor also noted down the presence of invasive plant species listed on Schedule 9 of the Wildlife and Countryside Act (1981, as amended) and vascular plant species of ecological importance within the site.

## 2.1 Ecological Evaluation

### Bat roosts

Potential bat roosts identified during the visual inspection of the building were categorised as to their suitability in accordance with the Bat Conservation Trust's (BCT) Good Practice Guidelines (Collins, 2016) as described below:

Negligible: negligible features with potential to support roosting bats.

Low: one or more features with potential to support individual bats on an occasional basis. Unlikely to support large numbers of bats.

Moderate: one or more features with potential to support roosting bats but unlikely to be of high conservation status.

High: one or more features with potential to support large numbers of bats on a regular basis.

### Habitats and other ecological features

Habitats and other ecological features recorded within the Bottom Annexe site were evaluated within a geographical context in accordance with the CIEEM Guidelines for Ecological Impact Assessment (CIEEM, 2018). Value is assigned in decreasing order of importance as follows: International/ European, UK, Regional (southwest), County, District, Parish, Local, within the Zone of Influence, and Negligible.

## 2.2 Limitations

There are three separate roof voids in Bottom Annexe, each accessible by individual roof hatches. The floors of the voids are un-boarded, so the assessment was undertaken from the entrance of each roof hatch. It is likely that further bat droppings would have been observed had it been possible to access the whole of the roof space.

The exterior of the building was viewed from ground level. It is possible that Potential Roost Features (PRFs) in the upper parts of the building were not visible from ground level. Weather during the survey was in line with seasonal norms (12°C, light air, sunny intervals and part cloud); there are no limitations associated with weather conditions.



## 3.0 Assessment Results

### 3.1 Site Description

Bottom Annexe is located in Old Grimsby, on the north-east coast of Tresco, Isles of Scilly c. 5km north of Hugh Town on St Mary's and c. 3.5km west of Higher Town on St Martin's, c.48 km west of the mainland at Land's End.

The Isles of Scilly Complex Special Area of Conservation (SAC) lies c. 171m east of Bottom Annexe at its closest point on the shoreline. The Castle Down (Tresco) Site of Special Scientific Interest (SSSI) lies c. 370m west of Bottom Annexe and the Pentle Bay, Merrick and Round Islands SSSI lies c. 473m south-east of Bottom Annexe.

The Isles of Scilly Complex SAC has been designated for its pristine marine environment and diverse fauna. Rocky reefs in Scilly stretch from the intertidal to deep circalittoral reefs and are recognised for the diversity of species they support. The Castle Down SSSI has been designated for its maritime heathland and Merrick and Round Islands SSSI has been recognised for its transition from dunes to lichen-rich heathland and uninhabited islands important for breeding seabirds.

The Isles of Scilly are unique in their importance for nature conservation. Due to the archipelago's southerly location, coastal influences and range of exposures, species assemblages here are different from the mainland UK. A range of warmer water species are noticeably more prevalent on Scilly.

The wider area comprises coastal heathland, beaches and low cliffs, open sea and the mature trees of the subtropical garden at Abbey Garden. Small fields and hedges, and mainly period properties with small gardens make up the rest of the surrounding habitat on Tresco.

In combination, these features provide potentially high-quality foraging and roosting habitat for bats, and suitable nest sites, roosts and foraging habitat for birds.

### 3.2 Bat Assessment

The visual assessment of the building was undertaken on 24<sup>th</sup> March 2023.

#### Exterior

The Bottom Annexe is a single storey building of rendered concrete block wall, with slate effect roof tiles and concrete ridge tiles (Figure 1: East elevation, Figures 2 and 3: West elevation, Figure 4: North elevation, Figure 5: South elevation). The roof is pitched with one flue and two vents on the west elevation (Figure 6). Three roof slates were identified on the west elevation as being slightly raised which may be providing access for bats into the interior of the roof (Figure 7). Timber fascia boards are present all around the building with some small gaps on the west elevation (Figure 8). The gable end of the north elevation has a fascia board at the top of the wall of the gable end. There are very small gaps behind this fascia board which may provide crevices for bats and allow bats access into the interior. The fascia board on the east elevation appears to be completely tight and the roof structure appears tight in the most part with no obvious access points or gaps that could be utilised by crevice dwelling bats. However, there are replacement roof slates that may provide an access point for bats on the east elevation (Figure 9).

#### Interior

Bottom Annexe has three separate roof voids that are accessible from individual roof hatches. The location of the roof hatches can be seen on Map 1 (Appendix 1).



Roof void 1: The roof space is hot and dark with a timber roof structure lined with an impermeable plastic liner (Figure 10). The floor of the roof void is covered in old piles of roofing insulation. The hot water tank is housed here. This void is un-boarded so the inspection was made from the hatch. No droppings were observed from the survey point.

Roof void 2: This roof void has an identical structure to roof void 1 and the floor of the roof void is also covered in piles of old roofing insulation. It is very hot and dark in this roof void, possibly due to the impermeable plastic roof liner. This void is un-boarded so the inspection was made from the hatch. No droppings were observed from the survey point.

Roof void 3: This section of roof void has the same timber structure as roof voids 1 and 2 but has been lined with bitumen roofing felt (Figure 11). This roof void is much cooler than voids 1 and 2. The floor of the void also has piles of old roofing insulation and was un-boarded so the inspection was made from the hatch. Several bat droppings c. 3 droppings were identified close to the hatch entrance (Figure 12).

As droppings were identified during the survey and the building supports a number of features that could support roosting bats, the Bottom Annexe was assessed as being of **'moderate suitability'** for supporting roosting bats.



Figure 1: View of the east elevation of Bottom Annexe



Figure 2: View of the west elevation of Bottom Annexe



Figure 3: View of the west elevation of Bottom Annexe





Figure 4: View of the north elevation of Bottom Annexe



Figure 5: View of the south elevation of Bottom Annexe



Figure 6: View of the flue and vents on the roof of the west elevation



Figure 7: Raised roof slates on the west elevation of Bottom Annexe



Figure 8: Gaps behind the fascia boards on the west elevation



Figure 9: Replacement roof slates on the east elevation that may provide an access point for bats



Figure 10: Roof structure of roof voids 1 and 2. Impermeable plastic liner and timber frame



Figure 11: Roof structure of void 3. Bitumen roofing felt and timber frame



Figure 12: Droppings on the roofing felt close to the hatch entrance of roof void 3

### 3.3 Bird Assessment

There was no evidence of barn owls using Bottom Annexe and there is no suitable access for barn owl into the building. In the absence of evidence, Bottom Annexe was assessed as being of **'negligible suitability'** for nesting, breeding or resting barn owls.

There was no other evidence of nesting birds at Bottom Annexe.

### 3.4 Phase 1 Habitat Distribution

A total of five Phase 1 Habitats/ UKHab classification types were recorded within the site during the Phase 1 Habitat Survey: amenity grassland (J1.2) / (g4 66 230 700), introduced shrub (J1.4) / (u1 1150 1160) , fence (J3.4) / (u1e 69) bare ground (J4) / (u1b 1231) and building (J3.6) / (u1b5).

The distribution of these habitats is shown on Map 1 (Appendix 1). UKHab classification code descriptions can be seen in Appendix 2.

All the habitats identified at Bottom Annexe are of low ecological value and are briefly described below. NB: Habitats of negligible or low ecological value may support protected or notable species.

#### **Amenity grassland (J1.2)/ (g4 66 230 700)**

A strip of amenity grassland is present on the east and west sides of Bottom Annexe. The grass is mown short and supports a reasonably diverse range of forbs and fewer grasses. Yorkshire fog and common bent are frequent with occasional red fescue and cock's-foot. Common cat's ear is abundant with frequent ribwort plantain and white clover, locally frequent common mouse-ear, and occasional scented mayweed, daisy, hogweed, common mallow and alexanders. Sheep's sorrel, prickly sow-thistle and bermuda buttercup are rare components of the grassland.

Amenity grassland is considered to have some ecological value, but only **'within the Zone of influence'**.



### **Introduced shrub (J1.4) / (u1 1150 1160)**

Surrounding Bottom Annexe on the west and southern aspects of the building, there is a hedge of a single ornamental species (*Olearia traversii*) traditionally planted for coastal hedging because of its salt tolerance. Further ornamental species have been planted to create a colourful planting scheme on the west side of the building. Abundant species include rock roses, hebes, Cape daisy, shasta daisy and montbretia. New Zealand flax is locally frequent, agapanthus is occasional and rose scented geranium is rarely occurring. In amongst the ornamental species other native ruderal and hedgerow species are growing. These include frequent alexanders and ribwort plantain and occasional hogweed, tree mallow, common mallow, and balm-leaved figwort.

Introduced shrub is considered to have some ecological value, but only **'within the Zone of influence'** It is likely to provide some opportunities for nesting birds.

### **Fence (J3.4) / (u1e 69)**

A timber fence is present on the east, south and west sides of Bottom Annexe.

Fences are considered to be of **'negligible'** ecological value.

### **Bare ground (J4) / (u1b 1231)**

A paved hardstanding area is present immediately south of the building and there is a paved pathway along the west side of the building.

These areas are largely devoid of vegetation and offer limited ecological opportunities for biodiversity.

Bare ground is considered to be of **'negligible'** ecological value.

### **Building (J3.6) / (u1b5)**

The building itself is considered to be of **'negligible'** ecological value, though it is likely to support notable species; i.e bats.

The assemblage of vascular plant species associated with each habitat is provided in the table at Appendix 3.

## **3.5 Other notable species**

One vascular plant species of ecological importance was identified during the habitat survey. This is balm-leaved figwort (*Scrophularia scorodonia*) which is Nationally Scarce and listed in the Cornwall Red Data Book (Figure 13). The location of this plant can be seen on Map 1 in Appendix 1.

Steps should be taken to conserve this plant. Mitigation measures are provided in Section 4.3.



Figure 13: Balm-leaved figwort (*Scrophularia scorondonia*)

Two species listed as invasive under schedule 9 of the Wildlife and Countryside Act, 1981, as amended, were identified on site. These are three-cornered leek and montbretia. It is an offence to cause the spread of Schedule 9 species into the wild.

The location of Schedule 9 invasive species can be seen on Map 1 (Appendix 1). Steps should be taken to control these species. Mitigation measures are provided in Section 4.3.

The assemblage of vascular plant species associated with each habitat including Latin names is provided in the table at Appendix 3.



## 4.0 Mitigation Recommendations

### 4.1 Bat Mitigation

Evidence of bats was found in Bottom Annexe in the form of several bat droppings, scattered on the floor of the roof void 3, on top of the roofing insulation, close to the entrance hatch (Map 1). It was not possible to access the whole of roof void 3 or roof voids 1 and 2 during the survey so there may have been further droppings in the inaccessible areas.

Bottom Annexe also supports external features with potential to support crevice dwelling bats or which could permit bat access into the building's interior. Bottom Annexe was, therefore, assessed as being of '**moderate suitability**' for roosting bats.

The client seeks permission for demolition and re-building of the Bottom Annexe to improve the staff accommodation facilities. **Demolition works must be informed with at least two bat emergence or re-entry surveys undertaken between May and September; one of which should be carried out between May and August. A static detector survey between May-September of roof void 3 is also required together with DNA analysis of bat droppings found within this void.** The survey information will be required to inform the planning application and subsequent demolition works. The surveys will determine the bat species present, number of individuals, bat access points and timings of usage.

Please note that planning permission will not be granted with outstanding ecological surveys. This report must be updated with the results of the recommended further surveys or superseded with a standalone bat survey report, following provision of the final site plan and prior to submission of the planning application.

### 4.2 Bird Mitigation

No evidence of nesting birds, including barn owl, was found within the interior of Bottom Annexe. The building was, therefore, assessed as being of '**negligible suitability**' for barn owl.

Although no evidence of nesting birds was observed during the survey, it is possible that birds could nest later during the year, in the main breeding season. A precautionary approach should be adopted during works. Works to the buildings and adjacent habitats should be avoided during the main bird nesting season (March to September inclusive) or preceded with a thorough search for nests, to be undertaken by an ecologist. If, during works, an active bird nest is uncovered, works must stop immediately (as soon as it is safe to do so) and delayed until nesting activity has ceased. Works are most likely to be delayed during the peak breeding period between April and July.

Further surveys for birds are not recommended as part of this assessment.

### 4.3 Habitat Mitigation

None of the habitats are deemed to be ecologically important however, the introduced shrub habitat has some potential for supporting nesting birds. See section 4.2 above for mitigation.

The Nationally Scarce balm-leaved figwort is present in various locations around Bottom Annexe. If possible, retain the habitats where this species occurs. If this is not possible, the translocation of plants to a nearby, suitable site is advised.

The works should be informed with a post-planning, pre-construction invasive plant method statement to ensure that the works do not cause the spread of Schedule 9 (WCA, 1981), species into nearby semi-natural habitats.





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#### **4.4 Opportunities for Biodiversity Enhancement**

Biodiversity net gain is an approach to development and/or land management that aims to leave the natural environment in a measurably better state than it was beforehand. To avoid a net loss, ecological impacts should be minimised by applying the mitigation hierarchy approach: firstly to avoid impacts, then to reduce impacts and finally to compensate for impacts. Biodiversity enhancements should be incorporated within development schemes to achieve a net gain.

The biodiversity value of the Bottom Annexe site can be enhanced in accordance with the Cornwall Planning for Biodiversity Guide (Cornwall Council, 2018). Habitats for roosting bats and nesting birds could be enhanced by installing bat and bird boxes on the exterior of the new building (on north and east elevations for bird boxes and south and west elevations for bat boxes). The value of the site for invertebrates could be enhanced by installing bee posts within garden of the site. Plan For Ecology Ltd can provide detailed recommendations upon request.

NB: suitable products are available from [www.nhbs.com](http://www.nhbs.com), [www.wildcareshop.com](http://www.wildcareshop.com) and [www.greenandblue.co.uk](http://www.greenandblue.co.uk)



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## 6.0 Appendix 1. Map 1: Bat, Bird and Habitat Survey





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## 7.0 APPENDIX 2: Habitat codes

Phase 1 Habitat type: Amenity grassland (J1.2) / UKHab classification: (g4 66 230 700)

UKHab primary code g4 – modified grassland

Secondary codes: 66 – frequently mown, 230 – garden, 700 – open space around premises

Phase 1 Habitat type: Introduced shrub (J1.4) / UKHab classification (u1 1150 1160)

UKHab primary code u1 – built up areas and gardens

Secondary codes: 1150 – flower bed, 1160 – introduced shrub

Phase 1 Habitat type: Fence (J3.4)

UKHab primary code u1e – built linear features

Secondary code: 69 – fence

Phase 1 Habitat type: bare ground (J4) / UKHab classification (u1b 1231)

UKHab primary code u1b – developed land, sealed surface

Secondary code: 1231 – permeable paving

Phase 1 Habitat type: Building (J3.6) / UK-Hab classification (u1b5)

UKHab primary code u1b5 – building



## 8.0 Appendix 3: Phase 1 Habitat Plant List

| Latin Name                       | Common Name            | Amenity grassland | Introduced shrub |
|----------------------------------|------------------------|-------------------|------------------|
| <i>Agapanthus sp.</i>            | Agapanthus             |                   | O                |
| <i>Agrostis capillaris</i>       | Common bent            | F                 |                  |
| <i>Allium triquetrum</i>         | Three-cornered leek    | LF                | F                |
| <i>Arum maculatum</i>            | Lords and ladies       |                   | LA               |
| <i>Bellis perennis</i>           | Daisy                  | O                 | O                |
| <i>Cerastium fontanum</i>        | Common mouse ear       | LF                |                  |
| <i>Cistus spp.</i>               | Rock rose species x 2  |                   | LF               |
| <i>Crococsmia crocosmiiflora</i> | Montbretia             | LF                | LA               |
| <i>Dactylis glomerata</i>        | Cock's-foot            | O                 |                  |
| <i>Echium sp.</i>                | Echium species         |                   | O                |
| <i>Fatsia japonica</i>           | Japanese fatsia        |                   | R                |
| <i>Festuca rubra</i>             | Red fescue             | O                 |                  |
| <i>Fumaria officinalis</i>       | Common fumitory        |                   | O                |
| <i>Geranium molle</i>            | Dove's-foot cranesbill | O                 |                  |
| <i>Hebe spp.</i>                 | Hebe species x 2       |                   | LA               |
| <i>Hedera helix</i>              | Ivy                    |                   | O                |
| <i>Heracleum sphondylium</i>     | Common hogweed         | O                 | O                |
| <i>Holcus lanatus</i>            | Yorkshire fog          | F                 |                  |
| <i>Hypochaeris radicata</i>      | Common cat's ear       | A                 |                  |
| <i>Leucanthemum</i>              | Shasta daisy           |                   | LA               |
| <i>Lupin sp.</i>                 | Lupin species          |                   | LA               |
| <i>Malva arborea</i>             | Tree mallow            |                   | O                |
| <i>Malva sylvestris</i>          | Common mallow          | O                 | O                |
| <i>Matricaria chamomilla</i>     | Scented mayweed        | O                 | O                |
| <i>Olearia traversii</i>         | Olearia                |                   | LD               |
| <i>Osteospermum sp.</i>          | Cape daisy             |                   | LF               |
| <i>Oxalis pes caprae</i>         | Bermuda buttercup      | R                 |                  |
| <i>Parietaria sp.</i>            | Pellitory species      | O                 |                  |
| <i>Pelargonium capitatum</i>     | Rose scented geranium  |                   | R                |
| <i>Phormium tenax</i>            | New Zealand flax       |                   | LF               |
| <i>Plantago lanceolata</i>       | Ribwort plantain       | F                 | LF               |



| Latin Name                     | Common Name         | Amenity grassland | Introduced shrub |
|--------------------------------|---------------------|-------------------|------------------|
| <i>Rubus fruticosus</i>        | Bramble             |                   | R                |
| <i>Rumex acetosella</i>        | Sheep's sorrel      | R                 |                  |
| <i>Rumex obtusifolius</i>      | Broad-leaved dock   | O                 | O                |
| <i>Scrophularia scorodonia</i> | Balm-leaved figwort |                   | LO               |
| <i>Senecio jacobaea</i>        | Common ragwort      |                   | R                |
| <i>Smyrniolum olusatrum</i>    | Alexanders          | O/LF              | F/LA             |
| <i>Sonchus asper</i>           | Prickly sow-thistle | R                 |                  |
| <i>Sonchus oleraceus</i>       | Smooth sow-thistle  |                   | O                |
| <i>Trifolium repens</i>        | White clover        | F                 |                  |
| <i>Urtica dioica</i>           | Nettle              | O                 | O                |

**RECEIVED**

By Liv Rickman at 2:55 pm, Dec 19, 2023

**APPROVED**

By Lisa Walton at 2:33 pm, Apr 23, 2024

# BOTTOM ANNEXE STAFF ACCOMMODATION, TRESKO

## DESIGN, ACCESS & PLANNING STATEMENT

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### Contents

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Prepared by Llewellyn Harker Lowe Architects



Application Site (Google Maps 2023)



# I. INTRODUCTION

This document has been prepared in support of an application for the construction of a new staff accommodation development to replace the 'Bottom Annexe', in the Old Grimsby area of Tresco.

The application seeks to replace the existing 17 units of HMO accommodation with 11 new higher quality units, in order to address the shortage of quality staff accommodation on Tresco.

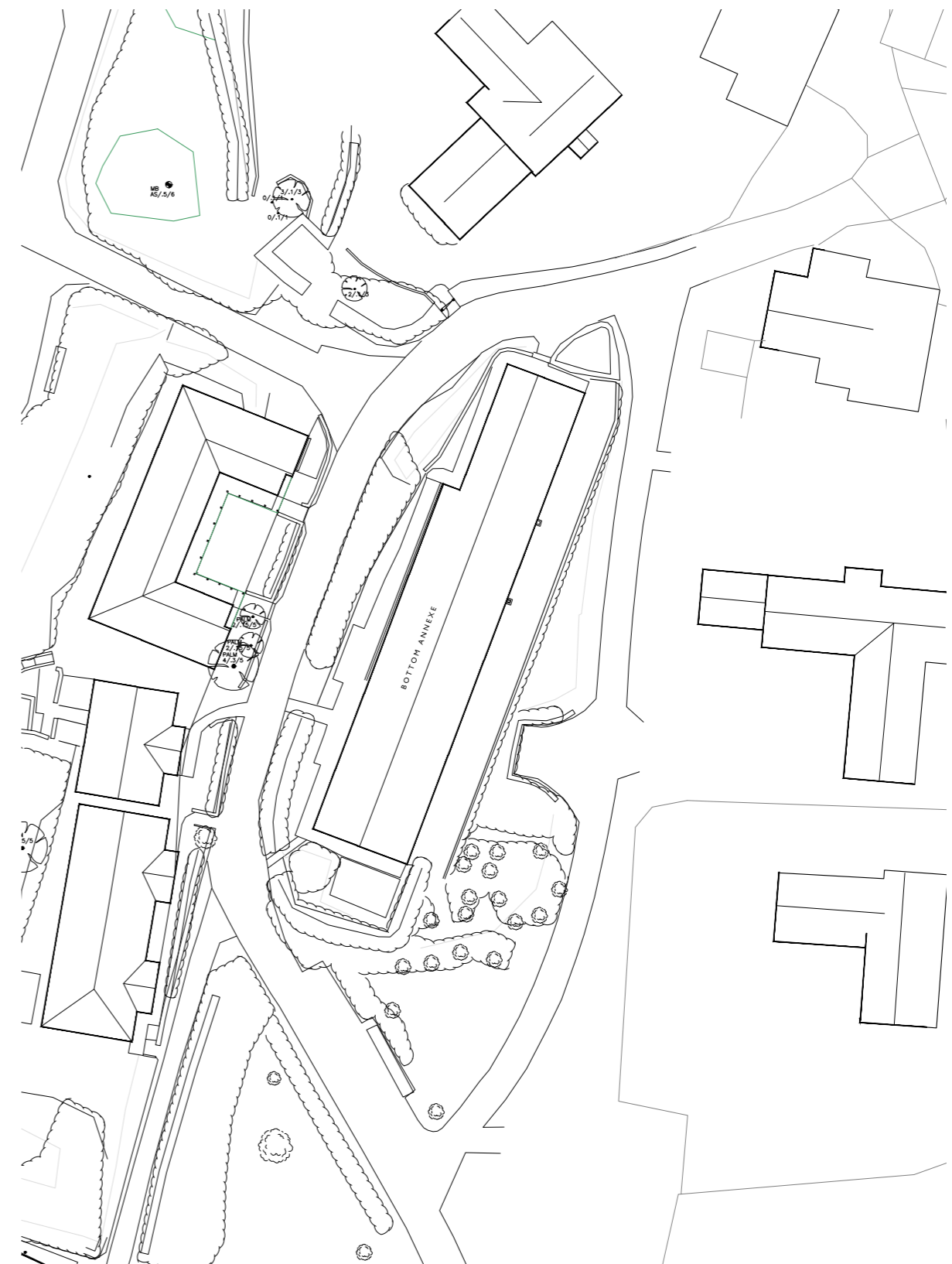
Tresco is unique on the Isles of Scilly in that the Island is leased and managed by a single family and the residents are generally staff of the Estate, partners and children of Estate staff, have retired after many years of working on the Estate or teachers at the school. Having the right mix and quality of staff housing for the present and future is key to the development of the business and the maintenance of an active, vibrant community that embraces the very young and very old.

With the return of the Helicopter service, Tresco's strategic goal is to continue to change the current business model from a seasonal operation to an all year round offering. This approach will rely on a more permanent staffing structure, with more staff making the Island their permanent home, all year round. This requires a fundamental change to staff accommodation requirements. Whilst there will be a continued requirement for accommodation for the summer influx of seasonal staff, much of the existing accommodation stock, including the existing bottom annexe, are rooms with shared facilities, which are not appropriate for permanent year-round use.

In accordance with the policy set out in the local plan, this development provides good quality accommodation for singles and couples. They are attractive, well designed and spacious, located in a pleasant tucked away spot close to the existing community of staff housing. They have been designed to be as sustainable as possible, through the use of natural low carbon materials, reduction in energy use, and renewable energy generation.

To attract the highest quality staff the business needs to provide the highest quality accommodation. Tresco Island are continuously striving as a business to improve the living and working conditions of its staff and therefore the wider community. This helps the business attract and retain staff. Many of the existing staff have worked on Tresco for decades, as do their children who the estate also endeavour to employ and house. This continuity is important to the business and community.

The proposed works form part of Tresco Island's policy for ongoing investment in the tourism industry on the island. Invariably investment on Tresco has an indirect economic benefit to other islands, with transport services, employment, restaurant and retail services benefiting across the archipelago.



Existing Site Plan

## 2. SITE & EXISTING BUILDING

The application site is located in the Old Grimsby area of Tresco. It is set behind and above the existing waterfront houses looking onto Raven's Porth Beach, clearly within the established development boundary, and bounded and shielded by existing buildings and development on all sides.

The site is accessed via Back Lane, which runs above and to the west of Bottom Annexe, parallel to the building. Other buildings along Back Lane, including Back Lane Cottages are set at a higher level, overlooking the site.

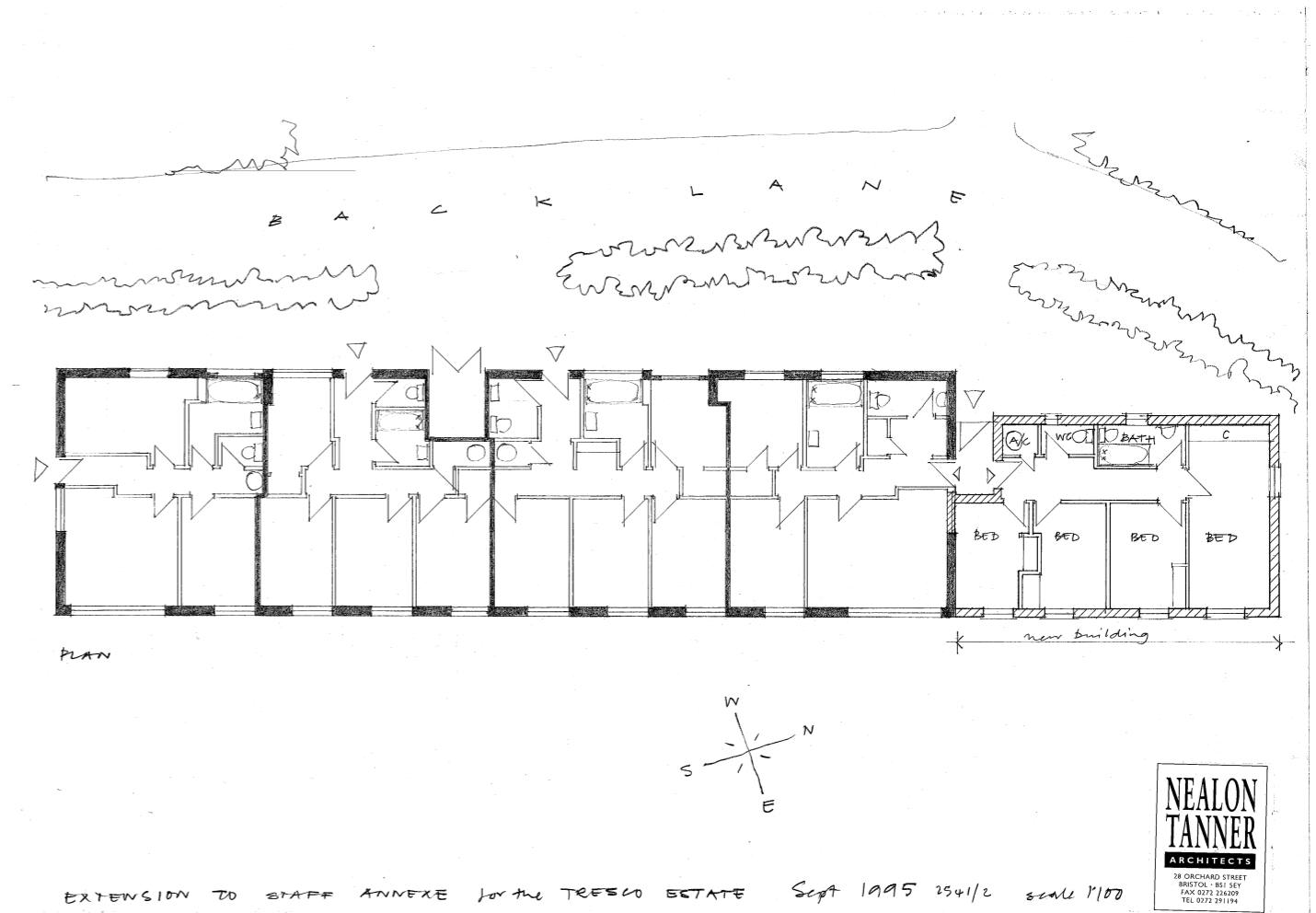
Bottom Annexe in a central location on the island with access to facilities and transport, and would extend an existing enclave of other staff / worker units. It is also in close proximity to many of the tourist facilities and accommodation on the island, so is ideally suited for staff accommodation.

The existing building on the site is single storey and low slung, with a single ridge running from north to south. The building steps inwards at the northern end, where it has been previously extended. The main volume is constructed in single skin blockwork and rendered, with an asbestos slate roof.

The existing building fabric is poorly constructed and has poor thermal performance. The walls between units are thin and have poor acoustic performance, and existing services are outdated and in poor condition.

Internally, the layout is complex, with limited shared facilities. It is a registered House in Multiple Occupation (HMO), with 17 bedrooms with 3 doubles and 14 singles, so houses a maximum of 20 residents sharing 4 bathrooms and a single kitchen facility.

This arrangement is considered less desirable, and Tresco Island have issues attracting and retaining staff that are allocated accommodation at Bottom Annexe.



Existing Building Plans

## 3. PLANNING STATEMENT

### PLANNING CONTEXT

This proposal has been prepared within the context of a policy framework set out in both primary legislation and national and local planning policy. A summary of this framework is set out below.

#### Primary Legislation

The Planning (Listed Buildings and Conservation Area) Act 1990

The application site is situated within a Conservation Area and as such there is a requirement that the proposed development preserves or enhances the character or appearance of the area.

#### The Countryside and Rights of Way Act 2000

Tresco, along with the whole of the Isles of Scilly is designated as an Area of Outstanding Natural Beauty (AONB). In considering proposals located within AONB's, there is a consequential requirement for Local Authorities to have regard to the purpose of conserving and enhancing the natural beauty of the area.

#### The Conservation of Habitats and Species Regulations

There is a duty for the Local Authority to assess the impact of proposed development on any European Protected Species.

### PLANNING POLICY

#### National Planning Policy Framework, (NPPF)

This important policy document outlines the Government's over arching planning policies and details of how they expect these to be applied by Local Planning Authorities. The NPPF makes clear that there is a presumption in favour of development and confirms that the starting point for decision making is the statutory Development Plan. Local Planning policy is expected to conform with the requirements of the NPPF.

#### Isles of Scilly Local Plan 2015-2030

The Isles of Scilly Local Plan sets out a spatial strategy for the next 15 years and provides a vision for the islands, along with key objectives. The plan seeks to strike a balance between protecting and enhancing the high quality environment, whilst ensuring the islands communities and economy to grow sustainably. Central to achieving this objective will be the creation of new employment opportunities and in particular, improving the quality of the tourism experience on the islands.

The Local Plan makes clear that tourism will be a key driver for the islands' economy, recognising that whilst historically this grew rapidly, more recently the Islands' tourism economy has suffered a decline. Visitor numbers have dropped, (alongside a contraction in fishing and farming). The Local

Plan records that it must be responsive to the specific challenges it faces, (including the decline in tourism) and work proactively with applicants and investors to, 'secure developments that improve the economic and social conditions'. The Plan states that the focus will therefore be on finding solutions, 'to secure development that sustains the islands' future'.

The Local Plan specifically acknowledges the part tourism will play in sustaining the economy of the islands. It states, 'there is a need to capitalise on and strengthen the quality and value of tourism, given it will continue to dominate the islands' economy over the plan period'. It goes on to say, 'creating a successful economy will require businesses to develop new opportunities, become more productive, and continually adapt to new challenges'.

The recognition within the Local Plan that tourism is a key player in the islands' economy and that there is a requirement to strengthen and adapt this in the future, provides an important policy context for the consideration of these proposals. Whilst there are no specific employment developments identified in the Local Plan, the policy framework generally encourages proposals that will help strengthen and diversify the islands' economy.

The Local Plan acknowledges the fact that tourism is likely to remain the largest part of the economy over the plan period. For this reason, the Plan states that it is important this sector is supported in, 'improving the quality of its offer, and that it responds to the expectations of its visitors'. The Plan goes on to state, 'A key challenge is to maximise the quality of its product and provide an offer that appeals to a range of visitors, including opening up to, or creating, new tourism markets and niches'.

The Local Plan acknowledges that the provision of quality staff accommodation is a key requirement in the ongoing development of the tourism sector on the islands. These proposals respond directly to the challenge of providing this accommodation.

Policy WC1 – General Employment Policy makes clear that development proposals that strengthen, enhance and diversify the islands' economy will be supported where they are appropriately designed, scaled and located, in accordance with other policies in the Local Plan.

Policy WC5 - Visitor Economy and Tourism Developments sets out proposals for new or upgraded tourism development. Such proposals will be permitted where they, inter alia:

- (a) make a positive contribution to the provision of high quality sustainable tourism on the islands;
- (b) are located in sustainable and accessible locations; and
- (c) are appropriate to the site and its surroundings in terms of activity, scale and design; and
- (d) do not result in an unacceptable impact on the environment or residential amenities in accordance with other relevant policies in the Local Plan.

Policy WC5 also records that tourism developments will be particularly encouraged where it is demonstrated that, inter alia, they extend the tourism season and increase productivity and wages in tourism.

The policies within the Local Plan also provide a range of policies designed to protect the landscape character (Policy OE1) as well as the natural (Policy OE2) and historic environment (Policy OE3).

The key policy within the Local Plan that relates to these proposals is Policy LC4 Staff Accommodation. As a small island-based community, there is a need for Scilly to retain a balanced workforce. Consequently, the plan notes that staff accommodation needs cannot be met outside the islands, due to the expense and logistics of commuting to and from the mainland. Policy LC4 recognises that additional staff accommodation may be required for businesses or organisations.

The Policy sets out a number of specific requirements, recording that new staff accommodation will be permitted where:

- a. It can be demonstrated that there is a functional and operational need;
- b. the size and type of the proposed is appropriate to the functional and operational needs of the business or organisation; and
- c. on an off-island, the proposed accommodation is located within an existing building or well-related to the existing business.

Policy LC4 records that all staff accommodation permitted will be subject to occupancy restrictions. In addition, the policy sets out two further requirements in respect of seasonal staff accommodation:

- a. It is located in an area that relates to the business, where possible; and
- b. does not cause harm to the residential amenity through staff working unsociable hours.

The proposals contained with this application have been prepared to respond to the specific requirements of Policy LC4.

### **Isles of Scilly Design Guide 2007**

The Isles of Scilly Design Guide is a Supplementary Planning Document (SPD) that forms part of the local Development Plan. This states that “It is important that the nature of the surrounding area is understood and reflected in any development proposal. Without this awareness it is likely that a development will be unsympathetic”.

## 4. PROPOSALS

### Form

It is proposed that the existing 'Bottom Annexe', which is no longer fit for purpose, is demolished, and replaced with two new low slung, single storey terraces, consisting of 11 separate ensuite double bedroom units and 2 shared kitchens. The proposed buildings take their form from the traditional Tresco vernacular and the 'island style' that has been developed on Tresco over the last ~30 years.

The terraces would be single story and linear, with dual pitched roofs, oriented north to south, replicating the form of the existing building. The two terraces would be staggered slightly, to avoid the appearance of a continuous linear development.

A central laundry and plant room with a low pitched flat roof would connect the two terraces, which would break up the ridge line and introduce variation into the scale of the proposals.

The proposals would borrow features from the typical 'Tresco Style', with timber cladding, recessed porches and glazed screens, providing natural light into the shared living spaces.

### Scale

The low slung, single storey scale of development would be appropriate to this backland infill site, and would be similar in scale to the building it would be replacing.

The units are 4.9m high at the ridge and 2.2m high at the eaves. This modest scale of development ensures that the proposals would have minimal visual impact, despite the raised ground level of the plot above the beachfront houses on Raven's Porth Beach.

The ridge height of the proposed terraces would be +11.1m, which is comparable to the existing Bottom Annexe building, and similar or lower than the ridge heights of the waterfront cottages below, which range from +10.80 to +12.06.

Consequently, the proposals would be of very low prominence when viewed from the beach or across the harbour, and certainly no worse than the existing building.

Back Lane, and the terraces above the 'Bottom Annexe' site, are set well above the proposed site. The proposals are well shielded by existing fencing, planting and the change in level, and as such the proposed development would have no impact on the aspect and views from these buildings.



Proposed Elevations

## Use/Layout

The northern terrace would consist of five units, each with an ensuite double bedroom, separate entrance, plenty of storage and access to a shared garden space. Each unit would be designed to house an individual or couple.

There would be a central shared kitchen/living/dining space for use by these units. The southern terrace would be similar, housing six ensuite double bedroom units and a shared kitchen.

A shared laundry and plant room would lie between the two terraces, breaking up the form and accessible to all residents.

Access to the building would remain on the western side from Back Lane as existing, with the bedroom and living spaces facing east towards the beach and harbour.

## Materials

The buildings would take their material palette from the existing vernacular on the islands, continuing an architectural language that has developed over recent decades into a Tresco style. This style employs local natural materials and traditional details. The proposed staff accommodation terraces would be clad in a mixture of a horizontal and vertical cedar boarding, left untreated and allowed to silver naturally.

Roofs would be predominantly covered with natural slate. This material palette is appropriate to the site, reflecting both the surroundings and nearby buildings, respecting the character and setting of the conservation area. A PV array would be integrated into the roof on the south-east elevation to provide renewable electricity generation for the new accommodation. They would be discreet and recessed into the roof surface to minimise their visual prominence. The laundry link would be roofed in standing seam zinc, to allow a lower pitch and provide a visual break between the two volumes.

This material palette is appropriate to the site and would reflect both the surroundings and nearby buildings, respecting the character and setting of the conservation area.



Proposed Site Plan

## 5. SETTING

The plot lies within the Isles of Scilly AONB & Conservation Area, which covers Treско in its entirety.

The proposals would replace an existing building, in an area defined as 'Settlement' on the Landscape Character Map within the Draft Isles of Scilly Conservation Area Character Statement.

The proposals have been developed with due consideration of the Conservation Area and AONB setting. The design of the proposed buildings responds to the characteristics and historic context of the area, the relationship with existing proximate buildings, and the landscape character.

The form, scale, massing and character of the proposed buildings would continue established existing development patterns, including that of the existing building; staggered linear terraces that follow the existing contours.

The proposals would replace an existing building, and the site is shielded by an established hedgerow perimeter, which would be retained. The terraces would be single storey, with ridge heights that are at or below the row of seafront terraces. As a result, the development

would be largely concealed from view. In addition, the proposed building would have no greater visual impact than the existing building it is replacing; with comparable eaves and ridge heights. Rather, the proposed building would generally enhance the visual appearance of this area.

Any perceived harm caused by the visual impact of the proposed buildings is arguably mitigated by their proposed form and materials responding to the traditional buildings and vernacular on the island, and the improved accommodation and opportunities that the buildings would provide for local workers.

The proposals are therefore considered to be the type of sustainable development for which the NPPF establishes a strong presumption and it would align with relevant national and local policy.

### Ecology

A day roost for an individual common pipistrelle bat was identified in one of the roof voids of the existing building during two emergence surveys.

A licence for the demolition works will be obtained from Natural England prior to commencement, and appropriate mitigation measures will be implemented in accordance with the Plan For Ecology Bat Survey Report August 2023.

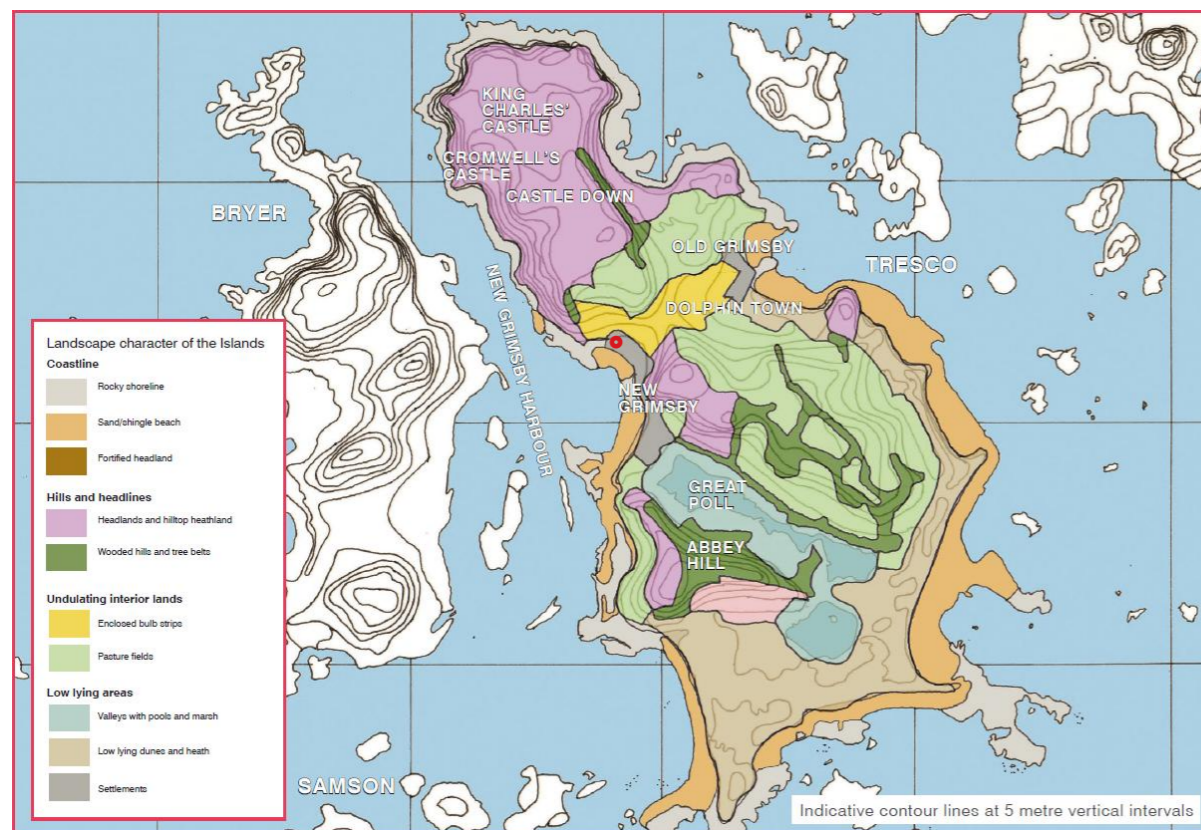


Figure 20 Landscape character on Treско

Landscape Character Map Extract from the Draft Isles of Scilly Conservation Area Character Statement  
The site is identified as 'Settlement' (grey shaded).

## 6. SUSTAINABILITY

### Context

The underlying principle behind the scheme is economic, social and environmental sustainability. Improvements are made through clean energy, with reductions in emissions and reduced reliance on carbon fuels, in line with Council policy.

### Social

The proposal would provide improved worker accommodation to the islands. This will improve the housing standards for the local families of existing staff that live on the island.

Providing more high quality permanent accommodation would reduce the reliance on a influx of seasonal workers, providing better opportunities for local people to work and make their home on the island.

The proposed development would allow the Island to extend and further improve its tourist offering, thereby enabling visitors to access Scilly's unique cultural and heritage assets throughout the year.

### Economic

There is currently a shortage of high quality worker accommodation. Changing tourism patterns and an extended tourist season require a greater permanent staff presence on the island. This requires accommodation that is spacious and comfortable enough to be suitable for individuals and couples to stay on the island throughout the year.

Attractive accommodation is also essential in the recruitment and retention of high quality permanent staff. As such the proposals would support the island economy.

Inevitably, investment on Tresco has an indirect economic benefit to other islands, with transport services, employment of local people, restaurant and retail services across the islands benefiting.

### Environmental

The proposals would use an existing, previously developed plot. The existing building fabric is poorly constructed, and has poor thermal performance.

The proposed construction would employ lightweight construction methods and materials.

The detailed design would be developed to minimise energy use and the building's carbon footprint, both in the construction works and in ongoing use. The following energy strategy outlines this approach in detail.

### Embodied Energy In Construction

A considerable proportion of a building's carbon footprint is attributable to the manufacturing and transportation of building materials. To minimise this the buildings would be constructed with a timber frame and with timber cladding; which are low embodied energy, carbon sequestering materials when sourced from sustainable forestry.

Highly insulated prefabricated timber cassette panels would be manufactured on the mainland and shipped over to reduce wastage and construction time on site.

The building's exterior would be clad in long lasting materials, and installed with robust detailing, capable of withstanding the marine environment. Improved life span ensures a better return on the energy expended in construction.

Natural materials would be used wherever possible, these include slate roofing and timber cedar cladding. The specification would be developed with reference to the BRE Green Guide to Specification to evaluate the environmental credentials of the materials procured in construction.

A Site Waste Management Plan detailing handling and recycling of building materials is included in the accompanying documentation. Recycling of materials once the building is in use would be dealt with by the Island's central arrangements, where re-use and composting of waste products is managed across the island.

### Heat Loss and Energy Use

The proposals would take a 'fabric first' approach to energy reduction, seeking to minimise consumption from the outset through the use of passive design principles. These would include optimising orientation and massing, as well as ensuring the use of high-performance building fabric.

The simple linear form will reduce the surface area to volume ratio, minimising heat loss. Good levels of glazing for the living areas will reduce the need for artificial light. The arrangement of opening windows on both sides of the dwelling allows natural cross ventilation which in the summer will help maintain even, comfortable temperatures.

The prefabricated timber framed building envelope can achieve excellent levels of insulation, with minimal thermal bridging. Off-site manufacturing ensures precision construction, with improved air tightness and thermal performance beyond building regulations standards.



U-value performance of typical building fabric elements would be as follows:

| Element | B Reg.s Min.            | Proposed               |
|---------|-------------------------|------------------------|
| Walls   | 0.26 W/m <sup>2</sup> K | 0.16W/m <sup>2</sup> K |
| Roof    | 0.16 W/m <sup>2</sup> K | 0.15W/m <sup>2</sup> K |
| Floor   | 0.18 W/m <sup>2</sup> K | 0.17W/m <sup>2</sup> K |

This would be a significant improvement on the performance of the existing building fabric. High performance standards would dramatically reduce the energy required to heat the property.

The use of new double glazed windows would: improve air tightness; improve thermal performance; increase the amount of natural light entering the property; and reduce the energy demand from space heating and artificial lighting as a consequence

### Renewable Energy Sources

Solar PV arrays spread across the terraces would be installed as part of the development. The energy and carbon associated with the manufacture and installation of the PV panels would be covered by 3 years of generation in this location.

The buildings' heating and hot water system would be entirely electric, avoiding any reliance on the import of carbon producing fossil fuels. This approach is particularly effective on Tresco, where the temperate climate combined with a super insulated fabric ensures very low heating requirements. Heating and hot water systems would be powered by locally generated electricity from the PV array.

Lighting can add significantly to the electrical loads. All internal and external lighting will use low energy lamps and bulbs. External lighting will also be controlled by appropriate timing and daylight sensor devices to minimise energy consumption.

### Transport

Transport on Tresco is by foot or bicycle and there are no private cars. Vehicles employed to distribute goods around the island are typically electric golf carts.

### Water and Sewage

The island is self-sufficient in harvesting and distributing potable water, and in collecting and treating sewage effluent. Large-scale centralised management of these services is considerably more efficient and effective than micro-measures associated with individual dwellings. As this is a replacement building, there is already sufficient capacity in the existing system for the proposed accommodation units.

The proposals have been designed to minimise water usage. Low water use appliances would be specified where possible, including dual-flush toilets and aerating nozzles throughout.

Excess surface water will be discharged into soakaways.

## 7. FLOOD RISK

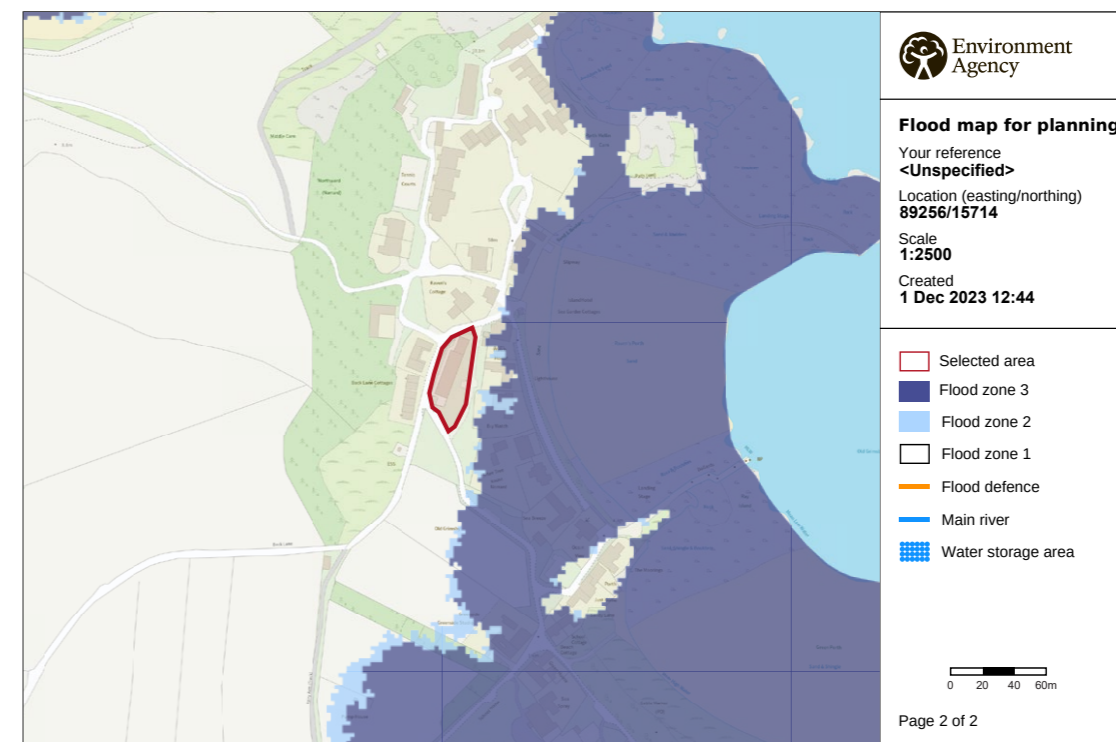
The proposed site is identified on the environment agency maps as being located in Flood Zone 1.

Areas deemed to be in flood zone 1 have been shown to be at less than 0.1% chance of flooding in any year, (i.e. a 1:1000 year chance). As such the development should not face any restrictions due to flood risk.

The local plan requires a min ground floor level of +5.000m for any new development.

The proposed units have a minimum floor level of +6.40m.

The plot is in a well-protected part of the coastline, set back from the seafront and the existing row of seafront cottages.



Flood Risk Map

## 8. ACCESS

### Outside

Access to the site would remain unchanged. Back Lane runs to the west of the plot, and would provide sufficient access to the units.

The absence of cars on Tresco creates a safe, peaceful and refreshing environment and reduces emissions. Most visitors hire bicycles or walk, but for staff and less mobile guests, golf buggies are available. Back Lane would provide space for a golf cart to turn, park and unload in relative proximity to the entrances. The accommodation would be in close proximity to many of the tourist facilities and accommodation on the island.

There would be no overall increase in accommodation units, so Tresco's emergency services would have sufficient existing capacity.

### Inside

The buildings has been designed to comply with Part M of the Building Regulations as a minimum standard. Provision of ground floor bedrooms and living spaces, level access throughout, generous circulation spaces and glazing allowing views out for seated occupants would ensure that the units could be occupied by all.

This will be a significant improvement over the existing staff accommodation stock, including the existing Bottom Annexe, which is typically cramped and inaccessible.



## 9. CONCLUSION

In line with local plan policy, which recognises that staff accommodation needs - necessary to support tourism - cannot be met outside the islands, the proposed staff accommodation development aims to address the shortage of good quality staff accommodation on Tresco.

The application seeks to replace the existing Bottom Annexe, which provides poor quality, cramped and undesirable accommodation with higher quality and better performing accommodation units, which would support Tresco Island in attracted and retaining staff, which is essential to support the strengthening of the tourism industry to the Island.

The form, scale, character and materiality of the proposed buildings are designed to be appropriate to the character and setting of the conservation area, preserving the vernacular character that has developed across the Island.

Tresco's success is integral to the economic prosperity of the island group as a whole, its contribution sustains many other local services including transport, employment, restaurant and retail across the archipelago.

**APPROVED**

*By Lisa Walton at 2:50 pm, Apr 23, 2024*



## **Bat Survey Report**

Bottom Annexe, Old Grimsby, Tresco, Isles of Scilly

Grid Reference: SV 89252 15730

15<sup>th</sup> August 2023

Version 1



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### Document Control:

|                                 |   |
|---------------------------------|---|
| <b>Site Name:</b>               | Bottom Annexe, Old Grimsby, Tresco, Isles of Scilly   |
| <b>OS Grid Reference:</b>       | SV 89252 15730  |
| <b>Report Author:</b>           | Caroline Davey BSc. (Hons) MSc; ACIEEM, bat licence no: 2022-10817-CL18-BAT; (Accredited agent under CL29/00037 (barn owl) held by Kim Jelbert BSc. (Hons) MSc. PhD. MCIEEM (Registered Consultant RC224) |
| <b>Document Approved by:</b>    | Dr Kim Jelbert BSc (Hons), MSc, PhD, MCIEEM (Bat licence no: 2015-10444-CLS-CLS; Registered Consultant: RC224; Barn owl licence no. CL29/00037; Dormouse license no: 2016-22394-CLS-CLS)                  |
| <b>Client:</b>                  | Tresco Estate   |
| <b>Report Reference Number:</b> | P4E3047   |
| <b>Version:</b>                 | 01  |
| <b>Date:</b>                    | 15 <sup>th</sup> August 2023  |

### Declaration:

"The information, evidence and advice, which we have prepared and provided is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology & Environmental Management's (CIEEM) Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions."

|                       |  |
|-----------------------|--|
| <b>Caroline Davey</b> |  |
| <b>Kim Jelbert</b>    |  |

### Report Lifespan:

Ecological features can change over time, particularly if site management/ use changes. Typically, bat surveys are valid for 18 months (until December 2024).



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## 1.0 Summary

|  |   |
|--|---|
| <p><b>Bat evidence?</b></p> <p><b>Proposed works?</b></p> <p><b>Bat specific mitigation recommendations?</b></p> | <p>The survey results indicate that Bottom Annexe, Old Grimsby, Tresco, Isles of Scilly, supports a day roost used by an individual common pipistrelle bat (<i>Pipistrellus pipistrellus</i>).</p> <p>Demolition of the existing building and construction of a replacement building to upgrade staff accommodation on Tresco.</p> <p>Demolition works will not commence until an appropriate licence has been obtained from Natural England.</p> <p>The licence cannot be applied for until planning consent is in place. If the works will commence later than May 2024, then the licence must be informed with at least one additional bat emergence survey, to be undertaken in the most recent bat survey season (May-September). This is a condition of the licence application and is not a planning requirement. The current level of survey effort (two bat emergence surveys, a static monitoring survey and DNA analysis of bat droppings less than 18 months old) is sufficient to inform a planning application. No further survey effort is required to inform the planning application.</p> <p>Works will be scheduled for a time of year when bats are least likely to be impacted.</p> <p>Works with potential to impact bats will be carried out under an ecological watching brief. A licensed bat ecologist will oversee works to the roof/ fascias/ wall tops and the dismantling of the ridge. Any common pipistrelle bats uncovered will be relocated to a bat box installed within a nearby tree or structure. NB: the bat box (1 x Schwegler 2F or comparable product) will be installed in advance of works commencing and in a location that will not be disturbed as a result of building works.</p> <p>The common pipistrelle bat day roost located on the south side of the building, at the ridge on the gable end, will be lost during the demolition works. Loss of the common pipistrelle bat day roost will be compensated by either creating a bat access beneath a fascia board or between the roof tiles and roof membrane or by installing bat boxes/crevices on the exterior of the building.</p> <p>If bats will be allowed to access the roof space of the proposed replacement building, then bitumen type 1F roofing felt must be used to line the replacement roof; this is because modern synthetic membranes are harmful to bats and their use will not be permitted by Natural England.</p> <p>No exterior lighting will be installed close to the temporary or permanent bat roost features or new access points in the new building.</p> <p>Building contractors will be briefed prior to commencement of site works.</p> |
|--|---|



## 2.0 Introduction

### 2.1 Background

In February 2023 Tresco Estate commissioned Plan for Ecology Ltd to undertake a Preliminary Bat and Bird Assessment (sometimes referred to as a Bat and Barn Owl Assessment) and a habitat assessment of adjacent habitats at Bottom Annexe, Tresco, Isles of Scilly (Grid Ref: SV 89252 15730). The client proposes to demolish the existing building and construct new accommodation in its place.

External and internal features were noted during the preliminary survey that have potential to support roosting bats/ permit bats access to the building interior. Apparent bat droppings were also observed within the roof void. Bottom Annexe, Tresco, Isles of Scilly, was assessed as being of '**moderate suitability**' for roosting bats (Plan for Ecology Ltd, 2023).

In accordance with the 'Bat Surveys for Professional Ecologists: Good Practice Guidelines' (Collins, 2016), further bat surveys were recommended, comprising a minimum of two bat emergence or re-entry surveys during the bat active season (May to September inclusive) to inform the development works. In May 2023, Tresco Estate commissioned Plan for Ecology Ltd to undertake the recommended further survey work. This report describes and evaluates the use of the building by bats, and details mitigation recommendations to minimize impacts upon bats in accordance the 'Bat Surveys for Professional Ecologists - Good Practice Guidelines' produced by the Bat Conservation Trust (Collins, 2016).

### 2.2 Project Administration

|  |   |
|--|---|
| <b>Property Address:</b>               | Bottom Annexe, Tresco, Isles of Scilly  |
| <b>OS Grid Reference:</b>              | SV 89252 15730  |
| <b>Client:</b>                         | Tresco Estate   |
| <b>Planning Authority:</b>             | Cornwall Council  |
| <b>Planning Reference Number:</b>      | Unknown   |
| <b>Report Reference Number:</b>        | P4E3047   |
| <b>Proposed work:</b>                  | Demolition of existing building and construction of new accommodation   |
| <b>Visual Assessment Date:</b>         | 24 <sup>th</sup> March 2023   |
| <b>Emergence Survey Dates:</b>         | 18 <sup>th</sup> May and 22 <sup>nd</sup> June 2023   |
| <b>Ecologist &amp; Licence Number:</b> | Caroline Davey BSc. (hons) MSc ACIEEM; bat licence no: 2022-10817-CL18-BAT; CL29/00037 (barn owl) held by Kim Jelbert BSc. (Hons) MSc. PhD. MCIEEM (Registered Consultant RC224)<br><br>Nicola Dyer BSc MSc MCIEEM; bat licence no. 2019-40845-CLS-CLS<br><br>Chloe Balmer MSci (Hons) ACIEEM; Bat licence No. 2020-47040-CLS-CLS |



Dr Lucy Wright BSc (Hons) MSc PhD MCIEEM; bat licence  
no. 2022-10359-CL17-BAT

### 2.3 Legislation & Planning Policy

**Planning:** The local planning authority has a statutory obligation to consider impacts upon protected species resulting from development. Planning permission will not be granted with outstanding ecological surveys, and if applicable an appropriate mitigation plan.

**Bats:** In Britain protection of European Protected Species (EPS) such as bats is achieved through their inclusion on Schedule 2 of the Conservation and Habitats Regulations 2017 (as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (HM Government, 2019)), Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 12 of the Countryside and Rights of Way Act 2000 (HM Government, 1981, 2000, 2017, 2019).

As a result of this statutory legislation it is an offence to:

- Deliberately capture, injure or kill a bat;
- Intentionally or recklessly disturb a bat/s in its roost;
- Intentionally or recklessly damage, destroy or obstruct access to a bat roost (even if bats are not occupying the roost at the time);
- Possess or sell or exchange a bat (dead or alive) or part of a bat.

Works with potential to cause significant disturbance to roosting bats may require a European Protected Species (EPSL) licence or Bat Mitigation Class Licence (CL21) from Natural England before works can legally commence. Works likely to result in less significant disturbance may be carried out under a Bat Mitigation Method Statement. The magnitude of disturbance and, therefore, the requirement for an EPSL, Bat Mitigation Class Licence or method statement is assessed on a case-by-case basis by the bat ecologist. The Bat Mitigation Method Statement or EPSL must be prepared and/or applied for by a suitably experienced and licenced bat ecologist. Where planning permission is required, the appropriate licence cannot be obtained until planning permission has been granted.





## 3.0 Methodology

### 3.1 Summary Visual Assessment

A visual assessment of Bottom Annexe, Tresco, Isles of Scilly, was undertaken on the 24<sup>th</sup> March 2023. The ecologist (Caroline Davey) assessed the suitability of the building and surrounding habitat to support bats in accordance with Collins (2016). A high-power torch was used to illuminate all accessible areas of the building with potential to support roosting bats. The ecologist searched for signs of bats including droppings, staining and feeding remains.

The assessment was carried out in accordance with the 'Bat Surveys for Professional Ecologists - Good Practice Guidelines' produced by the Bat Conservation Trust (Collins, 2016). Potential bat roosts identified during the visual inspection of the building were categorised as to their suitability in accordance with the Bat Conservation Trust's (BCT) Good Practice Guidelines (Collins, 2016) as described below:

Negligible: negligible features with potential to support roosting bats.

Low: one or more features with potential to support individual bats on an occasional basis. Unlikely to support large numbers of bats.

Moderate: one or more features with potential to support roosting bats but unlikely to be of high conservation status.

High: one or more features with potential to support large numbers of bats on a regular basis.

### 3.2 Emergence Surveys

Emergence surveys of the building were undertaken on 18<sup>th</sup> May and 22<sup>nd</sup> June 2023. An emergence survey involves an ecologist(s) counting the number of bats emerging from the building at dusk or dawn for a period of at least 1.75 hrs. The surveyor(s) records the calls of any bats that emerge using a bat detector and recording equipment; this enables identification of the species present and the location of bat access points. Two ecologists were required to cover all elevations of the building. Surveyor locations are shown in Fig. 1 (below).

In accordance with the interim guidance note on the use of night vision aids (BCT, 2022), the surveyors also used night vision recording equipment as detailed below; this enables identification of the species present and the location of bat access points (where applicable). Night vision aids increase the likelihood of detecting bats emerging later during the survey (45 minutes after sunset onwards) when light levels are low. The ecologists reviewed the video footage for the last 60 minutes of the survey (when light levels were low, and bats could be missed by the surveyor).

On the first bat emergence survey occasion (18<sup>th</sup> May 2023), surveyor 1 (Chloe Balmer) and surveyor 2 (Lucy Wright) used Echo Meter Touch 2 (EMT2) detectors coupled with Reolink RLC-811A security cameras and JC Security Infrared Illuminators 12-LED.

On the second bat emergence survey occasion (22<sup>nd</sup> June 2023), surveyor 1 (Caroline Davey) used an Echo Meter Touch 2 Pro (EMT2) detector coupled with Reolink RLC-811A security camera and JC Security Infrared Illuminators 12-LED and surveyor 2 (Nicola Dyer) used an Echo Meter Touch 2 (EMT2) detector but no Reolink security camera.

The reolink camera and infrared illuminator were mounted on tripods. The Reolink RLC-811A CCTV cameras are widely and successfully used to record bats emerging from buildings. The fields of view of each camera during the first emergence survey are shown in Fig. 2 and Fig.3 below.



Different bat detector types use different methods of detecting; the EMT2 detectors use heterodyne and real-time expansion. Each method of detection is described below:

- Heterodyne: this method identifies bat calls echolocating at the frequency set by the operator but will fail to/ or only partially record bat calls outside this frequency.
- A real-time expansion bat detector digitally records ultrasonic bat calls and then plays them back at a slower rate and frequency to give an audible output.



Figure 1: Emergence survey – surveyor locations. Bottom Annexe is outlined in red. Yellow triangles show surveyor locations.

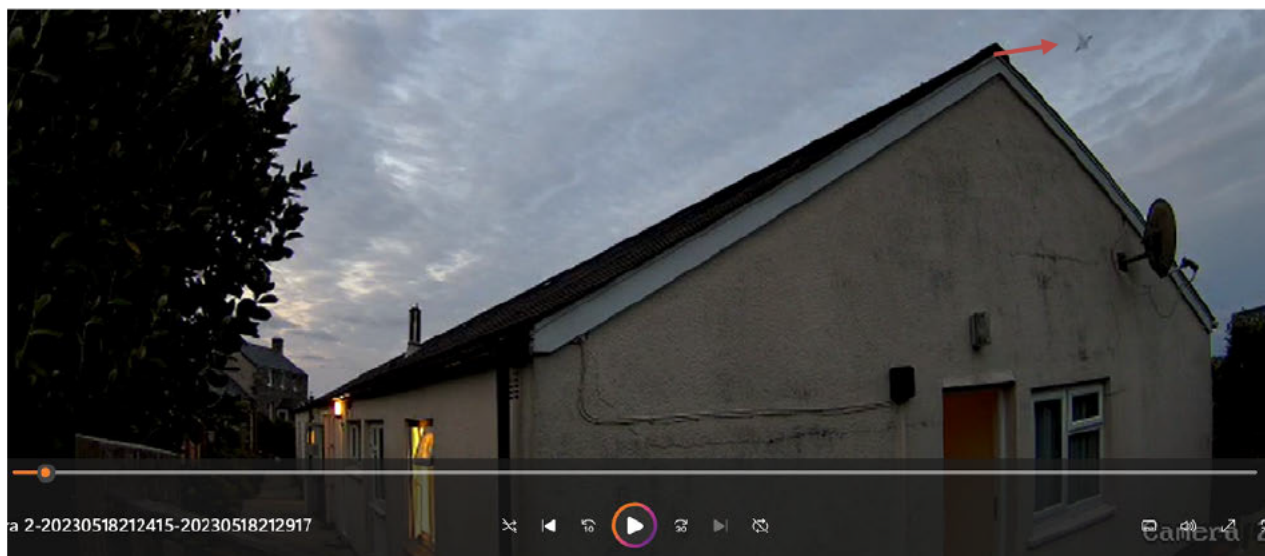


Figure 2: Still image taken from the infra-red video footage used by surveyor 1 (Lucy Wright – south elevation) during the first emergence survey on 18<sup>th</sup> May 2023. Emerging pipistrelle bat recorded on the top right of the photograph (red arrow)

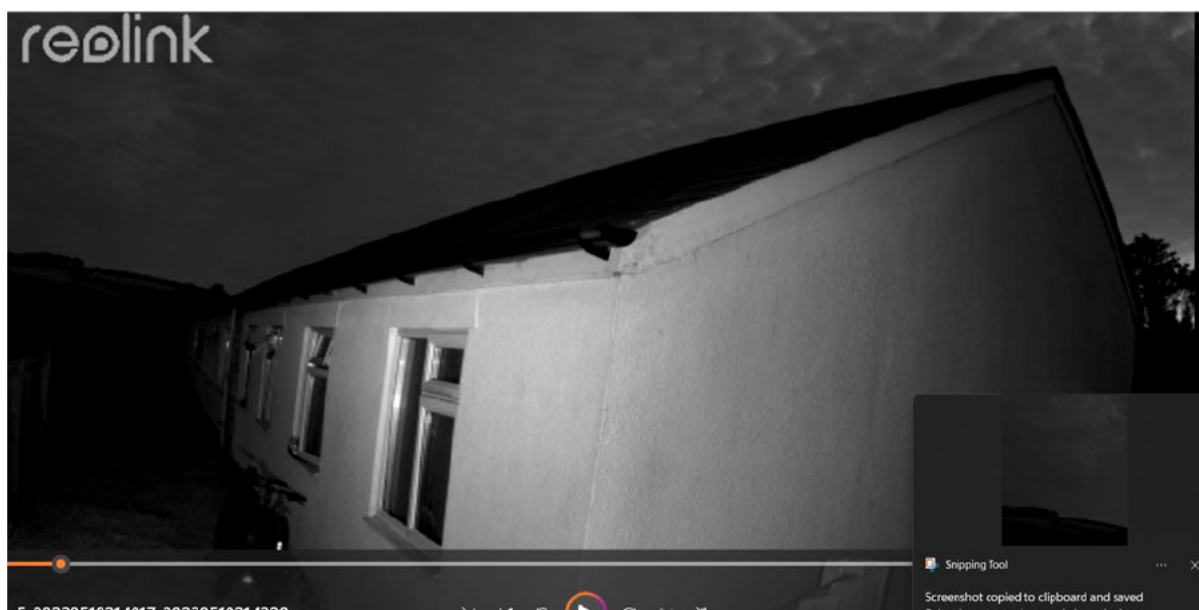


Figure 3: Still image taken from the infra-red video footage during the latter part of the survey (Chloe Balmer – north elevation) on 18<sup>th</sup> May 2023.

### 3.3 DNA analysis

One sample of apparent bat droppings was collected from the roof void of Bottom Annexe during the initial visual assessment. The sample was sent for DNA analysis to provide further information on the bat species present. DNA analysis was carried out by SureScreen Scientifics Ltd, Derbyshire, U.K.



### 3.4 Ecological Evaluation

The value of buildings/ other structures for roosting bats is determined following the framework provided by Wray *et al.* (2010). This framework determines the appropriate value of a roost on a geographic scale, based on the relative rarity of the bat species using the site (based on the known distribution and population size in the U.K.), as well as the type of roost (based on the results of the emergence/ re-entry and static detector surveys). Where more than one bat species is present within the site, each species is valued individually, and the highest value obtained is assigned to the site.

Table 1 (below) categorizes bat species by their distribution and rarity in England. Table 2 (below) assigns a value for each roost type for the different rarity categories (Tables 1 and 2 are adapted from Wray *et al.* 2010).

Table 1: Relative rarity of bat species in England (adapted from Wray *et al.* 2010)

| Rarity (within range) | Region  |
|-----------------------|---|
|                       | England   |
| Common                | Common pipistrelle ( <i>Pipistrellus pipistrellus</i> )<br>Soprano pipistrelle ( <i>Pipistrellus pygmaeus</i> )<br>Brown long-eared ( <i>Plecotus auritus</i> )   |
| Rarer                 | Lesser horseshoe ( <i>Rhinolophus hipposideros</i> )<br>Whiskered ( <i>Myotis mystacinus</i> )<br>Brandt's ( <i>Myotis brandtii</i> )<br>Daubenton's ( <i>Myotis daubentonii</i> )<br>Natterer's ( <i>Myotis nattereri</i> )<br>Leisler's ( <i>Nyctalus leisleri</i> )<br>Noctule ( <i>Nyctalus noctula</i> )<br>Nathusius' pipistrelle ( <i>Pipistrellus nathusii</i> )<br>Serotine ( <i>Eptesicus serotinus</i> ) |
| Rarest                | Greater horseshoe ( <i>Rhinolophus ferrumequinum</i> )<br>Bechstein's ( <i>Myotis bechsteinii</i> )<br>Alcathoe ( <i>Myotis alcathoe</i> )<br>Greater mouse-eared ( <i>Myotis myotis</i> )<br>Barbastelle ( <i>Barbastella barbastellus</i> )<br>Grey long-eared ( <i>Plecotus austriacus</i> )   |

Table 2: Value of bat roosts (adapted from Wray *et al.* 2010)

| Value                     | Roost types   |
|---------------------------|---|
| District, local or parish | Feeding perches (common species)<br>Individual bats (common species)<br>Small numbers of non-breeding bats (common species)<br>Mating sites (common species)  |
| County                    | Maternity sites (common species)<br>Small numbers of hibernating bats (common and rarer species)<br>Feeding perches (rarer/rarest species)<br>Individual bats (rarer/rarest species)<br>Small numbers of non-breeding bats (rarer/rarest species) |



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| Value         | Roost types  |
|---------------|--|
| Regional      | Mating sites (rarer/rarest species) including well-used swarming sites<br>Maternity sites (rarer species)<br>Hibernation sites (rarest species)<br>Significant hibernation sites for rarer/rarest species or all species assemblages |
| National      | Maternity sites (rarest species)<br>Sites meeting SSSI guidelines  |
| International | SAC sites  |

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### 3.5 Weather Conditions

The weather during the initial visual assessment was in line with seasonal norms. The emergence surveys were undertaken during suitable weather conditions, as described below:

- 18<sup>th</sup> May 2023: Dry with part cloud and a temperature of 13°C at the beginning of the survey; and 12°C, part cloud and dry at the end of the survey; in accordance with the Beaufort Scale, wind was described as 'light air'.
- 22<sup>nd</sup> June 2023: Dry and clear with a temperature of 17°C at the beginning of the survey; and 16°C, clear and dry at the end of the survey; in accordance with the Beaufort Scale, wind was described as 'light air'.

### 3.6 Limitations

There are numerous visible features on the exterior of the building with potential to support roosting bats, which could not be fully inspected for evidence of bats. These limitations were addressed by undertaking two bat emergence surveys. There are no limitations associated with weather conditions.

The bat surveys were undertaken in accordance with best practice guidance; however, the results of these surveys represent only a snapshot of use at the time of survey.

Surveyor 1's (22<sup>nd</sup> June 2023) Reolink RLC-811A SD card was erroneously reformatted prior to saving the video recordings; all footage was reviewed prior to the formatting error. Surveyor 2 (22<sup>nd</sup> June 2023) did not use a camera.

The calls of four bat species are notoriously difficult to record: the long-eared bat (*Plecotus spp.*) and the barbastelle bat (*Barbastella barbastellus*) have a quiet echolocation call, and the horseshoe bats (*Rhinolophus hipposideros* & *R. ferrumequinum*) have highly directional calls. The long-eared, barbastelle and horseshoe species can be easily missed during bat detector surveys. We presume all *Plecotus spp.* recordings are those of brown long-eared bat (*Plecotus auritus*) because Cornwall is outside the known range of the grey long-eared bat (*Plecotus austriacus*).



## 4.0 Bat Survey Results

### 4.1 Site Description and Habitat Assessment

Bottom Annexe is located in Old Grimsby, on the north-east coast of Tresco, Isles of Scilly c. 5km north of Hugh Town on St Mary's and c. 3.5km west of Higher Town on St Martin's, c. 48 km west of the mainland at Land's End.

The Isles of Scilly Complex Special Area of Conservation (SAC) lies c. 171m east of Bottom Annexe at its closest point on the shoreline. The Castle Down (Tresco) Site of Special Scientific Interest (SSSI) lies c. 370m west of Bottom Annexe and the Pentle Bay, Merrick and Round Islands SSSI lies c. 473m south-east of Bottom Annexe.

The Isles of Scilly Complex SAC has been designated for its pristine marine environment and diverse fauna. Rocky reefs in Scilly stretch from the intertidal to deep circalittoral reefs and are recognised for the diversity of species they support. The Castle Down SSSI has been designated for its maritime heathland and Merrick and Round Islands SSSI has been recognised for its transition from dunes to lichen-rich heathland and uninhabited islands important for breeding seabirds.

The Isles of Scilly are unique in their importance for nature conservation. Due to the archipelago's southerly location, coastal influences and range of exposures, species assemblages here are different from the mainland UK. A range of warmer water species are noticeably more prevalent on Scilly.

The wider area comprises coastal heathland, beaches and low cliffs, open sea and the mature trees of the subtropical garden at Abbey Garden. Small fields and hedges, and mainly period properties with small gardens make up the rest of the surrounding habitat on Tresco.

In combination, these features provide potentially high-quality foraging and roosting habitat for bats.

### 4.2 Visual Assessment Summary

The visual assessment of the building was undertaken on 24<sup>th</sup> March 2023.

#### Exterior

Bottom Annexe is a single storey building of rendered concrete block wall construction, with slate effect roof tiles and concrete ridge tiles (Figure 4: east elevation, Figure 5: west elevation, Figure 6: north elevation, Figure 7: south elevation). The roof is pitched with one flue and two vents on the west elevation. Three roof slates were identified on the west elevation as being slightly raised which may provide access for bats into the interior of the roof. Timber fascia boards are present all around the building with some small gaps on the west elevation. The gable end of the north elevation has a fascia board at the top of the wall of the gable end. There are very small gaps behind this fascia board which may provide crevices for bats and allow bats access into the interior. The fascia board on the east elevation appears to be completely tight and the roof structure appears tight in the most part with no obvious access points or gaps that could be utilised by crevice dwelling bats. However, there are replacement roof slates that may provide an access point for bats on the east elevation.



## Interior

Bottom Annexe has three separate roof voids that are accessible from individual roof hatches.

Roof void 1: The roof space is hot and dark with a timber roof structure lined with an impermeable plastic liner. The floor of the roof void is covered in old piles of roofing insulation. The hot water tank is housed here. This void is un-boarded, so the inspection was made from the hatch. No droppings were observed from the survey point.

Roof void 2: This roof void has an identical structure to roof void 1 and the floor of the roof void is also covered in piles of old roofing insulation. It is very hot and dark in this roof void, possibly due to the impermeable plastic roof liner. This void is un-boarded, so the inspection was made from the hatch. No droppings were observed from the survey point.

Roof void 3: This section of roof void has the same timber structure as roof voids 1 and 2 but has been lined with bitumen roofing felt (Figure 8). This roof void is much cooler than voids 1 and 2. The floor of the void also has piles of old roofing insulation and was un-boarded, so the inspection was made from the hatch. Several apparent bat droppings c. 3 droppings were identified close to the hatch entrance (Figure 9).

As droppings were identified during the survey and the building supports a number of features that could support roosting bats, Bottom Annexe was assessed as being of '**moderate suitability**' for supporting roosting bats.



Figure 4: View of the east elevation of Bottom Annexe



Figure 5: View of the west elevation of Bottom Annexe



Figure 6: View of the north elevation of Bottom Annexe





Figure 7: View of the south elevation of Bottom Annexe



Figure 8: Interior of roof void 3



Figure 9: Droppings on roofing insulation of roof void 3

#### 4.3 Emergence Survey

During the first emergence survey on the 18<sup>th</sup> May 2023, one common pipistrelle bat was recorded emerging from the beneath the ridge tile at the gable end on the south elevation.

During the second emergence survey on 22<sup>nd</sup> June 2023, one common pipistrelle bat was recorded emerging from beneath the ridge tile at the gable end on the south elevation.



Figure 10: South elevation of Bottom Annexe. The red arrow indicates the emergence location of the single common pipistrelle bat during both surveys (18<sup>th</sup> May and 22<sup>nd</sup> June 2023)



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#### 4.4 DNA Analysis

DNA analysis of a sample of droppings collected from Bottom Annexe to determine species was described as lesser white toothed shrew (*Crocidura suaveolens*). The lesser white toothed shrew is primarily insectivorous, the same as bats, and their droppings can be mistaken for bat droppings as they are similar in appearance and crumble when touched due to the presence of insect remains.

#### 4.5 Bat Species Evaluation

The survey results show that Bottom Annexe supports a day roost used by an individual common pipistrelle bat. The roost site appears to be beneath the ridge tile on the gable end of the south elevation.

The common pipistrelle bat: is a crevice dwelling bat species that typically roosts between slates/ tiles and the roofing felt, or beneath fascia boards/ soffits. The common pipistrelle bat is common and widespread throughout the UK, and evidence indicates that the UK population has increased in recent years (BCT, 2023). Common pipistrelle is also considered common and widespread in Cornwall.

The day roost within Bottom Annexe supports an individual non-breeding common pipistrelle bat. This roost is considered to be of **low conservation significance** for this bat species.

Following the framework described by Wray *et al* (2010), as outlined in Section 3.3 above (Tables 1-2), the rarity of the bat species recorded on-site (common pipistrelle) is 'common.' The corresponding value for a day roost/ feeding perch of a small number of a common bat species is 'District, local or parish' level. Bottom Annexe is considered to be of **Local** importance for roosting bats.



## 5.0 Impacts and Mitigation Recommendations

### 5.1 Evaluation of Development Proposals and Impacts

The further survey work has shown that Bottom Annexe supports a common pipistrelle bat day roost (likely one individual).

The client proposes to demolish the existing building and construct new accommodation in its place. In the absence of mitigation, the proposals have the potential to disturb, injure or kill bats and to result in the loss and disturbance of a common pipistrelle bat day roost. In the long term, works are likely to result in the loss of the identified roost. Loss can be mitigated by reinstating new roosting features within the replacement building post-development. The impact of this on the local bat populations is detailed below:

- Common pipistrelle bat day roost comprising likely 1 individual (low impact).

### 5.2 Mitigation

To avoid, mitigate and compensate for potential impacts on roosting bats, an outline of the recommended mitigation is provided below (to be agreed with the client). The proposals have potential to have a significant impact on roosting bats; a European Protected Species (EPS) licence or a Bat Mitigation Class licence (CL21) must be obtained from Natural England before works can lawfully commence. The appropriate licence will set out the mitigation required to maintain the favourable conservation status (FCS) of the bat species using Bottom Annexe.

Outline of recommended mitigation:

- Works will not commence until an appropriate licence has been obtained from Natural England.
- The licence cannot be applied for until planning consent is in place. If the works will commence later than May 2024, then the licence must be informed by at least one additional bat emergence survey, to be undertaken in the most recent bat survey season (May-September). This is a condition of the licence application and is not a planning requirement. The current level of survey effort (two bat emergence surveys and DNA analysis of bat droppings less than 18 months old) is sufficient to inform a planning application. No further survey effort is required to inform the planning application.
- Works will be scheduled for a time of year when bats are least likely to be impacted.
- Works with potential to impact bats will be carried out under an ecological watching brief. A licensed bat ecologist will oversee demolition works to the roof/ fascias/ wall tops and the dismantling of the roof. Any common pipistrelle bats uncovered will be relocated to a bat box installed within a nearby structure. NB: the bat box (Schwegler 2F or comparable product) will be installed in advance of works commencing and in a location that will not be disturbed as a result of building works. See <https://www.nhbs.com/> for product specification.
- The common pipistrelle bat day roost located on the south elevation of Bottom Annexe will be lost during the demolition works. Loss of the common pipistrelle bat day roost will be compensated by either installing a bat access (i.e., bat access slate/ tile over bitumen type 1F) to provide bat access to the space between the bitumen membrane and roof tiles, by installing a single raised ridge tile with 50mm x 25mm gap over bitumen type 1F; by installing a timber fascia board with 20 x 50mm gap beneath providing bat access to the



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wall top; or by installing a bat box on the exterior of the building. The location/ aspect of the alternative bat roost features will replicate those lost as closely as possible.

- If bats will be allowed to access the roof space of the proposed replacement building, then bitumen type 1F roofing felt must be used to line the replacement roof; this is because modern synthetic membranes are harmful to bats and their use will not be permitted by Natural England.
- No exterior lighting will be installed close to the temporary or permanent bat roost features or new access points.
- Building contractors will be briefed prior to commencement of site works. Contractors will be notified about the presence of bats within the building and informed that if a bat/s is/are uncovered during works, then work must stop immediately (as soon as it is safe to do so) and advice sought from the licensed bat ecologist/s (Plan for Ecology Ltd, 01326 218839).



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## 6.0 References

- BCT (2023) The National Bat Monitoring Programme Annual Report 2022. Bat Conservation Trust, London. Available at [www.bats.org.uk/our-work/national-bat-monitoringprogramme/reports/nbmp-annual-report](http://www.bats.org.uk/our-work/national-bat-monitoringprogramme/reports/nbmp-annual-report).
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- Wray S., Wells D., Long E. and Mitchell-Jones T. (2010) Valuing Bats in Ecological Impact Assessment. *In Practice*, 70 (December), pp23-25. Chartered Institute for Ecology and Environmental Management (CIEEM).