



Hugo Davies Architect,
4 Easterways,
Broadhempston,
Totnes,
England,
TQ9 6FY

Ref: New Barn at the Turks Head, St Agnes, Isles of Scilly, TR22 OPL
Date: 9th March 2025

Dear Hugo,

Biodiversity Net Gain

Following on from the assessment of the proposed development at the above referenced address, I would consider that the project meets the necessary exemptions criteria under the provisions of Regulation 4 of The Biodiversity Gain (Exemptions and Other Matters) (England) Regulations 2024 (SI 2024/47).

The Regulations state that:

"The biodiversity gain planning condition does not apply in relation to planning permission for development which meets the first and second conditions:

- 1) The first condition is that the development does not impact an onsite priority habitat.*
- 2) The second condition is that the development impacts:*
 - a) less than 25 square metres of onsite habitat that has biodiversity value greater than zero; and*
 - b) less than 5 metres in length of onsite linear habitat."*

The first criteria is met as no priority habitats are present within the redline boundary. This is confirmed by the ecologist and can be verified through reference to the supporting documentation provided in the Small Site Metric (SSM) which accompanies this letter.

The second criteria is met as follows:

- a) The total area of onsite habitat impacted by the proposals which has a biodiversity value greater than zero is **21 sqm** which is below the 25 sqm threshold required to qualify for the exemption. This is demonstrated in the SSM.

- b) No linear habitats would be impacted by the proposals. Note that whilst the karo vegetation around the periphery is not mapped as a linear feature due to their character being more akin to a shrubbery of non-native species, there would be no removal of these as boundary features. The works on the eastern boundary to facilitate the footprint of the new barn would be restricted to cutting back overhanging branches from undermanaged shrubs whilst retaining these shrubs as screening between the new barn and the road to the east.

This assessment therefore concludes that the New Barn at the Turks Head, St Agnes, Isles of Scilly, TR22 OPL development would be exempt from the Biodiversity Net Gain requirements on the basis of its compliance with the *de minimis* exemption.

The Baseline and Proposed habitat maps are appended to this letter. If you or the Planning Authority require any further information or supporting evidence in relation to this project, I would be happy to provide this.

Bats

No suitable features for use by roosting bats were recorded on site – this includes the small wooden shed which would be removed as part of the application.

Nesting Birds

The site does offer suitable nesting habitat for breeding birds – care should be taken during clearance both of boundary karo shrubs and structures/artificial materials on site to ensure that no birds are present when these actions are undertaken.

Clearance works should be undertaken outside of the breeding season which runs from March – September inclusive, where practicable. This would provide the most robust means of avoiding risk of impact to nesting birds. If this is not possible, then contractors should visually inspect the work area before they are affected by the works, in order to confirm that no nests are present. In the event that a bird nest is present, it must be left undisturbed until chicks have fledged the nest, at which point works can proceed.

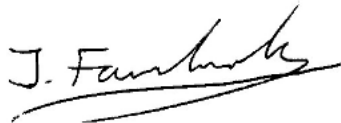
Enhancement Opportunities

As discussed at the beginning of this letter, it is considered that the project would not be required to demonstrate 10% net gain due to the *de minimis* exemption; however the new construction would offer opportunities for enhancements for bats and nesting birds. This would help ensure that the project is compliant with Policy OE2 of the Local Plan.

Bird boxes targeted at species such as house sparrow, as well as common garden bird species such as blackbird and robin would have a high chance of occupation. Boxes should be mounted on the wall of the new barn, ideally facing the vegetation to the east to provide cover and shelter from disturbance. These should be at a height of at least 3m above the ground with an entrance clear of vegetation/other features which may put them at risk of predation from cats. Boxes can be sourced from various sources such as the NHBS website, or can be constructed on site using methodology and specifications available online.

The new barn would provide a suitable situation to position a **bat box** on the western aspect or southern gable. The box should be positioned at a height of at least 3m. An open-based box design would ensure that it would not require cleaning. The location and aspect would be optimal for bats such as common pipistrelle which is the dominant species present on the island and the most likely species to use the environs for foraging and roosting. A suitable box could be purchased or constructed following freely available plans. Kent Bat Box style boxes are slim and easy to construct from appropriate timber using the plans provided at: <http://www.kentbatgroup.org.uk/kent-bat-box.pdf>

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'J. Faulconbridge', with a long horizontal flourish extending to the right.

James Faulconbridge BSc (Hons), MRes, MCIEEM
IOS Ecology, St Martin's, Scilly.





Key (Existing Baseline)

 Red Line Boundary

HABITATS


 Artificial unvegetated, unsealed surface

 Developed land; sealed surface

 Introduced shrub

 Other neutral grassland



0 2.5 5 m





Key (Proposed)


 Red Line Boundary


HABITATS

Habitats Proposed EDIT ME

 Artificial unvegetated, unsealed surface

 Developed land; sealed surface

 Introduced shrub

 Other neutral grassland



0 2.5 5 m

