

**From:** [Craig Jardine](#)  
**To:** [Andrew Bayne](#)  
**Cc:** ["Scott Braidwood"](#); [\[REDACTED\] McLaren](#); [\[REDACTED\] Blease](#); [Planning Monitoring](#)  
**Subject:** FW: 2018/0011/DET - URGENT ACTION REQUIRED - Discharging Conditions and Start of Development  
**Date:** 13 March 2023 11:28:57  
**Attachments:** [1835-P-00-900.pdf](#)  
[18\\_00011 revised MS.pdf](#)  
[174204-GIS011 Invasive Species Plan - FINAL.pdf](#)  
[174204-GIS014 Tree Protection Plan - FINAL.pdf](#)  
[174204 Inchconnachan Existing Lodge Bat Activity Report October 2021.pdf](#)  
[230308 Inchconnachan NID-20180011DET.pdf](#)  
[ECRPT13284 Inchconnachan Outbuildings Inspection \(Bats\) Final.pdf](#)

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Andrew,

Thank you for your email of 8<sup>th</sup> March and attachments (above for reference).

I can respond as follows:

**Discharging of Suspensive Conditions**

Focusing on the planning conditions which have a pre-commencement element, we can confirm the following:

- **Condition 4. Bat Protection Measures:** We hereby take receipt of the Bat Survey Report (dated October 2021) and the Bat Inspection Report (dated 7<sup>th</sup> March 2023 and received on 8<sup>th</sup> March 2023). We note the conclusion of the submitted reports that no evidence of bats in the outbuildings confirming negligible suitability for roosting bats and that no further assessment or licensing is required for removal of the outbuildings. Furthermore, we note that the former Lodge building has been subject to a fire. We are satisfied that the pre-commencement element of Condition 4 of planning permission 2018/0011/DET has been satisfied and can be discharged to enable demolition of the 3no. outbuildings (detailed in the submitted plan dwg no. 1835-P-00-900) to proceed.
- **Condition 5. Tree and Woodland Protection:** We hereby take receipt of the proposed Tree Protection Plan (as detailed in the submitted dwg. no. 174204-GIS014, originally received on 3<sup>rd</sup> Nov 2021, and copy attached). We hereby accept the tree protection proposals as submitted and discharge the pre-commencement element of Condition 5 of planning permission 2018/0011/DET. The implementation element of Condition 5 remains in force, , should development proceed beyond the scheduled demolition proposed (as detailed in the submitted plan dwg no. 1835-P-00-900).
- **Condition 8 Control of Invasive Species:** We hereby take receipt of the proposed Invasive Species Plan (as detailed in the submitted dwg. no. 174204-GIS011, originally received on 3<sup>rd</sup> Nov 2021, and copy attached). We hereby accept the proposals as submitted and discharge the pre-commencement element of Condition 8 of planning permission 2018/0011/DET. The implementation element of Condition 8 remains in force, should development proceed beyond the scheduled demolition proposed (as detailed in the submitted plan dwg no. 1835-P-00-900).
- **Condition 10. Archaeological Watching Brief:** The pre-commencement element of this condition has previously been discharged by this Authority in a letter to the previous owner. However, I can re-confirm that we hereby accept the Method Statement as submitted (by Rebecca Shaw Archaeological Services, dated 31 July 2019) and discharge the pre-commencement element of Condition 10 of planning permission 2018/0011/DET. The implementation element of Condition 10 remains in force, should development proceed beyond the

scheduled demolition proposed (as detailed in the submitted plan dwg no. 1835-P-00-900).

In conclusion, all pre-commencement elements of the above noted planning conditions of planning permission 2018/0011/DET are hereby discharged to enable material operations to commence. Please ensure that any requirements for adherence of the above and remaining planning conditions is complied with (where relevant and applicable to the material operations to be undertaken) by your client on the planning permission site.

#### **Initiation of Development**

I note your client's intention, (subject to receipt of our above confirmation on the planning conditions) to initiate planning permission 2018/0011/DET on 14<sup>th</sup> March 2023 - prior to the expiry of said planning permission on 31<sup>st</sup> March 2023 (note - extended date by Coronavirus legislation).

We note your client's intentions to demolish 3no. outbuildings on the planning permission site (as detailed in the submitted plan dwg.no. 1835-P-00-900) and that you consider this to constitute material operations due to the inclusion of 'Demolition of existing structures...' in the planning permission description and also that Section 27 of the Town and Country Planning (Scotland) Act 1997 refers to 'demolition of a building' as being considered as constituting 'material operations'. I also note your confirmation that no ground disturbance will take place during demolition. Although we can advise informally that the above proposal appears to be a logical interpretation of the terms of the planning permission and the aforementioned section of the legislation, as advised previously, the only way for this Authority to formally confirm whether any works undertaken constitute a lawful implementation of the planning permission would be through submission of an application under Section 150 of the Planning Act (i.e. a Certificate of Lawfulness of Existing Use or Development).

Please note - Section 151(2) of the Planning (Scotland) Act states that if the planning authority is satisfied that the use or operations described in the application would be lawful if instituted or begun during the timescale of the planning permission then they shall issue a certificate. The determining issues are therefore solely matters of evidential fact and law with the onus placed on the applicant to satisfactorily demonstrate the lawfulness of the operational development.

We can provide no further confirmation on the status of this planning permission without the submission of, and our assessment of, a Section 150 application with sufficient supporting information and evidence to address the above points.

If you wish to pursue a Certificate application, at the relevant time, then you can apply online or download the necessary application forms at the government's planning portal at [www.eplanning.scot](http://www.eplanning.scot)

I hope that the above confirmations and advice is of assistance.

Please contact me if you have any queries regarding the above email.

Kind regards

Craig

**Craig Jardine**

**Development Management Planner MRTPI**

**Loch Lomond & The Trossachs National Park**

Direct: 01389 722020

Email: [craig.jardine@lochlomond-trossachs.org](mailto:craig.jardine@lochlomond-trossachs.org)

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**From:** Andrew Bayne [REDACTED]@abcpad.co.uk>

**Sent:** Wednesday, March 8, 2023 10:46 PM

**To:** Craig Jardine <[craig.jardine@lochlomond-trossachs.org](mailto:craig.jardine@lochlomond-trossachs.org)>

**Cc:** Scott Braidwood [REDACTED]@sunax.org>; [REDACTED] McLaren@ironsidefarrar.com>; [REDACTED]

[REDACTED]Blease@envirocentre.co.uk>

**Subject:** 2018/0011/DET - URGENT ACTION REQUIRED - Discharging Conditions and Start of Development

Hi Craig,

As discussed.

### **INITIATION OF DEVELOPMENT**

Mr and Mrs Jones intend to start development associated with planning permission 2018/0011/DET on the **14th March 2023**.

Please find attached the completed Notice of Initiation of Development.

To constitute a material start to development (Description of Proposed Development:

Demolition of existing structures and erection of replacement lodge, floating pontoon and boat shelter(renewal of 2012/0103/DET), as discussed this week with yourself, and in accordance with Section 27 of the Town and Country Planning (Scotland) Act 1997 the applicant/ owners will demolish and remove three dangerous outbuildings, as shown on the attached Plan (Drawing 1835-P-00-900: First Phase of Demolition). For the avoidance of any doubt, no ground disturbance will take place during demolition.

### **DISCHARGING OF SUSPENSIVE CONDITIONS**

Prior to starting, as we discussed on 26th October 2021, following on from my email on 19.10.21 and subsequent discussion week commencing 06.03.23, please find attached the information required to discharge the suspensive conditions. Below is a summary of actions in relation to the 12 conditions associated with the planning permission Application 2018/0011/DET to start development.

**Condition 1.** Permitted Development Rights - noted, [no action required prior to commencement of development - AGREED](#).

**Condition 2.** Short Term Holiday Accommodation - noted, [no action required prior to commencement of development - AGREED](#).

**Condition 3.** Warden's Accommodation - noted, [no action required prior to commencement of development - AGREED](#).

**Condition 4.** Bat Protection Measures - no works shall commence on demolition of the existing building until an emergent bat survey has been carried out, submitted to and approved in writing by the Local Planning Authority. Please find attached two reports (1) Bat Survey, October 2021; and (2) Bat Inspection Report, March 2023. Please note, both Surveys and reports confirm that there is/ was no evidence of bats in the outbuildings and they concludes that no further assessment or licensing is required for removal of the outbuildings. **REPORTS ATTACHED FOR YOUR APPROVAL.**

**Condition 5.** Tree and Woodland Protection - prior to works commencing a Tree and Woodland Protection Plan shall be submitted and approved in writing by the Local Planning Authority. The plan shall identify trees within the development boundary to be retained and a buffer area in relation to the Western Acidic Oak woodland and include measures to protect the retained trees and safeguard these woodland areas from damage by construction vehicles and activities. **TREE AND WOODLAND PROTECTION PLAN ATTACHED FOR YOUR APPROVAL.**

**Condition 6.** Otter protection - noted, [no action required prior to commencement of development - AGREED](#).

**Condition 7.** Capercaillie Protection - noted, [no action required prior to commencement of development - AGREED](#).

**Condition 8** Control of Invasive Species - prior to construction work commencing an invasive species management plan for the development site targeted at the removal of the Rhododendron shall be submitted to and approved by the Local Planning Authority. **INVASIVE SPECIES (RHODODENDRON) MANAGEMENT PLAN ATTACHED FOR YOUR APPROVAL.**

**Condition 9.** Breeding Birds - no vegetation clearance or tree felling will take place, [no action required prior to commencement of development - AGREED.](#)

**Condition 10.** Archaeological Watching Brief - prior to commencement of development, the developer shall secure the implementation of an archaeological watching brief. A method statement for the watching brief will be submitted by the applicant, agreed by the Planning Authority prior to commencement of the watching brief. Please see attached, which we understand West of Scotland Archaeology (WOSAS) has already approved. [REDACTED] Baker from Firat Archaeological Services Ltd contacted Paul [REDACTED] at WOSAS and Paul confirmed on 12th October 2021 that the attached Method Statement has been already agreed. **ARCHAEOLOGICAL MONITORING WORKS METHOD STATEMENT PREVIOUSLY SUBMITTED AND APPROVED - On this basis, Condition 10 can be discharged.**

**Condition 11.** Agreement of Materials and Specifications - noted, [no action required prior to commencement of development - AGREED.](#)

**Condition 12.** Water Supply - noted, [no action required prior to commencement of development - AGREED.](#)

**URGENT REPLY PLEASE**

We know time is tight, but as discussed could you please process and approve the information ASAP to enable the applicant to start on site Tuesday 14th March 2023.

The current planning permission expires on the 31st March 2023 and we would like to make a start on site on 14th March 2023, so anything you can do to help fast track the process would be greatly appreciated.

I would be grateful if you confirm receipt of this email and that all document files open successfully.

I look forward to hearing from you this week.

Kind regards

Andrew

**DIRECTOR**

**ABC PLANNING & DESIGN**

[REDACTED] [REDACTED]



# Notification of Initiation of Development

Town and Country Planning (Scotland) Act 1997 as amended by the Planning etc. (Scotland) Act 2006 (s 27A and 123(1))

APPLICATION NUMBER: 2018/0011/DET

DATE DECISION ISSUED: 6 December 2018

DEVELOPMENT AT: Inchconnachan, Alexandria, G83 8NU,



Please complete the table below and return this form before works start on site, preferably within a minimum of 2 weeks notice.

A person who has been given planning permission must, as soon as practical, inform the planning authority of the date on which works will start on site. Submission of this form is a statutory requirement and will assist the LLTNPA to monitor active work within its area to ensure compliance with the approved details and to identify and correct any potential problem as it arises, rather than later when correction may be more difficult and more costly. Failure to submit this notice is a breach of planning control.

Work will start on site on: 14.03.23  
Anticipated completion date: TBC  
Name of Applicant: MR & MRS JONES  
Address: 410 SUNAX LTD, 1 ROSENDAYE WAY, BLANTYRE, G72 0NJ  
Contact Details: SCOTT BRAIDWOOD [REDACTED]@SUNAX.ORG  
Name of person/builder carrying out the development: SUNAX LTD  
Address: 1 ROSENDAYE WAY, BLANTYRE, G72 0NJ  
Contact Details: SCOTT BRAIDWOOD [REDACTED]@SUNAX.ORG  
Name of Site Agent (if applicable): SUNAX LTD  
Address: AS ABOVE  
Contact Details: AS ABOVE

Please complete the above form and send to:

Development Monitoring Officer, The Loch Lomond and The Trossachs National Park Authority,  
FREEPOST SCO5909, Balloch, G83 8EG

Tel: 01389 722661, email: [planning.monitoring@lochlomond-trossachs.org](mailto:planning.monitoring@lochlomond-trossachs.org)

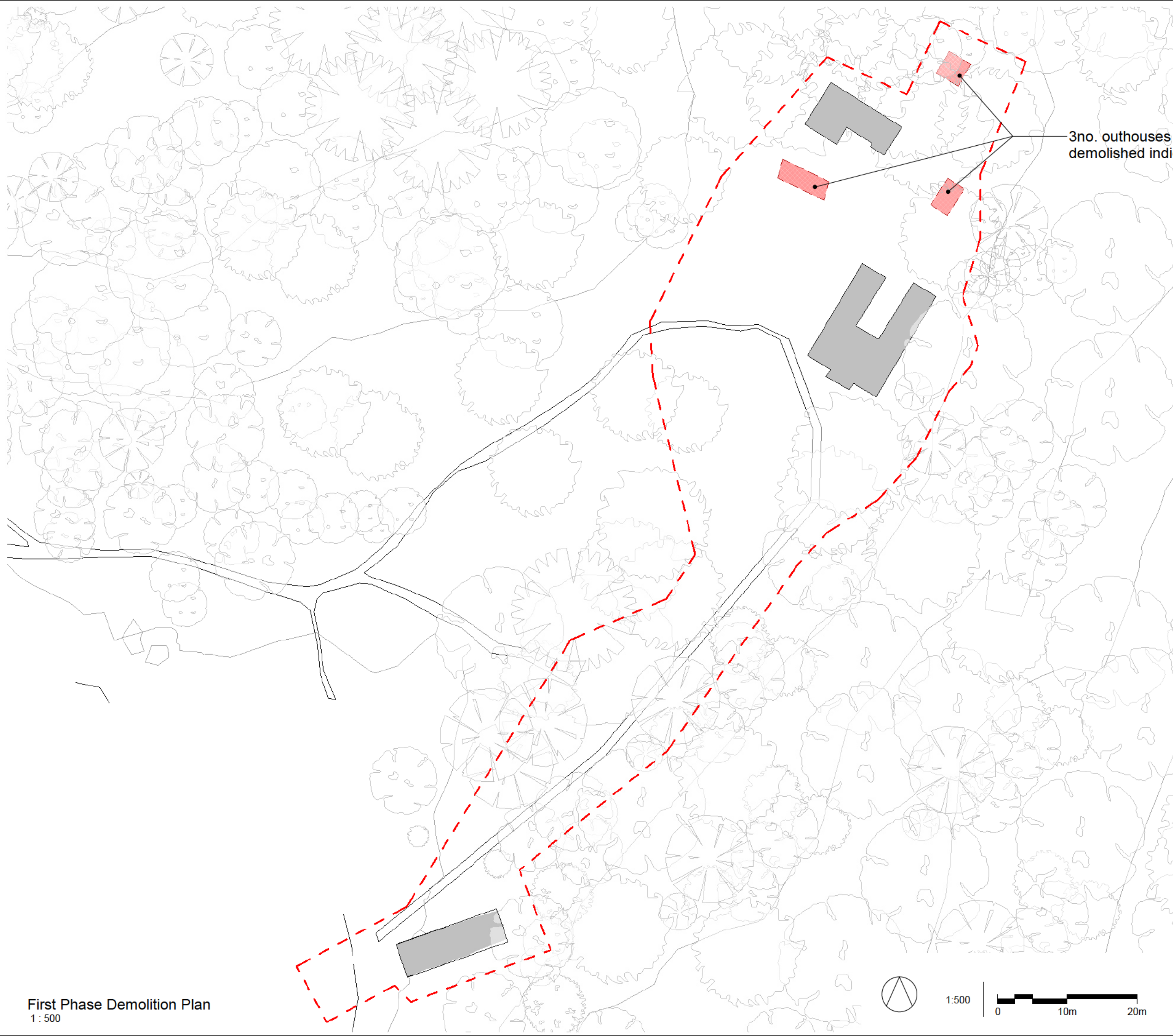
## LOCH LOMOND & THE TROSSACHS NATIONAL PARK AUTHORITY

National Park Headquarters, Carrochan, Carrochan Road, Balloch, G83 8EG Long: 4°34'24"W Lat: 56°00'12"N  
T: 01389 722600 f: 01389 722633 e: [info@lochlomond-trossachs.org](mailto:info@lochlomond-trossachs.org) w: [lochlomond-trossachs.org](http://lochlomond-trossachs.org)

Printed on paper sourced from certified sustainable forests

Page 9 of 10





3no. outhouses to be demolished indicated in red

Planning Ref:  
2018/0011/DET

GRĀS

part of  
Groves-Raines Architects Studios Ltd.  
11 Waters Close  
Edinburgh  
EH6 6RB

0131 467 7777  
practice@gras.co  
gras.co

Do not scale for construction purposes. Contractors shall work to figured dimensions only, verify all dimensions on site, and clarify all discrepancies with the architect prior to construction. Drawings to be read with all relevant specification and schedules. Copyright reserved.

Project Title  
Inchconnachan Lodge

Client  
Mr and Mrs Jones

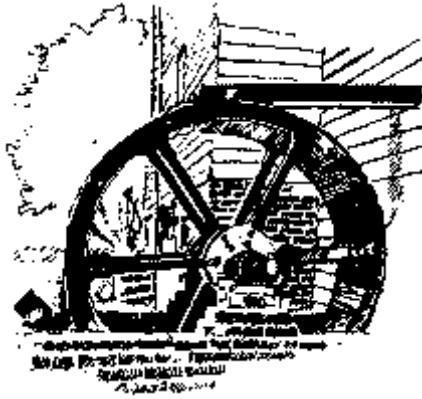
Status  
Planning  
Drawing Title  
Planning reference 2018/0011/DET -  
First Phase Demolition Plan

Date	Revision
11/02/21	

Sheet size	Scale
A3	1 : 500

Project Number	Drawing Number
1835	P-00-900
Drawn By	Checked By
PA	-

**Inchconnachan Island, Alexandria, Loch Lomond:  
Archaeological Monitoring Works**



**Method Statement**

**by Rebecca Shaw**

**submitted 31st July 2019**

**Rebecca Shaw Archaeological Services**

## 1 Introduction

This Method Statement is for a programme of archaeological works required in respect of the proposed works on Inchconnachan Island, Alexandria, Loch Lomond (Figure 1). The works comprise: demolition of existing structures and erection of replacement lodge, floating pontoon and boat shelter (planning application no. 2018/0011/ DET) (renewal of planning application no. 2012/0103/DET) (Figures 2 & 3).

Archaeological concerns have arisen as historical map sources indicates that there are recorded archaeological sites on the island. These are either of relatively modern date such as the structures to be removed or are of pre-improvement and earlier dates (pre 18<sup>th</sup> Century) but many are of unknown date. Other islands in the loch support medieval features and remains of prehistoric date are strongly suspected but not yet identified with any certainty. This previously recorded material indicates an archaeological landscape of some interest and suggests that the area as a whole has some potential for the survival of unrecorded sub-surface archaeological remains.

As any archaeological material of this type would be susceptible to damage or removal as a result of the construction activity, Loch Lomond & The Trossachs National Park Authority therefore asked for a programme of archaeological works to be undertaken as a requirement of the issued planning consent. The West of Scotland Archaeology Service (WoSAS), who advise Loch Lomond & The Trossachs National Park Authority on archaeological matters provided guidance on the nature of archaeological works required. WoSAS recommended a watching brief during the main pieces of proposed ground disturbance to observe whether there are surviving traces of earlier remains on the site and if uncovered to properly excavate and record them prior to their destruction.

The existing (lodge) structure to be demolished (Figure 2) mainly comprises a raised wooden base resting on concrete blocks and therefore has no foundations - although there is a small cellar like section to the rear to give access to pipework.

Rebecca Shaw Archaeological Services was appointed to undertake the archaeological works by The Hay Partnership (Lomond) Ltd, on behalf of their client Luss Estates Company.

## 2 Aims and Objectives

- archaeological monitoring of *all* ground breaking works associated with the proposals.
- features identified will be assessed for significance. Significant remains and deposits will be excavated and recorded, and any significant artefacts recovered. Where possible this will be accommodated within the ordinary progress of the work, but a downtime of 2 to 3hrs may be required for each discrete significant feature.
- if more complex archaeological remains are found during the initial works which cannot be dealt with adequately in this way, then this will be reported to the client, the main contractor, and the West of Scotland Archaeology Service (WoSAS) and a suitable recording strategy discussed. WoSAS will be the final judge of significance in any case and may require full excavation of features to be destroyed by the proposals
- once agreed to the satisfaction of the planning authority, the recording strategy will be submitted in writing as an addendum to the agreed MS and will be implemented in full. The client will be responsible for funding any subsequent phase of mitigation fieldwork works that may be necessary following the initial works.
- submission of a Data Structure Report within 4 weeks of completion of field work, detailing the results of the archaeological works that have been undertaken.
- submission of a Discovery & Excavation in Scotland and OASIS entries.

- post-excavation works including analysis, reporting and publication may also be required. Should these works be necessary a post excavation research document (PERD) will be submitted within 3 months of agreement of the DSR with the finalised publication being submitted within a year of the agreement of the PERD. The client will be responsible for funding these works (not costed at this stage).

### 3 Projects Works

#### *Recording*

All recording will be done using the standard method of practice: with sections drawn at 1:10; plans at 1:20 for individual features and overall site plan at 1:100 (though a larger or smaller scale may be used if appropriate); digital colour & mono photographs will be taken and all contexts, small finds and bulk samples will be given unique numbers. Any artefacts that are retrieved will be subject to standard Treasure Trove procedures.

#### *Reporting*

The Data Structure Report will present the findings of the archaeological works and copies will be sent to the West of Scotland Archaeology Service. A summary report will be submitted for inclusion in Discovery and Excavation in Scotland and in line with recent procedures works will also be reported via OASIS. The project archive will be deposited in the archive to HES Collections and a list of finds (if applicable) will be submitted to the Treasure Trove Advisory Panel.

#### *Human Remains*

Should *in-situ* human remains be uncovered all works will halt immediately and the West of Scotland Archaeology Service will be informed immediately. If necessary the Police/Fiscal's Office will also be informed and a warrant for disinterment may be required to be sought by the client. If articulated remains cannot be left *in situ* they will be excavated in accordance with Historic Environment Scotland's Policy Paper 5 on '*The treatment of human remains in Archaeology*'. Essentially if *in situ* human remains are located at a shallow depth where it is not possible to leave them *in situ* (covering them over after they have been recorded), they will be fully excavated and removed.

#### *Post-excavation work*

Should significant archaeological materials be recovered then the applicant will undertake a programme of post-excavation analysis and publication to the agreement of the West of Scotland Archaeology Service. The scope of these works will be agreed through an addendum to this document.

#### *Copyright*

Rebecca Shaw Archaeological Services will retain full copyright of any commissioned reports or any other project documents under the Copyright, Designs and Patents Act 1988. Rebecca Shaw Archaeological Services will assign copyright to the client upon request but retains the right to be identified as the author of all project documentation and reports. All works will adhere with the Chartered Institute for Archaeologists Standards and Policy Statements and Code of Conduct, and Historic Environment Scotland Policy Statements.

### 4 Project details

This Method Statement is subject to agreement by the West of Scotland Archaeology Service and approval by Loch Lomond & The Trossachs National Park Authority prior to commencement of any on site works.

The works will be undertaken by Rebecca Shaw, an experienced field archaeologist and an Associate member of the Chartered Institute for Archaeologists. The West of Scotland Archaeology Service will be kept updated on the proposed start date. The data structure report on these works will be issued to the West of Scotland Archaeology Service and for comment / approval within 4-6 weeks of the completion of on-site works.

#### Method Statement - Inchconnachan Island, Loch Lomond

If significant archaeological remains are uncovered during the works the West of Scotland Archaeology Service will determine the nature of any post-excavation works required. Their decision will be based on the results of the archaeological monitoring works.

On-site contact no. [REDACTED] [REDACTED]

Rebecca Shaw will maintain close contact with both the client and their representative and all significant finds will be reported immediately to both the client and the West of Scotland Archaeology Service.

#### Insurances

Rebecca Shaw Archaeological Services carries the necessary insurances which can be presented on request.



## Method Statement - Inchconnachan Island, Loch Lomond



Figure 1 – location map (indicated by red star)



## Method Statement - Inchconnachan Island, Loch Lomond

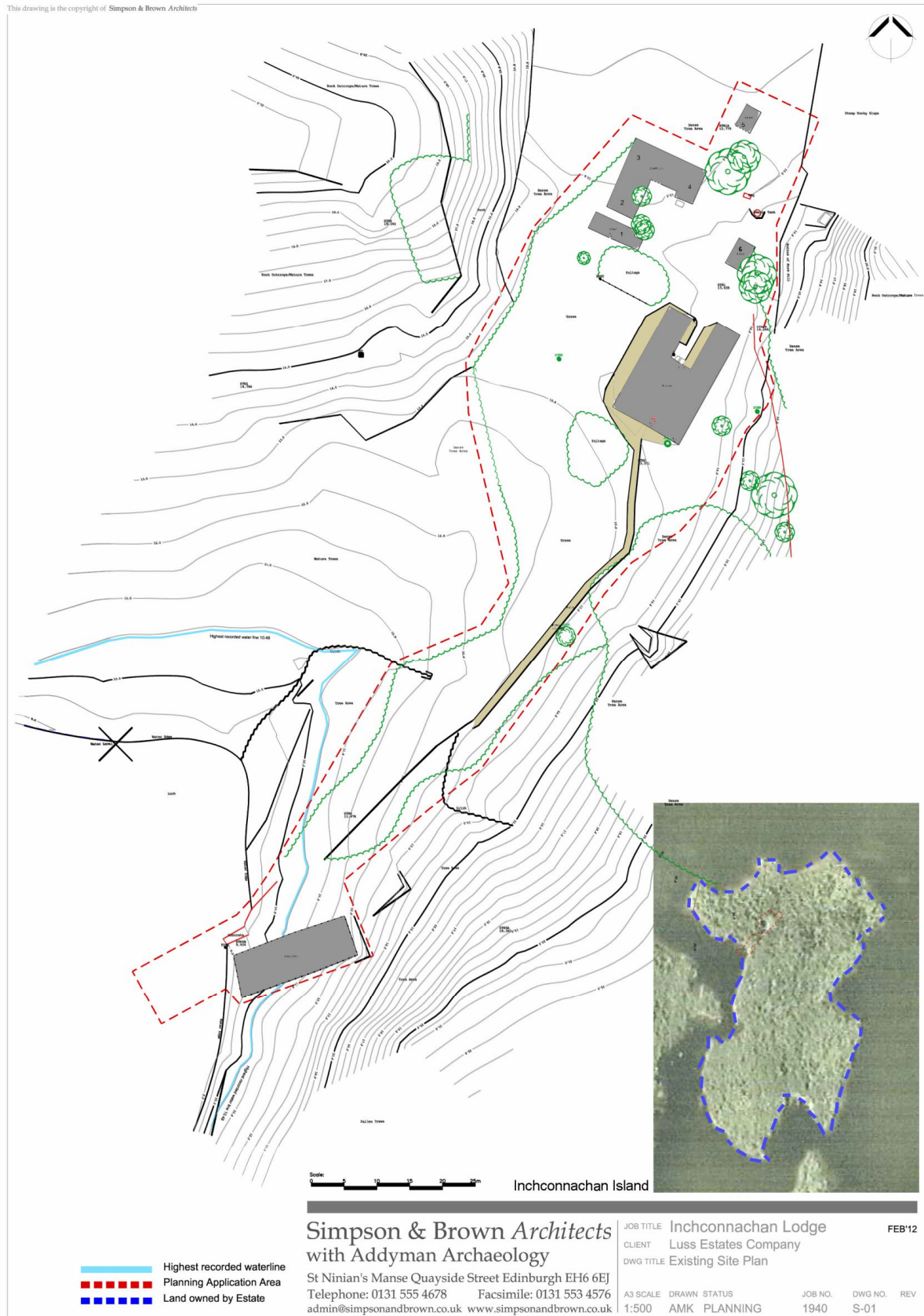


Figure 2 – existing site plan  
(kindly provided by Simpson & Brown Architects with Addyman Archaeology)

## Method Statement - Inchconnachan Island, Loch Lomond

This drawing is the copyright of Simpson & Brown Architects

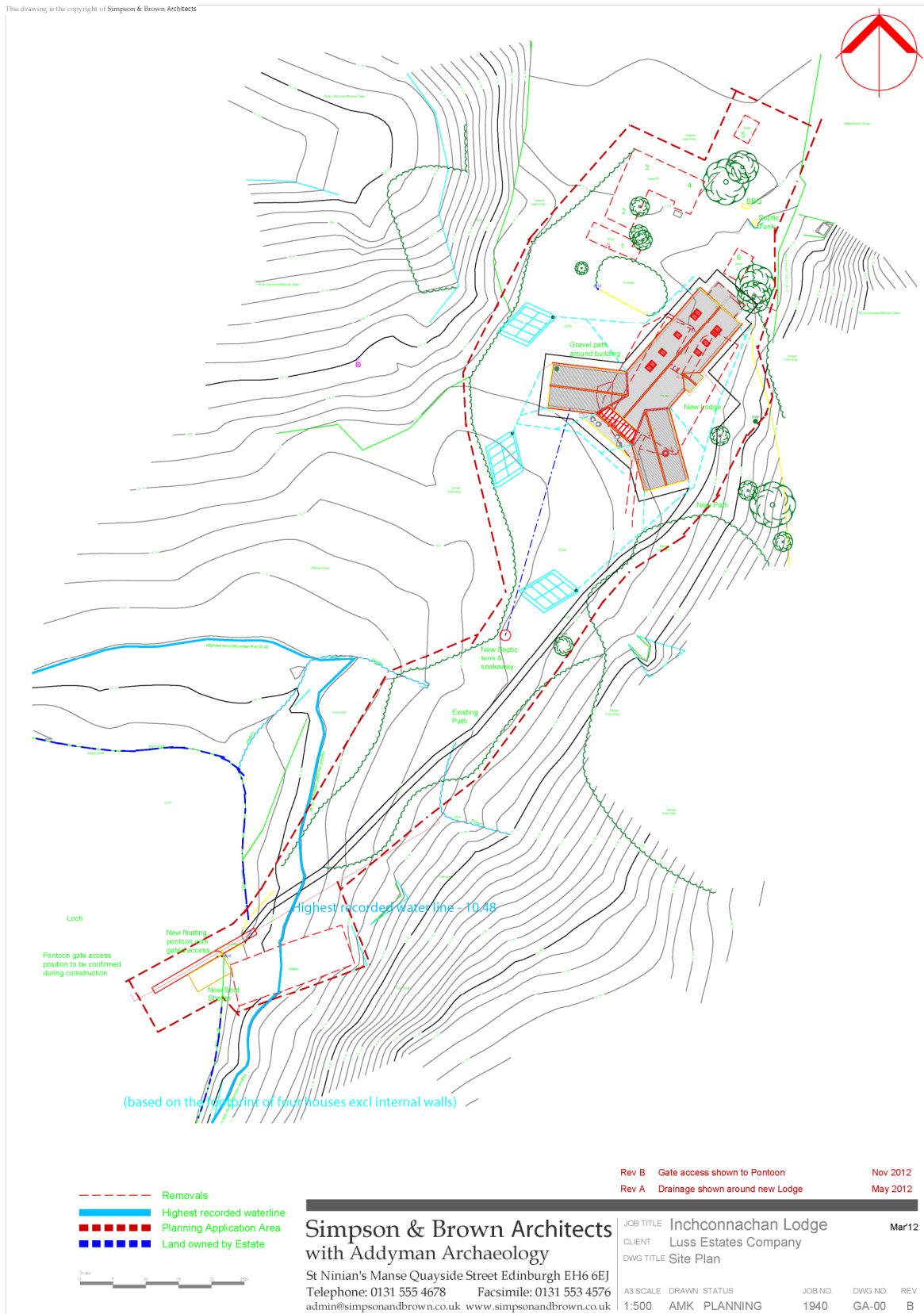


Figure 3 – proposed site plan showing new lodge  
(kindly provided by Simpson & Brown Architects with Addyman Archaeology)

## References

<i>Documentary</i> SOEn	2010	Scottish Planning Policy (SPP). <i>Archaeology</i> , Scottish Office Environmental Department.
SOEn	2011	<i>PAN 2/2011</i> , Planning & Archaeology Scottish Office Environmental Department.
HES	2016	Historic Environment Scotland Policy Statement June 2016

## Contact Details

### **Rebecca Shaw Archaeological Services**

9 Earl Place  
Ranfurly  
Bridge of Weir  
PA11 3HA

tel: 01505 612762  
mob: [REDACTED]  
email: rebeccashaw@archaeologist.com  
website: www.rebeccashawarchaeologicalservices.co.uk

### **Rebecca Shaw Archaeological Services (sub office)**

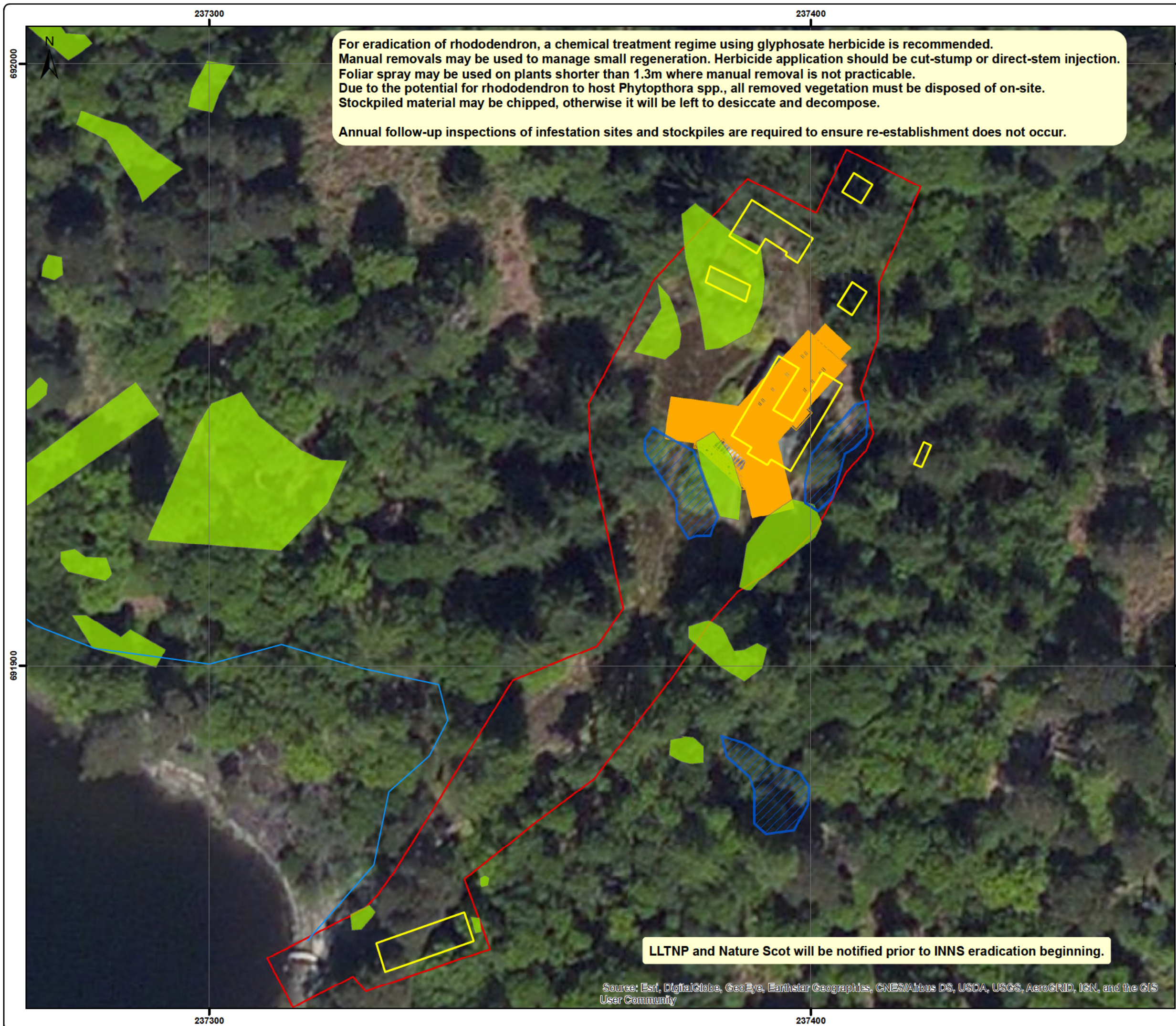
Kirriereoch  
Bargrennan  
Newton Stewart  
Wigtownshire  
DG8 6TB

### **West of Scotland Archaeology Service**

231 George Street  
Glasgow  
G1 1RX

tel: 0141 287 8334  
email: enquiries@wosas.glasgow.gov.uk





For eradication of rhododendron, a chemical treatment regime using glyphosate herbicide is recommended. Manual removals may be used to manage small regeneration. Herbicide application should be cut-stump or direct-stem injection. Foliar spray may be used on plants shorter than 1.3m where manual removal is not practicable. Due to the potential for rhododendron to host Phytophthora spp., all removed vegetation must be disposed of on-site. Stockpiled material may be chipped, otherwise it will be left to desiccate and decompose.

Annual follow-up inspections of infestation sites and stockpiles are required to ensure re-establishment does not occur.

LLTNP and Nature Scot will be notified prior to INNS eradication beginning.

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

**Legend**

- Site Boundary
- Existing Buildings
- Proposed Building
- Waterline

**Rhododendron Distribution**

- Continuous
- Scattered

Do not scale this map

**Client**  
Mr. & Mrs. Jones  
C/- Sunax Ltd  
1 Rosendale Way, Biantyre, G72 0NJ

**Project**  
Inchconnachan (Planning Ref: 2018/0011/DET)

**Title**  
For Planning - Invasive Species (Rhododendron) Management Plan (Condition 8)

<b>Status</b>		
FINAL		
<b>Drawing No.</b> 174204-GIS011	<b>Revision</b> 1	<b>Date</b> 25 Oct 2021
<b>Drawn</b> PD	<b>Checked</b> DB	<b>Approved</b> DB

**Scale**  
1:600 @A3

0 3 6 12 18 Metres

Rev	Date	Amendment	Initials
1	26/10/2021	Client Comments	PD

Craighall Business Park, Eagle Street, Glasgow, G4 9XA  
T: 0141 341 5040 E: info@envirocentre.co.uk W: www.envirocentre.co.uk



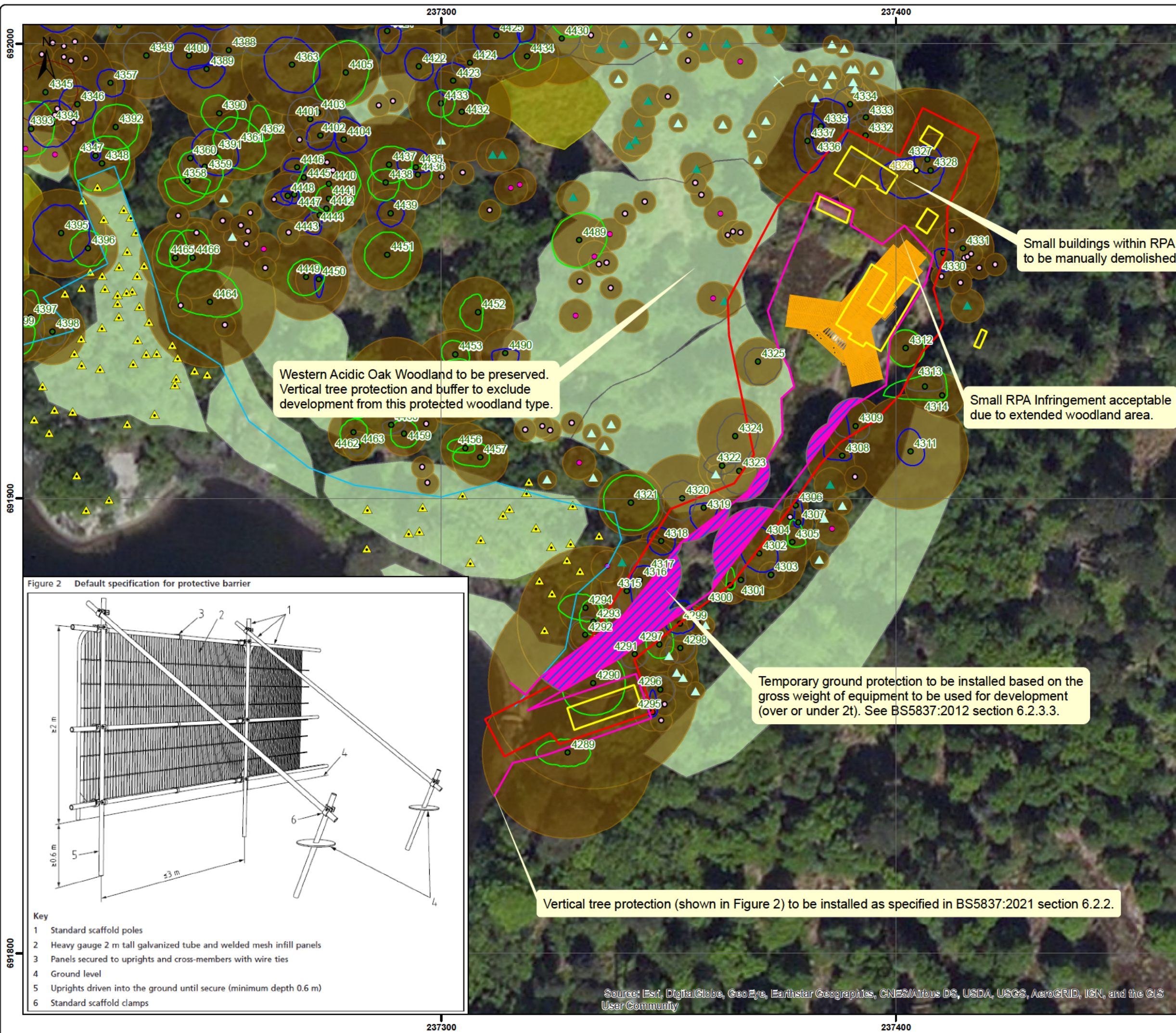
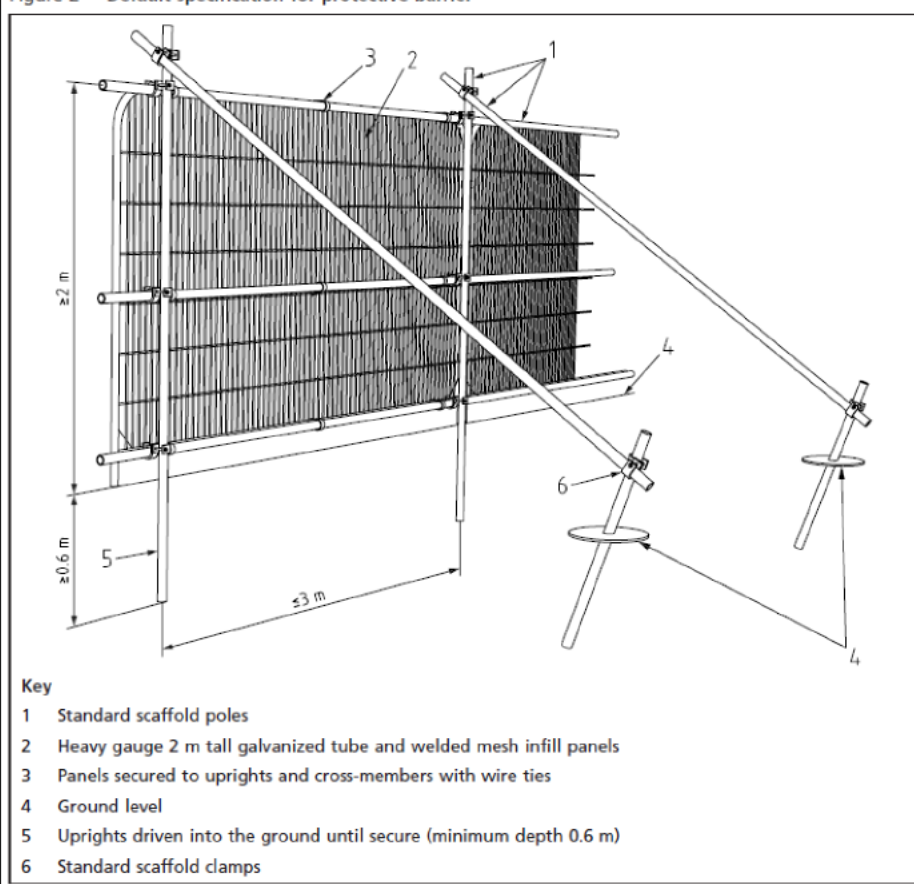


Figure 2 Default specification for protective barrier



**Legend**

- Application Area
- Vertical Tree Protection
- Ground Protection Required
- Existing Buildings
- Proposed Building
- Waterline
- Tree Groups to Retain
- Vegetation Groups

**Individually Surveyed Tree Locations**

- RPA Infringement
- To be Retained

**Tree Crown Extents & Quality Category**

- A
- B
- C
- U
- Tree RPA

**Tree Locations**

- Small Native Broadleaves
- Medium Native Broadleaves
- Small Commercial Conifers
- Incompatible Small Commercial Conifers
- Medium Commercial Conifers
- Inaccessible Trees

Do not scale this map

**Client**  
Mr. & Mrs. Jones  
C/- Sunax Ltd  
1 Rosendale Way, Bantyre, G72 0NJ

**Project**  
Inchconnachan (Planning Ref: 2018/0011/DET)

**Title**  
For Planning - Tree and Woodland  
Protection Plan (Condition 5)

Status		
FINAL		
Drawing No. 174204-GIS014	Revision -	Date 26 Oct 2021
Drawn PD	Checked DB	Approved DB

Scale  
1:800 @A3

0 4 8 16 24 Metres

Rev	Date	Amendment	Initials
-	-	-	-



## **Inchconnachan Lodge Bat Activity Survey**



**October 2021**



# Inchconnachan Lodge

## Bat Activity Survey

Client: Mr and Mrs Jones

Document number: 9774

Project number: 174204

Status: Final

Author: [REDACTED] Judd

Reviewer: [REDACTED] Blease

Date of issue: 18 October 2021

Filename: K:\174204 Inchconnachan\Outputs\Issued

### EnviroCentre Limited Office Locations:

**Glasgow**

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**Inverness**

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Registered Office: Craighall Business Park 8 Eagle Street Glasgow G4 9XA

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This report has been prepared by EnviroCentre Limited with all reasonable skill and care, within the terms of the Contract with Mr and Mrs Jones ("the Client"). EnviroCentre Limited accepts no responsibility of whatever nature to third parties to whom this report may be made known.

No part of this document may be reproduced or altered without the prior written approval of EnviroCentre Limited.



## EXECUTIVE SUMMARY

EnviroCentre Ltd was commissioned by Mr and Mrs Jones to undertake a bat activity survey at the existing lodge on the northwest corner of Inchconnachan, Loch Lomond. The survey was required to update existing baseline data on roosting bats within the lodge and outbuildings to purify conditions of planning approval 2018/0011/DET.

The lodge is a single storey, approximately square building with two parallel appendages at the north, constructed from timber and cement-fibreboard sheet roofing. To the north of the lodge is a handful of small outbuildings. All the buildings are in poor condition and are rapidly in decline due to wet surroundings, ingress of wind and water plus vandalism.

All buildings were subject to multiple internal and external checks by a licensed bat ecologist between October 2020 and June 2021. No direct evidence of bats was discovered. The outbuildings are open, timber construction housing such items as redundant sawmill equipment. Full internal inspection of the outbuildings was possible, and no roosting bats were located. The outbuildings were therefore considered to offer negligible roosting potential and not taken forward for activity survey.

The lodge building has enclosed voids within the ceiling which could not be accessed to inspect for roosting bats. Based on historic survey data indicating a roost may be present, the building's location and provision of voids where bats could shelter, and accounting for the building's deteriorating condition the lodge was considered to have moderate potential to host roosting bats.

Bat surveys of the lodge were undertaken in optimum conditions and within the peak of summer roosting activity. Approximately 12-16 soprano pipistrelle bats were observed emerging and entering the roof space of the lodge at three separate locations. It is possible that the roof space is internally connected therefore the building has been categorised as hosting a small maternity colony. Additionally, Brown long-eared and *Myotis* bats were recorded utilising the site's habitat during dusk and dawn surveys.

The known bat roost will be lost as part of the lodge demolition and a derogation licence from Nature Scot will be required. No further assessment or licensing is required for removal of the outbuildings.

This report details '*client agreed*' avoidance, mitigation and compensation strategies in a Species Protection Plan to inform the application to Nature Scot for a derogation licence to destroy the bat roost as part of the demolition process.

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# **1 INTRODUCTION**

## **1.1 Terms of Reference**

EnviroCentre Ltd was commissioned by Mr and Mrs Jones to undertake a bat activity survey at the existing lodge on the northwest corner of Inchconnachan, Loch Lomond. The survey was required to update existing baseline data on roosting bats within the lodge and outbuildings to purify conditions of planning approval 2018/0011/DET.

The 'site' location is presented in Appendix A.

## **1.2 Scope of Report**

The aim of the survey was to inform the purification of planning conditions associated with approval 2018/0011/DET. The objectives to achieve the aim were as follows:

- Test the hypothesis that active bat roosts are present at the existing lodge on Inchconnachan;
- Conduct internal and external searches of the lodge and outbuildings for field evidence of roosting bats;
- Conduct targeted dusk and dawn bat activity survey of the lodge;
- Analyse survey results including species identification and roost character;
- Propose a Species Protection Plan which can be used in application to Nature Scot licensing team.

## **1.3 Site Description**

Inchconnachan is situated within the islands of Inchtavannach to the west, and Inchmoan to the south and hosts an existing lodge at Ordnance Survey Grid Reference NS 37397 91940, surrounded by maturing spruce plantation. The lodge is a single storey, approximately square building with two parallel appendages at the north, constructed from timber and cement-fibreboard sheet roofing. To the north of the lodge is a handful of small outbuildings. All the buildings are in poor condition and are rapidly in decline due to wet surroundings, ingress of wind and water plus vandalism.

The wider landscape of the island sustains a mixture of native broadleaf and coniferous woodland as well as introduced tree and shrub species.

## **1.4 Relevant Legislation**

Bats are protected under the Wildlife and Countryside Act 1981 (as amended by the Nature Conservation (Scotland) Act 2004) and under the Conservation (Natural Habitats &c.) Regulations 1994 (as amended). Taken together, these make it offence to:

- a) Deliberately capture or intentionally take a bat;
- b) Deliberately or intentionally kill or injure a bat;
- c) To be in possession or control of any live or dead wild bat or any part of, or anything derived from a wild bat;
- d) Damage or destroy a breeding site or resting place of such an animal or intentionally or recklessly damage, destroy or obstruct access to any place that a wild bat uses for shelter or

protection (e) Intentionally or recklessly disturb any wild bat while it is occupying a structure or place that it uses for shelter or protection; *and*

- e) Deliberately disturb any bat, in particular any disturbance which is likely to impair their ability: i. to survive, breed and reproduce or to rear or nurture their young; or ii. In the case of hibernating or migratory species, to hibernate or migrate; or to affect significantly the local distribution or abundance of the species to which they belong.

### 1.4.1 Licensing

For a licence to be issued these three tests must be satisfied:

1. the development is 'in the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment';
2. That there is 'no satisfactory alternative'; *and*
3. That the derogation (i.e. any permission/licence granted) is 'not detrimental to the maintenance of the populations of the species concerned at a favourable conservation status in their natural range'.

To obtain a licence a Method Statement is required that identifies the activities to be undertaken, the location of all resting sites (e.g. bat roosts), the potential effects and details of the proposed mitigation.

## 1.5 Report Usage

The information and recommendations contained within this report have been prepared in the specific context stated above and should not be utilised in any other context without prior written permission from EnviroCentre.

If this report is to be submitted for regulatory approval more than 12 months following the report date, it is recommended that it is referred to EnviroCentre for review to ensure that any relevant changes in data, best practice, guidance or legislation in the intervening period are integrated into an updated version of the report.

Whilst the Client has a right to use the information as appropriate, EnviroCentre Ltd retain ownership of the copyright and intellectual content of this report.

EnviroCentre do not accept liability to any third party for the contents of this report unless written agreement is secured in advance, stating the intended use of the information. EnviroCentre accept no liability for use of the report for purposes other than those for which it was originally provided, or where EnviroCentre have confirmed it is appropriate for the new context.

## 2 METHODS

The survey was designed and undertaken in reference to the Bat Conservation Trust: Bat Surveys Good Practice Guidelines<sup>1</sup>.

### 2.1 Desk Study

In order to investigate the potential for bat presence on site or within / out with survey area, a desk study was conducted in advance of the field survey, in July 2021. The following sources were checked:

- Existing knowledge of the site;
- NBN Atlas<sup>2</sup> for records of bats which are commercially available; and
- SNH's SiteLink<sup>3</sup> website for information on statutory designated sites (within 5km of the site).

### 2.2 Preliminary Roost Assessment

Multiple internal and external searches of the lodge and outbuildings were undertaken by EnviroCentre Principal Ecologist, Douglas Blease, between October 2020 and June 2021.

An additional internal and external inspection of the building on site on the 14<sup>th</sup> of July 2021, undertaken by EnviroCentre ecologist, Ben Kelly.

These inspections were made to search for field signs of bats and identify any potential roost entry features. Table 2-1 lists the common indicators used to determine the actual or potential presence of roosting bats this was based on the criteria outlined by the Bat Conservation Trust (BCT)<sup>4</sup>.

**Table 2-1:** Active Bat Roost Indicators and PRFs in Buildings

Signs indicating possible use by bats	Features of buildings frequently used as bat roosts
Live bats or dead specimens	Gaps in windowsills and window panes
Droppings and their relative freshness, shape and size	Underneath peeling paintwork or lifted rendering
Feeding remains including the amount and type of prey	Behind hanging tiles, weatherboarding, eaves, soffit boxes, fascia and lead flashing
Urine splashes and fur-oil straining around crevices and holes	Under tiles and slates
Distinctive smell of bats	Gaps in brickwork and stonework

According to their suitability to host roosting, commuting and foraging bats, structures and habitats were categorised as follows:

<sup>1</sup> Collins, J. (ed.) (2016). Bat Surveys for professional Ecologists: Good Practice Guidelines, 3rd edition, Bat Conservation Trust (Accessed July 2021)

<sup>2</sup> NBN Atlas Available at: NBN Atlas - UK's largest collection of biodiversity information (Accessed July 2021)

<sup>3</sup> SNH (2009). SiteLink, available from <http://gateway.snh.gov.uk> (Accessed July 2021).

<sup>4</sup> Collins, J. (ed.) (2016). Bat Surveys for professional Ecologists: Good Practice Guidelines, 3rd edition, Bat Conservation Trust (Accessed July 2021)

**Table 2-2:** Categorising PRFs in Structures and the Suitability of Commuting and Foraging Habitats

<b>Suitability</b>	<b>Roosting Features</b>	<b>Commuting and Foraging Habitats</b>
<b>High</b>	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.	<p>Continuous high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting bats such as river valleys, streams, hedgerows, lines of trees and woodland edge.</p> <p>High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.</p>
<b>Moderate</b>	A structure with one or more potential roost sites that could be used by bats due their size, shelter, protection, conditions and/or surrounding habitat but unlikely to support a roost of high conservation status.	<p>Continuous habitat connected to the wider landscape that could be used by bats for commuting such as lines of trees and scrub or linked back gardens.</p> <p>Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.</p>
<b>Low</b>	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis.	<p>Habitat that could be used by small numbers of commuting bats such as a fragmented hedgerow or un-vegetated stream, but isolated.</p> <p>Suitable but isolated habitat that could be used by small numbers of foraging bats such as a lone tree or a patch of scrub.</p>
<b>Negligible</b>	A structure with negligible features unlikely to be used by roosting bats.	Negligible habitat features on site unlikely to be used by foraging or commuting bats.

## 2.3 Bat Activity Survey

Bat activity surveys aim to establish if a roost is present within, or adjacent to the site and to identify foraging and commuting routes in the surrounding landscape. This data used to inform the requirement for, and design of, mitigation and / or compensation, in line with current wildlife legislation. The survey effort (i.e. number of survey visits) is scoped from the potential of the structures to host roosting bats.

Accurate numbers of bats can be difficult to identify during flight, therefore each bat pass (i.e. each call identified using a bat detector) is recorded to species level with an indication of the time it was identified, its location and behaviour. This information is gathered to characterise activity and any roosts discovered at the site.



Frequency division bat detectors (Bat Box Duet) coupled with audio recorders were used to gather digital sound file samples of bat activity during the surveys. One time expansion recorder (EMTouch 2) was used to gather recordings of bat activity throughout the survey. Post survey analysis was conducted to confirm species identification.

During the activity survey, surveyors are positioned at vantage points to gain visual and audible coverage of all features of a structure which offer potential roosting features for bats. The survey team comprised EnviroCentre Ecologists: [REDACTED] Kelly, [REDACTED] Judd (dusk only), [REDACTED] Zabalegui, supported by contractor [REDACTED] Turnbull (dawn only), covering three vantage points. Surveyor vantage points are shown in Appendix B.

### **2.3.1 Dusk Activity Survey**

Dusk activity surveys locate bats emerging from roost sites. The dusk survey was conducted on the 14<sup>th</sup> of July 2021 and commenced 15 minutes before sunset and ceased 1.5 hours after sunset, when surveyors were satisfied, enough time had elapsed to encapsulate any late emerging bats within the survey results.

The dusk survey was undertaken during suitable weather conditions for bat activity, dry conditions with 88% humidity, 80% cloud cover, a temperature of 16°C throughout the survey with slight wind 12-15 mph.

### **2.3.2 Dawn Activity Survey**

Dawn activity surveys locate bats emerging from roost sites. The dawn survey was conducted on the 30<sup>th</sup> of July 2021 and commenced 2 hours before sunrise and ceased 15 minutes after sunrise, when surveyors were satisfied, enough time had elapsed to encapsulate any late bats re-entering within the survey results.

The dusk survey was undertaken during suitable weather conditions for bat activity, dry conditions with 90% humidity, 90% cloud cover, a temperature of 13°C throughout the survey with slight wind 3mph.

### **2.3.3 Constraints**

Desk studies are limited by the reliability of third-party information and the geographical availability of biological and / or ecological records and data. The absence of a species from biological records cannot be taken to represent actual absence. Species distribution patterns should be interpreted with caution as they may reflect survey / report effort rather than actual distribution.

### **2.3.4 Disclaimer**

Bats are transient species and utilise a variety of habitats and structures throughout their active period (April – September). This bat survey forms a 'snap-shot' of how bats were found to utilise the site in mid- July 2021. Due to the rapidly declining condition of the lodge, it cannot be assured that this baseline will remain consistent in the medium to long term.

## 3 RESULTS

### 3.1 Desk Study

EnviroCentre are of the understanding that a small number of roosting bats were discovered in the lodge during study to inform the planning application referenced 2018/0011/DET. EnviroCentre are also cognisant of the fact that the site is surrounded by suitable habitat for bat activity including numerous trees which could contain roosting bats.

Records were limited to 1 bat species within a 5km buffer of the site were returned during the desk study from NBN Atlas:

- Common Pipistrelle (*Pipistrellus pipistrellus*), recorded year 2020, 456m south- east from site, recorded by Bat Conservation Trust as a Human Observation during NBMP Sunset- Sunrise Survey at GR: NS3791.

The site is within a 5km radius of numerous designated sites identified:

- Loch Lomond and the Trossachs National Park
- Loch Lomond National Scenic Area (NSA)
- Loch Lomond Special Protection Area (SPA)
- Loch Lomond Woods Special Area of Conservation (SAC)
- Inchtavannach and Inchconnachan Site of Special Scientific Interest (SSSI)

### 3.2 Preliminary Roost Assessment

The following results should be read in conjunction with Appendix C: Photographic Record.

#### 3.2.1 Building Descriptions

The building on site is a derelict bungalow (Photo 1 and 2) supported on pad and beam above relatively damp ground. The structure is constructed using timber frame and thin wooden cladding. The roof is single skin cement-fibreboard and there appears to be a void between ceiling the roof covering which may hold some form of dated/aging insulation. Access to the roof by bats can be made via the deteriorating wooden fascia.

The building is subject to intense weathering and periodic vandalism including occasional small fires and as such wall and roof voids are becoming increasingly open to the elements over time. The outbuildings are mostly open to the elements or have lost their doors and windows (Photo 3 and 4).

The lodge and all outbuildings were thoroughly searched on multiple site visits to Inchconnachan between October 2020 and July 2021 and no physical evidence of roosting bats was noted. The outbuildings are open, timber construction housing such items as redundant sawmill equipment. Full internal inspection of the outbuildings was possible, and no roosting bats were located throughout these site visits across a range of seasons.

The lodge building has enclosed voids within the ceiling which could not be accessed to inspect for roosting bats. Based on historic survey data indicating a roost may be present, the building's location and provision of voids where bats could shelter, and the PRA accounts for the lodge's rapidly deteriorating condition.

### 3.2.2 Habitat

The lodge building is surrounded in the north by maturing plantation spruce woodland. The southern aspect contains mature rhododendron shrubbery, leading to a glade shrouded by mature mixed woodland and eventually the open water of a sheltered bay. The wider habitat is a mixed broadleaf woodland containing a variety of species and relatively diverse woodland structure. Despite the infusion of competitive non-native vegetation species, the structure of the habitat, lack of artificial light, assumed clean air quality would suggest good quality prey resource for bats.

### 3.2.3 Preliminary Assessment

Based on the habitat type and the available potential roost features, plus the historic knowledge that bats may be present, the lodge building would normally be categorised as of High suitability to host bats i.e., *A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions, and surrounding habitat.*

However, given the lodge's current condition and rate of decline even in the time between initial inspection in October 2020 and July 2021, the lodge building is currently considered to be reducing in suitability and falls into the definition of **Moderate** i.e., *A structure with one or more potential roost sites that could be used by bats due their size, shelter, protection, conditions and/or surrounding habitat but unlikely to support a roost of high conservation status.*

The outbuildings are considered **Negligible** i.e., *a structure with negligible features unlikely to be used by roosting bats;* due to a lack of roost features and multiple thorough internal searches throughout various seasons, presenting no evidence of roosting bats, and therefore these outbuildings were not taken forward for activity survey.

## 3.3 Bat Activity Survey

Bat roost emergence and re-entry locations were discovered in the main lodge building during the dusk and dawn studies, summarised as follows (detailed survey results are available in Appendix D):

### Dusk Key Findings

- Five soprano pipistrelle (*Pipistrellus pygmaeus*) bats were recorded emerging from the south facing vestibule apex (Photo 5).
- Five soprano pipistrelle bats were recorded emerging from the north west gable (Photo 6).
- Two soprano pipistrelle bats were recorded emerging from the north east gable (Photo 7).
- Persistent common and soprano pipistrelle foraging and commuting was recorded throughout the survey.
- One Brown long-eared bat (*Plecotus auritus*) and one *Myotis sp.* were identified and observed commuting over the site later in the survey period.

### Dawn Key Findings

- Persistent common and soprano pipistrelle foraging and commuting was recorded throughout the survey.
- A Brown long-eared bat(s) was observed foraging and commuting over the site.
- Numerous soprano pipistrelle bats observed in flight simultaneously before re-entry to roosts.
- Ten soprano pipistrelle bats entered the roost on the south facing vestibule apex.

- Four soprano pipistrelle bats entered the roost on the north west gable.
- Two soprano pipistrelle bat entered the roost on the north east gable.

## **4 ASSESSMENT**

### **4.1 Assessment**

#### **4.1.1 Building**

Based on the results gathered during optimal conditions and within a robust survey timeframe, it is assessed that the main lodge building hosts a small maternity roost of soprano pipistrelle bats. It is feasible that the roof void is continuous and therefore access is not reserved to one location, or that opportunities for thermoregulation are available.

Due to the thin and relatively uninsulated nature of the construction, it is not likely that the building can sustain constant cool and humid temperatures required for winter torpor. Therefore, the building is not considered suitable as a hibernacula. Large trees with deep cavities, and structures in the wider landscape are more likely to provide such conditions.

#### **4.1.2 Habitat**

The habitat provides good foraging and commuting resource for adaptable species such as *Pipistrelle* sp. bats. The landscape hosts other species such as Brown long-eared and *Myotis* sp. although these can be more selective in their roosting and foraging preferences and it is assumed would thrive in a habitat less affected by introduced exotic vegetation such as spruce plantation which, whilst creating dark and connected corridors, may be reducing floral diversity, homogenising woodland structure and therefore reducing invertebrate diversity which is important for species seeking to exploit a niche in an ecosystem.

### **4.2 Potential Impacts to Bats**

The known bat roost will be lost as part of the demolition of the main lodge-building. No impacts to bats are predicted through removal of the outbuildings.

The Species Protection Plan provided in Section 5 is designed to reduce any negative impacts on roosting, commuting and foraging bats. It is considered that if these measures are applied the works will not affect the overall favourable conservation status of the local bat population. As such, future development activities are not considered to affect bats in a manner that is, or in circumstances which are, likely to significantly affect the local distribution or abundance of the species.

### **4.3 Licensing**

A licence from Nature Scot will be required to proceed with demolition of the lodge building and therefore loss of a soprano pipistrelle maternity roost.

No licensing is required to remove the outbuildings based on their negligible potential to host roosting bats.

### 4.3.1 Licensing Tests

For a licence to be issued these three tests must be satisfied:

1. *the development is 'in the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment';*

The development will see the removal of a building which is subject to persistent vandalism, cannot be effectively excluded from human use, and is derelict to a point of being a danger of injury to visitors on the island.

2. *That there is 'no satisfactory alternative';*

The feasibility study of the island suggested that there is no satisfactory alternative which includes retention and restoration of this building maintaining the soprano pipistrelle roost intact.

3. *That the derogation (i.e. any permission/licence granted) is 'not detrimental to the maintenance of the populations of the species concerned at a favourable conservation status in their natural range'.*

Although this building may have been capable at one time of hosting a much larger roost, the data shows that just 12-16 soprano pipistrelle bats are present (perhaps 24-30 total including young assuming some independent flight at dawn).

The disruption of their current normal behaviour can be carefully managed through a species protection plan to avoid death and injury, followed by supplementary roost provision and habitat restoration leading to no detriment regarding their favourable conservation status within their natural range.

## 4.4 Further Survey

Should predicted demolition of the lodge be delayed, this survey data should be reviewed and updated annually beginning in May-August 2022 to maintain a valid baseline.

## 5 SPECIES PROTECTION PLAN

The following should be considered alongside a derogation licence application to Nature Scot prior to works associated with, and demolition of, the existing lodge:

1. A bat licenced ecologist should be appointed to oversee works associated with known roost locations.
2. Demolition should occur in the winter months, October onwards, and completed prior to March/April to avoid the presence of roosting bats.
3. Prior to demolition a series of bat boxes should be installed upon nearby trees which do not already contain potential bat roost features (trees which will be retained, not removed).  
Examples below:
  - a. [https://www.nhbs.com/4/practical-conservation-equipment?q=&hPP=60&idx=titles&p=0&fR%5Bhide%5D%5B0%5D=false&fR%5Bhide%5D%5B1%5D=false&fR%5Blive%5D%5B0%5D=true&fR%5Blive%5D%5B1%5D=true&fR%5Bshops.id%5D%5B0%5D=4&fR%5Bshops.id%5D%5B1%5D=4&hFR%5Bsubjects\\_equipment.lvl1%5D%5B0%5D=Bat%20Boxes%20%3E%20Bat%20Boxes%20for%20External%20Walls&qview=176914](https://www.nhbs.com/4/practical-conservation-equipment?q=&hPP=60&idx=titles&p=0&fR%5Bhide%5D%5B0%5D=false&fR%5Bhide%5D%5B1%5D=false&fR%5Blive%5D%5B0%5D=true&fR%5Blive%5D%5B1%5D=true&fR%5Bshops.id%5D%5B0%5D=4&fR%5Bshops.id%5D%5B1%5D=4&hFR%5Bsubjects_equipment.lvl1%5D%5B0%5D=Bat%20Boxes%20%3E%20Bat%20Boxes%20for%20External%20Walls&qview=176914)
  - b. [https://www.nhbs.com/4/practical-conservation-equipment?q=&hPP=60&idx=titles&p=0&fR%5Bhide%5D%5B0%5D=false&fR%5Bhide%5D%5B1%5D=false&fR%5Blive%5D%5B0%5D=true&fR%5Blive%5D%5B1%5D=true&fR%5Bshops.id%5D%5B0%5D=4&fR%5Bshops.id%5D%5B1%5D=4&hFR%5Bsubjects\\_equipment.lvl1%5D%5B0%5D=Bat%20Boxes%20%3E%20Bat%20Boxes%20for%20External%20Walls&qview=158629](https://www.nhbs.com/4/practical-conservation-equipment?q=&hPP=60&idx=titles&p=0&fR%5Bhide%5D%5B0%5D=false&fR%5Bhide%5D%5B1%5D=false&fR%5Blive%5D%5B0%5D=true&fR%5Blive%5D%5B1%5D=true&fR%5Bshops.id%5D%5B0%5D=4&fR%5Bshops.id%5D%5B1%5D=4&hFR%5Bsubjects_equipment.lvl1%5D%5B0%5D=Bat%20Boxes%20%3E%20Bat%20Boxes%20for%20External%20Walls&qview=158629)
  - c. [https://www.nhbs.com/4/practical-conservation-equipment?q=&hPP=60&idx=titles&p=0&fR%5Bhide%5D%5B0%5D=false&fR%5Bhide%5D%5B1%5D=false&fR%5Blive%5D%5B0%5D=true&fR%5Blive%5D%5B1%5D=true&fR%5Bshops.id%5D%5B0%5D=4&fR%5Bshops.id%5D%5B1%5D=4&hFR%5Bsubjects\\_equipment.lvl1%5D%5B0%5D=Bat%20Boxes%20%3E%20Bat%20Boxes%20for%20External%20Walls&qview=219954](https://www.nhbs.com/4/practical-conservation-equipment?q=&hPP=60&idx=titles&p=0&fR%5Bhide%5D%5B0%5D=false&fR%5Bhide%5D%5B1%5D=false&fR%5Blive%5D%5B0%5D=true&fR%5Blive%5D%5B1%5D=true&fR%5Bshops.id%5D%5B0%5D=4&fR%5Bshops.id%5D%5B1%5D=4&hFR%5Bsubjects_equipment.lvl1%5D%5B0%5D=Bat%20Boxes%20%3E%20Bat%20Boxes%20for%20External%20Walls&qview=219954)
4. Prior to demolition, the known roost locations shall be carefully opened and inspected by an ecologist. Should bats be discovered then small numbers of bats (<5 no.) can be transferred by the ecologist to the pre-installed boxes.
5. Should greater numbers of bats be found, or torpid bats, then Nature Scot will be informed and the works programme may be altered.
6. Once confident that no bats are at risk of injury or death from demolition works, the building and known roost locations shall be quickly rendered unsuitable for roosting bats.
7. If bats are discovered during works or witnessed flying during daylight hours then works in that area shall cease until an ecologist can provide advice.
8. Artificial lighting used on site shall only be directed towards the given area of work and will aim to avoid treelines and the surface of water.
9. Trees hosting bat boxes and trees highlighted in supplementary reports to present cavities capable of hosting roosting bats in the site shall be afforded a 20m buffer zone from items such as generators, percussive instruments etc., unless it can be confirmed by the ecologist that at that time no roosting bats are present.

Suggested additional measures:

1. Any replacement building is likely to attract opportunistic roosting bats and to discourage future human/bat conflicts it is suggested that discreet inbuilt roosting provision is included in design. Examples below:
  - a. [https://www.nhbs.com/4/practical-conservation-equipment?q=&hPP=60&idx=titles&p=0&fR%5Bhide%5D%5B0%5D=false&fR%5Bhide%5D%5B1%5D=false&fR%5Blive%5D%5B0%5D=true&fR%5Blive%5D%5B1%5D=true&fR%5Bshops.id%5D%5B0%5D=4&fR%5Bshops.id%5D%5B1%5D=4&hFR%5Bsubjects\\_equipment.lvl1%5D%5B0%5D=Bat%20Boxes%20%3E%20Bat%20Boxes%20for%20External%20Walls&qview=176914](https://www.nhbs.com/4/practical-conservation-equipment?q=&hPP=60&idx=titles&p=0&fR%5Bhide%5D%5B0%5D=false&fR%5Bhide%5D%5B1%5D=false&fR%5Blive%5D%5B0%5D=true&fR%5Blive%5D%5B1%5D=true&fR%5Bshops.id%5D%5B0%5D=4&fR%5Bshops.id%5D%5B1%5D=4&hFR%5Bsubjects_equipment.lvl1%5D%5B0%5D=Bat%20Boxes%20%3E%20Bat%20Boxes%20for%20External%20Walls&qview=176914)



[e%5D%5B1%5D=false&fR%5Blive%5D%5B0%5D=true&fR%5Blive%5D%5B1%5D=true&fR%5Bshops.id%5D%5B0%5D=4&fR%5Bshops.id%5D%5B1%5D=4&hFR%5Bsubjects\\_equipment.lvl1%5D%5B0%5D=Bat%20Boxes%20%3E%20Integrated%20Bat%20Boxes](#)

- b. [https://www.nhbs.com/4/practical-conservation-equipment?q=&hPP=60&idx=titles&p=0&fR%5Bhide%5D%5B0%5D=false&fR%5Bhide%5D%5B1%5D=false&fR%5Blive%5D%5B0%5D=true&fR%5Blive%5D%5B1%5D=true&fR%5Bshops.id%5D%5B0%5D=4&fR%5Bshops.id%5D%5B1%5D=4&hFR%5Bsubjects\\_equipment.lvl1%5D%5B0%5D=Bat%20Boxes%20%3E%20Bat%20Boxes%20for%20External%20Walls](https://www.nhbs.com/4/practical-conservation-equipment?q=&hPP=60&idx=titles&p=0&fR%5Bhide%5D%5B0%5D=false&fR%5Bhide%5D%5B1%5D=false&fR%5Blive%5D%5B0%5D=true&fR%5Blive%5D%5B1%5D=true&fR%5Bshops.id%5D%5B0%5D=4&fR%5Bshops.id%5D%5B1%5D=4&hFR%5Bsubjects_equipment.lvl1%5D%5B0%5D=Bat%20Boxes%20%3E%20Bat%20Boxes%20for%20External%20Walls)

## **APPENDICES**

## **A      SITE LOCATION**





LOCH LOMOND AND THE  
TROSSACHS NATIONAL PARK  
05 APR 2012  
HEADQUARTERS



Scale: 0 5 10 15 20 25m

Inchconnachan Island



- Highest recorded waterline
- Planning Application Area
- Land owned by Estate

Simpson & Brown Architects  
with Addyman Archaeology

St Ninian's Manse Quayside Street Edinburgh EH6 6EJ  
Telephone: 0131 555 4678 Facsimile: 0131 553 4576  
admin@simpsonandbrown.co.uk www.simpsonandbrown.co.uk

JOB TITLE Inchconnachan Lodge  
CLIENT Luss Estates Company  
DWG TITLE Existing Site Plan

FEB'12

A3 SCALE	DRAWN	STATUS	JOB NO.	DWG NO.	REV
1:500	AMK	PLANNING	1940	S-01	



## B SURVEYOR VANTAGE POINT



## C PHOTOGRAPHIC RECORD



Photo 1: Exiting lodge front (south)



Photo 2: Exiting lodge rear (North)



Photo 3: Sawmill outbuilding



Photo 4: Additional outbuilding



Photo 5: South vestibule apex roost location



Photo 6: N. west and N. east gable roost entrances

## D SURVEY RESULTS

Dusk Bat Activity Survey		
<b>Date</b> 14/07/2021	<b>Weather</b> Dry conditions with 88% humidity, 80% cloud cover with slight wind 12-15 mph. <b>Start Temperature</b> 16°C <b>Finish Temperature</b> 16°C	
<b>Sunset</b> 21:56	<b>Start Time</b> 21:41	<b>Finish Time</b> 23:26
North aspect		
<b>Time</b> 21:52 22:02 22:04 22:05 22:06 22:08 22:10 22:11 22:15 – 22:34 22:26 22:40 22:42 22:46 22:51 22:55 22:56 23:14 23:21	<b>Activity</b> 1x Soprano pipistrelle emergence from west gable 1x Soprano pipistrelle emergence from west gable 2x Soprano pipistrelle emergence from east gable 3x Soprano pipistrelle emergence from west gable 2x Soprano pipistrelle commuting over top of the house 2x Soprano pipistrelle Soprano pipistrelle foraging over east of the house 3x Soprano pipistrelle passes Soprano pipistrelle continuous foraging in front of the house Soprano pipistrelle flying from south to north over the house Brown Long-Eared commuting over site Soprano pipistrelle passing Soprano pipistrelle and Common pipistrelle foraging Soprano pipistrelle foraging 2x Soprano pipistrelle passes Soprano pipistrelle passing Soprano pipistrelle passing Soprano pipistrelle emergence, Myotis flying south to north over site	
South aspect		
<b>Time</b> 21:53 22:02 22:03 22:10 22:16 22:22 22:27 22:29 22:42 23:14	<b>Activity</b> 1x Soprano pipistrelle emergence from vestibule apex 2x Soprano pipistrelle emergence from vestibule apex 1x Soprano pipistrelle emergence from vestibule apex 1x Common pipistrelle commuting west to east Common pipistrelle commuting south to west Common pipistrelle foraging Common pipistrelle commuting south to north Common soprano foraging Soprano pipistrelle foraging Soprano pipistrelle foraging	



Dawn Bat Activity Survey		
<b>Date</b> 30/07/2021	<b>Weather</b> Still with 3mph breeze, dry, 90% cloud cover, 90% humidity. <b>Start Temperature</b> 13°C <b>Finish Temperature</b> 13°C	
<b>Sunrise</b> 05:18	<b>Start Time</b> 03:48	<b>Finish Time</b> 05:33
<b>North aspect</b>		
<b>Time</b>	<b>Activity</b>	
04:18	Soprano pipistrelle pass	
04:20	Soprano pipistrelle pass	
04:21	Soprano pipistrelle foraging	
04:25	2x Soprano pipistrelle flying west to east over building	
04:27	3x Soprano pipistrelle foraging over building	
04:29	Soprano pipistrelle pass in woodland behind	
04:32	2x BLE passes above surveyor	
04:33	1x BLE, 2X Soprano pipistrelle circling over west gable	
04:36	2x Soprano pipistrelle commuting	
04:37	2x Soprano pipistrelle circling over west gable	
04:38	5x Soprano pipistrelle foraging over building and west gable	
04:39	2x Soprano pipistrelle commuting from woodland	
04:40	6x Soprano pipistrelle circling fast over west gable	
04:45 – 5:03	2x Soprano pipistrelle entrance in west gable	
05:05	2x Soprano pipistrelle entrance in west gable	
05:11	2x Soprano pipistrelle entrance in east gable	
<b>South aspect</b>		
<b>Time</b>	<b>Activity</b>	
04:09	2x Soprano pipistrelle very quiet foraging	
04:14	Soprano pipistrelle commuting	
04:18 – 04:28	2x Soprano pipistrelle passes	
04:30	Common pipistrelle commuting	
04:30	Soprano pipistrelle commuting	
04:32	Brown Long-eared flying westwards over south aspect	
04:39	Mutiple soprano pipistrelle swarming	
04:54	5x Soprano pipistrelle entrance	
04:59	1x Soprano pipistrelle entrance	
05:00	2x Soprano pipistrelle foraging	
05:02	1x Soprano pipistrelle entrance	
05:08	Soprano pipistrelle commuting	
05:11	1x Soprano pipistrelle entrance	



Mr & Mrs Jones c/o Scott Braidwood  
SUNAX Ltd  
1 Rosendale Way  
Blantyre  
Glasgow

Our ref 174204/CJ/001  
Telephone 0141 341 5040  
E-mail [REDACTED]@envirocentre.co.uk

7 March 2023

Dear Scott

**Inchconnachan; Outbuildings  
Internal Inspection (Bats)**

Please find attached our site observation report following our Roost Assessment of the outbuildings which were associated with the lodge at Inchconnachan. The lodge was known to host a bat roost following survey by EnviroCentre in 2021. Following the destruction by arson in 2022, the lodge no longer exists and therefore the only remaining potential for bats to shelter on the site would be in the remaining outbuildings.

The site was visited on 7<sup>th</sup> of March 2023 by [REDACTED] Blease who thoroughly searched the outbuildings, including the roof apexes, and where corrugated sheets meet timber frame.

No field evidence of bats was discovered during the inspection; {i.e., droppings, urine staining, moth wings etc,} and no direct observations of bats were made. As per previous assessments, the outbuildings were assessed as having **Negligible** suitability for roosting bats.

Based on the results of the site inspection no further surveys are required prior to the planned, careful demolition of the outbuildings. As the previously recorded bat roost no longer exists, no further bat protection measures would be applicable in relation to the planning permission associated with the site.

Yours sincerely  
**for EnviroCentre Ltd**

(issued electronically)

**[REDACTED] Judd BSc (Hons) QCIEEM  
Consultant Ecologist**

**[REDACTED] Blease BSc (Hons) MCIEEM  
Principal Consultant**

## INCHCONNACHAN OUTBUILDINGS; BAT ROOST INSPECTION

<b>Project:</b> Inchconnachan	<b>Project number:</b> 174204	<b>Report Author:</b> Christine Judd	<b>Report No:</b> 001
<b>Surveyor on site:</b> [REDACTED] Blease			
<b>Reporting to:</b> Scott Braidwood/ Andrew Bayne			
<b>Date of site observation:</b> 07/03/2023			
<b>Upcoming Operations:</b> Dismantle and removal of outbuildings			
<p><b><u>Terms of Reference</u></b>          EnviroCentre Ltd were commissioned by Mr and Mrs Jones c/o (Scott Braidwood) SUNAX Ltd, to conduct an inspection of the outbuildings at Inchconnachan, Loch Lomond.</p> <p><b><u>Site/Project Description</u></b>          Inchconnachan is one of the islands within Loch Lomond archipelago and is part of the Loch Lomond and Trossachs National Park, centered on Ordnance Survey Grid Reference NS 37466 91685. The three outbuildings on site comprise two corrugated sheet and wooden structures, single skin construction, no insulation.</p> <p>The outbuildings are all that remain of what was the Inchconnachan lodge complex. The lodge was surveyed in 2021 and found to host a small pipistrelle roost. The lodge was destroyed by fire in 2022, meaning the known roost no longer exists and no other roost provision is evident in the site boundary, as a precautionary principle it was deemed good practice to re-inspect the outbuildings prior to their demolition to make the site safe.</p> <p><b><u>Scope</u></b></p> <ul style="list-style-type: none"> <li>• A site visit by a licenced ecologist to conduct an external/internal search of Inchconnachan outbuildings to identify evidence or observations of bats.</li> <li>• Provide an observation report detailing the survey findings and forward recommendations.</li> </ul> <p><b><u>Method</u></b>          The site visit was undertaken by [REDACTED] Blease on the 7<sup>th</sup> of March 2023. The inspection of the outbuildings was based on the methods detailed within the Bat Conservation Trust (BCT) survey guidelines<sup>1</sup> with the aid of a high powered, red filter torch and close focus binoculars, where required.</p>			

<sup>1</sup> Bat Conservation Trust (BCT), Bat Surveys for Professional Ecologists, Practice Guidelines (3<sup>rd</sup> edition) 2016, Available at: [Bat Survey Guidelines 2015](#) (Accessed March, 2023)

### **Results**

The site sustains three outbuildings, two of which were of corrugated sheeting supported by wooden post/beams with wooden hinged doors/window shutters, upon bare earth with no flooring. The third outbuilding was comprised of wooden slats. Each outbuilding was single skin construction, no insulation and supported an apex roof.

No observation of bats was made during the inspection of the outbuildings. No field evidence of bats was discovered during the inspection; {i.e., droppings, urine staining, moth wings etc.,}.

The outbuildings on site were assessed as offering **Negligible** suitability for roosting bats.

The wider landscape contains a small number of trees presenting cavities whereby bats could roost. Most of the trees in the immediate surrounds do not present cavities, including those adjacent to the outbuildings.

### **Further Survey**

Due to the **Negligible** potential for roosting bats no further surveys are required prior to careful demolition of the outbuildings due to the presence of cement-fibreboard sheeting which can be known to contain asbestos fibres. The contractor was instructed that in the unlikely event that a roosting bat is discovered, works in that area should cease and an ecologist called for advice.

### **Photographic Record**



