MAR 2020

Preliminary Roost Assessment (Bats)

6-8 CARLIN GATE BLACKPOOL LANCASHIRE FY2 9QX



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THIS REPORT IS <u>NOT VALID</u> FOR STAND ALONE SUBMISSION TO PLANNING AUTHORITIES.

Reason:

THIS PRELIMINARY ROOST ASSESSMENT HAS IDENTIFIED THE NEED FOR FURTHER SURVEY WORKS IN RELATION TO BATS OF WHICH SUITABLE HABITAT IS PRESENT ONSITE.

CONSIDERATION OF THE FINDINGS OF THIS REPORT IN ISOLATION OF SUCH FURTHER SURVEY DATA CANNOT BE DEEMED ACCEPTABLE FOR APPROPRIATELY IDENTIFYING THE IMPACTS UPON PROTECTED SPECIES AT THIS SITE.

SUMMARY

This report presents the results of a preliminary roost assessment commissioned by Belsfield Care in assistance of a planning application for the demolition and redevelopment of 6-8 Carlin Gate, Blackpool, FY2 9QX.

The survey was conducted on 5th March 2020 when an inspection of the exterior and interior of the property was undertaken to assess for signs of bats in accordance with the survey protocol as set out in the Bat Conservation Trust Bat Survey Good Practice Guidelines (2016).

The survey was conducted by Ms. Oonagh Nelson a Natural England class 2 licensed bat surveyor, who has been awarded full membership of the Chartered institute of Ecology and Environmental Management (CIEEM), also serving as a peer elected member of CIEEM's North West section committee and is an associate member of the Royal Institute of Chartered Surveyors (RICS).

In relation to No.6 Carlin Gate; no evidence of bats was found at the time of survey to suggest current or historical roosting at the property. The property is considered to offer negligible opportunity for bat roosting and no further survey effort is deemed necessary in relation to bats at this property.

No.8 Carlin Gate has been classified as having '**low suitability**' for bat roosting in accordance with BCT guidelines. The sole notable feature of interest being restricted to the timber cladding on the southern and eastern façade of the structure.

It is therefore the recommendation of this preliminary roost assessment that a further nocturnal bat emergence/re-entry survey be undertaken at this property to establish the status of the building for roosting, identification of species and population density (if confirmed present), before any assessment of the likely impacts the proposed redevelopment works can be thoroughly made.

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1.0 INTRODUCTION

- 1.1 This report presents the results of a preliminary roost assessment commissioned by Belsfield Care in assistance of a planning application for the demolition and redevelopment of 6-8 Carlin Gate, Blackpool, FY2 9QX, hereby referred to as the 'property' or 'structure(s)'. Grid Ref: SD 30815 38665.
- 1.2 The objectives of the survey are to:
 - Identify and assess the potential and suitability of the structures to be redeveloped to support roosting bat species
 - Inspect the fabric of the structures and examine both the exterior and interior for evidence of or the presence of roosting bat species
 - Provide recommendations in light of any species evidence identified within
 - Identify any further survey requirements

2.0 LEGISLATIVE CONTEXT

- 2.1 All British species of bat are protected under Schedule 5 of the *Wildlife and Countryside Act*, 1981 (as amended by the *Countryside and Rights of Way Act, 2000*) and the *Conservation of Habitats and Species Regulations 2017* (as amended) (Subject to draft legislation *'Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019'*).
- 2.2 Actions prohibited under the above legislation are detailed in Table 1.

Legal Provision	Actions Prohibited
	Intentionally or deliberately kill a bat,
Wildlife and Countryside	Intentionally or deliberately injure a bat,
Act 1981 (as amended)	Intentionally or deliberately capture or take a bat,
&	Deliberately or recklessly disturb a bat (whether in a roost or not),
Conservation of Habitats	Recklessly damage, destroy or obstruct access to any structure used by
and Species Regulations	bats as a roost,
2017 (As Amended)	Possess/control a bat or any part of a bat (unless acquired legally),
	Sell, advertise, transport or offer for sale a bat or any part derived from
	a bat.

Table No.1: Legislative Guidelines (Bats- all species)

2.3 It should be noted that the word 'roost' is not actually used in any of the above legislation; such terminology has been used within this report for simplicity. The actual wording used within *The Wildlife and Countryside Act 1981* (as amended) refers to 'any structure or place which any wild animal uses for shelter or protection'.

3.0 SITE LOCATION

- 3.1 The survey structures are located along a residential street in north Blackpool, approximately 160m east of the main promenade in the resort. They are bounded by urban development on all sides.
- 3.2 Blackpool North Shore Golf Club is located 280m to the east. Within the golf course, an area of young woodland and assumed woodland occurs which are listed in the National Forest Inventory. The golf course also contains at least five waterbodies.
- 3.3 Further east (approximately 685m), are the Devonshire Road Rock Gardens, which contain two waterbodies. The Rock Gardens are listed in the National Forest Inventory and Priority Habitat Inventory for their deciduous woodland cover. Green infrastructure continues beyond the Rock Gardens by means of school playing fields and the grass covered Warbreck Reservoir.
- 3.4 The linear grasslands which flank the promenade to the west of the survey structures are listed in the Priority Habitat Inventory for Maritime Cliffs and Slopes.
- 3.5 Further west of the promenade, the coastline is designated as a Special Protection Area (SPA), (Liverpool Bay, UK9020294).
- 3.6 The survey structures fall within a SSSI Impact Risk Zone, however as the development proposal is residential, it does not trigger the need for further assessment under this criterion.

4.0 DESK STUDY

- 4.1 Particulars regarding the site location, surrounding environment and evidence of any structural changes historically at the applicant site, as outlined in the previous chapter, were obtained using current and archive aerial photography from the Government's online mapping service 'MAGIC', Lancashire County Council's mapping service 'Mario' and Google Earth.
- 4.2 A search of the NBN gateway shows 85 records of bats of varying species within a 5KM search radius of the property. Due to commercial licensing constraints it is only possible to reference Daubenton's bat (*Myotis daubentonii*) and common pipistrelle (*Pipistrellus pipistrellus*) from these records. These have been recorded via the Bat Conservation Trust Waterway Survey (2019) and Natural England's volunteer roost visitor licence scheme (limited information distributed under open government licence v3.0) respectively.

5.0 SITE SURVEY METHODOLOGY

- 5.1 The survey was conducted on 5th March 2020 when an inspection of the exterior and interior of the property was assessed for signs of bats (such as droppings, dead bats, feeding remains, urine staining, grease marks around crevices and noises such as scratching and chitting).
- 5.2 The surveyor walked the perimeter of the survey structures to look for means of ingress to potential roost sites including but not limited to; slipped or missing tiles, gaps in or around barge boards, missing mortar at the eaves and stonework and gaps around any window frames.
- 5.3 The surveyor examined all accessible internal areas within the survey structures looking for signs of ingress, bats, droppings, urine staining on ceilings and walls and potential feeding remains.
- 5.4 Apparatus used to aid the survey effort included surveyor's ladders, close focusing binoculars, and an LED Lenser torch.
- 5.5 Weather at the time of survey was dry with a light breeze and a recorded temperature of 9°C.
 The assessment was conducted by licenced bat surveyor Ms. Oonagh Nelson *MICEEM AssocRICS* (Natural England class 2 licence No. 2017-29114-CLS-CLS).
- 5.6 The survey was conducted in accordance with the "Bat Survey, Good Practice Guidelines" (Bat Conservation Trust 2016).

6.0 LIMITATIONS

- 6.1 It is rare for any site to be surveyed using all the available techniques to full effect, as there are often reasons of seasonality, weather or access, which restrict survey intensity.
- 6.2 In this instance, significant water ingress and damage had occurred within No.8 Carlin Gate. As a result, the staircase had rotted and fallen through, thereby restricting access to the upper floors of the property. Due to the water damage and the presence of numerous live and dead pigeons inside the structure, the surveyor did not access the interior beyond the front porch and hallway of the property due to heath and safety concerns.
- 6.3 The attic space of the workshop located to the rear of No.6 Carlin Gate could not be accessed due to the restrictive size of the loft hatch.
- 6.4 Garage structures located on the driveways of both properties were not accessible at the time of survey.

6.5 The survey was conducted in March which is outside most bat species typical active period. Therefore, the potential for droppings and other field signs to be present on the exterior of the property are unlikely to have persisted or be present in reduced numbers, should they have been present in peak season.

7.0 SITE SURVEY RESULTS (No.6 Carlin Gate)

- 7.1 No.6 Carlin Gate is a large semi detached property. It is brick built with a rendered finish. It features a tiled roof which has no sarking or underlay present. This was confirmed via damage to a third floor 'attic' room ceiling through which the underside of the tiles could be clearly seen sitting upon timber battens. Daylight could be seen through some of the tile covering. The property features overhanging eaves with exposed rafter ends.
- 7.2 The property frontage is south facing onto Carlin Gate. The frontage features a two storey high bay window and a cantilever bay window to the second floor, both these feature a flat roof with lead flashing overhang.
- 7.3 A pediment with window is also present to the frontage of the property (third floor attic room). The pediment features hanging tiles which appear to be in good condition with little visible lifting.
- 7.4 The windows are uPVC framed and are tight fitting. Damage has occurred to the render above one ground floor window and a large gap is present in the facing of the wall.



Photograph No.1: Frontage of 6-8 Carlin Gate (south facing).

- 7.5 The roof displays numerous slipped and missing tiles. With many tiles missing along the hip of the roof. Gaps in the mortar are visible under the ridge tiles. Several courses of tiles are missing from the eaves of the pediment.
- 7.6 A dormer window is present on the west facing roof plane at the side of the property. Much damage is present to the roof covering at the southern edge of the dormer, allowing water ingress.



Photograph No.2: Roof of No.6 looking east. Showing damage to roof and lead flashing.

- 7.7 To the rear of the No.6, the property features a large skylight and dormer window. The latter is covered in hanging felt tiles, but these are likely to be shaded out, being on the northern side of the property. Again, the roof has suffered loss of tiles, particularly along the hip on the western side.
- 7.8 Internally No.6 has been used as residential accommodation but has been vacant for some time. The property has three floors. Much water ingress could be seen on the ceiling of the attic rooms and several holes in the ceilings are present through which the underside of the roof covering was visible. All curtains were checked for signs of roosting bats. None were found.



Photograph No.3: Rear of No.6, looking south.



Photograph No.4: Hole in ceiling of attic room, showing tile covering is devoid of underlay and daylight is visible.

7.9 Multiple single storey extensions are present on the northern façade which occupy most of the outdoor space. Moving northwards from the rear of the main dwelling house, the first extension

(Labelled A on proceeding photograph) is rendered with a pitched tiled roof which is in very poor condition. This connects to a single storey flat roofed structure (B) with deep timber barge boards.

- 7.10 The final extension is a large single storey workshop (C) which features a pitched tiled roof which has a bitumen felt underlay. Ridge tiles are present which are mortared in. The mortar is in generally good condition. Timber boxed soffits are present which are damaged along the west facing eaves. The north facing gable end features an offset barge board under which the top of the wall plate is visible.
- 7.11 Internal inspection revealed that water ingress has caused much damage inside the workshop, with the ceiling haven fallen through in one of the rooms inspected.
- 7.12 A detached single storey garage (D) is present on the western side of the property. This features a hipped tile roof and rendered walls. Lead flashing is lifting along the hips. A further single storey flat roof extension (E) is present on the north side of the garage. No access was available to the inside of the garage at the time of survey.



Photograph No.5: Collection of outbuildings to the rear of No.6.

8.0 SITE SURVEY RESULTS (No. 8 Carlin Gate).

8.1 No.8 Carlin Gate is also a large semi detached property, which mirrors No.6. The frontage of the property and part of the eastern façade from the second floor upwards is covered in waney edge timber cladding.

8.2 The cladding due to its naturally uneven surface and through warping possesses numerous gaps and crevices which are considered to offer suitable ingress for bats. The cladding being present on the southern and eastern façade offers favourable conditions for bat roosting as these facades will be warmed by the sun.



Photograph No.6: Timber cladding to the frontage of No.8 (south Facing), features numerous gaps and lifting where timber has warped.



Photograph No.7: showing gaps and crevices under cladding.



Photograph No.8: Eastern façade of No.8 also has timber cladding present. This is in much better condition than the frontage of the property, but crevices are still present due to the natural unevenness of the timber.

- 8.3 Some of the cladding is damaged or missing and a hole is present where it meets the boundary of No.6. Pigeons were seen entering and exiting the structure through this feature.
- 8.4 Two potential bat droppings were recorded stuck to the west facing pane of the second floor bay window. The lead overhang above this point has lifted and gaps are present underneath the lead which are considered to offer suitable ingress for bats.

Continued overleaf...



Photograph No.9: Potential bat droppings (*x*2) attached to second floor window of No.8 on the southern façade, as viewed from the upstairs of No.6. Lead flashing has lifted above location of the droppings and is considered to offer suitable ingress for crevice dwelling bat species.

- 8.5 Access to the upper floors of property was not possible at the time of survey as the staircase had fallen though due to water damage. Therefore, the surveyor could not inspect the droppings at close range to provide a more accurate description of likely species.
- 8.6 The property has been vacant for over 10 years and much water ingress has occurred. The surveyor was only able to safely access the porch and lower hallway of the property. Numerous live and dead pigeons are present inside the structure, pigeon detritus and debris from fallen ceilings litters the floor.



Photograph No.10: showing inside of No.8 Carlin Gate. Stairs have rotted through and much detritus is present on the floors and surfaces.

- 8.7 The rear of the property features a timber sided dormer window and a large skylight which has been boarded over. Many of the roof tiles have slipped or are missing entirely. The north facing gable has close fitting barge boards.
- 8.8 A detached garage is present to the eastern side of the property. This also features a small amount of timber cladding to the top of the south facing gable end. It features a pitched tile roof with mortared gable ends, the eastern plane was not visible to the surveyor as it overlooks the neighbouring property, however the western plane is in a good state of repair. The garage has a metal door which has rotted through at the top and bottom. No access was possible to the interior of the garage at the time of survey.
- 8.9 The garden of No.8 is heavily overgrown with bramble scrub and accumulations of brash and building debris litter the floor to the immediate rear of the structure.
- 8.10 A large cypress tree (species unknown) is present in the northwest corner. This was assessed using BCT 2016 guidelines for ground level assessment and is considered to offer negligible features suitable for bat roosting.



Photograph No.11: view of garden of No.8 looking northwards.

9.0 DISCUSSION OF RESULTS AND RECOMMENDATIONS

9.1 In accordance with the "Bat Survey, Good Practice Guidelines" (Bat Conservation Trust 2016), the preliminary roost assessment was conducted at a time deemed optimal for assessing structures for suitability of features for bats.

No.6 Carlin Gate

- 9.2 There was no sign of bat usage within any structure located at No.6 Carlin Gate to suggest that bats are actively or have historically roosted at the property.
- 9.3 No.6 Carlin Gate is therefore considered to offer negligible roosting opportunity for bats. Whilst opportunity for bat ingress is plentiful with much damage having occurred to the roof covering, it is devoid of underlay and so not optimal for crevice dwelling species. The attic is considered likely to be draughty due to the number of holes in the roof covering through which daylight could be seen at the time of survey. The property has been vacant for some time and is cold and damp.
- 9.4 Similarly outbuildings A, B, D & E to the rear of No.6 are considered to offer negligible roosting opportunity. Many of the structures are suffering from water ingress. Being located on the northern side of the three storey dwelling house, they are shaded from the sun and so are damp and cold.

- 9.5 Workshop (D) does possess some albeit limited features suitable for bat ingress. The barge boards on the southern façade do receive a limited amount of sunshine in the morning from the east but are likely to be shaded at high sun and so opportunity for bat roosting is considered to be negligible.
- 9.6 No further survey effort is deemed necessary in relation to bats at No.6 Carlin Gate.

No.8 Carlin Gate

- 9.7 No.8 Carlin Gate is in a very poor state of repair with much structural damage having been caused by water ingress. The main construction of the property is considered to offer negligible opportunity for roosting bats. However due to the presence of the timber cladding to the southern and eastern elevations with these features offering plentiful gaps and crevices which will be heated by the sun, the property's suitability for bats cannot be fully ruled out.
- 9.8 In accordance with the "Bat Survey, Good Practice Guidelines" (Bat Conservation Trust 2016), No.8 Carlin Gate is considered to possess suitable features for roosting and ingress for roosting with optimal offsite habitat on the nearby golf course and rock gardens having a clear linear linkage along Carlin Gate (albeit not green infrastructure). These features could be used by low numbers of bats for roosting between April and October, which under the guidelines would classify the property as having 'low' suitability for bat roosting.
- 9.9 A low rating is classified as: "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 or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation)". (* For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance). BCT 2016.
- 9.10 It is therefore recommended that a nocturnal bat survey be undertaken at this site to establish the status of the building in relation to bats, and to assess what impact the proposed works may have.
- 9.11 In accordance with the "Bat Survey, Good Practice Guidelines" (Bat Conservation Trust 2016), structures identified as being of low roost suitability require at least one survey visit. One dusk emergence or dawn re-entry survey to be undertaken between May and August.

10.0 REFERENCES AND FURTHER READING

Bat Conservation Trust (2016) '*Bat Surveys, Good Practice Guidelines*'. Bat Conservation Trust, London.

BSI (2013) '*BS 42020:2013, Biodiversity – Code of practice for Planning and Development*'. BSI Hemel Hempstead.

CIEEM (2015) Guidelines for Ecological Report Writing.

English Nature (2004) 'Bat Mitigation Guidelines'. English Nature, Peterborough.

Hutson, A. M. (1993) '*Action Plan for conservation of Bats in the United Kingdom*'. The Bat Conservation Trust, London.

Joint Nature Conservation Committee (2004) 'Bat Workers Manual'. JNCC, Peterborough

Appendix 1 Relevant Legislation and Planning Policy

Appendix 1: Relevant Legislation and Planning Policy

This section summarises the legislation and national and local planning policies and other reference documents which are considered to be of relevance to the baseline of this ecological assessment report:

European Protected Species Legislation (Bats)

Bats are European Protected Species (EPS) and as such both individuals and places which they use for breeding or resting receive legal protection in England under The Conservation of Habitats and Species Regulations 2017 (as amended) (Subject to draft legislation *'Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019'*) and the Wildlife and Countryside Act 1981 (WCA) (as amended).

All bat species are listed on Schedule 2 of the Conservation of Habitats and Species Regulations 2017 and Regulation 41 states that a person commits an offence if they:

- Deliberately capture, injure or kill an EPS;
- Deliberately disturb an EPS;
- Deliberately take or destroy the eggs of an EPS; or
- Damage or destroy a breeding site or resting place of an EPS.

Disturbance of animals includes in particular any disturbance which is likely to impair their ability to survive, to breed or reproduce, or to rear or nurture their young, or in the case of animals of a hibernating or migratory species, to hibernate or migrate; or to affect significantly the local distribution or abundance of the species to which they belong.

It is also an offence for any person to have in his possession or control, to transport, to sell or exchange or to offer for sale, any live or dead EPS, part of a EPS or anything derived from an EPS, which has been unlawfully taken from the wild.

Wildlife and Countryside Act 1981 (as amended)

Bats are listed on Schedule 5 of the Act and are offered protection under Section 9. Although similar to the above legislation, under the WCA 1981 (as amended) it is also an offence to:

- Intentionally kill, injure or take any protected species.
- Intentionally or recklessly* damage or destroy, or obstruct access to, any structure or place which a protected species uses for shelter or protection.
- Intentionally or recklessly* disturb any protected species while it is occupying a structure or place which it uses for shelter or protection.

*"Reckless" offences were added by the Countryside and Rights of Way (CRoW) Act 2000. This legislation applies to all life stages of EPS.

National Planning Policy

National Planning Policy Framework (NPPF) adopted 2019

The NPPF sets out the Government's planning polices for England and how these policies are expected to be applied by Planning Authorities when drawing up local policy, development plans and making decisions on planning applications. The sections of the NPPF that are most relevant to ecology are detailed below:

Section 2 Achieving Sustainable Development

Section 2 sets out the three overarching objectives of the NPPF (economic, social and environmental) which are to be achieved to enable sustainable development.

Objective C, the Environmental Objective, seeks to achieve sustainable development by contributing to the protection and enhancement of our natural environment, including helping to improve biodiversity.

"c) **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, <u>helping to improve biodiversity</u>, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy." - NPPF (2019), page 5, paragraph 8.

Chapter 15: Conserving and Enhancing the Natural Environment

"170. Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) <u>protecting and enhancing valued landscapes</u>, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) <u>minimising impacts on and providing net gains for biodiversity, including by establishing</u> <u>coherent ecological networks that are more resilient to current and future pressures;</u>
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

171. Plans should: distinguish between the hierarchy of international, national and locally designated sites; <u>allocate land with the least environmental or amenity value</u>, where consistent with other policies in this Framework; <u>take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure</u>; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

172. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. <u>The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas</u> and should be given great weight in National Parks and the Broads. <u>The scale and extent of development within these designated areas should be limited.</u> Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

173. Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 172), planning policies and decisions should be consistent with the

special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.

Habitats and Biodiversity

174. To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

175. When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

176. The following should be given the same protection as habitats sites:

- a) Potential Special Protection Areas and possible Special Areas of Conservation;
- b) Listed or proposed Ramsar sites; and
- c) Sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

177. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site." NPPF (2019), page 50 and 51.

Wildlife Exclusion Fence Installation, Maintenance & Removal

Habitat Restoration, Enhancement & Creation

Mitigation Design & Implementation

Ecological Impact Assessment

Protected Species Survey

Invasive Species Survey

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