Bat Emergence and Re-entry Surveys

23 Old Market Street, Stowmarket, Suffolk, IP14 5RZ

Marcus Keeble

Status	Issue	Name	Date
Draft	1	Georgia Arnold BSc (Hons), MSc Graduate Ecologist (Accredited Agent under Natural England Bat Licence Number: 2018-33540-CLS-CLS)	11/07/2023
Reviewed	1.1	Natalie Evans BA (Hons), MA, MRSB, Principal Consultant, Bat Licence Lead	13/07/2023
Final	2	Georgia Arnold BSc (Hons), MSc Graduate Ecologist (Accredited Agent under Natural England Bat Licence Number: 2018-33540-CLS-CLS)	15/07/2023

Arbtech Consultant's Contact Details:

Georgia Arnold
Graduate Ecologist
Tel: 07512300377 **Email:** georgiaarnold@arbtech.co.uk
https://arbtech.co.uk

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Industry Guidelines and Standards

This report has been written with due consideration to:

- Chartered Institute of Ecology and Environmental Management (2017). Guidelines for Preliminary Ecological Appraisal. 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Version 1.1. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2017). Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2020). Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK. 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- British Standard 42020 (2013). Biodiversity – Code of Practice for Planning and Development.
- British Standard 8683:2021 (2021). Process for Designing and Implementing Biodiversity Net Gain.

Proportionality

> The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, the decision-maker should only request supporting information and conservation measures that are relevant, necessary and material to the application in question. Similarly, the decision-maker and their consultees should ensure that any comments and advice made over an application are also proportionate.
>
> The desk studies and field surveys undertaken to provide a Preliminary Ecological Appraisal (PEA) might in some cases be all that is necessary.
>
> (BS 42020, 2013)

Executive Summary

Arbtech Consulting Ltd was instructed by Marcus Keeble to undertake Bat Emergence and Re-entry Surveys (BERS) at 23 Old Market Street, Stowmarket, Suffolk, IP14 5RZ (hereafter referred to as "the site"). The survey was required to inform a planning application for the demolition of the existing partially collapsed outbuilding and construction of a new garage/workshop (hereafter referred to as "the proposed development").

The following is work you will need to implement or commission to comply with planning policy and legislation. Further information, along with opportunities for biodiversity enhancement, are outlined in Table 2 of this report.

Feature	Survey Results Summary	Impact Assessment	Recommendations
Roosting bats (B1)	A likely absence of roosting bats is confirmed from building B1. The survey found foraging and commuting activity to be relatively low in the local area.	Bats are very unlikely to be roosting within this building. However, any bats that begin using the buildings during the intervening period between the surveys being undertaken and works commencing could be injured or killed and their roosts destroyed. Due to the lack of foraging and commuting habitat surrounding the building, it is not anticipated that the proposed development will include the use of lighting which could spill on to bat roosting, foraging or commuting habitat and deter bats from using these areas.	A precautionary working method will be implemented during and post-development. Please refer to Table 2.

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed by Marcus Keeble to undertake Bat Emergence and Re-entry Surveys (BERS) at 23 Old Market Street, Stowmarket, Suffolk, IP14 5RZ (hereafter referred to as "the site"). The survey was required to inform a planning application for the demolition of the existing partially collapsed outbuilding and construction of a new garage/workshop (hereafter referred to as "the proposed development"). A plan showing the proposed development is provided in Appendix 1.

The aim of the BERS was to determine the presence or likely absence of roosting bats and to characterise any roosts present. This has been undertaken with due consideration to the "Bat Surveys for Professional Ecologists —Good Practice Guidelines" publication (Collins, 2016).

The BERS have been informed by a Preliminary Roost Assessment (PRA) which was completed by Arbtech Consulting Ltd. on 31/06/2023 (Arbtech Consulting Ltd, 2023). The PRA survey found no roost features or bat evidence in the dilapidated, partially collapsed part of the structure (B1a) which was assigned negligible roost value. The PRA survey found a few suitable roost features on the main shed/workshop (B1b) in the form of some tile gaps on the roof and a gap behind the weatherboard on the gable end. The partially collapsed structure (B1a) was assigned negligible roost value and the main shed/workshop was assigned low roost value. Recommendations included one bat emergence/re-entry survey in accordance with BCT Bat Survey Guidelines (Collins 2016).

1.2 Site Location and Landscape Context

The site is located at National Grid Reference TM 10411 65836 and has an area of approximately 0.03ha. There are two buildings on the site. Building B1 (B1a and B1b) was subject to survey. The main house was not subject to survey as it won't be affected by the proposed development. In addition to the buildings, the site comprises an area of hardstanding and a small garden with lawn grass. There are no habitats on site suitable for foraging and commuting bats, though scattered trees within nearby residential gardens may provide some opportunities for foraging. The site itself is located in a rural context within the village of Mendlesham, Suffolk. It is surrounded by built-up areas on all sides, comprising residential properties with small to medium sized gardens and scattered tree cover. The wider landscape surrounding the village predominantly comprises arable land and grassland with occasional residential and agricultural infrastructure and scattered hedgerows and trees. There are some small, isolated pockets of woodland within 2km, the closest being approx. 615m south of the site. There are no distinct linear features providing connectivity through the village, though the scattered hedgerows and trees in the wider area may offer some opportunities for foraging and commuting. A site location plan is provided in Appendix 2.

1.3 Scope of the Report

This report provides a description of the bat activity observed and recorded during BERS. The aim of the surveys was to determine the presence or likely absence of bats and to characterise any roosts present including species, number of individuals, number and location of roost access points, and to gain an understanding of how bats use the site. The report provides information on possible constraints to the proposed development as a result of bats and summarises the requirements for any mitigation proposals, including a European Protected Species Licence (EPSL), where appropriate, to achieve planning or other statutory consent and to comply with wildlife legislation.

To achieve this, the following steps have been taken:

- BERS of built structures has been undertaken to determine the presence or likely absence of bat roosts.
- An outline of potential impacts on any confirmed or unidentified roosts has been provided, based on the proposed development.
- Recommendations for mitigation have been made, along with advice on the requirements for a European Protected Species Licence (EPSL) application if appropriate.
- Opportunities for the enhancement of the site for roosting, foraging and commuting bats have been set out.

2.0 Methodology

2.1 BERS

One BERS, comprising one dusk emergence survey was undertaken of building B1, as per the recommendations from the Preliminary Roost Assessment. The survey involved surveyors positioned around the building ensuring that all elevations and roof sections with suitable roosting features could be clearly observed. Particular attention was paid to the areas of the building identified as providing suitable access points to bat roosts. Each surveyor was assigned an area of the building to observe for the duration of the survey.

Surveyors used heterodyne and frequency division bat detectors, and Echo Meter Touch detectors connected to iPads or Android tablets. Bat echolocation calls recorded during the surveys were analysed using Wildlife Acoustics sound analysis software Kaleidoscope V3.1.7 when required. The Echo Meter Touch includes an auto ID function for bat species, however this is not 100% accurate and further post-survey sound analysis is often required to confirm species that could not be identified by the auto ID software during the survey. Surveyors also used head torches, survey record sheets and pens/pencils for recording all activity observed during the surveys. Each surveyor was also provided with a handheld radio for communication between surveyors to assist with confirming ambiguous bat activity e.g. a bat emergence or a bat passing over the building.

One infrared recording kit was set up to monitor the building during the BERS. This comprised Nightfox Red Goggles set up on a tripod with two separate infrared lamps on a second tripod to provide additional illumination. Analysis of the footage was subsequently undertaken to detect roosting activity.

Dusk emergence surveys commenced 15 minutes before sunset and continued for 1½ - 2 hours after sunset – depending upon bat activity and surveyor visibility.

Surveys were completed during optimal weather conditions i.e., when temperatures were above 10ºC, with no rain or strong winds (greater than 5m/s), as these adverse weather conditions can impact upon bat emergence and foraging behaviour. Periods of high moon illuminance (>80%) were also avoided insofar as possible as this can reduce bat activity.

2.2 Surveyors

A total of two surveyors were used to cover the building. The name, bat licence details or level of bat survey experience and the designated position of each surveyor during each survey is detailed in the tables in Section 3.1 below and shown on the plan in Appendix 3.

2.3 Bat Roost Characterisation

When bat roosts are present, the bat surveys undertaken at a site facilitate the characterisation of the roost type. This allows for appropriate mitigation and compensation to be designed to inform a European Protected Species Licence (EPSL) application to Natural England.

The definitions of bat roost types are provided below, taken from the *Bat Mitigation Guidelines* (English Nature, 2004) and the Bat Conservation Trust (BCT) publication *Bat Surveys for Professional Ecologists – Good Practice Guidelines* (Collins, 2016).

Day roost: a place where individual bats, or small groups of males, rest or shelter in the day but are rarely found by night in the summer.

Night roost: a place where bats rest or shelter in the night but are rarely found in the day. May be used by a single individual on occasion or it could be used regularly by the whole colony.

Feeding roost: a place where individual bats or a few individuals rest or feed during the night but are rarely present by day.

Transitional / occasional roost: used by a few individuals or occasionally small groups for generally short periods of time on waking from hibernation or in the period prior to hibernation.

Swarming site: where large numbers of males and females gather during late summer to autumn. Appear to be important mating sites

Mating sites: sites where mating takes place from later summer and can continue through winter.

Maternity roost: where female bats give birth and raise their young to independence.

Hibernation roost: where bats may be found individually or together during winter. They have a constant cool temperature and high humidity. Sites where hibernating bats have been confirmed by appropriate survey effort should be classed as 'hibernation confirmed'.

Satellite roost: an alternative roost found in close proximity to the main nursery colony used by a few individual breeding females to small groups of breeding females throughout the breeding season.

Other: roost types are interchangeable and not always easy to classify according to the nuances of certain species.

2.4 Limitations

This survey follows best practice guidance to confirm presence or likely absence of roosting bats and where present, characterise the roost. However, this information is collected at finite dates and times, and provides an indication of the conditions on site only. The use of the building and the site as a whole by bats, at all times cannot be established based on this information. Bats are highly mobile creatures that switch roosts regularly and therefore the usage of a site by bats can change over a short period of time.

There were no specific limitations to the survey.

3.0 Results and Evaluation

3.1 Survey Results

The results of the survey are provided in the table below and shown on the plan in Appendix 3.

Table 1: Survey results

Date		10/07/23	
Building inspection prior to survey		The roost features identified during the PRA were subject to an inspection prior to the BERS to check for evidence of roosting bats. No new features or evidence were found.	
Start and end times		21:00 – 23:15 Sunset: 21:15	
Weather conditions		**Start:** Temp: 20°C Relative Humidity: 60% Cloud Cover: 100% Wind: 9mph Rain: None Moon illuminance: 0%	**End**: Temp: 18°C Relative Humidity: 68% Cloud Cover: 100% Wind: 7mph Rain: None Moon illuminance: 0%
Surveyor (position) **As shown in Appendix 3**		**Emma Cantu** – 3 years bat survey experience - Position 1 – observing the northern and eastern elevation and roof structure of B1. **Georgia Arnold -** Accredited Agent under Natural England Bat Licence Number: 2018-33540-CLS-CLS - 2 years bat experience - Position 2 – observing the southern and western elevation and roof structure of B1.	
IR position **As shown in Appendix 3**		Position 1 - observing the western elevation and roof structure of B1b	
Building reference	**Surveyor position**	**Notes/observations:**	
B1	1	At 21:16, an LED street light adjacent to the shed turned on. Between 21:36 and 21:40, two distant passes from a common pipistrelle were heard but not seen. Between 21:45 and 21:47 a common pipistrelle was observed foraging from the gardens to the south-east of the site, passing through the garden on site towards a group of trees in gardens to the west of the site. At 22:12, a serotine was observed passing overhead of the site, travelling from east to west. At 22:28 an unidentified, non-echolocating bat passed through the garden on site from the west, over the southern end of the shed towards the gardens to the east of the site. **No bat emergences or re-entries were observed.**	
B1	2	At 21:16, an LED street light adjacent to the shed turned on. At 22:12, a serotine was observed passing overhead of the site, travelling from east to west. At 22:58, a distant pass from a serotine was heard but not seen. At 22:59, a distant pass from a common pipistrelle was heard but not seen. **No bat emergences or re-entries were observed.**	

Building reference	**IR position**	**Notes/observations:**
B1	1	No activity recorded in field of view of IR camera. **No bat emergences or re-entries were observed.**
Other observations		None.

3.2 Photographs

Photograph 1*: Screenshot showing the field of view of the infrared camera, capturing the western elevation and roof structure of B1b. Taken at the darkest point of the survey.*

4.0 Conclusions, Impacts and Recommendations

Taking the field survey results into account, Table 2 presents an evaluation of the value of the buildings for roosting bats in relation to the proposed development which will comprise the demolition of the existing partially collapsed outbuilding and construction of a new garage/workshop.

Table 2: Evaluation of buildings on site for roosting bats

Building	Survey Results Summary	Impact Assessment	Recommendations	Biodiversity Enhancement Opportunities[1]

Building B1	A likely absence of roosting bats is confirmed from building B1.	Bats are very unlikely to be roosting within this building and as such, there are not anticipated to be any impacts on bats in this location as a result of the proposed development.
		
		However, bats are highly mobile creatures that switch roosts regularly and therefore the usage of a site by bats can change over a short period of time. Any bats that begin using the building during the intervening period between the surveys being undertaken and works commencing could be injured or killed and their roosts destroyed.
		
		Due to the lack of foraging and commuting habitat on site and immediately surrounding the building, it is not anticipated that the proposed development will include the use of lighting which could spill on to bat roosting, foraging or commuting habitat and deter bats from using these areas.
			A precautionary working method will be implemented during and post-development. This will include the following measures:
			• The potential roost features will be removed by hand prior to any mechanical demolition. This includes:
			  ○ The lifted tiles and tile gaps on the roof of B1b.
			  ○ The wooden weatherboard on the western gable end of B1b.
			• In the unlikely event that a bat or evidence of bats is discovered during the development all work must stop and a bat licensed ecologist contacted for further advice.
				The installation of one bat box at the site will provide additional roosting habitat for bats.
				The bat box will be installed on the retained main building/house.
				Bat boxes should be positioned 3-5m above ground level facing in a south or south-westerly direction with a clear flight path to and from the entrance, away from artificial light.
				The bat boxes will be a specification suitable for crevice dwelling species, such as the NHBS Beaumaris Woodstone Bat Box. Or a similar alternative brand.

[1] The Local Planning Authority has a duty to ask for enhancements under the NPPF (2021).

Nesting birds	No birds were observed to use the building for nesting.	None.	None.	The installation of a minimum of one bird box on the retained main building/house will provide additional nesting habitat for birds. e.g. Vivara Pro Woodstone Oval Nest Box Woodstone Nest Box Or a similar alternative brand. General purpose bird boxes should be positioned 3m above ground level where they will be sheltered from prevailing wind, rain and strong sunlight. Species-specific bird boxes should be installed in line with manufacturers specifications.

5.0 Bibliography

- Arbtech Consulting Ltd (June 2023). Preliminary Roost Assessment – 23 Old Market Street, Stowmarket, Suffolk, IP14 5RZ.
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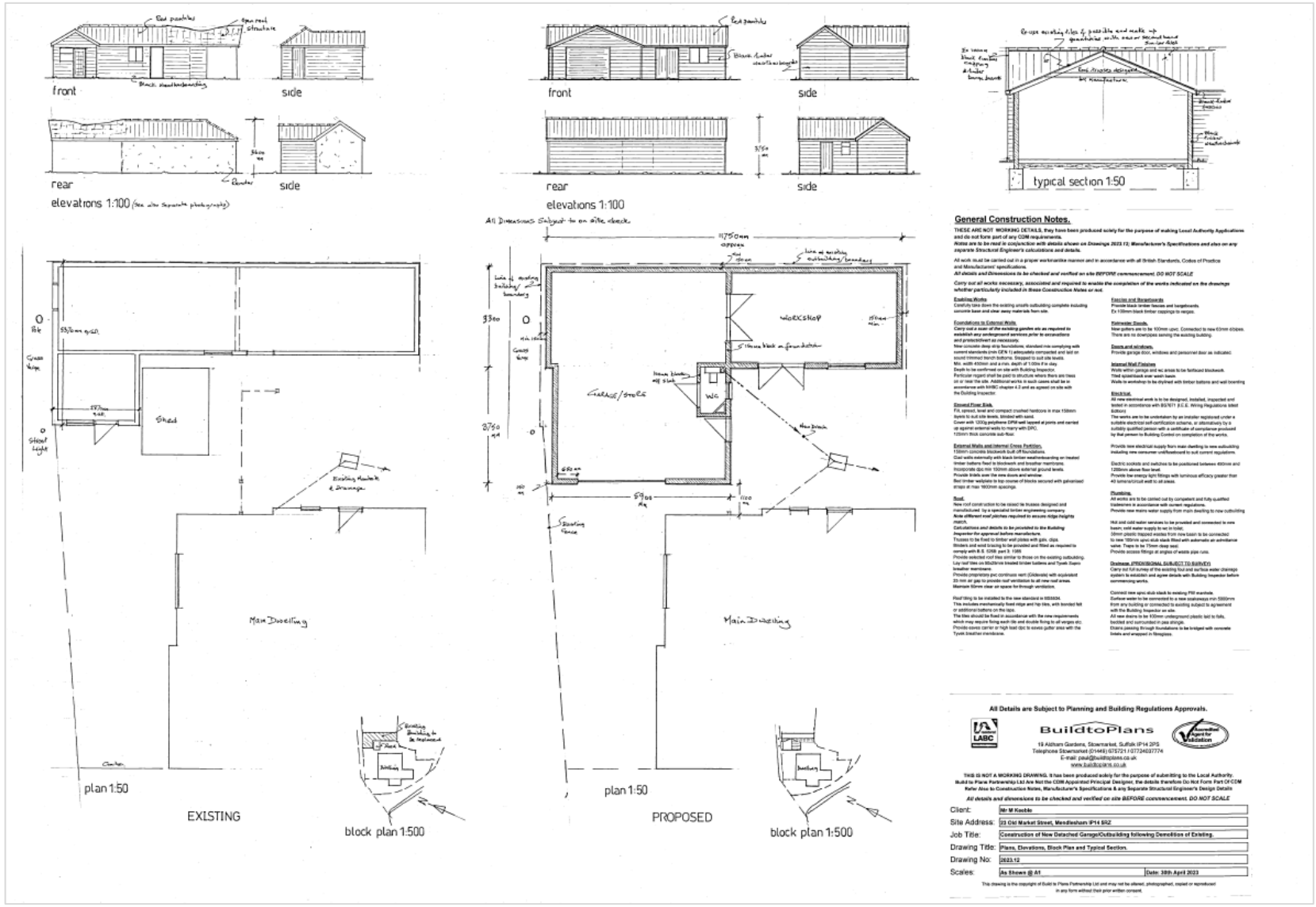
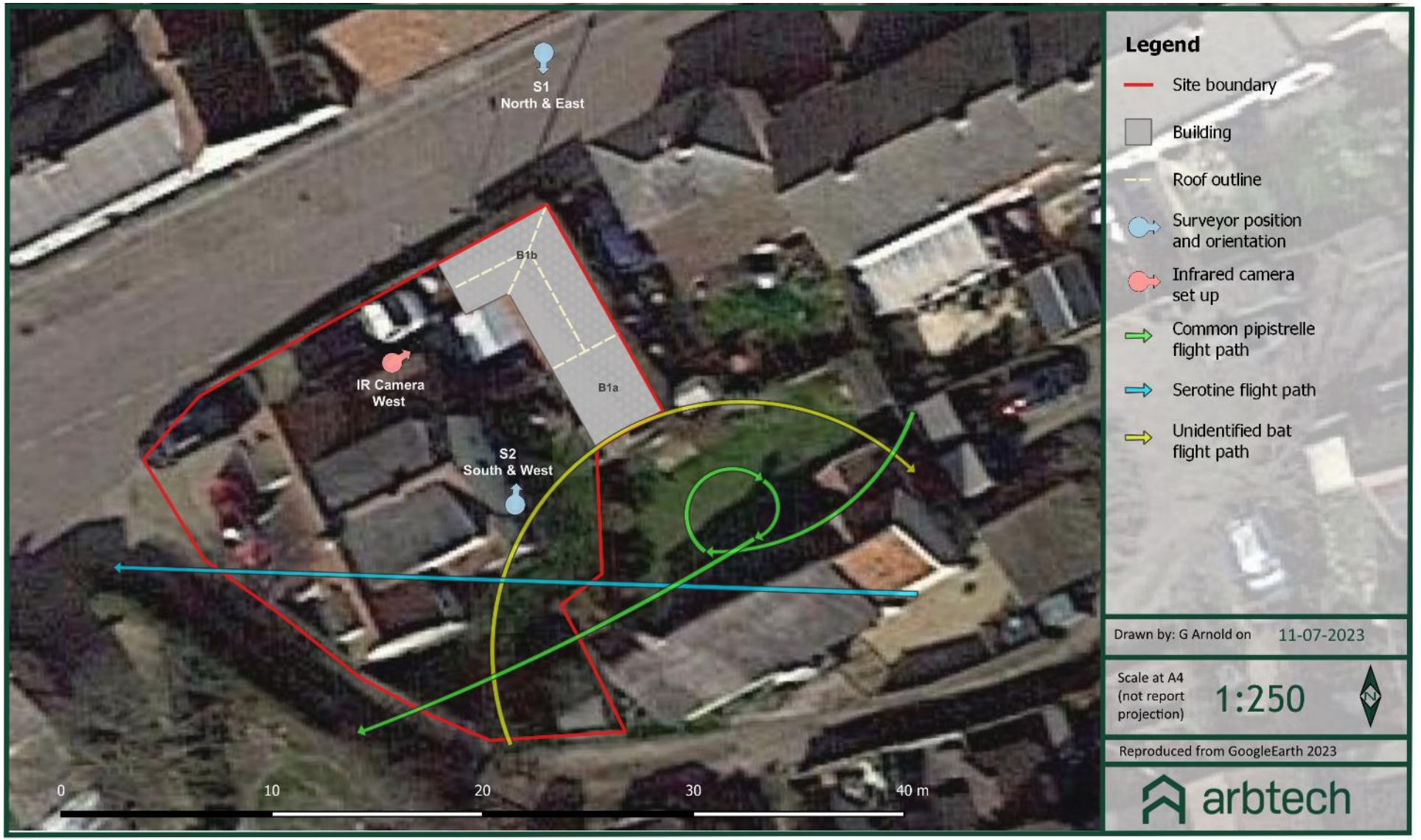
- Wray, S., Wells, D., Long, E., Mitchell-Jones, T (2010) Valuing Bats in Ecological Impact Assessment. IEEM In-Practice. Number 70 (December 2010). Pp. 23-25.

Appendix 1: Proposed Development Plan



Appendix 2: Site Location Plan

Appendix 3: BERS Plan



Appendix 4: Legislation and Planning Policy Related to Bats

LEGAL PROTECTION

All species of bat are fully protected under ***The Conservation of Habitats and Species Regulations 2017*** (as amended) through their inclusion on Schedule 2.

Regulation 43: Protection of certain wild animals - offences

(1) A person is guilty of an offence if they:

(a) Deliberately captures, injures or kills any wild animal of a European protected species,

(b) Deliberately disturbs wild animals of any such species,

(c) Deliberately takes or destroys the eggs of such an animal, or

(d) Damages or destroys a breeding site or resting place of such an animal,

(2) For the purposes of paragraph (1) (b), disturbance of animals includes in particular any disturbance which is likely—

(a) To impair their ability:

(i) To survive, to breed or reproduce, or to rear or nurture their young; or

(ii) In the case of animals of a hibernating or migratory species, to hibernate or migrate; or

(b) To affect significantly the local distribution or abundance of the species to which they belong.

Bats are also protected under the ***Wildlife and Countryside Act 1981*** (as amended) through their inclusion on Schedule 5. Under this Act, they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection
- Selling, offering or exposing for sale, possession or transporting for purpose of sale

NATIONAL PLANNING POLICY

National Planning Policy Framework 2021

The National Planning Policy Framework promotes sustainable development. The Framework specifies the need for protection of designated sites and priority habitats and species. An emphasis is also made on the need for ecological infrastructure through protection, restoration and re-creation. The protection and recovery of priority species (considered likely to be those listed as species of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006) is also listed as a requirement of planning policy.

In determining a planning application, planning authorities should aim to conserve and enhance biodiversity by ensuring that: designated sites are protected from harm; there is appropriate mitigation or compensation where significant harm cannot be avoided; measurable gains in biodiversity in and around developments are incorporated; and planning permission is refused for development resulting in the loss or deterioration of irreplaceable habitats including aged or veteran trees and also ancient woodland.

The Natural Environment and Rural Communities Act 2006 and the Biodiversity Duty

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'.

Section 41 of the Act requires the Secretary of State to publish a list of habitats and species which are of 'principal importance for the conservation of biodiversity'. This list is intended to assist decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications. A developer must show that their protection has been adequately addressed within a development proposal.

LOCAL PLANNING POLICY

Babergh and Mid Suffolk Joint Local Plan (2020)

The Babergh and Mid Suffolk Joint Local Plan (2020) can be viewed here: https://www.babergh.gov.uk/planning/planning-policy/new-joint-local-plan/

The following planning policies have implications for developers in relation to bats:

- Policy LP18 - Biodiversity & Geodiversity:
    - All development should follow a hierarchy of seeking firstly to; enhance habitats, avoid impacts, mitigate against harmful impacts, or as a last resort compensate for losses that cannot be avoided or mitigated for. Adherence to the hierarchy should be demonstrated. Development should:
        - Conserve, restore and contribute to the enhancement of biodiversity and geological conservation interests including priority habitats and species. Enhancement for biodiversity should be commensurate with the scale of development.
        - Plan positively for the creation, protection, enhancement and management of local networks of biodiversity with wildlife corridors that connect areas. Where possible, link to existing green infrastructure networks and areas identified by local partnerships for habitat restoration or creation so that these ecological networks will be more resilient to current and future pressures.
        - Apply additional measures to assist with the recovery of species listed on S41 of the NERC Act 2006.
    - Development which would have an adverse impact on species protected by legislation, or subsequent legislation, will not be permitted unless there is no alternative and the local planning authority is satisfied that suitable measures have been taken to:
        - Reduce disturbance to a minimum.
        - Maintain the population identified on site.

- Provide adequate alternative habitats to sustain at least the current levels of population.

- Where appropriate, the local planning authority will use planning obligations and/or planning conditions to achieve appropriate mitigation and/or compensatory measures and to ensure that any potential harm is kept to a minimum.

Suffolk Local Biodiversity Action Plan

The Suffolk Local Biodiversity Action Plan (Grouped plan for bats) can be viewed here: https://www.suffolkbis.org.uk/species/mammals-bats

The following bat species are included in the plan:

- Barbastelle
- Brandts
- Brown long-eared
- Common Pipistrelle
- Daubentons
- Leislers
- Lesser horseshoe
- Nathusius' pipistrelle
- Natterer's
- Noctule
- Serotine
- Soprano pipistrelle
- Whiskered

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

A European Protected Species Licence (EPSL) issued by Natural England will be required for works likely to affect a bat roost or for operations likely to result in a level of disturbance which might impair their ability to undertake those activities mentioned above (e.g. survive, breed, rear young and hibernate). The licence is to allow derogation from the relevant legislation but also to enable appropriate mitigation measures to be put in place and their efficiency/success to be monitored. The legislation may also be interpreted such that, in certain circumstances, important foraging areas and/or commuting routes can be regarded as being afforded *de facto* protection, for example, where it can be proven that the continued usage of such areas is crucial to maintaining the integrity and long-term viability of a bat roost (Garland & Markham, 2008).

There are 17 species of bat breeding in England and Natural England issues licences under Regulation 55 of the Habitats Regulations to allow you to work within the law. Licences are issued for specific purposes stated in the Regulations, if the following three tests are met:

- The purpose of the work meets one of those listed in the Habitats Regulations (see below);
- That there is no satisfactory alternative;
- That the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range

The Habitats Regulations permits licences to be issued for a specific set of purposes including:

- include preserving public health or public safety or other imperative reasons of over-riding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment;
- scientific and educational purposes;
- ringing or marking; and,
- conserving wild animals.

Development works fall under the first purpose and Natural England issues bat mitigation licences for developments.

EUROPEAN PROTECTED SPECIES POLICIES

In December 2016 Natural England officially introduced the four licensing policies throughout England. The four policies seek to achieve better outcomes for European Protected Species (EPS) and reduce unnecessary costs, delays and uncertainty that can be inherent in the current standard EPS licensing system. The policies are summarised as follows:

- Policy 1; provides greater flexibility in exclusion and relocation activities, where there is investment in habitat provision;
- Policy 2; provides greater flexibility in the location of compensatory habitat;
- Policy 3; provides greater flexibility on exclusion measures where this will allow EPS to use temporary habitat; and,
- Policy 4; provides a reduced survey effort in circumstances where the impacts of development can be confidently predicted.

The four policies have been designed to have a net benefit for EPS by improving populations overall and not just protecting individuals within development sites. Most notably Natural England now recognises that the Habitats Regulations legal framework now applies to ‘local populations’ of EPS and not individuals/site populations.