



Preliminary Roost Assessment

Walkers Farm, White Roding, Uttlesford CM6 1RX

Malcolm Gemmill

Status	Issue	Name	Date
Draft	1	Olga Hermann, Graduate Ecologist	12/10/2023
Reviewed	1.1	Megan Knapp BSc (Hons), Consultant Ecologist [Natural England Level 1 bat licence 2022-10627-CL17-BAT and accredited agent to Natural England Level 2 bat licence 2018-33540-CLS-CLS]	13/10/2023
Final	2	Olga Hermann, Graduate Ecologist	13/10/2023

Arbtech Consultant's Contact Details:

Olga Hermann
Graduate Ecologist

Limitations and Copyright

Arbtech Consulting Limited has prepared this report for the sole use of the above-named client or their agents in accordance with our General Terms and Conditions, under which our services are performed. It is expressly stated that no other warranty, expressed or implied, is made as to the professional advice included in this report or any other services provided by us. This report may not be relied upon by any other party without the prior and express written agreement of Arbtech Consulting Limited. The conclusions and recommendations contained in this report are based upon information provided by third parties. Information obtained from third parties has not been independently verified by Arbtech Consulting Limited.

© This report is the copyright of Arbtech Consulting Limited. Any unauthorised reproduction or usage by any person other than the addressee is strictly prohibited.

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 Limited was instructed by Malcolm Gemmill to undertake a Preliminary Roost Assessment (PRA) at Walkers Farm, White Roding, Uttlesford CM6 1RX (hereafter referred to as “the site”). The survey was required to inform a planning application for the demolition of agricultural building remains with build of a replacement agricultural building (hereafter referred to as “the proposed development”).

The following is work you will need to commission to obtain planning permission and to comply with legislation. Further information, along with opportunities for biodiversity enhancement, are outlined in Table 5 of this report.

Feature	Survey Results Summary	Impact Assessment	Recommendations
Roosting bats	B1 is assessed to hold a negligible habitat value of supporting roosting bats due to the lack of external and internal features.	Bats are considered highly unlikely to be roosting within this building which will be demolished as part of the proposed development. As a result, no impacts to roosting bats are anticipated.	No further surveys are recommended to inform the planning application. 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.
Nesting birds	B1 contains evidence of nesting birds as evidenced by a loose twigged nest, likely belonging to a pigeon. The scrub surrounding B1 could also provide suitable nesting opportunities for common species of birds.	The proposed development will result in the demolition of B1, which could cause destruction or the disturbance and subsequent abandonment of active bird nests.	Works should be undertaken outside the period 1st March to 31st August. If this timeframe cannot be avoided, a close inspection of the building and nests should be undertaken immediately, by a qualified ecologist, prior to the commencement of work. All active nests will need to be retained until the young have fledged.

Contents

1.0 Introduction and Context6

 1.1 Background 6

 1.2 Site Location and Landscape Context..... 6

 1.3 Scope of the Report 6

2.0 Methodology.....7

 2.1 Desk Study 7

 2.2 Field Survey 7

 2.3 Breeding Birds and Other Incidental Observations..... 7

 2.4 Suitability Assessment..... 7

 2.5 Limitations 8

3.0 Results and Evaluation9

 3.1 Designated Sites..... 9

 3.2 Historical Records 9

 3.3 Field Survey Results..... 9

4.0 Conclusions, Impacts and Recommendations13

5.0 Bibliography.....16

 Appendix 1: Proposed Development Plan..... 17

 Appendix 2: Site Location Plan 18

 Appendix 3a: PRA Plan..... 19

 Appendix 4: Legislation and Planning Policy Related to Bats 20

1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed by Malcolm Gemmill to undertake a Preliminary Roost Assessment (PRA) at Walkers Farm, White Roding, Uttlesford CM6 1RX (hereafter referred to as “the site”). The survey was required to inform a planning application for the demolition of agricultural building remains with build of a replacement agricultural building (hereafter referred to as “the proposed development”). A plan showing the proposed development is provided in Appendix 1.

The aim of the PRA was to determine the presence or evaluate the likelihood of the presence of roosting bats, and to gain an understanding of how bats could use the site for roosting, foraging or commuting. This has been undertaken with due consideration to the “Bat Surveys for Professional Ecologists—Good Practice Guidelines” publication (Collins, 2016). No previous ecology reports have been produced for this site by Arbtech Consulting Ltd or, to the author’s knowledge, by any other consultancy.

1.2 Site Location and Landscape Context

The site is located at National Grid Reference TL 57601 14562 and has an area of approximately <0.1ha comprising building remains, modified grassland and scattered trees. The development area is located in a working farm with associated agricultural buildings and a residential dwelling, and is surrounded by agricultural fields in all directions. There are two water bodies directly north of the site, and a tree line access the road from the eastern boundary of the farm. A site location plan is provided in Appendix 2.

1.3 Scope of the Report

This report provides a description of all features suitable for roosting, foraging and commuting bats and evaluates those features in the context of the site and wider environment. It further documents any physical evidence collected or recorded during the site survey that establishes the presence of roosting bats. It provides information on possible constraints to the proposed development as a result of bats and summarises the requirements for any further surveys to inform subsequent mitigation proposals, achieve planning or other statutory consent and to comply with wildlife legislation.

To achieve this, the following steps have been taken:

- A desk study has been carried out.
- A field survey has been undertaken, including an inspection of built structures, to determine the presence or the suitability of any features which bats could use for roosting and to assess the suitability of the site’s bat foraging and commuting habitat.
- An outline of potential impacts on any confirmed or unidentified roosts has been provided, based on the proposed development.
- Recommendations for further surveys and 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 Desk Study

The desk study included a 2km radius review of statutory designated sites with bat qualifying interests and granted EPSL records for bats held on magic.gov.uk database. An assessment of the surrounding landscape structure was also completed using aerial images from Google Earth and OS maps.

2.2 Field Survey

The survey was undertaken by Olga Hermann, Graduate Ecologist [accredited agent to Natural England Level 2 bat licence number 2019-41480-CLS-CLS] on 01/09/2023. The PRA focussed on one built structure which will be affected by the proposed development as well as providing an overview of the wider site and the surrounding landscape for bat roosting, foraging and commuting habitat.

For any surveyed buildings:

A non-intrusive visual appraisal was undertaken from the ground, using binoculars to inspect the external features of the building for features which bats could use for roosting, including access or egress points and for signs of bat use including droppings, scratch marks, insect remains and urine smear marks. An internal inspection of the structure was also made.

2.3 Breeding Birds and Other Incidental Observations

The surveyor also made note of any other ecological constraints observed during the survey, notably the likelihood of presence or signs of breeding birds, and the suitability of the site for barn owls *Tyto alba*.

2.4 Suitability Assessment

Built structures were categorised according to the likelihood of bats being present and the types of roost that the identified features could support. This is summarised in Table 1 below. Roost suitability is classified as high, moderate, low and negligible and dictates any further surveys required before works can proceed.

Table 1: Features of a building that are correlated with use by bats

Classification	Feature of building and its context
Moderate to high	Buildings or structures with features of particular significance for larger numbers of roosting bats e.g. mines, caves, tunnels, icehouses and cellars. Habitat on site and surrounding landscape of high quality for foraging bats e.g. broadleaved woodland, tree-lined watercourses and grazed parkland. Site is connected with the wider landscape by strong linear features that would be used by commuting bats e.g. river and or stream valleys and hedgerows. Site is proximate to known or likely roosts (based on historical data). Buildings with high suitability could support roosts of high conservation value such as maternity or hibernation roosts.

Low	A small number of possible roost sites or features, used sporadically by individual or small numbers of bats. Potential roost features may be suboptimal for reasons such as shallow depth, poor thermal qualities or upwards orientation with exposure to inclement weather or predators. Habitat suitable for foraging in close proximity, but isolated in the landscape. Or an isolated site not connected by prominent linear features. Few features suitable for roosting, minor foraging or commuting.
Negligible	Unsuitable for use by bats.

2.5 Limitations

It should be noted that whilst every effort has been made to describe the features on site in the context of their suitability for roosting bats, this does not provide a complete characterisation of the site. This survey provides a preliminary view of the likelihood of bats being present. This is based on suitability of the habitats on site and in the local area, the ecology and biology of bats as currently understood, and the known distribution of bats as recovered during the desk study. 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.

A biological records data search has not been undertaken. However, given the location of the site, the nature of the habitats present and the assessed suitability of the site for protected or notable species, it is not anticipated that the purchase of biological records data will add any significant weight or alter the conclusions and recommendations outlined in this report.

The interior of the structure was unsafe to fully enter due to its dilapidated condition. However, it was extremely cramped with building supplies, concluding bats would be unlikely to use this space due to the lack of open flight access. As such, this limitation is not seen to be significant or alter the conclusion of this report.

These limitations have been taken into account during the evaluation of the site and requirement for further surveys and mitigation.

3.0 Results and Evaluation

3.1 Designated Sites

No statutory designated sites with bat qualifying interests were identified within 2km of the site.

3.2 Historical Records

A search of the magic.gov.uk database for granted EPSLs within a 2km radius of the site has been completed. Displaced bats from licensed sites <2km away from the survey site will find alternative habitat either within the mitigation measures implemented as part of the licence or will relocate to other known roosts sites in close proximity to the licensed site. EPSL records for bats are summarised in Table 2.

Table 2: Granted EPSLs for bats within 2km of the site

EPSL reference	Bat species affected	Impacts allowed by licence
2014-5161-EPS-MIT	Common and soprano pipistrelle	Located ~1700m east from the site. Destruction of a resting place.

3.3 Field Survey Results

The weather conditions recorded at the time of the survey are shown in Table 3. The results of the field survey are detailed in Table 4 and illustrated in Appendix 3.

Table 3: Weather conditions during the survey

Date:	01/09/2023
Temperature	17°C
Humidity	74%
Cloud Cover	100%
Wind	4mph
Rain	None

Table 4: PRA Results

Feature	Description	Photographs
Bat foraging and commuting habitat	The site is completely surrounded by agricultural fields in all directions, with the closest woodland parcel being located ~650m east. The site itself has scattered trees, providing limited foraging opportunities for bats, but a treeline across the road from the site which connects to the closest woodland parcel. The two fishing lakes to the north of the site could also provide some foraging opportunities for bats.	N/A

B1 – overview and exterior

B1 stands in a complete state of despair. The majority of the building fell down in years previous, with only the remnants of a wooden shed and rubble remaining. The structure is made of single wooden panelling, with a corrugated metal roof. The structure is surrounded by scrub and plum trees.




Figure 1: B1 covered in vegetation




Figure 2: North elevation of B1



Figure 3: West elevation of B1 remains

<p>B1 – interior</p>	<p>The interior was deemed unsafe to fully enter due to the structures' poor condition. However, it was extremely cramped with building supplies, concluding bats would be unlikely to use this space due to the lack of open flight access. Due to the small scale of the building, most of the inside area was still able to be inspected for evidence of roosting bats, with no droppings, live or deceased bats, urine staining or feeding remains being present.</p> <p>The interior provides no opportunities for roosting bats due to its open and exposed nature. The unlined roof and walls also provide no possible voids or crevices for roosting bats.</p>	 <p>Figure 4: East elevation of B1</p>
<p>B1 – suitability assessment for bats</p>	<p>B1 is assessed to hold negligible habitat value for roosting bats. B1 provides no suitable features for roosting bats due to the lack features present. The open, exposed nature of the structure and single sheeted metal roof deems it unlikely of being able to support void-dwelling bats, whilst the exterior has no crevices suitable for crevice-dwelling bats, only large gaping holes where the building is deteriorating. Although the dilapidated building provides no roosting suitability, it could be used by foraging bats as a night feeding roost, however no evidence of this was found and the cluttered inside would also conclude this type of activity to be unlikely.</p>	<p>N/A</p>

<p>B1 - breeding birds and other incidental observations</p>	<p>The interior of B1 contains evidence of nesting birds in the form of a loose twigged nest, likely belonging to pigeons. The scrub surrounding the structure could also provide suitable nesting opportunities for common species of birds.</p>	 <p><i>Figure 5: Birds nest in the interior of B1</i></p>
--	---	--

4.0 Conclusions, Impacts and Recommendations

Taking the desk study and field survey results into account, Table 5 presents an evaluation of the value of the site for bats and also details any other ecological constraints identified such as nesting birds in relation to the proposed development which will comprise the demolition of agricultural building remains with build of a replacement agricultural building.

Table 5: Evaluation of the site for bats and any other ecological constraints

Building	Survey Results Summary	Impact Assessment	Recommendations	Biodiversity Enhancement Opportunities ¹
Roosting bats- B1	<p>B1 has a negligible value for roosting bats due to a lack of potential roost features.</p> <p>B1 could potentially be used as a night feeding roost although no evidence of this was found in the form of droppings or feeding remains.</p>	Bats are very unlikely to be roosting within this building and as such, there are not anticipated to be any impacts on roosting bats as a result of the demolition of this building.	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.	<p>The installation of one bat box at the site will provide additional roosting habitat for bats.</p> <p>The bat box can be integrated into the fabric of the new building as shown on Appendix 1, or placed on suitable trees on site.</p> <p>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.</p> <p>The bat boxes will be a specification suitable for both crevice dwelling and void dwelling bats such as Vivara Pro WoodStone Bat Box or a similar alternative brand.</p>

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

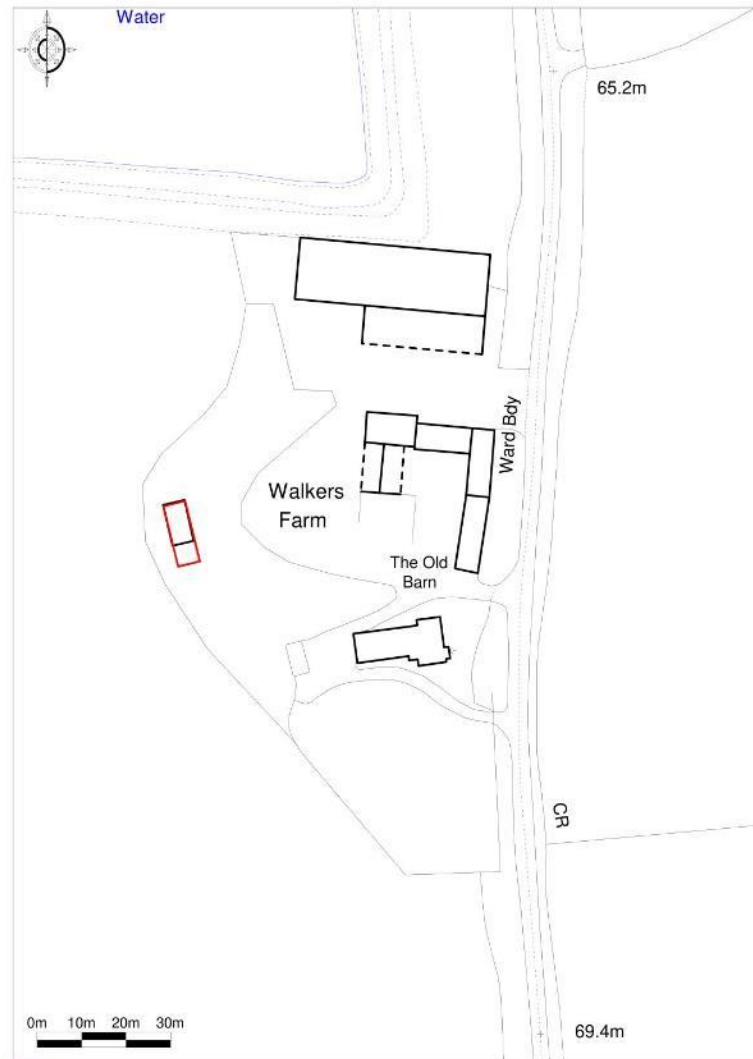
<p>Foraging and commuting bats</p>	<p>The site offers extremely limited foraging and commuting habitats for local bat populations.</p>	<p>The proposed development will not result in the removal of any habitats which could be used by foraging or commuting bats.</p> <p>The proposed development could include the use of lighting which could spill on to bat roosting, foraging or commuting habitat and deter bats from using these areas.</p>	<p>A low impact lighting strategy will be adopted for the site during and post-development, which will include the following measures:</p> <ul style="list-style-type: none"> • Light spill on to the west side of the site should be avoided. • Use narrow spectrum light sources to lower the range of species affected by lighting. • Use light sources that emit minimal ultra-violet light. • Avoid white and blue wavelengths of the light spectrum to reduce insect attraction and where white light sources are required in order to manage the blue shortwave length content they should be of a warm / neutral colour temperature <4,200 kelvin. • Not use bare bulbs and any light pointing upwards. The spread of light will be kept in line with or below the horizontal. • Light spill will be reduced via the use of low-level lighting used in conjunction with hoods, cowls, louvers and shields. Lights will also be directional to ensure that light is directed to the intended areas only. • External lighting will be on PIR sensors that are sensitive to large objects only (so that they are not triggered by passing bats) and will be set to the shortest time duration to reduce the amount of time the lights are on. • Wall lights and security lights will be 'dimnable' and set to the lowest light intensity settings. There are several products on the market that allow the control of the light intensity and the duration that the lights are on. All lighting on the developed site will make use of the most up to date technology available. 	<p>None.</p>
------------------------------------	---	--	--	--------------

<p>Nesting birds- B1</p>	<p>The building contains evidence of nesting birds in the form of a loose twigged nest on the interior corner.</p> <p>The scrub surrounding B1 could also provide suitable nesting opportunities for common species of birds.</p>	<p>The demolition of B1 could result in the destruction or the disturbance and subsequent abandonment of active bird nests.</p> <p>The scrub is likely to be removed during the development, and as such could result in the destruction or the disturbance and subsequent abandonment of active bird nests.</p>	<p>Works should be undertaken outside the period 1st March to 31st August. If this timeframe cannot be avoided, a close inspection of the building should be undertaken immediately, by qualified ecologist, prior to the commencement of work. All active nests will need to be retained until the young have fledged.</p>	<p>The installation of a minimum of two swift boxes on the new building post development will provide additional nesting habitat for birds. The boxes can be integrated into the fabric of the building, such as the WoodStone Build-in Swift Nest Box or a similar alternative brand. Contrarily, these could be either placed on existing trees on site.</p> <p>These should be sited ideally above 5 metres and be positioned at the eaves. If possible, avoid locations which receive long periods of direct sunlight throughout the day.</p>
<p>Other ecological constraints</p>	<p>None identified.</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>

5.0 Bibliography

- Collins, J. (2016). Bat Surveys for Professional Ecologists —Good Practice Guidelines, 3rd edition, Bat Conservation Trust, London.
- Garland, L. & Markham, S. (2008) Is Important Bat Foraging and Commuting Habitat Legally Protected? <http://biodiversitybydesign.co.uk/cmsAdmin/uploads/protection-for-bat-habitat-sep-2007.pdf>
- Google Earth. Accessed on 28/09/2023.
- Institution of Lighting Professionals (2018). Guidance Note 08/18 Bats and Artificial Lighting in the UK. Bats and the Built Environment Series Publication: http://www.bats.org.uk/news.php/406/new_guidance_on_bats_and_lighting.
- Magic Database. <http://www.magic.gov.uk/MagicMap.aspx> Accessed on 28/09/2023.
- Mitchell-Jones, A.J. (2004). Bat Mitigation Guidelines. English Nature, Peterborough.
- Natural England Designated Sites View. <https://designatedsites.naturalengland.org.uk/SiteSearch.aspx> Accessed on 28/09/2023.
- 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.

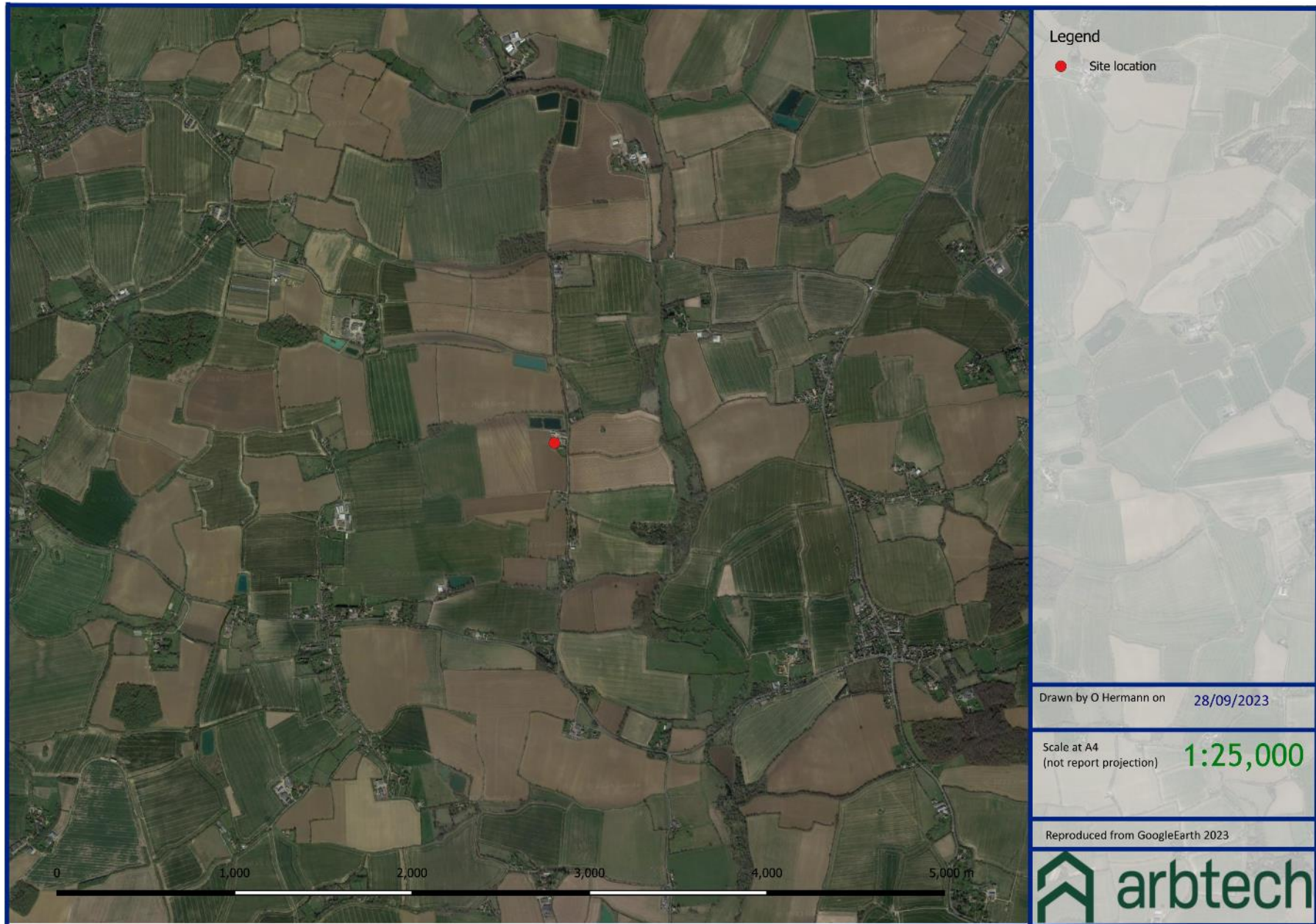
Appendix 1: Proposed Development Plan



Ordnance Survey © Crown Copyright 2017. All rights reserved.
Licence number: 100025431. Project Scale: 1:1250



Appendix 2: Site Location Plan



Appendix 3a: PRA 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.

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:

1. 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;

2. scientific and educational purposes;
3. ringing or marking; and,
4. 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.