



## Preliminary Roost Assessment

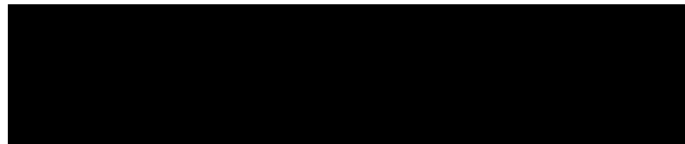
35 Curley Hill Road, Lightwater, GU18 5YQ

Mr Tomasz Jasinski

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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 Limited was instructed by Mr Tomasz Jasinski to undertake a Preliminary Roost Assessment (PRA) at 35 Curley Hill Road, Lightwater, GU18 5YQ (hereafter referred to as “the site”). The survey was required to inform a planning application for a roof extension to the front/rear, new front/rear dormers and roof changes above garage (hereafter referred to as “the proposed development”).

The following is work you will need to commission to comply with planning policy and legislation. Further information, along with opportunities for biodiversity enhancement, are outlined in Table 7 of this report.

Feature	Survey Results Summary	Impact Assessment	Recommendations
Roosting bats (B1)	B1 has negligible value for roosting bats due to a lack of potential roost features.	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 proposed extensions to 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.
Foraging and commuting bats	Scattered trees and hedgerows could be used by local bat populations for foraging and commuting. These could also be used by bats dispersing from nearby roosts outside of the site. The site has moderate value for foraging and commuting bats.	<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 will 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 within the proposed development. This should be designed in accordance with Guidance Note GN08/23 Bats and Artificial Lighting at Night (Institution of Lighting Professionals, 2023).</p> <p>Avoidance of light spill on to key habitats or features which bats may use for roosting, foraging or commuting, via an appropriately sized buffer insofar as possible. A luminaire specification which reduces the effects of light spill on bats should be chosen where feasible. The installation of physical screening features, glazing treatments and the use of dimming or part night lighting could also be considered, where appropriate.</p>

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## 1.0 Introduction and Context

### 1.1 Background

Arbtech Consulting Limited was instructed by Mr Tomasz Jasinski to undertake a Preliminary Roost Assessment (PRA) at 35 Curley Hill Road, Lightwater, GU18 5YQ (hereafter referred to as “the site”). The survey was required to inform a planning application for a roof extension to the front/rear, new front/rear dormers and roof changes above garage (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, 2023). To the author’s knowledge, no previous ecology reports have been produced for this site.

### 1.2 Site Location and Landscape Context

The site is located at National Grid Reference SU 91604 61411 and has an area of approximately 0.1ha. The site is characterised by a detached building, developed unsealed surface, and a rear garden. It is located on the western edge of the village of Lightwater, and is surrounded by residential development on all aspects, with deciduous woodland nearby to the west, and Colony Bog and Bagshot Heath Site of Special Scientific Interest (SSSI) to the south. Beyond this immediate infrastructure there are habitats of elevated ecological value within the wider landscape including extensive areas of lowland heathland, and good quality woodland and parkland habitat. 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 Day-time Bat Walkover (DBW) survey, 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 Charlie Drapala (Accredited Agent on Natural England Bat Licence Number: 2019-41480-CLS-CLS) on 07/11/2023.

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 DBW survey was undertaken, comprising 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 building was also made, including the living areas and any accessible roof spaces, using a torch and ladders. The surveyor paid particular attention to the floor and flat surfaces, window shutters and frames, lintels above doors and windows, and carried out a detailed search of numerous features within the roof space.

### 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.

### 2.4 Suitability Assessment

Habitats were categorised in accordance with Tables 4.1 and 6.2 of the “Bat Surveys for Professional Ecologists —Good Practice Guidelines” publication (Collins, 2023), which are replicated in Tables 1 and 2 below.

Table 1: Guidelines for assessing the potential suitability of a built structure for bats

Potential Suitability	Roosting Habitats in Structures
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. 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 and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).

Moderate	A structure with one of more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts e.g. maternity or classic cool/stable hibernation site.

Table 2: Guidelines for assessing the potential suitability of a site for bats

Potential Suitability	Potential Flight-Paths and Foraging Habitats
Negligible	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	Habitat that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.

## 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.

A search for historical bat records 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 bats, it is not anticipated that the purchase of historical records data will add any significant weight or alter the conclusions and recommendations outlined in this report.

The roof tiles of the eastern elevation were not fully visible during the survey due to the proximity to the wall. However, tiles were assumed to be in the same condition as the rest of the elevations which were closely inspected.

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

Details of any statutory designated sites with bat qualifying interests within a 2km radius of the site, including their reasons for notification, are provided in Table 3 below.

Table 3: Statutory designated sites with bat qualifying interests within 2km radius of the site

Designated site name	Distance from site	Reasons for notification from Natural England
Colony Bog and Bagshot Heath (SSSI)	~200m west	Qualifying habitats provide good foraging habitat for bats.
Thursley, Ash, Pirbright & Chobham Special Area of Conservation (SAC)	~200m west	Qualifying habitats provide good foraging habitat for bats.
Brentmoor Heath Local Nature Reserve (LNR)	~1800m east	Qualifying habitats provide good foraging habitat for bats.

#### 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 4.

Table 4: Granted EPSLs for bats within 2km of the site

EPSL reference	Bat species affected	Impacts allowed by licence
EPSM2013-5565	Common pipistrelle and soprano pipistrelle	Destruction of a resting place


### 3.3 Field Survey Results

The weather conditions recorded at the time of the survey are shown in Table 5. The results of the field survey are detailed in Table 6 and illustrated in Appendix 3.

Table 5: Weather conditions during the survey



Date:	07/11/2023
Temperature	13°C
Humidity	76%
Cloud Cover	80%
Wind	2m/s
Rain	None



Table 6: PRA Results

Feature	Description	Photographs
Bat foraging and commuting habitat	The site is characterised by a residential building, associated areas of hardstanding, with modified grassland, scattered trees and hedgerow in a garden to the rear. As these habitats are located within a garden context, these habitats are of limited value to foraging and commuting bats. The nearby woodland is of elevated value for foraging and commuting bats. The site is small in extent and therefore it is not considered likely to represent a significant resource in the context of the wider landscape. The habitat is assessed as having moderate value for foraging and commuting bats.	

<p>B1 – overview – northern elevation</p>	<p>B1 is a detached brick built two storey dwelling with a single storey section to the front. The roof is pitched and hipped and clad in clay tiles, with much of the single storey section flat bitumen felt roof. The garage is attached to the building B1 and lies under the flat roof section. There is a dormer window clad in hanging tiles on the rear elevation.</p> <p>The doors and windows are all UPVC framed and are well fitted. The soffits on all elevations are tight with no gaps. The brickwork is in good condition and there are no areas of falling mortar. The roof tiles appear in good condition with no lifted or missing tiles.</p> <p>It is noted that no evidence or opportunities for nesting birds was observed during the survey.</p>	
<p>B1 – western elevation</p>	<p>There are two vents on the roof which have gaps, which upon close up inspection via ladder, were deemed not suitable for roosting bats due to a lack of depth.</p> <p>The fascia board above the garage was also inspected close up via the roof, and was found to have no gap behind the board.</p>	



<p>B1 – southern elevation</p>	<p>The dormer window has hanging tiles which are in good condition and laid flat, providing no gaps for crevice dwelling bats to roost under. The lead flashing at the top of the dormer windows appears to create minor gaps which are shallow and exposed. There are no observable roosting features.</p>	 <p>A photograph showing the exterior of a brick house with a dormer window. The roof is covered in dark tiles, and the dormer has white-framed windows. A brick chimney is visible on the left. The house is surrounded by trees and a garden with a patio and outdoor furniture. A timestamp in the bottom left corner reads "7 November 2023 14:39".</p>
<p>B1 – eastern elevation</p>	<p>The visibility of the eastern elevation's roof is limited. However, given that a thorough examination on the majority of the roof concluded it to be in excellent condition, it is inferred that the overall condition aligns with the observed roof sections, and provides no suitable roosting features for bats.</p>	 <p>A close-up photograph of a brick wall and the edge of a roof. The bricks are reddish-brown with light-colored mortar. A white gutter runs along the top of the wall. To the right, a wooden fence or structure is visible. A timestamp in the bottom left corner reads "7 November 2023 14:46".</p>

<p>B1 – roof</p>	<p>The surveyor was able to climb on the roof to inspect potential features up close. A small section of fascia board on the garage section of the roof appeared to have a gap underneath but upon close up inspection was found to be shallow with no suitable gap. There are no lifted roof tiles and the tiles all appear in good condition. The ridge tiles are well sealed and the mortar appears in good condition at the verges.</p>	 <p>7 November 2023 14:53</p>
<p>B1 – interior</p>	<p>There is a main loft space and a smaller eave space. Conditions are uniform across the void spaces. The roof is lined with bitumen felt which is in good condition. There is no observable light ingress which could allow access points for bats.</p> <p>Loft: (approximate) length 6.1m x height 1.4m                  Eave space: (approximate) length 6m x 1.4m height</p>	 <p>7 November 2023 14:22</p>
<p>B1 – suitability assessment</p>	<p>B1 is assessed as having negligible value for roosting bats due to a lack of suitable roosting features. There are no access points to the loft voids and no observed roosting features externally.</p>	

#### 4.0 Conclusions, Impacts and Recommendations

Taking the desk study and field survey results into account, Table 7 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.

Table 7: Evaluation of the site for bats and any other ecological constraints

Feature	Survey Results Summary	Impact Assessment	Recommendations	Biodiversity Enhancement Opportunities <sup>1</sup>
Roosting bats (B1)	B1 has negligible value for roosting bats due to a lack of potential roost features.	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 proposed extensions to 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.	The installation of 2 bat boxes at the site will provide additional roosting habitat for bats. One bat box will be installed on a mature tree and one will be integrated within the new build extension. Bat boxes should be positioned 3-5m above ground level (at the eaves of buildings), facing in a south or south-westerly direction, with a clear flight path to and from the entrance, away from and unlit by artificial light, and not above any windows. The bat boxes will be a specification suitable for crevice dwelling species such as Bark Boxes Standard Bat Box (tree) and Vivara Pro Build-in Woodstone Bat Tube (integrated) or a similar alternative brand.
Foraging and commuting bats	Scattered trees and hedgerows could be used by local bat populations for foraging and commuting. These could also be used by bats dispersing from nearby roosts outside of the site. The site has moderate value for foraging and commuting bats.	The proposed development will not result in the removal of any habitats which could be used by foraging or commuting bats.  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 low impact lighting strategy will be adopted within the proposed development. This should be designed in accordance with Guidance Note GN08/23 Bats and Artificial Lighting at Night (Institution of Lighting Professionals, 2023).  Avoidance of light spill on to key habitats or features which bats may use for roosting, foraging or commuting, via an appropriately sized buffer insofar as possible. A luminaire specification which	The following habitat creation could be considered to enhance opportunities at the site for foraging and commuting bats post development:  Native tree, hedgerow, and shrub planting. Creation of wildflower grassland. Creation of a new pond.

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

			reduces the effects of light spill on bats should be chosen where feasible. The installation of physical screening features, glazing treatments and the use of dimming or part night lighting could also be considered, where appropriate.	
Nesting birds (B1)	The building B1 offers no opportunities for nesting birds.	None.	None.	<p>The installation of a minimum of two bird boxes on mature trees around the site boundaries or on retained buildings will provide additional nesting habitat for birds e.g.</p> <p>Schwegler No 17 Swift Nest Box (buildings)  Bark Boxes Blue Tit 25mm (trees)  Woodstone Nest Box (buildings or trees)  Or a similar alternative brand.</p> <p>Tree boxes should be positioned approximately 3m above ground level where they will be sheltered from prevailing wind, rain and strong sunlight. Small-hole boxes are best placed approximately 1-3m above ground on an area of the tree trunk where foliage will not obscure the entrance hole.</p> <p>Swift and sparrow boxes should be positioned at the eaves of a building and can be incorporated into the fabric of the building during construction.</p>

## 5.0 Bibliography

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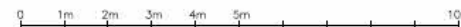
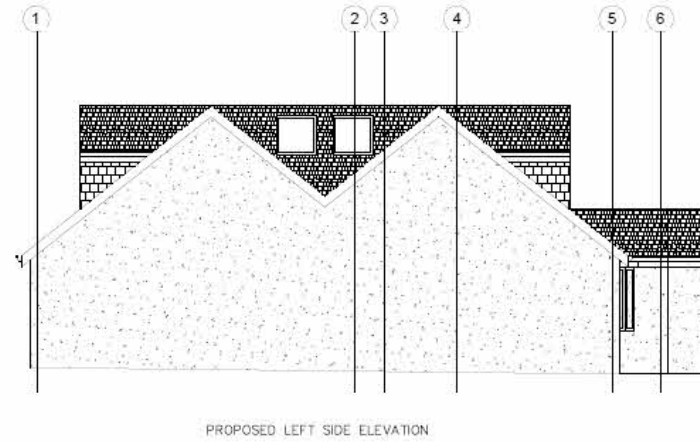
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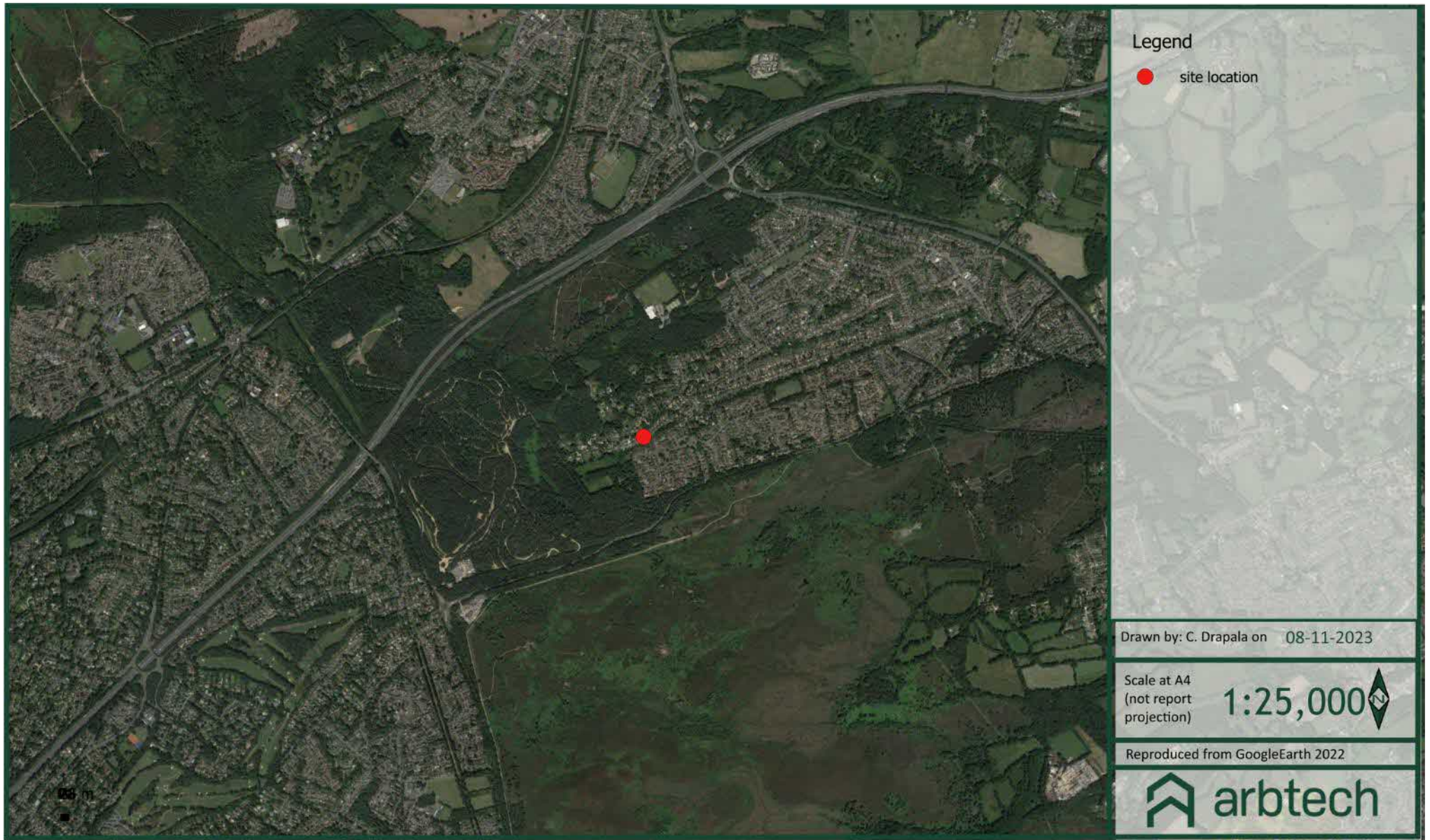


Appendix 1: Proposed Development Plan



 <b>STUDIO CAD PROJECTS</b> Architectural Designers TEL: 01753 661 561 562 E-mail: <a href="mailto:scps@studiocad.co.uk">scps@studiocad.co.uk</a>	
PROJECT: 35, CURLEY HILL ROAD LIGHTWATER, GU18 5YQ PROPOSED ELEVATIONS	
SCALE: 1/100 (A3) DATE: JUL 2023	PROJECT No: 2230728-3
<small>THIS DRAWING MUST NOT BE REPRODUCED WITHOUT THE WRITTEN PERMISSION OF STUDIO CAD PROJECTS. ALL DIMENSIONS TO BE CHECKED AND VERIFIED ON SITE.</small>	

### Appendix 2: Site Location Plan





Appendix 3: 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.