Preliminary Roost Assessment

130 Almodington Lane, Chichester, PO20 7JU

Mr & Mrs M Reed

Status	Issue	Name	Date
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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 & Mrs M Reed to undertake a Preliminary Roost Assessment (PRA) at 130 Almodington Lane, Chichester, PO20 7JU (hereafter referred to as "the site"). The survey was required to inform a planning application for the demolition of two outbuildings followed by the erection of one dwelling (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 6 of this report.

Feature	Survey Results Summary	Impact Assessment	Recommendations
Roosting bats B1 and B2	B1 and B2 have negligible value for roosting bats due to a lack of potential roost features. No evidence of bats was found internally or externally during the survey.	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 both outbuildings.	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.	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 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 B2	The building contains evidence of nesting birds in the form of a disused birds nest located at the southern gable end.	The proposed development could result in the 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 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.

Contents

1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed by Mr & Mrs M Reed to undertake a Preliminary Roost Assessment (PRA) at 130 Almodington Lane, Chichester, PO20 7JU (hereafter referred to as "the site"). The survey was required to inform a planning application for the demolition of two outbuildings followed by the erection of one dwelling (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 SZ 82547 97565 and has an area of approximately 1.3ha. The site is characterised by a residential dwelling with driveway, numerous out buildings, and a large garden. It is surrounded by arable farmland to the west and east, with residential dwellings and associated gardens to the north and south. 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 Romany Poole (Accredited Agent on Natural England Bat Licence Number: 2018-37888-CLS-CLS) on 18/01/2024.

The PRA focussed on two built structures 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 buildings 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 buildings 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
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).
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
None	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines, or generate/shelter insect populations available to foraging bats).
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 bas 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 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.

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 3.

Table 3: Granted EPSLs for bats within 2km of the site.

EPSL reference	Approx. distance from site	Bat species affected	Licence start date:	Licence end date:	Impacts allowed by licence
2020-50526-EPS-MIT	1.95km to the north-east	Brown long-eared bat	22/12/2020	31/12/2027	Destruction of a resting place

3.3 Field Survey Results

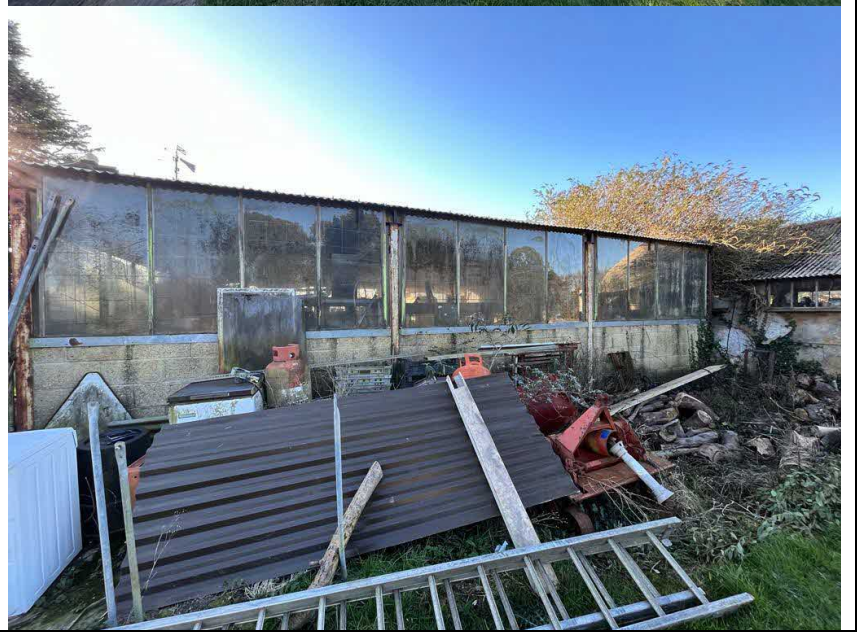
The weather conditions recorded at the time of the survey are shown in Table 4. The results of the field survey are detailed in Table 5 and illustrated in Appendix 3.

Table 4: Weather conditions during the survey

Date:	18/01/2024
Temperature	1°C
Humidity	61%
Cloud Cover	10%
Wind	8m/s
Rain	None

Table 5: PRA Results

Feature	Description	Photographs
Bat foraging and commuting habitat	The site is situated in a rural landscape. It contains scattered trees, shrubs and hedgerows which likely provide foraging and commuting opportunities for bats. There are further large trees in the gardens of neighbouring properties and some small pockets of woodland in close proximity to the site, all of which likely provide foraging and commuting opportunities for bats. The woodlands may also provide roosting opportunities. There are interconnected tree lines and hedgerows along field boundaries. These create a network of commuting routes for bats, connecting woodlands and other suitable bat habitats in the surrounding area.	 

B1 - overview	B1 is a single storey open-plan detached outbuilding of steel framed construction, all under a corrugated steel sheet clad duo pitched roof. The gable roof is formed with steel trusses, purlins and bracing which is supported on portalised SHS posts. The front east-facing elevation contains timber double doors. The front and side walls are formed with 6 courses of single skin blockwork with timber framed glazing over to eaves level, however there are two panels missing on the southern elevation (figure). The front gable is lead-clad. The rear elevation is mostly obscured by vegetation and a B2. B1 is due to be demolished.	 

B1 – southern elevation	An example of the foam filing any gaps between the steel roof and the timber framed windows which blocks potential access points, however there are missing window panels which make the internal of B1 easily accessible.	
B1 – eastern elevation	The steel gable front appears well sealed with no gaps suitable for bats to roost.	

B1 – northern elevation	An example of the timber framed glazing on the northern elevation. This allows high levels of natural light into the building, creating sub-optimal conditions for roosting bats. Any gaps located between the corrugated steel sheet, and the top of the walls is filled with foam which blocks up any potential roosting locations.	
B1 – interior	There is no loft void located within B2. The interior of the building is not lined, leaving the building to be single skinned. The rear elevation appears to be fully clad in corrugated steel. The building is used regularly by the clients which can create light, noise and vibrations. There are windows on the north, east and south elevations which allow high levels of natural light into the building. There is no evidence of bats internally or externally. There are no roosting features for crevice dwelling bats.	

B1 – suitability assessment	In line with Good Practice Guidelines (Collins, J. (Ed) (2023) B1 assessed to have 'negligible' habitat value for roosting bats due to the lack of roosting features located externally and internally. No evidence of bats was found internally or externally during the survey.
B1 - breeding birds and other incidental observations	No evidence of breeding bird was found internally or externally during the survey, however the inside of the building is accessible for birds to nest as there are missing window panels.

B2 - overview	B2 is a single storey open-plan detached outbuilding of steel framed and timber construction, all under a corrugated steel sheet clad duo pitched roof. There are double timber doors located on the southern elevation which appear tight fitting with no gaps. B2 is due to be demolished.	

B2 – northern elevation	There are gaps between the bargeboard and the timber wall, however there is no crawl space on top of the wall and therefore will not provide roosting opportunities. The width of the gap results in the area being too exposed and is not suitable.	
B2- southern elevation	The southern elevation is covered by vegetation which could provide nesting opportunities for birds.	

B2 – western elevation	An example of areas of missing boarding, however there are layers of plastic lining between both materials which could prevent bats from roosting under the boards.	
B2 – interior	There is no loft void located within B2. The interior of the building is not lined, leaving the building to be single skinned. The building is used regularly by the clients which can create light, noise and vibrations. There are windows on the east and west elevations which allow high levels of natural light into the building. An old birds nest was found within B2 (circled in red). There is no evidence of bats internally or externally. There are no roosting features for crevice dwelling bats.	
B2 – suitability assessment	In line with Good Practice Guidelines (Collins, J. (Ed) (2023) B2 assessed to have 'negligible' habitat value for roosting bats due to the lack of roosting features located externally and internally. No evidence of bats was found internally or externally during the survey.	

B2 - breeding birds and other incidental observations	An old, disused nest was located within the beams. Although the nest is no longer in use, birds are able to access the building and future nests could be constructed.

4.0 Conclusions, Impacts and Recommendations

Taking the desk study and field survey results into account, Table 6 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 6: Evaluation of the site for bats and any other ecological constraints

Feature	Survey Results Summary	Impact Assessment	Recommendations	Biodiversity Enhancement Opportunities[1]
Roosting bats B1 and B2	B1 and B2 have negligible value for roosting bats due to a lack of potential roost features. No evidence of bats was found internally or externally during the survey.	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 both outbuildings.	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 two bat boxes at the site will provide additional roosting habitat for bats. The bat boxes will be installed on mature trees within the garden. 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 and void dwelling species such as General Purpose Wood Concrete Bat Box. or a similar alternative brand.
Foraging and	Scattered trees and hedgerows could be used by local bat populations for	The proposed development will not result in the removal of any habitats which could be used by foraging or commuting bats.	A low impact lighting strategy will be adopted within the proposed development. This should be designed in accordance with Guidance Note	None.

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

commuting bats	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 include the use of lighting which could spill on to bat roosting, foraging or commuting habitat and deter bats from using these areas.	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 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 offers no opportunities for nesting birds by the nearby trees and hedgerows could provide nesting habitat. However none of this habitat will be impacted.	None.	None.	The installation of a minimum of two bird boxes on mature trees around the site boundaries will provide additional nesting habitat for birds e.g. Bark Boxes Blue Tit 25mm Woodstone Nest Box Or a similar alternative brand. 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.
Nesting birds B2	The building contains evidence of nesting birds in the form of a disused birds nest located at the southern gable end.	The proposed development could result in the 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 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.	The installation of two integrated swift bricks (e.g. Ibstock Swift Eco Habitat or similar alternative brand) at the site will provide additional nesting habitat for birds in line with the measures outlined in the British Standard "Integral nest boxes. Selection and installation for new

				developments. Specification" (BS 42021:2022). Swift bricks should be integrated into the fabric of the building during construction. Boxes should be positioned close together (0.6-1.0m between bricks) as swifts prefer to nest gregariously. The boxes should be placed at least 5m above ground level under the eaves of a building, on a north or east elevation, where they will be sheltered from prevailing wind, rain and strong sunlight. To be suitable for swifts, the bricks require an open aspect with no trees or large shrubs potentially obstructing the birds' flight path up to 5m from the brick. Swift bricks are a "universal nest brick" for small bird species, including red-listed species such as common swift, house sparrow, house martin, and starling.
Other ecological constraints	None identified.	N/A	N/A	N/A

5.0 Bibliography

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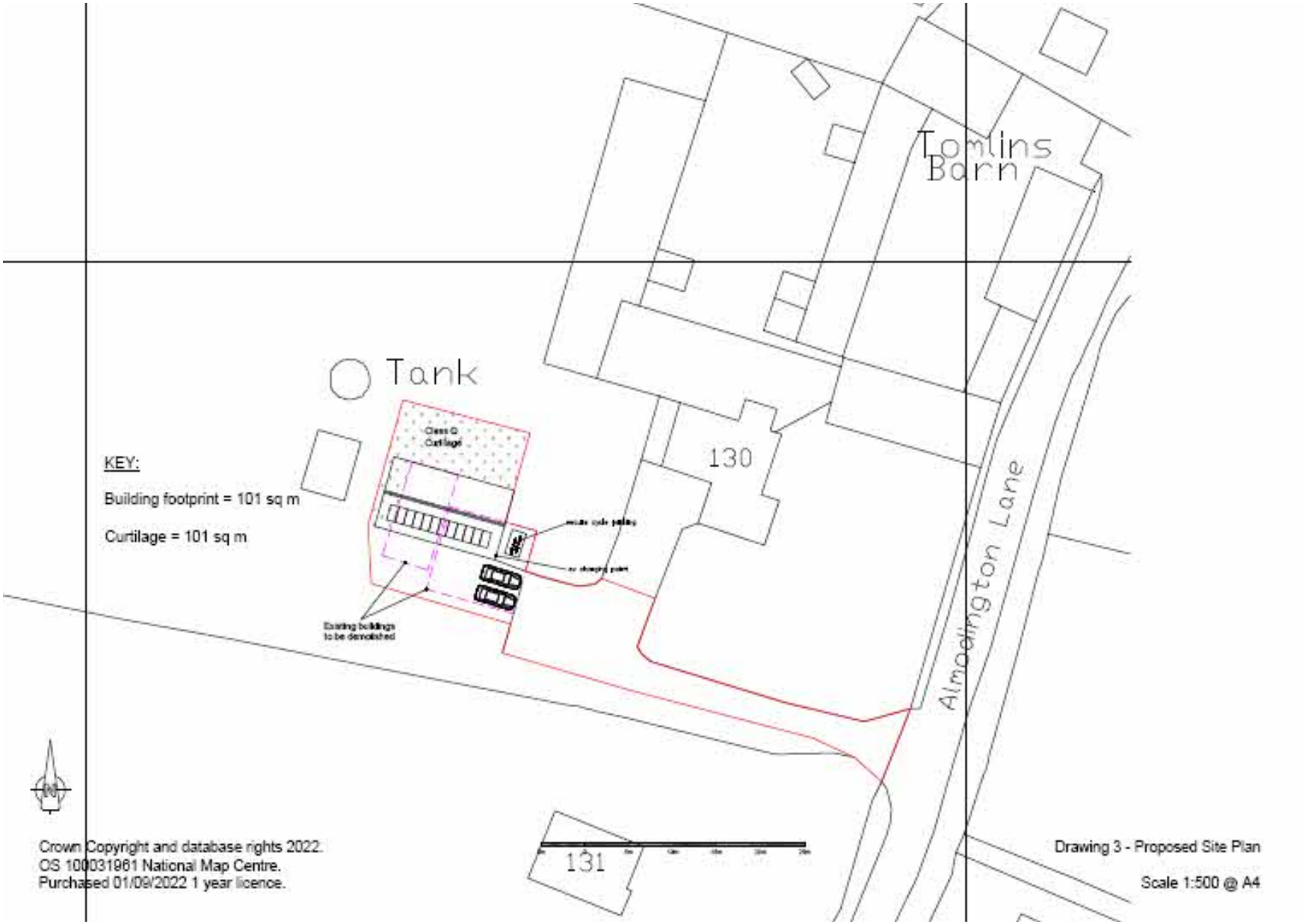
Appendix 1: Proposed Development Plan



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.