# Bat Survey: Presence/Absence Survey

## Higher Clough and Carr Wood Cottages

Carr Wood, Rochdale

October 2020

**Prepared for:** Mr Page and Ms Bamford

**Report prepared by: Verity Webster** **BSc (Hons) MSc CEcol CMIEEM**

## EXECUTIVE SUMMARY

- In September 2020 bat emergence survey work was undertaken at Higher Clough and Carr Wood Cottages, Carr Wood, Rochdale.
- The survey work was undertaken to update that undertaken in May and June 2019.
- The survey work reflects that undertaken in 2019. No bats were seen or heard emerging from the building. High numbers of common pipistrelles were recorded commuting through the site and foraging along the tree lines.
- The survey work is considered sufficient, along with the 2019 survey work, to confirm the likely absence of a bat roost within the building. However, due to the high level of bat activity and the numerous potential roost features present within the building, the potential presence of itinerant bats cannot be entirely ruled out.
- For this reason, reasonable avoidance measures are recommended during works to reduce the risk of harm to bats to negligible.
- The proposals provide the opportunity to enhance the site for bats and measures have been included in the Landscape and Ecological Enhancement Plan for the site.

# 1 Introduction

## 1.1 Application Site

1.1.1. This report details a Bat Presence/Absence survey of buildings at Higher Clough and Carr Wood Cottages, Carr Wood, Rochdale, OL11 5UT. Ordnance Survey grid reference (centre of cottages): SD 8538 1351

1.1.2. Mr Page and Ms Bamford commissioned Verity Webster Ltd to undertake the bat survey work to inform the planning application.

## 1.2 Background

1.1.3. On 23rd January 2019 a Preliminary Roost Assessment was undertaken at Higher Clough and Carr Wood Cottages. The cottages were considered to have high suitability for bats. Three bat emergence surveys were recommended to determine the presence or absence of bat roosts.

1.1.4. The findings of the Preliminary Roost Assessment, part of the Ecological Appraisal are detailed within the report:

- Ecological Appraisal: Higher Clough and Carr Wood Cottages, Carr Wood, Rochdale. Verity Webster Ltd. June 2019 Revision B.

1.1.5. In May and June 2019 three evening emergence surveys were undertaken. The surveys indicated the absence of a roost within the building.

1.1.6. The findings of the further bat survey work are detailed within the report:

- Bat Survey: Presence/Absence Survey. Higher Clough and Carr Wood Cottages, Carr Wood, Rochdale. Verity Webster Ltd. June 2019.

## 1.3 Objectives

1.3.1 The objectives of the updated Presence / Absence Survey were to determine:

- Whether bats are currently using the building.
- The potential status of any roost present.
- How bats might be using the rest of the site (garden).
- The potential impacts of the proposals on any roost present or on bats using the site.
- How any impacts might be avoided, mitigated and / or ameliorated, including advice on European Protected Species Mitigation (EPSM) application if required.

## 1.4 Proposals

1.4.1 The proposals comprise the demolition of the existing structures and construction of new buildings on a similar footprint.

### 1.5 Ecologist

1.5.1 The Bat Emergence Survey work was lead and undertaken by Verity Webster. Verity is a licensed bat surveyor (Bat Survey Class Licence WML CL18 (Class 2) Registration number: 2015-13858-CLS-CLS).

1.5.2 Verity has worked as an ecological consultant for over 13 years. She has undertaken preliminary bat assessments and further bat emergence / activity surveys for a large variety of projects and schemes, producing the required impact assessment and subsequent mitigation schemes / method statements when necessary.

## 2 The Survey Site

### 2.1 Site Location

2.1.1 The survey site is located in a rural location approximately 600m west of Bamford in Rochdale.

2.1.2 The site is set within Carr Wood, off School Lane, which runs east to west to the north of the property.

2.1.3 Carr Woods extends towards the southeast and is part of a wider area of woodland following Naden Brook. Naden Brook runs north to south from Norden to Hooley Bridge in Heywood. The brook runs through a steep ravine. This ravine commences approximately 10m to the east of the survey site at the closest point, just beyond the access road which serves Higher Clough Cottages and Lower Clough.

2.1.4 Cheeseden Brook, within Ashworth Valley SBI runs from the northwest to southeast and joins Naden Brook at Simpson Clough, approximately 1km south of the survey site. This provides another arm of woodland within the wider landscape. This connected woodland habitat extends to approximately 97 ha and provides a valuable ecological resource within the wider, less-wooded landscape.

2.1.5 Beyond Carr Woods within approximately a 1km radius of the site, the landscape comprises mainly grazed pasture to the south, east and west. The landscape becomes built-up to the northeast towards Norden.

2.1.6 Overall the landscape supports a variety of habitats and has suitability for a range of bat species. See Figure 1.

### 2.2 The Survey Site: Description

2.2.1 The Survey Site comprises a terrace of two cottages, two garages, stables, greenhouse and two sheds set within mature gardens.

2.2.2 The cottages (Structure A) are oriented northeast to southwest at the north of the site (see Figure 2). There is a high, wooded bank to the rear of the cottages. There is a single garage (Structure B) adjacent to the northeast of the cottages adjacent to the access driveway.

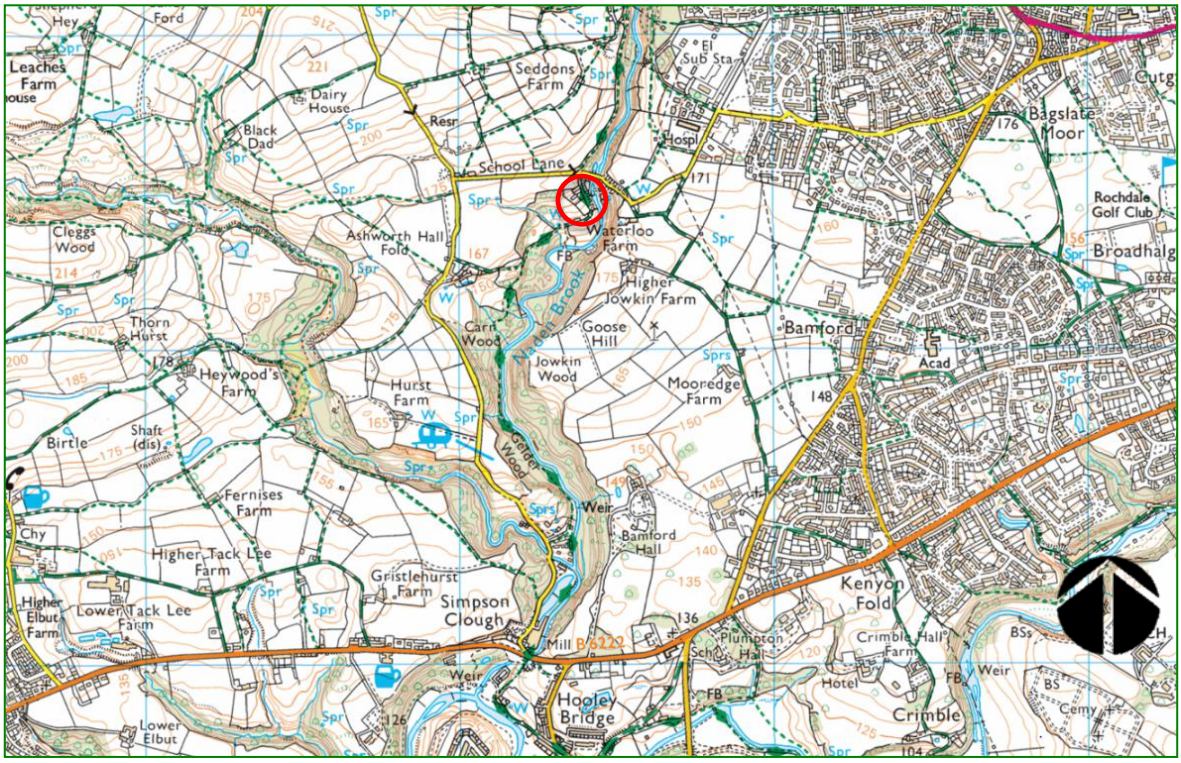
2.2.3 The driveway runs along the east side of the cottages, and the hardstanding wraps around the front of the building.

2.2.4 Adjoined to the southwest elevation of the cottages there are stables (Structure C) and to the southwest, an outbuilding (Structure D). A small shed (Structure E) is situated immediately to the rear of Structure D. A wooden garage (Structure F) is positioned on the access driveway.

2.2.5 The land slopes to the southeast. The greenhouse (Structure G) is positioned lower in the garden to the southeast. There is amenity grassland to the southwest and south, where there is a stepped garden with mature shrubs and trees around the boundary.

2.2.6 Woodland to the rear of the cottages and rear of the outbuilding extends to the west of the site and is continuous with Carr Woods Site of Biological Interest (SBI).

## Figure 1: Ordnance Survey Map Showing the Location of Higher Clough Cottages




Ordnance Survey Map 1:25000

Key:

Survey site

## Figure 2: The Survey Site in Relation to the Surrounding Habitat




*Showing the position of the cottages within the survey site*




*Showing the survey site in relation to the Naden Brook Valley*

# 3 Legislation

**Full details of relevant legislation and planning policy can be found in Appendix A.**

## 3.1 UK and EU Legislation

3.1.1 Key legislation regarding the protection of bats:

- Wildlife and Countryside Act 1981 (as amended)
- The Countryside and Rights of Way Act (CROW), 2000
- The Natural Environment and Rural Communities Act (NERC, 2006)
- Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations, 2018 (The Habitats Regs).

3.1.2 Under the Wildlife and Countryside Act, 1981 and Habitats Regs, 2018, it is a criminal offence to:

- Deliberately capture, injure or kill a bat
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats
- Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time)
- Possess or advertise/sell/exchange a bat (dead or alive) or any part of a bat
- Intentionally or recklessly obstruct access to a bat roost.

## 3.2 Planning Policy and Legislation

3.2.1 Under the NERC Act 2006, planning authorities are obliged to make sure that they have all the information on the presence of protected species on site before they make a decision on the planning permission.

3.2.2 The National Planning Policy Framework (NPPF) encourages Local Planning Authorities to conserve and enhance biodiversity.

Chapter 15, Para 170 of NPPF states: *"The planning system should contribute to and enhance the natural and local environment by:*

a) ***protecting and enhancing valued landscapes, sites of biodiversity*** *or geological value and soils….*

d) ***minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures***".

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

Para 174 identifies that plans should do the following to protect and enhance biodiversity and geodiversity:

***a)*** "***Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and***

***areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and***

**b)** ***Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and peruse opportunities for securing measurable net gains for biodiversity.***"

3.1.1 Para 175 states that "when determining planning applications, local authorities should apply the following principles:

**a)** ***if significant harm to biodiversity from a development cannot be avoided…,adequately mitigated, or, as a last resort compensated for, then planning permission should be refused***"

3.1.2 The local planning authority has a responsibility, therefore, to obtain all information regarding the potential for protected species on a site prior to making a decision about a proposal.

# 4 Survey Methodology

4.0.1 The Bat Presence / Absence Surveys were undertaken in accordance with current accepted guidance: Collins, J. (ed.) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd Edn). The Bat Conservation Trust, London.

## 4.1 Bat Emergence / Re-entry Surveys and Assessment of Activity

4.1.1 Following the Preliminary Roost Assessment the Cottages (Structure A) were considered to have high suitability for bats in 2019. However, the subsequent survey effort indicated the absence of a roost. The condition of the cottages has not changed since 2019. To update the survey work, two evening emergence surveys were considered sufficient.

4.1.2 The remaining buildings on site are considered to have negligible suitability for bats. However, the stables (Structure C) and the outbuilding (Structure D) have potential to support occasional foraging by bats and for this reason have been included in the evening survey assessment.

4.1.3 Table 7.1 of Collins, J. (ed.) (2016). Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd Edn). The Bat Conservation Trust, London:

**Table 7.3 Recommended minimum number of survey visits for presence/absence survey to give confidence in a negative result for structures.**

| Low roost suitability | Moderate roost suitability | High roost suitability |
|---|---|---|
| One survey visit. One dusk emergence or dawn re-entry survey. | Two separate survey visits. One dusk emergence and a separate dawn re-entry survey. | Three separate survey visits. At least one dusk emergence and a separate dawn re-entry survey. The third visit could be either dusk or dawn. |

4.1.4 The bat emergence surveys were undertaken from 20 minutes before sunset to 1.5hours after sunset.

4.1.5 During the surveys three or four surveyors were positioned on site such that that the elevations of the

buildings were easily observed. The skyline was such that it was clear to see bats against the sky if they were to emerge.

4.1.6 Approximately 40 minutes after dusk surveyors walked up and down between the buildings to assess the level of bat activity, including the activity in the stables and outbuilding.

4.1.7 Batbox Duet detectors and Echo Meter Touch detectors were used so that any calls heard that could not be identified were recorded for later analysis.

4.1.8 The time, activity (emergence, foraging, commuting) and species of bats (where possible) were recorded when observed. Notes were made of the activity of bats elsewhere on site as well as around the building. The number of bat passes were recorded to provide an indication of bat activity level within the site.

# 5 Survey Limitations

5.0.1 The survey work was undertaken in early – late September 2020. At this time of year bats would be expected within their summer roosts in the earlier part of the month, but may be in a transitory period between summer and transitional roots (occupied prior to hibernation). The surveys undertaken and data obtained, in conjunction with that obtained in 2019 is considered sufficient to make an adequate, reliable assessment of the likely presence / absence of a bat roost within the structure.

5.0.2 The latest records data from the local records centre was not obtained in order to inform this assessment. In this case, it is considered unnecessary to obtain the data, as previous survey work (2019) and the survey work in 2020 are considered adequate to inform any necessary mitigation recommendations.

# 6 Findings: Presence / Absence Surveys and Activity Assessment

## 6.1 Survey 1: Evening Emergence Survey on 13th September 2020

*Surveyors:* Verity Webster Bsc MSc CEcol MCIEEM (bat licence Class 2), Neil Edmondson (one years bat survey experience) and Derren Bailey (two years bat survey experience).
*Weather:* 14°c at 19:28. Clear sky. 70% humidity. Dry. Still.
*Sunset:* 19:28
*Time on site:* 19:10 – 21:00

### Findings

6.1.1 Two species of bat were recorded during the survey; common pipistrelle (*Pipistrellus pipistrellus*) and brown long-eared bat (*Plecotus auritus*).

6.1.2 The first bat, a common pipistrelle, was recorded at 19:40, 12 minutes after sunset, commuting north to south down the access track adjacent to the property. At 19:50 a single common pipistrelle was recorded commuting northeast to southwest across the site. This was followed over a period of 20 minutes by three other common pipistrelles commuting in the same direction.

6.1.3 A couple of common pipistrelles were recorded foraging to the northwest of the cottages from 19:54-20:20. There was sporadic foraging in the garden to the southeast and within the woodland to the east of the cottages.

6.1.4 A single brown long-eared bat was recorded commuting past the cottages (southeast elevation) at 19:51.

6.1.5 No bats were recorded emerging from the cottages and no bats were recorded in close proximity to, or foraging within the stables or the outbuilding.

## 6.2 Survey 2: Evening Emergence Survey on 30th July 2020

*Surveyors:* Verity Webster Bsc MSc CEcol MCIEEM (bat licence Class 2), James Callan (three years bat survey experience) and Derren Bailey (two years bat survey experience).
*Weather:* 9°c at 19:00. 70% cloud. 57% humidity. Dry. Light breeze
*Sunset:* 19:01
*Time on site:* 18:40 -20:30

### Findings

6.2.1 Two species of bat were recorded during the survey; common pipistrelle (*Pipistrellus pipistrellus*) and *Myotis* species.

6.2.2 Initial activity was signified by a single common pipistrelle foraging in the woodland to the southwest of the cottages and stables at 19:09 and this activity continued until 19:40.

6.2.3 Two common pipistrelles commuting north to south down the track and flying southwest past the frontage of the cottages at 19:18.

6.2.4 A single bat repeated this directionality of flight at 19:19.

6.2.5 At 19:23 a single common pipistrelle was recorded foraging in the woodland to the east of the cottage and this activity continued throughout the survey.

6.2.6 Occasionally, common pipistrelles would fly north to south down the track to the east of the cottages.

6.2.7 At 19:41 and 19:51 *Myotis* bat species were recorded passing across the site east to west to the south of the cottages but were not seen.

6.2.8 No bats were recorded emerging from the cottages and no bats were recorded in close proximity to or foraging within the stables or the outbuilding.

# 7 Appraisal and Impact Assessment

## 7.1 Appraisal

7.1.1 The survey work undertaken in September 2020 supports that undertaken in 2019, suggesting the likely absence of a bat roost within the cottages (Structure A) and an absence of activity associated with the stables (Structure C) and outbuilding (Structure D).

7.1.2 As recorded in 2019, three species of bat were recorded on site; common pipistrelle, brown long-eared bat and *Myotis* species.

7.1.3 Bat activity was relatively high. Common pipistrelle bats regularly commuted into and across the stie from the northwest.

## 7.2 Assessment of Impact

7.2.1 The survey work suggests that there is no significant roost, nor regularly used roost within the cottages on site, and no bat activity was recorded in association with the stables or outbuilding.

7.2.2 The proposals to demolish the structures are, therefore, unlikely to have a significant negative impact upon bats in the locality.

7.2.3 However, due to the high level of bat activity, the possibility of single itinerant bats utilising the features within the structure cannot be ruled out.

7.2.4 The risk of harm to individual bats, and destruction of potential roost sites is considered to be low at a site level and negligible at a local and regional level.

7.2.5 Reasonable avoidance measures during initial works to the roof are recommended to minimise the risk of harm to itinerant bats that may be present in the roof structure.

7.2.6 If these measures are employed, it is considered that the risk of harm to individual bats will be reduced to very low-negligible.

# 8 Conclusion and Recommendations

## 8.1 Avoidance Measures

*During building demolition*

8.1.1 The following recommendations are made to ensure avoidance of potential harm to bats during works.

- A Toolbox Talk must be delivered to site operatives prior to the start of works on site to ensure they are informed of the risk of bats within the roof structure.
- The roof must be dismantled by hand, with care, ensuring all roof materials (slates, beams, purlins and lining) are checked for bats and signs of the presence of bats (droppings).
- If a bat, or additional signs of the presence of bats (droppings) is found during the works, all works must stop in the vicinity and an ecologist be contacted for advice.

*Lighting*

- Lighting during the construction and operational phase will be directed to avoid the woodland canopy.
- Baffles will be used to avoid spillage of light into the sky and into areas toward the tree boundary and the canal.
- Lighting installed during the operational phase will be High or Low Pressure Sodium or LED. These forms of lighting have a lower UV output, which reduces the attraction of insects.

## 8.2 Enhancement

8.2.1 Enhancement measures for bats were advised within the original bat survey report (2019) and subsequently, measures have been included in the Landscape and Ecological Enhancement Plan for the site.

# 9 References


- Bing Maps (Accessed 2020) https://www.bing.com/maps/
- Collins, J. (ed.) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). The Bat Conservation Trust, London. ISBN-13 978-1-872745-96-1
- Google maps (Accessed 2020) https://www.google.co.uk/maps
- MAGIC Map (Accessed 2020) http://www.magic.gov.uk/MagicMap.aspx. DEFRA.

# APPENDIX A: Wildlife Legislation and Planning Policy

## UK AND EU LEGISLATION

### 1.1. KEY LEGISLATION

1.1.1. Key legislation regarding the protection of bats:

- Wildlife and Countryside Act 1981 (as amended)
- The Countryside and Rights of Way Act (CROW), 2000
- The Natural Environment and Rural Communities Act (NERC, 2006)
- Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations (2018)

### 1.2. WILDLIFE AND COUNTRYSIDE ACT 1981 (AS AMENDED)

1.2.1. The Wildlife and Countryside Act 1981 is UK legislation.

1.2.2. Bats are listed on Schedule 5 of the Wildlife and Countryside Act (WCA) 1981. Under Section 9 of this legislation it is an offence to:

- Kill, injure or take a bat.
- Possess, a live or dead bat.
- Intentionally or recklessly damage or destroy any structure of place which any bat uses as shelter or protection.
- Intentionally or recklessly disturb a bat whilst it is occupying a structure or place which it uses for shelter or protection.
- Internationally or recklessly obstruct access to any structure or place which a bat uses as shelter or protection.
- Sell, offer or expose for sale any live or dead bat.

### 1.3. COUNTRYSIDE AND RIGHTS OF WAY ACT 2000

1.3.1. Schedule 12 of the Countryside and Rights of Way (CROW) Act 2000, amended by the Wildlife and Countryside Act 1981 by removing the need to prove intent to damage a roost / harm (etc) a bat or other species listed on Schedule 1 by adding the words 'or recklessly' after 'intentionally' into the wording in Section 9 of the WCA 1981. The CROW act also strengthened the penalties for offences to bats and other species listed on Schedule 5.

### 1.4. CONSERVATION OF HABITATS AND SPECIES AND PLANNING REGULATIONS 2018

1.4.1. The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018 consolidate all the various amendments made to the Conservation (Natural Habitats, &c.) Regulations 1994 in respect of England and Wales.

1.4.2. The 1994 Regulations transposed Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive) into national law. The regulations came into force on 30 October 1994.

1.4.3. The Regulations provide for the designation and protection of European Sites and European

Protected Species, including bats.

1.4.4. Under the Regulations, competent authorities (ie any government department or public body) have a general duty, in the exercise of any of their functions, to have regard to the EC Habitats Directive.

1.4.5. With regard to European Protected Species (including bats), the Regulations make it an office to:

- Deliberately capture;
- Kill;
- Disturb or;
- Trade in animals listed in Schedule 2, which include all UK bat species.

### 1.5. European Protected Species (EPS) Licenses and the Three Tests

1.5.1. These actions can me made lawful through the granting of licenses by the appropriate authorities. Licenses may be granted for a number of purposes (such as science and education, conservation, preserve public health and safety). For such a licence to be granted the appropriate authority would have to be satisfied that an application has met the three tests, which are:

1) - The licence may be granted ''to preserve public health or public safety or for reasons of overriding public interest, including those of a social or economic nature and beneficial consequences or primary importance for the environment''

2) - There must be ''no satisfactory alternative''

3) - The proposal ''will not be detrimental to the maintenance of the species at a favourable conservation status in its natural range''

### 1.6. NATURAL ENVIRONMENT AND RURAL COMMUNITIES (NERC) ACT 2006 (PLANNING SYSTEM)

#### Planning Authorities: A Duty to Conserve Biodiversity

1.6.1. Under this legislation, planning authorities are obliged to make sure that they have all the information on the presence of protected species on site *before* they make a decision on the planning permission.

1.6.2. Part 2, Section 40 confers on the planning authorities a duty to conserve biodiversity and states:

''*Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of biodiversity*''

#### Species of Principal Importance

*1.6.3.* Part 3, Section 41 requires the Secretary of State to ''*publish a list of the living organisms and types of habitat which in the Secretary of State's opinion are of* ***principle importance*** *for the purpose of conserving biodiversity*''.

1.6.4. This requirement lead to production of a list of species and habitats of Principal Importance. This lists includes all UK bats.

## PLANNING POLICY

## 2.1 NATIONAL PLANNING POLICY FRAMEWORK

2.1.1 In March 2012 the Government introduced the National Planning Policy Framework (NPPF). This was revised in 2018.

Chapter 15: Conserving and Enhancing the Natural Environment

Chapter 15, Para 170 of NPPF states: *''The planning system should contribute to and enhance the natural and local environment by:*

*b)* ***protecting and enhancing valued landscapes, sites of biodiversity*** *or geological value and soils….*

e) ***minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures***".

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

Para 174 identifies that plans should do the following to protect and enhance biodiversity and geodiversity:

***c)*** "***Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and***

**d)** ***Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and peruse opportunities for securing measurable net gains for biodiversity*****."**

Para 175 states that "*when determining planning applications, local authorities should apply the following principles:*

**b)** ***if significant harm to biodiversity from a development cannot be avoided…,adequately mitigated, or, as a last resort compensated for, then planning permission should be refused*****''**

c) ***Development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted.*** *The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*

d) ***Development result in the loss of deterioration of irreplaceable habitats (such as ancient woodland or ancient or veteran trees) should be refused,*** *unless there are wholly exceptional reasons and a suitable compensatory strategy exists; and*

**e)** ***Development whos primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.***

Para 177 states "*the presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined*."

## 2.2 ODPM CIRCULAR 06/2005: BIODIVERSITY AND GEOLOGICAL CONSERVATION

2.2.1 This document, to be read in conjunction with NPPF provides administrative guidance on the application of the law relating to planning and nature conservation as it applies in England. It makes it clear that it is the intention of the government that local authorities and developers consider protected species at the earliest possible stage in the planning process. Any planning application that is likely to affect protected species should come with details of the surveys which have been undertaken and should include, if necessary, recommendations for mitigation. Applications which do not include sufficient data should be rejected.