



Preliminary Roost Assessment

Old Falinge, Falinge Fold, Rochdale, Greater Manchester, OL12 6LE

Amir Khan

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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.

This approach is enshrined in Government planning guidance, for example, paragraph 174 of the National Planning Policy Framework for England.

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 Amir Khan to undertake a Preliminary Roost Assessment (PRA) at Old Falinge, Falinge Fold, Rochdale, Greater Manchester, OL12 6LE (hereafter referred to as “the site”). The survey was required to inform a planning application for repair works to the existing roof structure (hereafter referred to as “the proposed development”).

The following is work you will need to commission to obtain planning permission and to comply with legislation. Further information, along with opportunities for biodiversity enhancement, are outlined in Table 4 of this report.

Feature	Foreseen impacts	Recommendations <i>Measures required to adhere to guidance, legislation and planning policies.</i>
Roosting bats B1 has low value for roosting bats due to the presence of a small number (<5) of gaps between the roof tiles on the northern elevation of the roof structure. Upon further inspection these gaps were not found to lead to any deeper crevices and did not provide access to the roof sub-space between the roof tiles and inner lining.	Bats are unlikely to be roosting within B1 due to the presence of a low number of features, which upon further inspection no evidence of bats was found. As such, there are not anticipated to be any impacts on bats as a result of the proposed development, however a precautionary approach to the proposed works is recommended due to the presence of these features. Roosting features were noted on the roof structure of B1a, however these features will be retained and unimpacted by the proposed works and therefore impacts to bats in this area of the building are not anticipated.	Owing to the nature of the proposed development and the low potential for impacts to bat roosts, further bat surveys are considered to be disproportionate. It is anticipated that any risk to bats can be reduced to an acceptably low level through the implementation of a precautionary working method during and post-development. See Table 4 for full details.
Foraging bats There are no habitats on the site which could be used by bats for foraging or commuting, however the adjacent woodland habitat will provide good quality bat foraging and commuting habitat.	The proposed development will not result in the removal of any habitats which could be used by foraging or commuting bats, and now new lighting will be installed on site.	None.
Nesting birds The building offers no opportunities for nesting birds.	None.	None.
Other ecological constraints None identified.	N/A	N/A

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed by Amir Khan to undertake a Preliminary Roost Assessment (PRA) at Old Falinge, Falinge Fold, Rochdale, Greater Manchester, OL12 6LE (hereafter referred to as “the site”). The survey was required to inform a planning application for repair works to the existing roof structure (hereafter referred to as “the proposed development”). A plan showing the proposed development is provided in Appendix 1.

The aim of the PRA was to determine the presence or evaluate the likelihood of the presence of roosting bats, and to gain an understanding of how bats could use the site for roosting, foraging or commuting. This has been undertaken with due consideration to the “Bat Surveys for Professional Ecologists —Good Practice Guidelines” publication (Collins, 2016). A Preliminary Ecological Appraisal was carried out by Arbtech in May 2022 on land adjacent to the current survey site, under the client’s ownership.

1.2 Site Context

The site is located at National Grid Reference SD 88809 14305 and has an area of approximately 0.1ha comprising one main dwelling with a surrounding garden area and hard standing driveway. It is surrounded by buildings and roads to the east and woodland to the west. A site location plan is provided in Appendix 2.

1.3 Scope of the Report

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

To achieve this, the following steps have been taken:

- A desk study has been carried out.
- A field survey has been undertaken, including an external survey and internal inspection of built structures where possible, 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 Mel Reid (Natural England Bat Licence Number: 2019-43774-CLS-CLS) on 20th October 2022.

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 building:

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. An endoscope was used to complete a close-up inspection of any accessible features, where appropriate.

2.3 Breeding Birds and Other Incidental Observations

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

2.4 Suitability Assessment

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

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

Classification	Feature of building and its context
Moderate to high	Buildings or structures with features of particular significance for larger numbers of roosting bats e.g. mines, caves, tunnels, icehouses and cellars. Habitat on site and surrounding landscape of high quality for foraging bats e.g. broadleaved woodland, tree-lined watercourses and grazed parkland. Site is connected with the wider landscape by strong linear features that would be used by commuting bats e.g. river and or stream valleys and hedgerows. Site is proximate to known or likely roosts (based on historical data). Buildings with high suitability could support roosts of high conservation value such as maternity or hibernation roosts.
Low	A small number of possible roost sites or features, used sporadically by individual or small numbers of bats. Potential roost features may be suboptimal for reasons such as shallow depth, poor thermal qualities or upwards orientation with exposure to inclement weather or predators. Habitat suitable for foraging in close proximity, but isolated in the landscape. Or an isolated site not connected by prominent linear features. Few features suitable for roosting, minor foraging or commuting.
Negligible	Unsuitable for use by bats.

2.5 Limitations

It should be noted that whilst every effort has been made to describe the features on site in the context of their suitability for roosting bats, this does not provide a complete characterisation of the site. This survey provides a preliminary view of the likelihood of bats being present. This is based on suitability of the habitats on site and in the local area, the ecology and biology of bats as currently understood, and the known distribution of bats as recovered during the desk study. Bats are highly mobile creatures that switch roosts regularly and therefore the usage of a site by bats can change over a short period of time.

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

3.0 Results and Evaluation

3.1 Desk Study Results

A summary of desk study results is provided below.

3.2 Designated Sites

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

3.3 Historical Records

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

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

EPSL reference	Bat species affected	Impacts allowed by licence
EPSM2009-709	Common pipistrelle	Destruction of a resting place
2015-8047-EPS-MIT	Common pipistrelle, soprano pipistrelle and Daubenton's	Destruction of a resting place

3.4 Field Survey Results

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

Table 3: Weather conditions during the survey

Date: 20/10/2022	
Temperature	11°C
Humidity	98%
Cloud Cover	100%
Wind	8mph
Rain	Light

Building B1 Exterior

B1 is a large double-storey stone-built dwelling with a pitched roof clad in stone roof tiles. The stonework walls on all elevations of the building appears in excellent condition with no gaps or cracks suitable for crevice-dwelling bats to roost in. There is scaffolding currently surrounding B1 allowing for a close-up inspection of the roof structure. The roof structure on the southern elevation of B1 appears in a good condition with no missing or slipped roof tiles creating suitable bat roosting habitat. There are small gaps between some of the roof tiles due to the uneven nature of stone tiles however these gaps were considered too small to provide suitable roosting habitat for crevice-dwelling bats. There was one area of slightly raised stone tiles on the northern elevation roof structure which has created a small number (<5) of gaps large enough to provide roosting habitat for crevice-dwelling bats (highlighted in photos below). Upon further inspection of the gaps using a torch and endoscope the gaps were found to be relatively shallow and did not lead into any deeper crevices between the roof tiles and inner lining. The roof ridge tiles are all in a good condition with all areas of mortar intact and therefore offering no suitable bat roosting areas. There are five chimneys across the roof structure of B1 all of which are stone-built and offer no suitable gaps for roosting bats. There is a flat roof dormer window on the northern elevation roof structure of B1 which was found to have no suitable bat roosting features. The mortar along the gable-ends on the eastern and western elevations of B1 appear in a good condition with no gaps suitable for roosting bats.

There is a lower double-storey extension to the rear (northern) elevation of B1, designated as B1a for the purpose of this report. B1a is a brick-built with a pitched roof clad in stone roof tiles. The brickwork across this elevation of the building appears in a good condition with no gaps suitable for roosting bats. The western elevation roof structure of B1a was inspected up close from the scaffolding and was found to be in a good condition with no missing or raised roof tiles, however the eastern elevation roof structure could only be surveyed from ground level and a low number of gaps between the roof tiles were noted (highlighted in the photo below). There is a small single-storey brick-built extension on the northern elevation of B1a which has a sloped roof clad in stone roof tiles. No suitable bat roosting features were noted on this section of B1a. B1a will be retained and unimpacted by the proposed works.



Southern elevation of B1 (pictured above).



Southern elevation of B1 (pictured above).



Southern elevation of B1 (pictured above).



Southern elevation of B1 (pictured above).



Eastern elevation of B1 (pictured above).



Eastern elevation of B1 (pictured above).



Northern elevation of B1 (pictured above).



Northern elevation of B1 (pictured above).



Northern elevation of B1 (pictured above).



Western elevation of B1 (pictured above).



Western elevation of B1 (pictured above).



Eastern elevation of B1a (pictured above).



Eastern elevation of B1a (pictured above).



Western elevation of B1a (pictured above).



Northern elevation of B1a (picutred above).



Northern elevation of B1a (picutred above).

B1 Interior

Internally there are no loft spaces within the main roof void of B1, with the interior of the roof structure forming a habitable living area. As such there are no bat access points into this area (as the interior of the roof is plastered) and the area is well lit due to the presence of windows, with a lack of bat perching areas, and therefore unstable for void-dwelling bats. There are two small crawl spaces on the northern and southern sides of the building which are too small to offer suitable void-dwelling bat habitat. There is a loft space within the main roof void of B1a. The internal roof structure of B1a is constructed from timber beams with a bitumen felt roof lining. No daylight could be seen entering the loft space through the roof or along the eaves indicating a lack of bat access points. This loft space will be retained and unimpacted by the proposed works.



Interior of roof void of B1 (pictured above).



Interior of roof void of B1 (pictured above).



Crawl space within roof void of B1 (pictured above).



Crawl space within roof void of B1 (pictured above).



Loft space within B1a (pictured above).



Loft space within B1a (pictured above).

B1 Evidence of bats

There was no evidence of bat activity located internally in B1 or B1a. Although evidence of bat activity (e.g. droppings) on the outside of a building can be easily weathered away, no evidence was observed externally on any of the features suitable for roosting.

B1 Breeding birds and other incidental observations

There was no evidence of nesting birds located internally or externally on the survey building.

Foraging and Commuting Habitat

There is limited bat foraging habitat present on site, however the adjacent woodland to the west will likely provide good quality bat foraging and commuting habitat.

4.0 Conclusions, Impacts and Recommendations

4.1 Informative Guidelines

A summary of the relevant legislation and planning policies is provided in Appendix 4.

Bats

Bats are protected under the Wildlife and Countryside Act and the Conservation of Habitats and Species Regulations 2017 (amended by the Conservation of Habitats and Species Regulations (amendment) (EU Exit) Regulations 2019).

There are three possible outcomes of this survey, each with specific recommendations. These are outlined below:

Confirmed bat roost

Best practice survey guidelines (Collins, 2016) recommend additional surveys for confirmed roosts. Three further surveys are required to characterise the bat roost present including species, roost type and access points to inform an EPSL application to Natural England. Surveys must be completed during the active bat season (May – September). At least two of the surveys should be completed during the optimal survey period mid-May to August, and at least one of the surveys should be a dawn re-entry survey.

Low, moderate or high likelihood of a bat roost present

Best practice survey guidelines (Collins, 2016) recommend additional surveys for features assessed as having low to high suitability for roosting bats. One, two or three further surveys are required to confirm presence or likely absence of a bat roost, based on a low, medium or high roost likelihood evaluation. Surveys must be completed during the active bat season (May – September). If more than one survey is recommended, at least one of them should be completed during the optimal survey period mid-May to August, and at least one of the surveys should be a dawn re-entry survey. If two or one further survey is recommended these surveys must be completed during the optimal survey period (mid-May to August). For low and moderate roost likelihood evaluation the survey effort recommended at this stage is iterative and if bats roosts are confirmed in the building, a further survey will be required to provide sufficient information to inform an EPSL application to Natural England.

Negligible likelihood of a bat roost present

Buildings assessed as comprising negligible suitability for roosting bats do not normally require further surveys. However, if bats are found during any stage of the development, work should stop immediately, and a suitably qualified ecologist should be contacted for further advice.

Birds

Legislation protects all wild birds whilst they are breeding, and prohibits the killing, injuring or taking of any wild bird or their nests and eggs. Certain species of bird, including the barn owl, are subject to special provisions; it is an offence to disturb any bird or their young during the breeding season.

4.2 Evaluation

Taking the desk study and field survey results into account, Table 4 presents an evaluation of the value of the site for bats and also details any other ecological constraints identified such as nesting birds in relation to the proposed development which will comprise repair works to the existing roof structure of B1.

Table 4: Evaluation of the site for bats and any other ecological constraints

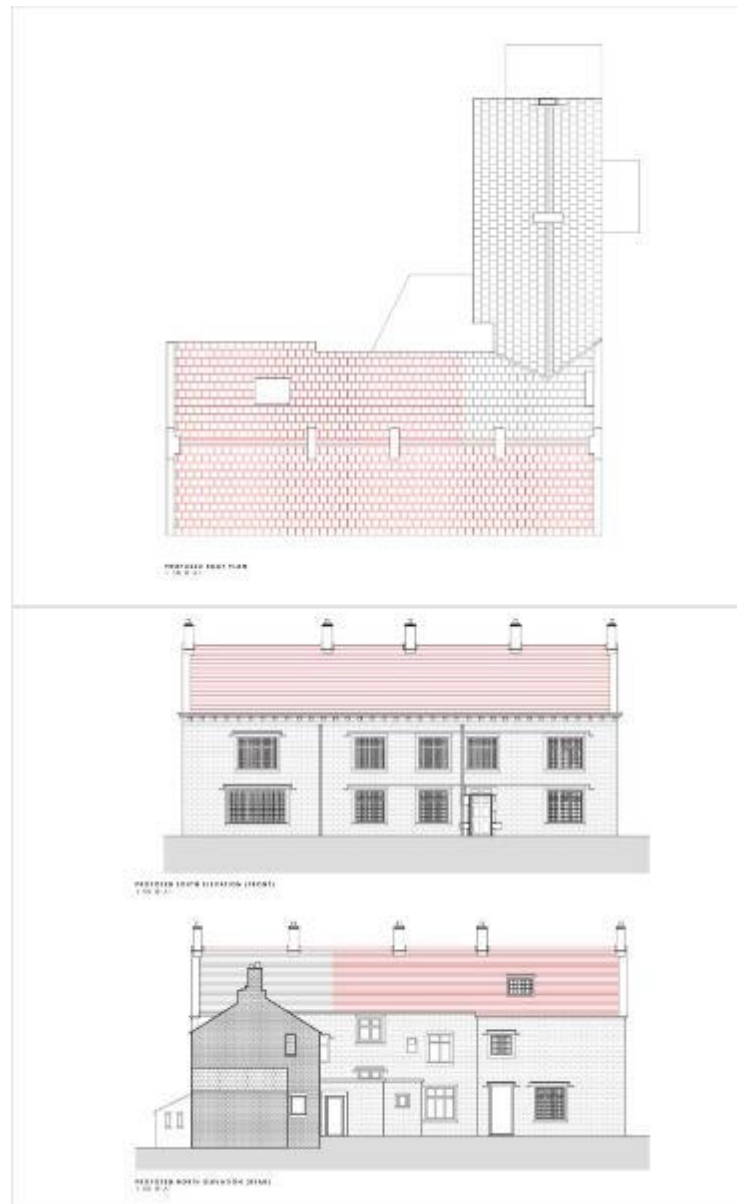
Feature	Survey conclusions (with justification)	Foreseen impacts	Recommendations <i>Measures required to adhere to guidance, legislation and planning policies.</i>	Biodiversity Enhancements <i>The Local Planning Authority has a duty to ask for enhancements under the NPPF (2021)</i>
Roosting bats	B1 has low value for roosting bats due to the presence of a small number (<5) of gaps between the roof tiles on the northern elevation of the roof structure. Upon further inspection these gaps were not found to lead to any deeper crevices and did not provide access to the roof sub-space between the roof tiles and inner lining.	Bats are unlikely to be roosting within B1 due to the presence of a low number of features, which upon further inspection no evidence of bats was found. As such, there are not anticipated to be any impacts on bats as a result of the proposed development, however a precautionary approach to the proposed works is recommended due to the presence of these features. Roosting features were noted on the roof structure of B1a, however these features will be retained and unimpacted by the proposed works and therefore impacts to bats in this area of the building are not anticipated.	Owing to the nature of the proposed development and the low potential for impacts to bat roosts, further bat surveys are considered to be disproportionate. It is anticipated that any risk to bats can be reduced to an acceptably low level through the implementation of a precautionary working method during and post-development. This will include the following measures: • Works will be scheduled during the winter months (November to March) when bats are least likely to be present, insofar as is possible. • A toolbox talk will be given to contractors to make them aware of the possible presence of bats on the site. • An inspection of the potential roost feature (gaps between roof tiles on northern elevation roof structure) identified in this report will be undertaken prior to works commencing. • The potential roost features will be removed by hand (where a risk still remains following the pre-commencement inspection) prior to any mechanical demolition. • 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 bat boxes on mature trees around the site boundaries will provide additional roosting habitat for bats e.g. 2F Schwegler Bat Box (1FF Schwegler Bat Box 2FN Schwegler Bat Box Beaumaris Bat Box Vivara Pro Woodstone Bat Box Or a similar alternative brand. Bat boxes should be positioned 3-5m above ground level facing in a south or south-westerly direction with a clear flight path to and from the entrance, away from artificial light.

Foraging and commuting bats	There are no habitats on the site which could be used by bats for foraging or commuting, however the adjacent woodland habitat will provide good quality bat foraging and commuting habitat.	The proposed development will not result in the removal of any habitats which could be used by foraging or commuting bats, and now new lighting will be installed on site.	None.	The following habitat creation and enhancement opportunities could be incorporated into the proposed development which would be beneficial for foraging bats: Planting of native tree, shrub and hedgerows to increase foraging opportunities.
Nesting birds	The building offers no opportunities for nesting birds.	None.	None.	The installation of bird boxes on mature trees around the site boundaries will provide additional nesting habitat for birds e.g. Schwegler 1B Nest Boxes Schwegler 2H Robin Boxes 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.
Other ecological constraints	None identified.	N/A	N/A	N/A

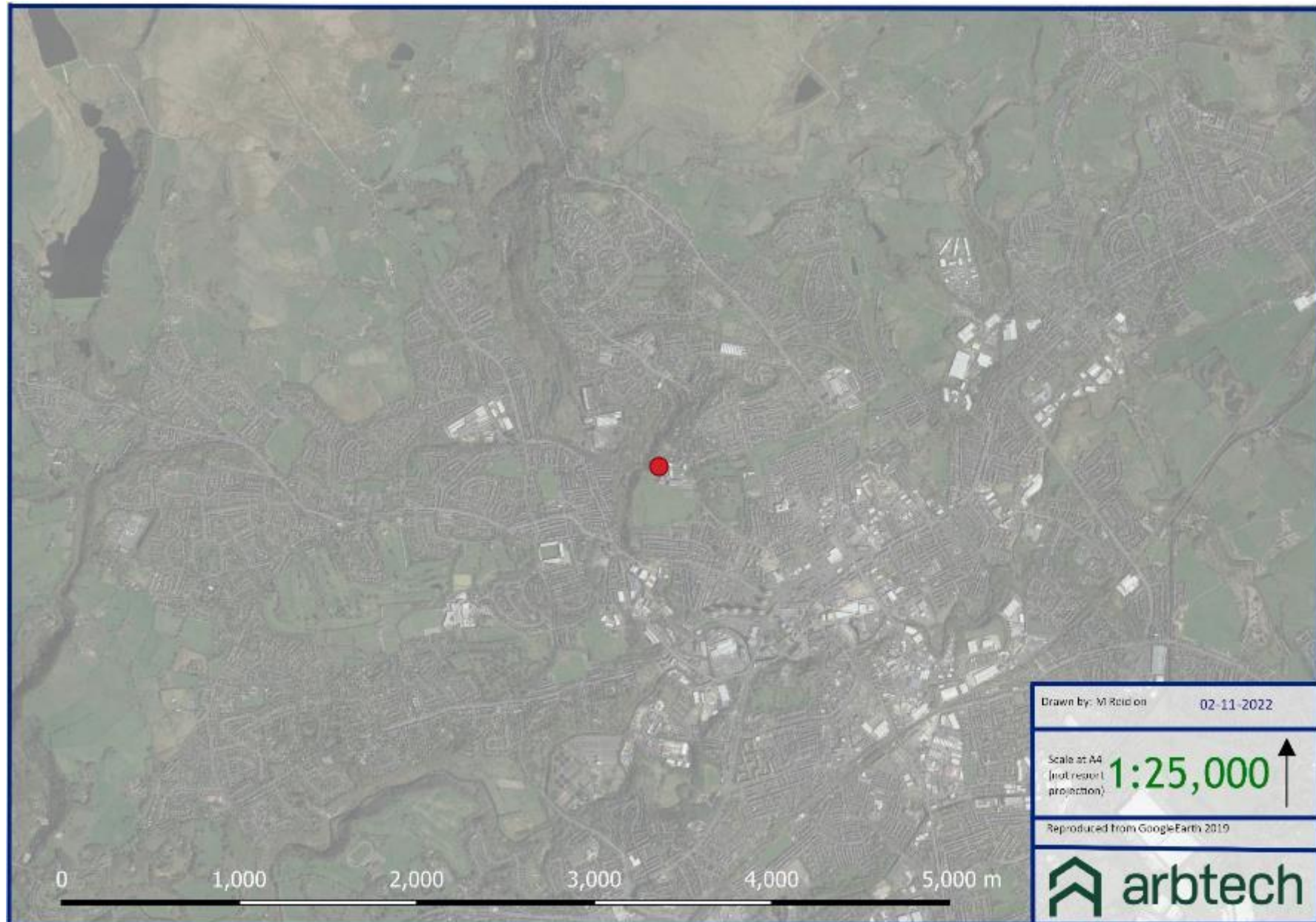
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Appendix 1: Proposed Development Plan



Appendix 2: Site Location Plan



Appendix 3: Bat Survey 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 (ENGLAND)

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.