



Preliminary Roost Assessment

11 Spinney Side, Groby, Leicester, LE6 0GX

Francesco Gatto

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 Francesco Gatto to undertake a Preliminary Roost Assessment (PRA) at 11 Spinney Side, Groby, Leicester, LE6 0GX (hereafter referred to as “the site”). The survey was required to inform a planning application for the proposed reconfiguration of existing roof to house to form additional bedroom of the residential property, B1 (hereafter referred to as “the proposed development”).

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

Feature	Survey Results Summary	Impact Assessment	Recommendations
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 proposed development will not result in the removal of any habitats which could be used by foraging or commuting bats. The proposed development may 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.

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed by Francesco Gatto to undertake a Preliminary Roost Assessment (PRA) at 11 Spinney Side, Groby, Leicester, LE6 0GX (hereafter referred to as “the site”). The survey was required to inform a planning application for the proposed reconfiguration of existing roof to house to form additional bedroom of the residential property, B1 (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. A previous survey was undertaken on another building on site which concluded a likely absence of roosting bats.

1.2 Site Location and Landscape Context

The site is located at National Grid Reference SK 52159 06982 and has an area of approximately 0.1ha comprising a residential property, B1, with residential properties to the north, east and south associated with the sprawl of the village of Groby, Leicester. The gardens and streets have scattered trees connecting the landscape. To the west of the site is Martinshaw Wood, which from aerial imagery appears to have plantation woodland. The wider landscape has the M1 to the south-west, arable and pastoral fields, but the woodland is of value for foraging, commuting and likely roosting bats in the landscape. To the north is Groby pool and several ponds and watercourses which will provide ample foraging for bats. 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 structure, 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 Katy Perry, an ecologist with eight years of bat survey experience and holder of a Natural England class 2 bat survey licence (reference available upon request), on 20th February 2024.

The PRA focussed on one built structure which will be affected by the proposed development as well as providing an overview of the wider site and the surrounding landscape for bat roosting, foraging and commuting habitat.

For any surveyed buildings:

A DBW survey was undertaken, comprising a non-intrusive visual appraisal was undertaken from the ground, using binoculars to inspect the external features of the 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
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.

Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).
Moderate	A structure with one of more potential roost sites that could be used by bats due to their size, shelter, protection, conditions, and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions, and surrounding habitat. These structures have the potential to support high conservation status roosts e.g. maternity or classic cool/stable hibernation site.

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

Potential Suitability	Potential Flight-Paths and Foraging Habitats
Negligible	No obvious habitat features on site likely to be used as flightpaths 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 flightpaths 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 flightpaths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland, or water.
High	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flightpaths 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. 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.

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

3.0 Results and Evaluation

3.1 Designated Sites

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

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

Designated site name	Distance from site	Reasons for notification from Natural England
Groby Pool and Woods Site of Special Scientific Interest (SSSI)	1.01km north	The site comprises one of the best remaining examples of ash and alder woodland in Leicestershire, and is representative of ancient woodland developed on clay soils in Central and Eastern England.
Sheet Hedges Wood SSSI	1.6km north-east	The site comprises a complex of habitats and includes fine examples of alder wood, dry and wet grassland, marsh, reedswamp and open water. The plant communities are representative of those developed on neutral or slightly acid soils in the North Midlands.

3.2 Historical Records

A search of the magic.gov.uk database for granted EPSLs within a 2km radius of the site has been completed. Displaced bats from licensed sites <2km away from the survey site will find alternative habitat either within the mitigation measures implemented as part of the licence or will relocate to other known roosts sites in close proximity to the licensed site. EPSL records for bats are summarised in Table 4.

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

EPSL reference	Bat species affected	Impacts allowed by licence
EPSM2013-6361	Common pipistrelle, soprano pipistrelle, brown long-eared bat	Destruction of a resting place
2015-14513-EPS-MIT	Common pipistrelle, soprano pipistrelle, brown long-eared bat	Destruction of a resting place
2014-3975-EPS-MIT	Common pipistrelle	Damage of a resting place

3.3 Field Survey Results

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

Table 5: Weather conditions during the survey

Date:	20/02/2024
Temperature	9°C
Humidity	93%
Cloud Cover	90%
Wind	12kmph
Rain	Dry

Table 6: PRA Results

Feature	Description	Photographs
Bat foraging and commuting habitat	There are scattered trees and hedgerows within the gardens and along the residential roads in the immediate landscape. In the wider landscape there is the Martinshaw wood to the west and Groby Pool and watercourses to the north providing foraging and commuting bats with optimal habitats.	
B1 – overview – northern elevation	B1 is a detached residential building, brick built with concrete tiles on the roof, a cross hipped gable end roof with a single storey tiled porch on the front of the property. The windows and doors are primarily UPVC around the property with some wooden, but all secure with no means of ingress. The brickwork is exposed around the property which is in good condition with no missing mortar. The roof tiles on the building are secure with no missing, slipped, raised or broken tiles. The ridge tiles are secure with no gaps under or missing mortar. The soffit and fascia are UPVC and secure around the elevations of the building. There are hanging tiles on the front (north) of the property which are in very good condition.	

B1 – northern elevation	On the northern elevation, there are hanging tiles present. These were inspected for any gap’s underneath or around the soffit that could provide any suitability for crevice dwelling roosting bats. From all angles, observed with binoculars, there were no gaps visible. The mortar under the end tiles on the gable ends was secure with no gaps and no missing mortar. The UPVC soffit and fascia are in very good condition with no visible gaps observed.	
B1 – north-western elevation	The roof tiles, including the ridge tiles are in very good condition. There are no slipped, raised, missing or broken roof tiles that could allow ingress. The brickwork on all elevations is secure with no missing mortar between the brickwork. The soffit and fascia are also secure on all elevations. The porch on the ground floor is secured to the brickwork with lead lashing which lies flush to the building with no gaps or raised sections.	

B1 – southern elevation	The rear of the building has no hanging tiles. The gable end on the rear of the building is secure with no missing mortar under the end tiles. There are solar panels present on the rear of the building. The panels have a clear and significant gap underneath which does not provide optimal conditions for roosting bats underneath due to exposure to inclement weather. The UPVC windows and doors are secure in the frames with no gaps present and no means of ingress.	
B1 – south-western elevation	The solar panels are present on the two slopes of the roof on the rear of the building, but not on the western elevation. The valley and tiles are all secure with no gaps present.	

B1 – western elevation	The brickwork on the western end of the building is secure, including the brickwork around the chimney stack. The lead flashing around chimney base is secure to the brickwork and the UPVC soffit and fascia are secure. The tiles on the roof are in very good condition.	
B1 – south-western elevation	There is a ground floor lean to on the western elevation. The timbers are secure on the panels and the door is secure. However, some of the end tiles on the southern elevation have a small gap underneath. There is low suitability for supporting very low numbers of bats, but this section of the building is not due to be impacted by the proposed works within the roof of the building.	

B1 – interior	One loft space is present in the property. It is approximately 1.5m tall internally from floor to ridge. The timbers are modern and in good condition with no warping or gaps in the joints to enable roosting opportunities. The membrane on the rear of the tiles is in very good condition with no tears or rips present. There is roll insulation on the floor, but access internally was gained using the beams on the floor and sporadic boards within the loft. The roll insulation and boards were searched for evidence of roosting bats such as droppings or feeding remains. No evidence of bats was observed within the loft space. There were numerous cobwebs throughout the loft space which can be an indicator of a lack of internal activity.	
  	B1 – suitability assessment	There are no features on the exterior of the building and no means of ingress on the roof or the main section of the building. There was no evidence of roosting bats internally or externally. The building is concluded to have negligible value within the working areas. The lean to has a very small feature present under the end tiles on the southern elevation, which is not due to be impacted by the proposed works. The works within the loft space and roof are not going to directly impact the low value feature on the ground floor.

B1 - breeding birds and other incidental observations	There was no evidence of nesting birds observed internally or externally.
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4.0 Conclusions, Impacts and Recommendations

Taking the desk study and field survey results into account, Table 7 presents an evaluation of the value of the site for bats and also details any other ecological constraints identified such as nesting birds in relation to the proposed development.

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

Feature	Survey Results Summary	Impact Assessment	Recommendations	Biodiversity Opportunities ¹ Enhancement
Roosting bats (B1)	B1 has negligible value for roosting bats due to a lack of potential roost features on the main body of the building which is to be impacted by the proposed works. The lean to on the western elevation has some small gaps under tiles on the southern elevation. This section of the building is not due to impacted.	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 extension of this building. If the works is altered in anyway and due to impact the lean to on the ground floor, then the lean-to should be thoroughly inspected prior to works. Any evidence of bats will require further surveys.	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 retained buildings on site. 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. The bat boxes will be a specification suitable for crevice dwelling bats such as Vivara Pro, Beaumaris or NHBS improved crevice boxes or a similar alternative brand.
Foraging and commuting bats	Scattered trees and hedgerows could be used by local bat populations for foraging and commuting. These could also be used by bats dispersing from nearby roosts outside of the site.	The proposed development will not result in the removal of any habitats which could be used by foraging or commuting bats. The proposed development may 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	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.

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

			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.	None.	None.	The installation of a minimum of two bird boxes on mature trees around the site boundaries or on retained buildings will provide additional nesting habitat for birds e.g. Schwegler 1SP Sparrow Terrace (buildings) Schwegler 1B Nest Boxes (trees) Woodstone Nest Box (buildings or trees) 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. Sparrow boxes should be positioned at the eaves of a building and can be incorporated into the fabric of the building during construction.
Other ecological constraints	None identified. The proposed alterations are on the existing building.	N/A	N/A	N/A

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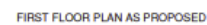
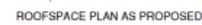
side

rear

side

front

ELEVATIONS AS PROPOSED 1:100



MEET A - JAN. 2024 - SUMMER WITH REDUCED, ALLEGED
 WILDFIRE OFFSETS.

 Please reply to:
 1563A Fennell of north
 Lakewood, CO 80226
 1.877.583.5555
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 Email: andy@ajsservices.com

Project: PROPOSED LOFT CONVERSION
 AND REAR EXTENSION (A1)
 11 SPINNEY SIDE, GROWY
 FORD
 MEET & MRS F. GATTO

Sheet Title: PLANS, SECTIONS & ELEVATIONS
 AS PROPOSED - LOFT (SHEET

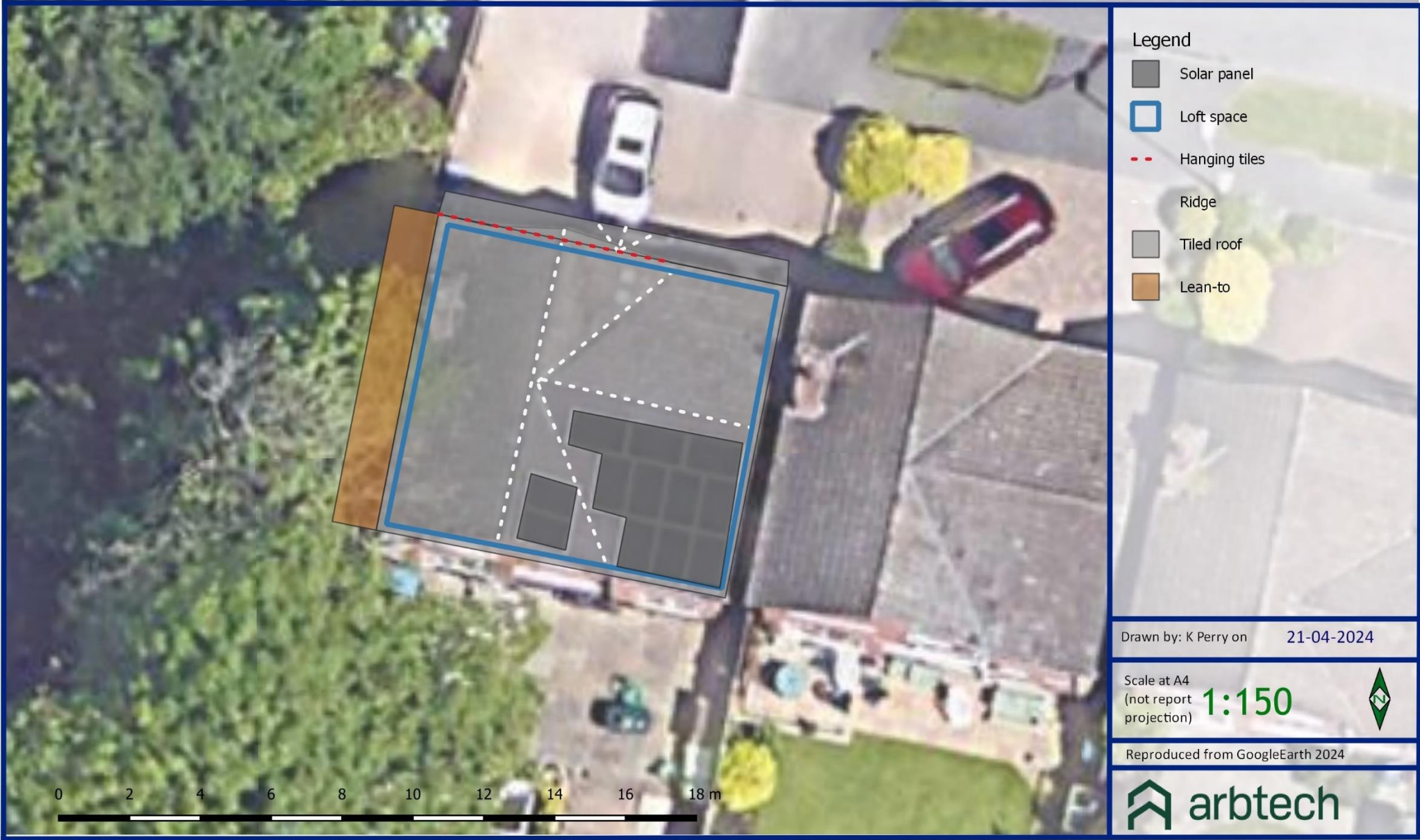
Scale: 1/8" = 1'-0" **Ref:** 2023/03/05/24

Date: OCT 2023 **Drawn:** A.M.

Appendix 2: Site Location Plan



Appendix 3: PRA Plan



Appendix 4: Legislation and Planning Policy Related to Bats

LEGAL PROTECTION

All species of bat are fully protected under *The Conservation of Habitats and Species Regulations 2017* (as amended) through their inclusion on Schedule 2.

Regulation 43: Protection of certain wild animals - offences

(1) A person is guilty of an offence if they:

- (a) Deliberately captures, injures, or kills any wild animal of a European protected species,
- (b) Deliberately disturbs wild animals of any such species,
- (c) Deliberately takes or destroys the eggs of such an animal, or
- (d) Damages or destroys a breeding site or resting place of such an animal,

(2) For the purposes of paragraph (1) (b), disturbance of animals includes in particular any disturbance which is likely—

- (a) To impair their ability:
 - (i) To survive, to breed or reproduce, or to rear or nurture their young; or
 - (ii) In the case of animals of a hibernating or migratory species, to hibernate or migrate; or
- (b) To affect significantly the local distribution or abundance of the species to which they belong.

Bats are also protected under the *Wildlife and Countryside Act 1981* (as amended) through their inclusion on Schedule 5. Under this Act, they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection
- Selling, offering, or exposing for sale, possession or transporting for purpose of sale

NATIONAL PLANNING POLICY

National Planning Policy Framework 2021

The National Planning Policy Framework promotes sustainable development. The Framework specifies the need for protection of designated sites and priority habitats and species. An emphasis is also made on the need for ecological infrastructure through protection, restoration, and re-creation. The protection and recovery of priority species (considered likely to be those listed as species of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006) is also listed as a requirement of planning policy.

In determining a planning application, planning authorities should aim to conserve and enhance biodiversity by ensuring that: designated sites are protected from harm; there is appropriate mitigation or compensation where significant harm cannot be avoided; measurable gains in biodiversity in and around developments are incorporated; and planning permission is refused for development resulting in the loss or deterioration of irreplaceable habitats including aged or veteran trees and also ancient woodland.

The Natural Environment and Rural Communities Act 2006 and the Biodiversity Duty

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'.

Section 41 of the Act requires the Secretary of State to publish a list of habitats and species which are of 'principal importance for the conservation of biodiversity'. This list is intended to assist decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications. A developer must show that their protection has been adequately addressed within a development proposal.

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

A European Protected Species Licence (EPSL) issued by Natural England will be required for works likely to affect a bat roost or for operations likely to result in a level of disturbance which might impair their ability to undertake those activities mentioned above (e.g. survive, breed, rear young and hibernate). The licence is to allow derogation from the relevant legislation but also to enable appropriate mitigation measures to be put in place and their efficiency/success to be monitored. The legislation may also be interpreted such that, in certain circumstances, important foraging areas and/or commuting routes can be regarded as being afforded *de facto* protection, for example, where it can be proven that the continued usage of such areas is crucial to maintaining the integrity and long-term viability of a bat roost (Garland & Markham, 2008).

There are 17 species of bat breeding in England and Natural England issues licences under Regulation 55 of the Habitats Regulations to allow you to work within the law.

Licences are issued for specific purposes stated in the Regulations, if the following three tests are met:

- The purpose of the work meets one of those listed in the Habitats Regulations (see below);
- That there is no satisfactory alternative;
- That the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range

The Habitats Regulations permits licences to be issued for a specific set of purposes including:

1. include preserving public health or public safety or other imperative reasons of over-riding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment;
2. scientific and educational purposes;
3. ringing or marking; and,

4. conserving wild animals.

Development works fall under the first purpose and Natural England issues bat mitigation licences for developments.

EUROPEAN PROTECTED SPECIES POLICIES

In December 2016 Natural England officially introduced the four licensing policies throughout England. The four policies seek to achieve better outcomes for European Protected Species (EPS) and reduce unnecessary costs, delays and uncertainty that can be inherent in the current standard EPS licensing system. The policies are summarised as follows:

- Policy 1; provides greater flexibility in exclusion and relocation activities, where there is investment in habitat provision;
- Policy 2; provides greater flexibility in the location of compensatory habitat;
- Policy 3; provides greater flexibility on exclusion measures where this will allow EPS to use temporary habitat; and,
- Policy 4; provides a reduced survey effort in circumstances where the impacts of development can be confidently predicted.

The four policies have been designed to have a net benefit for EPS by improving populations overall and not just protecting individuals within development sites. Most notably Natural England now recognises that the Habitats Regulations legal framework now applies to 'local populations' of EPS and not individuals/site populations.