SIMPLY ECOLOGY

Howgill Barn, Howgill Lane, Rimington, Clitheroe, Lancashire

Bats: Building and Activity Surveys

Simply Ecology Limited

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November 2015

For

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1.0 INTRODUCTION

1.1 Background Information

1.1.1 Simply Ecology Limited was commissioned by Mr and Mrs Conlon in July 2015 to undertake protected species assessment of Howgill Barn, Howgill Lane, Rimington, Clitheroe, Lancashire, BB7 4EF (O/S Grid SD 824 459; here after referred to as the site). See Plate 1; Plan 1: The Site Location; Plan 2: Site Layout; Plan 3: Proposed Site Layout.

1.2 Aims

1.2.1 The aims of this survey were to gather up-to-date information on the presence of bats at the site. This involved:

- Identifying potential structures of the building that could be used by bats.
- Identifying if there was any evidence of bats around the building.
- Providing an assessment of the likely importance of the site for bats and their conservation.
- Advising the client in relation to the proposed development and any impacts upon bats in order to ensure legislative compliance.

1.2.2 To achieve this, a building inspection for bats at the site was undertaken on 13th of August 2015. This submission presents the results of the ecological surveys at the site.

1.3 Site description and Proposed Works

1.3.1 The site consisted of a residential property situated in an agricultural landscape set in Eastern Lancashire. Immediately to the West is a small copse, and to the East are a small number of residential properties. Further afield, the surrounding area consists of pasture land punctuated with hedgerows and tree lines, with small villages interspersed, the nearest of which being Newby to the West.

1.3.2 The survey described in this report was commissioned to inform a future planning application for the redevelopment of the existing house on the proposed site which will involve building an extension on the South West aspect (see Plan 3). The planning process requires up-to-date survey data the ecological value of the site and the presence of any notable habitats or protected wildlife, which this report addresses directly.

Plate 1: A view of the rear of the building (South West aspect).

2.0 SURVEY METHODOLOGY

2.1 External and Internal Building Survey

2.1.1 An inspection of all buildings on the site was specifically carried out to search for bats. The building survey was undertaken in accordance with the standard methods described in the 'Bat Worker's Manual' (JNCC 1999) and 'Bat Surveys – Good Practice Guidelines' (BCT 2012). In accordance with best practice, the survey comprised the following elements:

- An inspection of the exterior of the building to look for obvious signs of bat activity (such as droppings) and assessing the potential for entry/exit into the property.
- An internal inspection of all spaces to determine whether bats were present, to look for signs of activity (such as discarded prey items and droppings) and to assess potential suitability for bat species. Lighting was provided by a million candle power Cluson Clulite CB2.

2.2 Bat Activity Survey

2.2.1 Dusk and dawn surveys of the property was undertaken in accordance with the standard methods described in the 'Bat Worker's Manual' (JNCC 2004) and 'Bat Surveys – Good Practice Guidelines' (Bat Conservation Trust 2012). In accordance with best practice, the survey comprised the following elements:

- Emergence Survey: Two night time visits were undertaken at dusk to determine if bats were emerging from the property and to assess levels of bat activity.
- Re-entry Survey: One dawn visit was undertaken to determine if bats were entering the building and to assess levels of bat activity.
- During the surveys the surveyors were positioned to provide the best coverage of the building based upon the potential roost location. The surveyors would be expected to hear and also see any bats emerging from the building. Activity was detected using heterodyne and bat detectors.

2.3 Personnel

2.3.1 All surveys were led by Jason Reynolds MSc MCIEEM, who conducted his MSc thesis at the University of Aberdeen on the foraging preferences of the *Pipistrelle* and who worked as an advisor during 1997-8 on the negotiations with the BCT over the NMBP. Jason has been undertaking bat surveys since 1995 and is a member of the Furness and Westmorland Bat Group. Jason runs his own ecological consultancy Simply Ecology and is an experienced botanist with a broad range of ecological and conservation knowledge gained over 20 years working as a Conservation Officer for both statutory and charitable conservation bodies, including English Nature, Cumbria Wildlife Trust and the Environment Agency. Jason holds protected species survey licences for white-clawed crayfish, great crested newts and all British bats.

2.3.2 Additional surveyors were Kevin Heywood BSc (Hons). Kevin is an Ecologist with Simply Ecology. He graduated from Lancaster University with a 1st Class degree and an active member of the North Lancashire Bat Group. He has over 3 years' experience with bats. This has ranged from an accumulation of field skills, experience handling bats, surveying for the Bat Conservation Trust and bat roost visitor licence training. During his time at Lancaster he completed a dissertation project looking at the effects of LED light on foraging Daubenton's bat (Myotis daubentonii) behaviour.

2.3.3 Further surveyors were Lydia Atkinson BSc and Sammy Gray BSc. Lydia has a degree in Ecology from Lancaster University and Sammy has a degree in Geography, also from Lancaster. Both were interns with Simply Ecology and this was their first season of bat survey experience.

2.4 Timing and Constraints

2.4.1 The building surveys were undertaken on 13th August 2015. This is an ideal time of year to search for signs of recent bat activity as bats are most active during the summer months. An uninhibited assessment of the buildings potential for bats could therefore be made according to evidence found, building condition, location and the surveyor's experience.

2.4.2 The weather was sunny and dry when the building surveys were undertaken, once again resulting in no constraint to the ecologist's ability to perform comprehensive surveys. Visibility of the exterior of each building was excellent, with access on all sides and with no trees or vegetation to limit the inspection. Overall, it was not considered that there were any constraints which would have affected the detection of bat potential within the buildings.

2.4.3 The night-time activity surveys of the property were carried out on 21st August, 25th August and 15th September 2015. This survey timing is during the optimal survey period and the weather conditions were considered ideal to observe and record any bat activity at the site (see Table 1).

Table 1: Weather conditions during the bat survey

Survey Date	Temperature at start of survey	Sunset/ Sunrise	Weather
21st August 2015	16 °C	06:00	Warm, light persistent rain until 05:45 and still. 80% cloud cover. Ideal conditions for observing bats.

25th August 2015	16 °C	20:17	Light breeze and warm with very light drizzle. 100% cloud cover. Conditions were fine for viewing typical bat behaviour.
15th September 2015	12 °C	19:28	Light breeze, dry and mild with 10% cloud cover. Fine weather for observing typical bat behaviour.

3.0 RESULTS

3.1 Building Inspection

Internal Inspection

3.1.1 A thorough search of the inside of the loft space was conducted. All beams and wooden frameworks were checked for any signs of bat activity, such as staining or scratch marks. No immediate signs were found on any of these structures within the loft (see Plate 2). Bitumen felt was underlying the external slates tiles. Within this void, it is possible for crevice dwelling bats to roost. A check of the walls within the loft space confirmed that bats were present within this void, with droppings apparently falling along the side of the walls (see Plate 3) and accumulating on the insulation (see Plate 4).

Plate 2: No signs of recent bat activity could be seen on the wooden framework within the loft space.

Plate 3: Droppings could be seen scattered across the brickwork, after falling from the void between the felt and the slates.

Plate 4: Collections of droppings were found directly on the insulation within the loft.

External Inspection

3.1.2 A close inspection of the roof indicated that there were gaps between the individual slates (see Plate 5). Looking at the gable ends (particularly on the North West end) this was most prominent (see Plate 6). Around much of the building the eaves offered little potential for bats to gain access, due to the roof being well sealed with the stone walls and the tie beams. However, there were some gaps of an ideal size for bats to gain access (see Plate 7). Further inspection around the building found scatterings of bat droppings on the walls and the ground, particularly at the Southern gable end (see Plate 8). The potential bat roosting locations between the slates and felt, the potential entrance/exit points in the gaps between the slates, and the clear signs of droppings situated within and outside the building, all cumulatively give strong indication that bats were utilising the building as a roost. As a result, **further night time bat surveys were recommended in order to determine bat species, numbers and roost location.** This will ensure compliance with the Wildlife and Countryside Act 1981 (as amended) Section 9, Schedule 5 and The Conservation of Habitats & Species Regulations 2010 (Regulation 41).

3.1.3 In addition to the above signs of bats described above, on the North Eastern side of the building there were approximately half a dozen house martin nests within the eaves (see Plate 9). However, due to these being located on the opposite side of the building to where the work will be carried out, these will not be affected.

Plate 5: Gaps between individual slates were large enough to allow bat access.

Plate 6: Gaps between the slates at the gable end offered ideal potential access points for bats.

Plate 7: There were some gaps in the eaves.

Plate 8: Around the building there were droppings dispersed, a clear sign that bats were utilising the property as a roost.

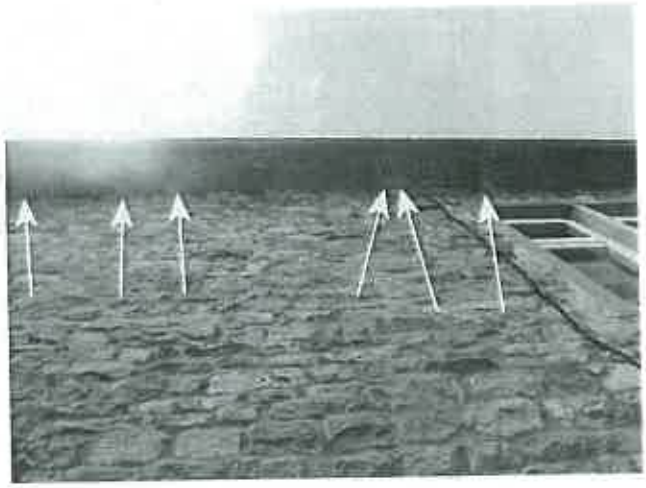


Plate 9: There were house martin nests within the eaves on the North East of the house.

3.2 Night Time Surveys

Entry Survey

3.2.1 It was immediately clear during the entry survey that the building was utilised by bats. There was relatively constant swarming behaviour which increased in magnitude throughout the survey. The survey took place on 21st August and started at 04:30 and ended at sunrise (06:00). Throughout the course of this time, approximately 170 bats were seen entering the building. Three species were represented, with the majority being soprano pipistrelles (*Pipistrellus pygmeus*), around two dozen being common pipistrelle (*Pipistrellus pipistrellus*) and five being Myotis (*Myotis* sp.). The majority of the bats entering the building entered at the North West gable end amongst the slates on the roof (see Plates 6 and 10). However, there were also bats seen entering in gaps between the slates across the North Eastern roof aspect, as well as in the opposite gable end.

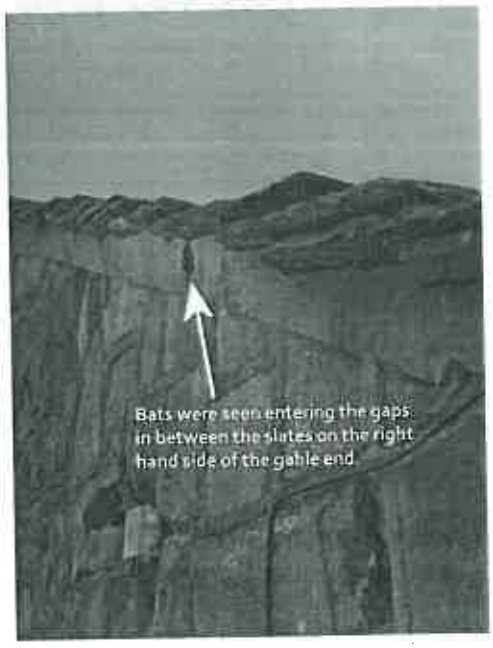


Plate 10: bats at the North West gable end during the entry survey.

Emergence Surveys

3.2.2 Similar levels of activity during the entry survey occurred during the emergence surveys. These surveys took place on 25th August and 15th September, and started at sunset (20:17 and 19:28 respectively) on both evenings. On the 25th August 159 bats were seen to emerge from the building in total. Of these there were 145 soprano pipistrelles (*Pipistrellus pygmeus*), 14 common pipistrelles (*Pipistrellus pipistrellus*) and 3 Myotis (*Myotis* sp.). By the 15th September the numbers present at the site had diminished slightly. However, there were still approximately 83 emergences, mostly consisting of soprano pipistrelles (*Pipistrellus pygmeus*), around 9 being common pipistrelle (*Pipistrellus pipistrellus*) and five were Myotis (*Myotis* sp.). The bat activity around the building consisted of typical pipistrelle bat activity (including foraging and swarming behaviour) at a relatively large roost, with constant activity throughout the surveys, later consisting of Myotis activity as well as pipistrelle. Once again, the majority of bats emerged from the same gable end. However, on the final survey there were a slightly higher proportion of the bats exiting through gaps in the slates all across the South Western roof aspect in numerous locations (see Plate 11). No bats were seen to emerge from the South Eastern gable end on the final survey. The surveys ended at 21:30 and 21:00 respectively.

Plate 11: There were a number of exit points all along the South Western aspect of the roof.

3.3 Site Status and Protected Species Risk Assessment

3.3.1 Due to ideal conditions and comprehensive surveys with 3 experienced surveyors covering all aspects of the building, it is possible to determine that there were multiple roost entry points on the building. These were largely situated on the North West gable end from gaps between slates and the wall. There were also multiple entry points situated all across the roof on the South West aspect of the building, as well as small numbers emerging from the opposite gable end (South East). The highest count of bats seen to be utilising the building as a roost was 170 on the first dawn survey and three species were seen to enter/exit on all surveys including: soprano pipistrelle (*Pipistrellus pygmeus*), common pipistrelle (*Pipistrellus pipistrellus*) and Myotis (*Myotis* sp.). The presence of such numbers indicates that the building is used as a maternity colony during the summer time. Taking into account all factors, the ecologist's expert judgement is that this site acts as a roost

for a relatively large population of bats, and is of relatively high importance for bat populations in the local area.

3.3.2 Proposed works at Howgill Barn involve movement of the flue on the North East roof aspect and the building of a new single floor extension on the South West aspect. Both of these activities will result in movement of existing slates, near to areas on the roof where large numbers of bats are known to roost during the Spring and Summer. Additionally, it is possible that Howgill Barn is utilised in the Winter as a hibernation roost, although no evidence of this was found due to the time of survey. The construction of the new slate roofed extension will effectively increase the roosting potential of the site. However, existing flight lanes may be altered due to the close location of the extension. All factors involved, there is deemed to a be a net increase in quality of the existing roosting source, as bats can still utilise flight lines from the gable ends (where the majority of access was observed) and the increase in potential roosts is of great benefit to this population. The only key issue that must be addressed is the

4.0 CONCLUSIONS AND RECOMMENDATIONS

4.1 Bats

4.1.1 Howgill Barn has a significant summer roost of predominantly soprano pipistrelles (*Pipistrellus pygmeus*) as well as smaller numbers of common pipistrelle (*Pipistrellus pipistrellus*) and Myotis (*Myotis* sp.) bats. The highest bat count on any given survey amounted to 170. These emerged from the roof mainly from the North West gable end as well as the South West pitched roof aspect. Behaviour observed was representative of that seen amongst summer maternity roosts. The building itself represents a high quality resource for bats to use as a roosting site.

4.1.2 The work proposed will cause disturbance to known bat roosts at Howgill Barn. Therefore mitigation measures will be required to address this impact. *It is recommended that the implementation of the mitigation strategy detailed below should enable the planning application to be determined without having a detrimental impact upon bats.*

4.1.3 The mitigation strategy for this site has been designed to meet the test of there being no adverse effect on the favourable conservation status of the bat population affected by the proposed work. National Planning Policy and legislation requires that mitigation addresses the impacts picked up by the site assessment, as follows:-

- Quantitative characteristics: There should be no net loss of roost sites, and in fact where significant impacts are predicted there will be an expectation that compensation will provide an enhanced resource compared with that to be lost. The reasoning behind this concept is that the acceptability of newly created roosts by bats is not predictable.
- Qualitative characteristics: the plans should aim to replace like with like. As an extreme example, it would be unacceptable to replace maternity roosts with hibernation sites.
- Functional characteristics: compensation should aim to ensure that the affected bat population can function as before. This may require attention to the environment around the roost.

4.1.4 As it is an offence to destroy or disturb a bat roost it is advised that this work must take place under the terms of a derogation licence issued by Natural England and the mitigation measures to provide alternative roosting sites to replace those destroyed and MUST be implemented to ensure legal compliance.

4.1.5 The mitigation measures recommended to the client are as follows:

4.2 In-situ retention of roosts

4.2.1 The roosts within the building will be retained during the works *in-situ*. The works simply have the potential to disturb roosting bats during the tying-in of the roofs, but no loss of roosts will occur.

4.3 Modification of existing roosts

4.3.1 The roosts within the building will only be disturbed by the works; there will be no roost modification.

4.4 Direct Capture/Movement of bats

4.4.1 No capture or direct disturbance of bats will occur at this site. Instead the careful planning and timing of the works will ensure that direct impacts upon bats will be avoided.

4.5 Indirect Impact Mitigation: Exclusion

- We consider it is not necessary or practical to exclude at a site such as Howgill Barn due to the nature of the roof and roosting space. Any attempt at excluding from the multiple access points may be counter-productive due to the numerous other potential access points that are present all around the building. Additionally, providing the timing of works is planned carefully, there are not likely to be bats present to be disturbed.

4.6 Indirect Impact Mitigation: Timing of Works

- Prior to any work on or near to the roof taking place, night time surveys should be carried out to ensure that no bats are still present. No work should take place during the sensitive summer period when bats are rearing young. Additionally, there is a possibility that bats could be hibernating within the roof over Winter. As such, works should be timed for the period when least bats are present within the building. Work should take place between September to October or March-Early May at which point bats would not be in their summer roosts and also will not be vulnerable to works if they are hibernating. Therefore, with this effective strategy in place, the roof stripping **can take place without having a detrimental impact on local bat populations.**

- During the working window, a dawn or dusk survey must take place to verify that bats are not observed using the roost. Once absence is confirmed, the roof strip will commence immediately in the presence of a licensed bat surveyor. The licensed bat handler or suitably experienced person (Accredited Agent) will remain on site as the roof is stripped and for the duration of the period that the roosting area is exposed. In the unlikely event that bats are found during work, which must then continue in order to weather proof the building, then bats will be removed by hand by the licensed bat handler or suitably experience person (Accredited Agent) and kept in a suitably secure dark box until they can be relocated by hand into the newly installed roosts.

- If bats are found elsewhere during the course of the remaining works, all work will stop and the ecological consultant for this project Jason Reynolds Tel: 07754 538437 will be informed prior to work re-commencing. Bats may be removed from high risk areas by hand, kept in a secure cardboard box with coverings in a quiet area of the site then released at night at the site on warm

- The site is in relatively close proximity to a well-known bat carer, Gail Armstrong, 1 Bottoms Lane, Silverdale, Carnforth, Lancashire. Gail has several bats in her care at any one time and regularly deals with sick and injured bats. Any bats found which are sick and or injured and it is judged that they need external care will be assessed on site and if necessary taken to Gail Armstrong for treatment. The risk of sick or injured bats being found at the site is however considered to be negligible.

In order to cover any residual risk that bats could be present, the following precautionary actions are advised:

- The contractors should be observant during the work for bats. Bats are opportunistic and may make use of gaps opened up during the work.
- In the event that any bats are found during the remainder of the works, the client (and any sub-contractor) is reminded of their protected legal status. All works must cease immediately until advice on how to proceed has been sought from the Appointed Ecologist.
- If it is absolutely necessary to remove a bat to avoid it being harmed, gloves should be worn. It should be carefully caught in a cardboard box and kept in the dark in a quiet place until it can be released at dusk near to where it was found, or moved to an undisturbed part of the building, with outside access, and placed in a location safe from predators. THIS MUST ONLY BE DONE FOR WELFARE CIRCUMSTANCES. The legal protection afforded to bats does not make this an admissible way to destroy a bat roost. The Appointed Ecologist will advise on steps necessary to ensure legal compliance and working under license if a bat roost is found.

4.7 Indirect Impact Mitigation: New Roost Provision

4.7.1 The planned extension is set to have a traditional slate roof and should therefore be lined with type 1F bitumen felt. This is because modern breathable roofing membranes have been known to cause mortality in bats. Given that there is a good chance that bats will utilise the new extension roof for roosting purposes, this is essential to ensure there are no detrimental impacts on bats as a result of the development.

4.7.2 Since it will be possible to retain the roosts within the site there will be no requirement for further compensatory roost provision. The entire new roof on the new build will however, be covered in roofing slates, so there is a high likelihood that these will provide additional roost opportunities.

4.8 Post Development Site Safeguard

4.8.1 After the work has been completed the roosts shall not be altered or destroyed without the appropriate statutory mechanisms being followed.

4.8.2 The site will remain in the management control of the current owners who will be responsible for site management.

4.9 Population monitoring

4.9.1 Due to the relatively large size and significance of the roost, in line with Natural England Guidelines, further monitoring is required. This should involve night time bat surveys over two subsequent years following on from the year that the work has taken place.

4.10 Mechanism for ensuring delivery

4.10.1 On the basis of survey information, specialist knowledge of the species concerned and understanding of the planning and legal system, we consider that there is no requirement for the use of a mechanism to ensure delivery of the recommendations of this report other than that which is already required by statute under a Natural England licence.

4.11 Breeding Birds

Barn Owls

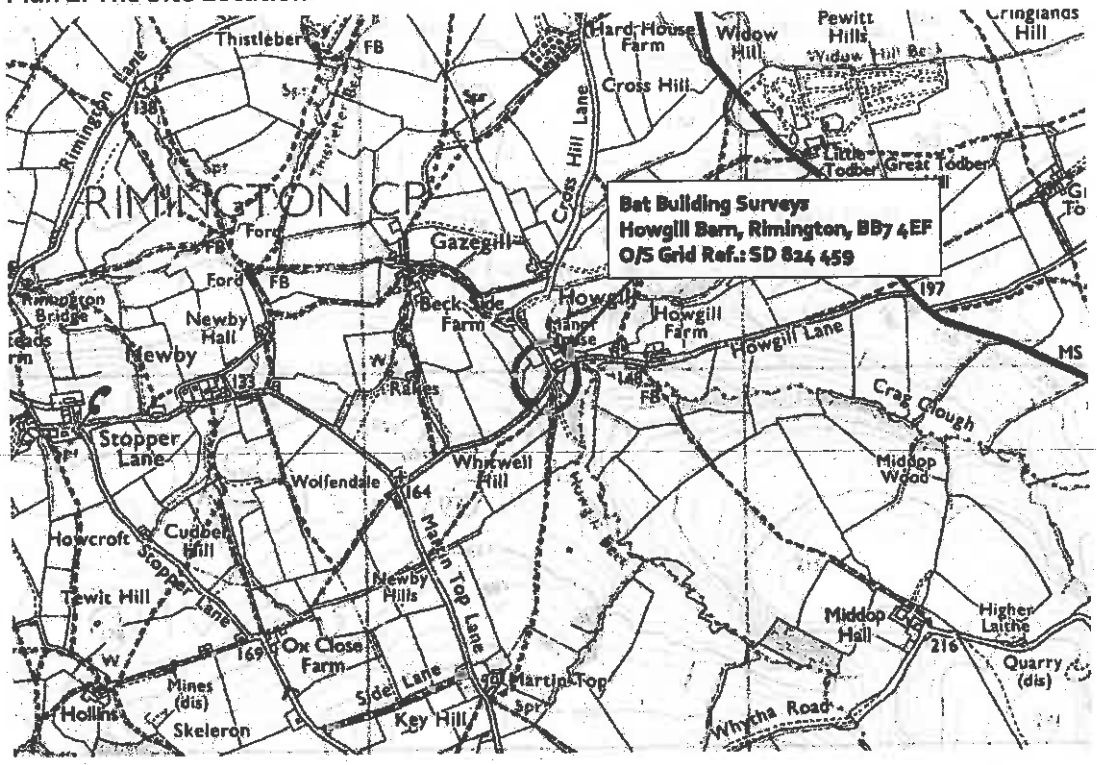
4.11.1 No evidence of Barn Owl habitation was discovered during the building surveys.

Swallow and House Sparrow

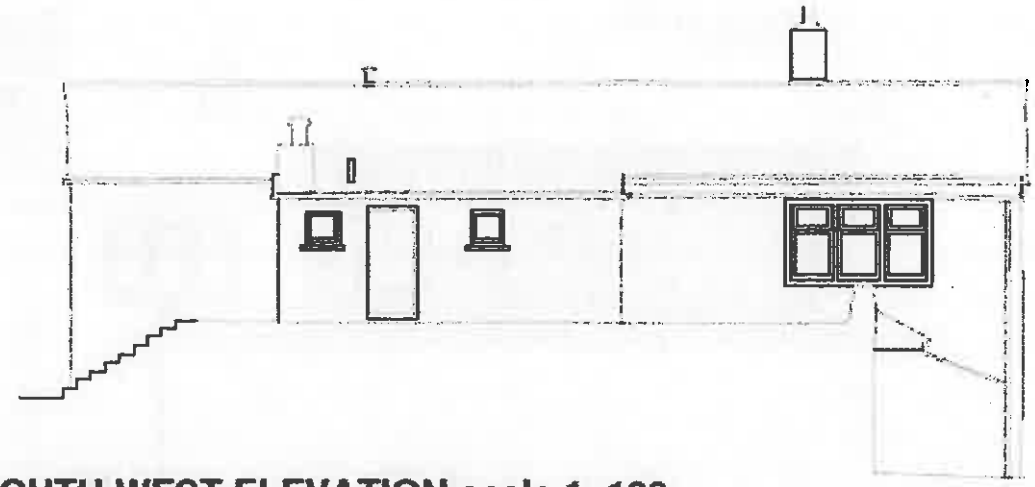
4.11.2 A number of house martin nests were identified within the eaves on the North East aspect of the building. However, given that the work will not affect this part of the house, no further recommendations are required.

PLANS

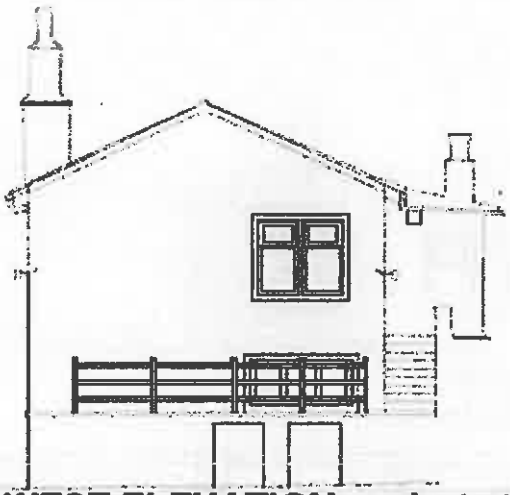
Plan 1: The Site Location.



Plan 2: Site Layout.

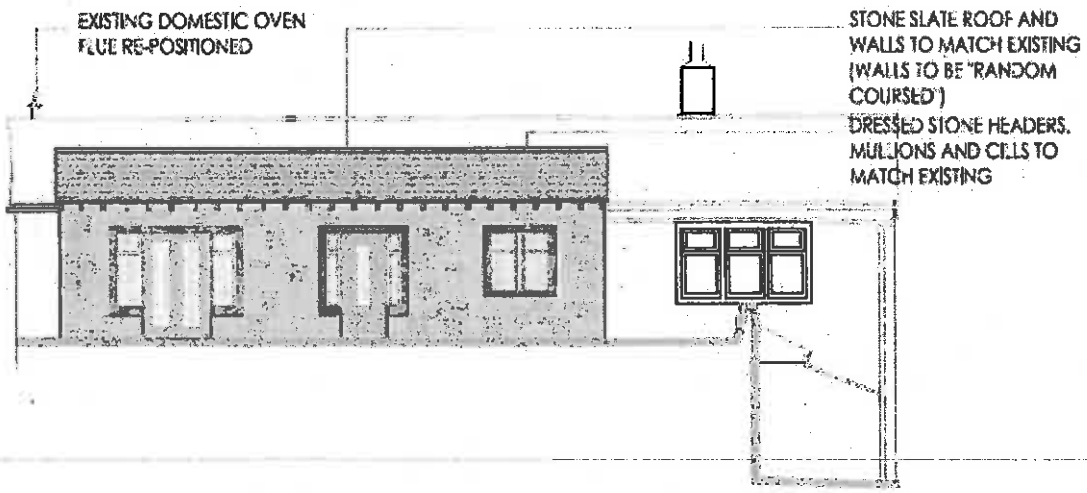


SOUTH WEST ELEVATION scale 1=100



NORTH WEST ELEVATION scale 1=100

Plan 3: Proposed Site Layout.



SOUTH WEST ELEVATION scale 1=100

NORTH WEST ELEVATION scale 1=100

5.0 REFERENCES

BAT CONSERVATION TRUST (2012). *Bat Surveys – Good Practice Guidelines*. Bat Conservation Trust, London.

DEPARTMENT FOR COMMUNITIES AND LOCAL GOVERNMENT (2012) *National Planning Policy Framework*. HMSO. London.

JOINT NATURE CONSERVATION COMMITTEE Mitchell-Jones, A.J. & McLeish, A.P. [Eds.] (2004) *The Bat Workers Manual (3rd edition)*. Joint Nature Conservancy Council, Peterborough.

Shawyer, C. R. (2011). Barn Owl *Tyto alba* Survey Methodology and Techniques for use in Ecological Assessment. Developing Best Practice in Survey and Reporting. IEEM, Winchester

Web addresses for access to full UK legislation and policy text:

Conservation of Habitats and Species Regulations 2010:

http://www.opsi.gov.uk/si/si2010/uksi_20100490_en_1

Wildlife and Countryside Act 1981:

www.opsi.gov.uk/RevisedStatutes/Acts/ukpga/1981/cukpga_19810069_en_1

Countryside and Rights of Way Act 2000:

www.legislation.hmso.gov.uk/acts/acts2000/20000037.htm

Natural Environment and Rural Communities Act 2006:

http://www.opsi.gov.uk/acts/acts2006/ukpga_20060016_en_1

ANNEX A: STATUTORY AND PLANNING CONTEXT

A.0 Bats

A.0.1 Bats and all places they use for shelter are afforded full protection by *The Wildlife and Countryside Act 1981* (as amended) (Section 9, Schedule 5). In addition to the above protection, bats are also protected under European legislation, which is implemented in England via The Conservation of Habitats and Species Regulations 2010.

A.0.2 If both national and international legislation are taken together, the legislative protection afforded to the species makes it an offence to:

- Intentionally/deliberately kill, disturb, injure or capture a bat.
- Intentionally or recklessly damage, destroy or obstruct access to any breeding site or resting place of a bat.
- Possess or control any live or dead specimen or anything derived from a bat.

A.0.3 If an activity is likely to result in any of the above offences, derogation from the legal protection can be issued in the form of a European Protected Species licence issued by Natural England. Licences for development purposes are issued under the Conservation of Habitats and Species Regulations 2010 and only allow what is permitted within the terms and conditions of the licence.

A.0.4 In addition to licensing, for activities requiring planning permission, the presence of bats is a material consideration, which must be fully considered when granting planning permission.

A.0.5 Where a development is proposed that may affect a protected species, alternative sites should be considered before granting planning permission. The planning authority may require mitigation or compensatory proposals in order for an activity to be granted planning permission.

A.1 Birds

A.1.1 *The Wildlife & Countryside Act 1981* (as amended) protects all nesting wild birds in Britain. It is an offence to intentionally:

- Kill, injure, capture or take a wild bird;
- Take, damage or destroy the nest of any wild bird while that nest is in use or being built; or
- Take or destroy an egg of any wild bird.

A.1.2 There are specific penalties for committing the above offences to Schedule 1 birds. These are rarer or more vulnerable species which includes the barn owl. It is an offence to intentionally:

- Disturb a barn owl while it is building a nest or is in, on or near a nest containing eggs or young; or
- Disturb dependent young of such a bird.

A.2 Planning

A.2.1 When considering each planning application, the presence of protected species, such as those listed above, is a material consideration which must be fully

considered by the Local Authority when granting planning permission. If a licence from Natural England is required, then prior to issuing any planning consent, the local planning authority will need to be satisfied that there is no reason why such a licence would not be issued. Therefore, in reaching the planning decision the local planning authority will need to have regard to the requirements of the Conservation of habitats and Species Regulations 2010. The three licensing tests given in the Regulations must be considered. In summary, these are that:

1. The development is required for the purpose of:
    - preserving public health or public safety,
    - 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.
    - preventing serious damage to property.
2. There is no satisfactory alternative.
3. The proposal will not be detrimental to the maintenance of the population of the species at a favourable conservation status.

A.2.2 All necessary information would need to be provided to the planning authority as part of the planning application in order to address the above tests.

A.2.3 The Natural Environment and Communities Act (NERC Act) 2006 extended the biodiversity duty set out in the Countryside and Rights of Way (CROW) Act to public bodies and statutory undertakers to ensure due regard to the conservation of biodiversity. The Duty is set out in Section 40 of the Act, and states that:

"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 conserving biodiversity"

A.2.4 The Duty applies to all local authorities, community, parish and town councils, police, fire and health authorities and utility companies. Section 41 (S41) of this Act (the 'England Biodiversity List') also requires the Secretary of State to publish a list of habitats and species that are of principal importance for the conservation of biodiversity in England. This list is used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 40(1) of the Act.

A.2.5 Also, Local Authorities must follow the National Planning Policy Framework (NPPF) which provides guidance on the interpretation of the law in relation to wildlife issues and development. For each development proposal considered by the Local Planning Authority the NPPF states that the authority must aim to conserve and enhance biodiversity. If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.

UK Biodiversity Action Plan (UK BAP)

A.2.6 The UK BAP, which was first published in 1994, was the UK government response to the 1992 Convention on Biological Diversity. It sets priorities for nationally important 'priority species' and 'priority habitats'. Each species and habitat action

plan has costed actions and targets, and is used to inform the compilation of national lists such as the Section 41 List described above.