Bat Survey: Preliminary Roost Assessment

Whinney Close Farm

Cockley Hill Lane, Kirkheaton

January 2023

Prepared for: Thomas Crompton

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

EXECUTIVE SUMMARY

- On 9th January a Preliminary Roost Assessment was undertaken at Whinney Close Farm, Kirkheaton.
- The house is considered to have high suitability for bats, whilst the smaller outbuilding is considered to have very low -negligible suitability for bats. The proposals to demolish the structures may impact on bats.
- Further survey work in the spring/summer months is recommended to determine the presence or absence of a bat roost in the house. This survey work must be undertaken between May – August when bats are active. Precautionary methods of work are proposed for the outbuilding.

1. Introduction

1.1 Application Site

1.1.1. This report details bat survey work at Whinney Close Farm, Cockley Hill Lane, Kirkheaton, Huddersfield, HD5 0PF. National grid reference SE 1877 1784.

1.1.2. Thomas Crompton commissioned Verity Webster Ltd to undertake the bat survey work to inform the planning application.

1.2 Objectives

1.2.1 The objectives of the Preliminary Roost Assessment are to determine:

- The suitability of the buildings on site to support a bat roost.
- Whether bats are currently using the buildings, or have done in the past.
- The potential status of any roost present.
- How bats might be using the site and the potential species present.
- The potential impacts of the proposals on any potential roost present or on bats using the site.
- The requirement for further survey work and/or mitigation.
- How any impacts might be avoided, mitigated and/or ameliorated, including advice on European Protected Species Mitigation (EPSM) application if required.
- The potential for biodiversity net gain on site.

1.2.2 The format and content of this report follow that required by the European Protected Species Mitigation (EPSM) licence application where appropriate.

1.3 Proposals

1.3.1 The proposals comprise the demolition of the house and outbuilding and construction of a new dwelling.

1.4 Ecologist

1.4.1 The Preliminary Roost Assessment was undertaken by Verity Webster. Verity is a licensed bat surveyor (Bat Survey Class Licence WML CL18 (Class 2) Registration number: 2015-13858-CLS-CLS).

1.4.2 Verity has worked as an ecological consultant since 2007. She has undertaken preliminary bat assessments and further bat emergence/activity surveys for a large variety of projects and schemes, producing the required impact assessment and subsequent mitigation schemes/method statements when necessary.

2. Site Location

2.0.1 The survey site is located in a rural location, approximately 400m east of the Kirkheaton town in Huddersfield. Open countryside surrounds the site to the north, east and south. The land slopes to the south and there are numerous scattered waterbodies approximately 600m to the south. There is also a reservoir approximately 600m to the northeast. Becks weave through the landscape, which is relatively open, although there are some small, scattered patches of woodland.

2.0.2 Overall, the site is in an excellent location for bats. The variety of habitat provides good potential foraging and roosting habitat.

Figure 1: Ordnance survey map showing the location of the proposed development site.

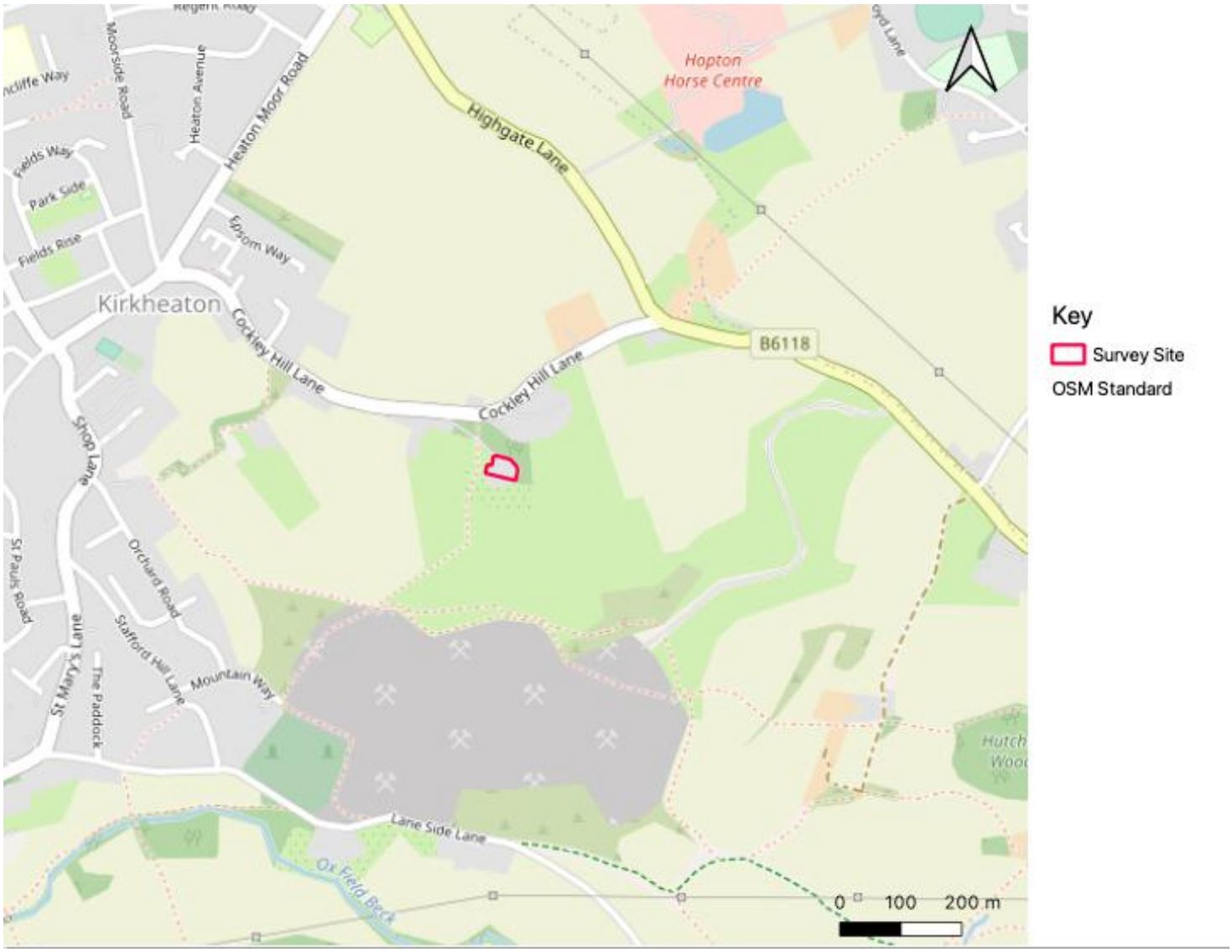
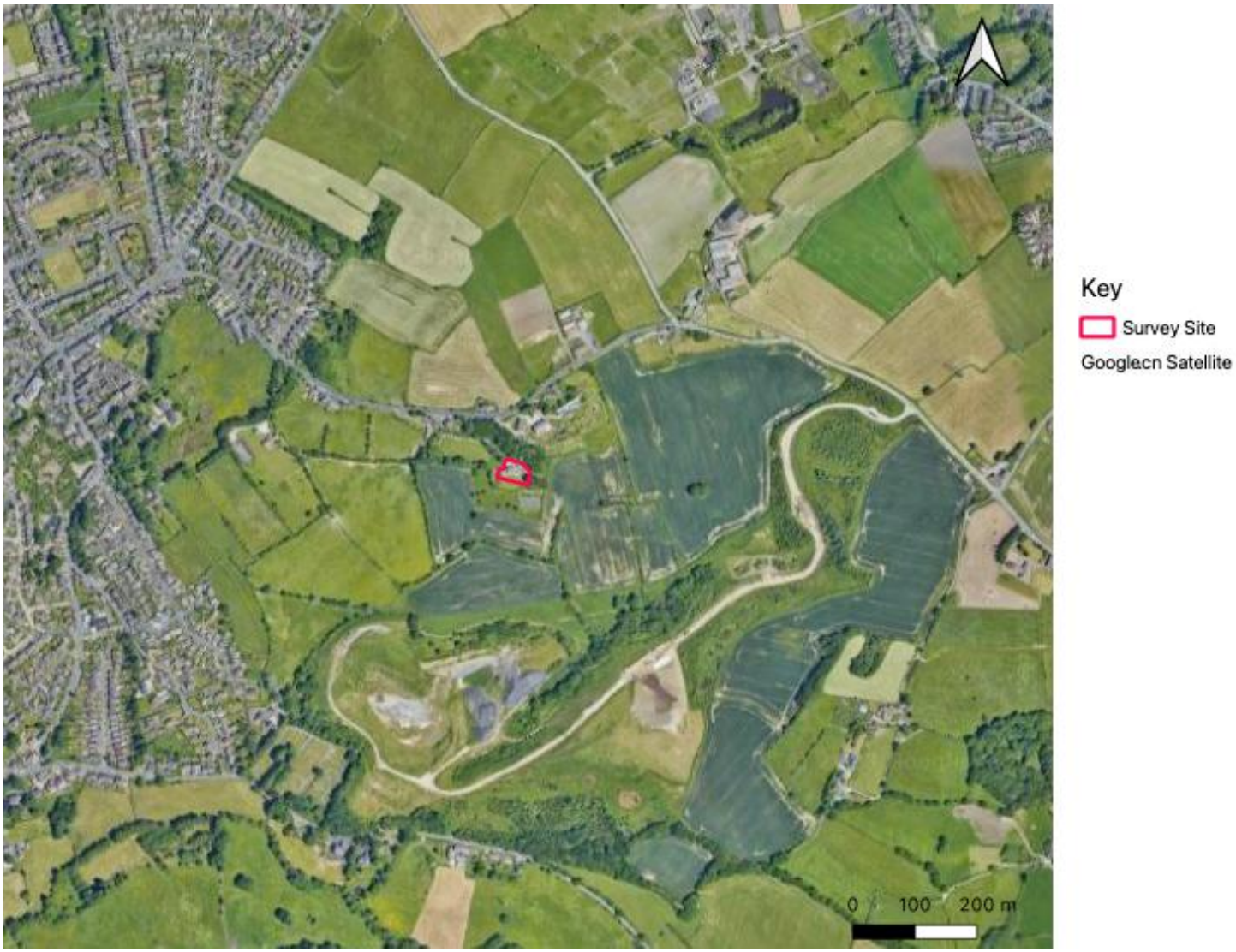


Figure 2: Aerial image showing the proposed development site and immediate surroundings



3. The Survey Site

3.0.1 The survey site is located in mature gardens, with a small plot of woodland to the north and managed grassland to the west and south. Arable fields extend to the east and beyond the gardens to the south and west.

3.0.2 The survey site comprises a house and outbuilding.

The House

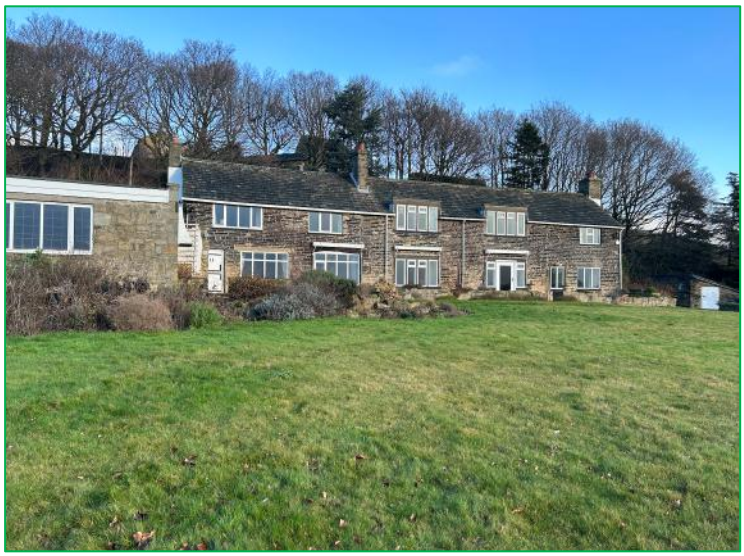
3.0.3 The house is a rectangular, two-storey stone structure, partially rendered with a pitched, heavy slate roof on the main body of the house, and a flat roof extension to the north. There is a wooden soffit around the eaves, but none on the gable ends. The windows and doors are a mix of wood and UPVC.

3.0.4 There is a loft void, which was accessible in the western portion of the house. The slates are lined beneath with roofing felt.

3.0.5 There is a garage and lean-to located on the southwest corner of the house. The garage is constructed of stone with a flat, felt roof and wooden soffits. The lean-to is constructed of wood panels with a corrugated metal roof.

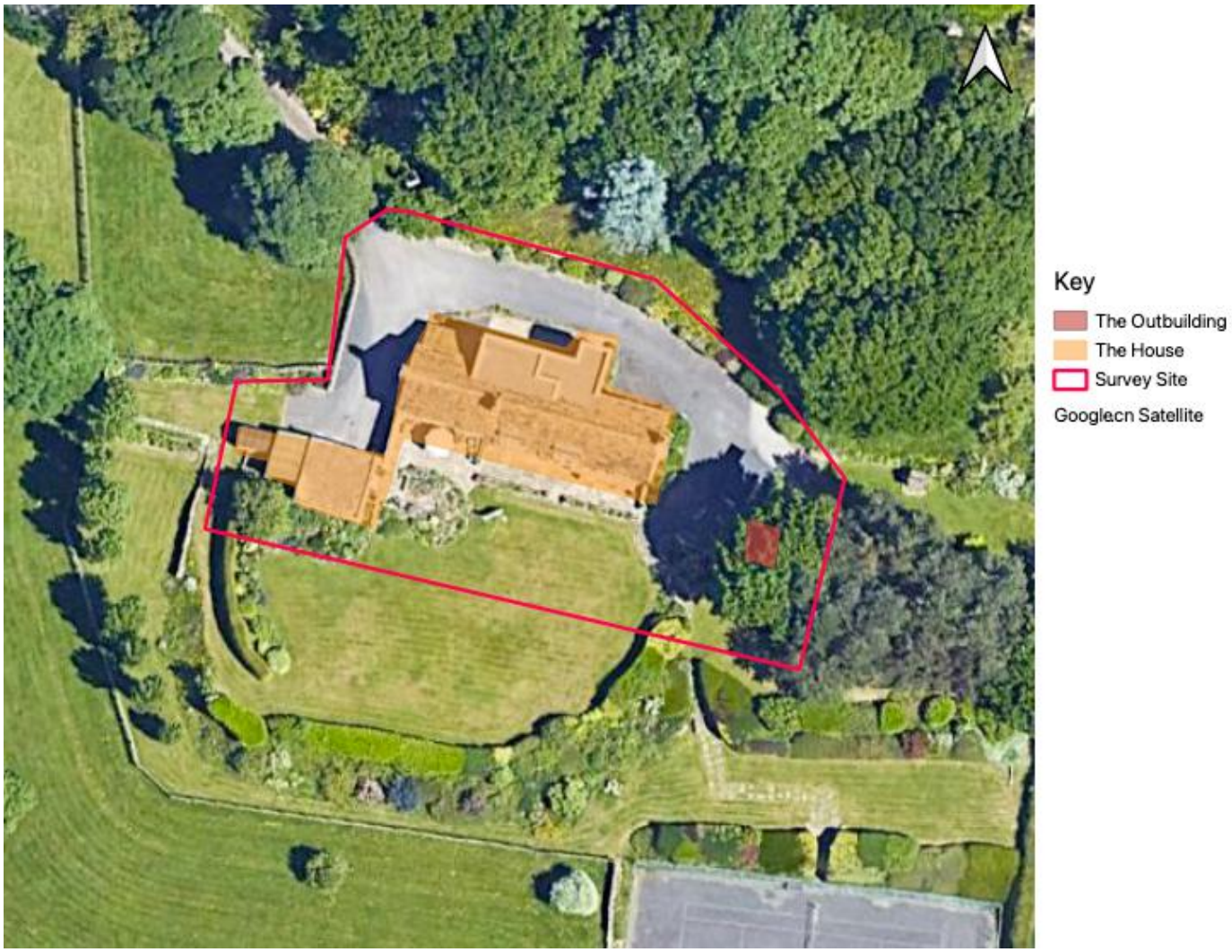
The Outbuilding

3.0.6 The outbuilding is a single-storey, rectangular structure located to the east of the house. The building is constructed of stone with a sloped, felt roof bounded with a wooden fascia and boarded beneath.



The south elevation of the house

Figure 3: The Survey Site



4. Legislation

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

4.1 UK and EU Legislation

4.1.1 Key legislation regarding the protection of bats:

- Wildlife and Countryside Act 1981 (as amended)
- The Countryside and Rights of Way Act (CROW), 2000
- The Natural Environment and Rural Communities Act (NERC, 2006)
- Conservation of Habitats and Species Regulations 2017 (as amended)

4.1.2 Under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2018, it is a criminal offence to:

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

4.2 Planning Policy and Legislation

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

4.2.2 The National Planning Policy Framework (NPPF, 2021) encourages Local Planning Authorities to conserve and enhance biodiversity.

Chapter 15, Para 174 of NPPF states: *''The planning system should contribute to and enhance the natural and local environment by:*

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

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

4.2.3 Para 179 states: "*Plans should: distinguish between the hierarchy of international, national and locally designated sites;*
allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a
strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of
natural capital at a catchment or landscape scale across local authority boundaries.''

4.2.4 Para 180 identifies that plans should do the following to protect and enhance biodiversity and geodiversity:

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

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

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

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

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

5. Survey Methodology

5.0.1 The Preliminary Roost Assessment was undertaken in accordance with currently accepted guidance: Collins, J. (ed.) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd Edn). The Bat Conservation Trust, London.

5.1 Desk Study

5.1.1 Data sources used to establish background information about bats and their likely presence in the locality:

- Magic Map, Natural England (2020)
- Bing Maps (2020)

5.1.2 Satellite mapping, Ordnance survey, road map, habitat and designated site data from Magic Map (Natural England, 2014) was used to assess the value of the surrounding habitat for bats in the area at a landscape scale (5km), including any potentially important habitat corridors (linear habitat features), feeding grounds or potential roost opportunities, such as large expanses of woodland. The features and habitats immediately surrounding the site (local area) were also assessed at a finer scale as these influence the likely presence of bats within the survey site.

5.2 Preliminary Roost Assessment

5.2.1 An internal and external inspection of the structures was undertaken during daylight to determine the suitability for bats and establish, if possible, whether bats are using the building or have been in the past.

5.2.2 All accessible parts of the structures were inspected to look for bats and signs of the presence of bats, including:

- Droppings.
- Feeding remains including moth and butterfly wings.
- Staining from urine or oils near crevices or holes or on timber (such as roof beams), walls, chimney breasts etc.
- Scratch marks on walls and timber.
- Squeaking or chattering calls.

5.2.3 The systematic search inside the building included inspection of beams, floors, surfaces of stored materials, loose roof insulation or felt covering, junctions between roof timbers and timbers and the walls, and crevices within brickwork. Potential access into the building was also inspected by searching for holes in insulation and any light penetration into the interior from the outside.

5.2.4 The assessment outside the building included inspection of all walls, windows, window sills, fascias, soffits, eaves and tiles, including a search for any crevices under tiles, under lifted lead flashing or lifted roofing felt, missing mortar, gaps in the ridge or gable end of the roofs, crevices in brickwork or under flaking paintwork or render, gaps in cladding or hanging tiles and any other potential bat roost opportunities.

5.2.5 Equipment: During the survey, a strong torch with directional beam was used to inspect the buildings.

5.2.6 As a result of the preliminary roost assessment, the structure on site was characterised as having

'negligible', 'low', 'medium' or 'high' suitability for bats. It may also be possible to confirm the presence of a roost.

5.2.7 Buildings or structures typically characterised as having:

- **Negligible** suitability for bats will lack features with any potential to support roosting bats. Modern or newly-built well-sealed structures may fall into this category. Structures that are metal clad with metal internal beams might have negligible potential if there are no favourable roosting spaces. Structures may also be unfavourable due to the level of disrepair, being subject to poor weather conditions.

- **Low** suitability for bats will have sub-optimal roost features with limited potential for roosting bats. Features may be used by single bats opportunistically, but do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis by large numbers of bats.

- **Medium** suitability for bats may have few features with potential for bats, that provide enough space, shelter, protection and other suitable conditions, or several features with limited potential for bats. It may also be that a potentially suitable structure is situated in an area with habitat that has an only low potential for foraging and commuting bats.

- **High** suitability for bats will support at least one or more features that provide opportunities for roosting bats such that they might be used regularly, for longer periods by larger numbers of bats. These may be external features, such as lifted weatherboard or crevices in brick or stonework, or internal, such as large loft spaces with potential access. Barns, with open doorways and windows with wooden rafters and beams, may fall into this category. If a structure is close to good habitats, such as a waterway, marshland or woodland, this also increases the potential for roosting bats.

- **Confirmed** roost presence when it is evident as a result of signs from inspection, such as droppings, or sight of bats, that a roost exists within the building. It is not always possible to ascertain the presence or absence of a roost even if some signs, such as droppings or feeding remains are found.

6. Survey Limitations

6.0.1 The survey was undertaken in daylight in early January. At this time of year bats are in hibernation and are unlikely to be occupying structures such as the house, which is more likely to provide summer roost opportunities. Evidence of bats on the exterior of a building is unlikely to be present as it is likely to have been washed away by the weather. Evidence of use of the interior of a building by bats either currently or over the previous seasons is likely to be present as signs (such as droppings and feeding remains) are likely more protected from the elements.

6.0.2 Data from the local biological records centre of known bat roosts and bats recorded in the area was not obtained to inform this assessment. The inspection alone is considered sufficient to inform any necessary requirements for further survey work and/or mitigation.

7. Findings: Preliminary Roost Assessment

7.1 Suitability of the Locality for Bats

7.1.1 At a landscape level, the area surrounding the survey site is very good for bats. Refer to Figure 2.

7.1.2 Open countryside comprising a matrix of habitat types surrounds the site. The habitat, including grassland, hedgerows, small plots of woodland and waterbodies will support a variety of bat species such as the widespread common and soprano pipistrelle bat (*Pipistrellus pipistrellus* and *Pipistrellus pygmaeus* respectively). Species that favour open habitats such as Leisler's (*Nyctalus leisleri*) and noctule bat (*Nyctalus noctula*) are also expected. Woodland is present, but no extensive, so species that favour wooded habitat, such as Natterer's bat (*Myotis natterri*), whiskered bat (*Myotis mystacinus*) and Brandt's bat (*Myotis brandtii*) are less likely to be present in abundance.

The Conservation Status of Bats in the Area

7.1.3 The conservation status of bats in the area is shown in Table 1.

***Table 1**: The Conservation Status of Bats in the area at a Local, County and Regional Level*

Species	***Local***	***County***	***Regional***
Common pipistrelle	*Likely to be common in the area. There are records of this species in the area (10km).*	*Common and widespread Frequently recorded.*	*Common and widespread Frequently recorded across the Northwest*
Soprano pipistrelle	*Likely to be present due to the presence of riparian habitat.*	*Widespread. Frequently recorded.*	*Common and widespread Frequently recorded across the Northwest*
Nathusius's pipistrelle	*Likely to be rare in the area.*	*Infrequently recorded, but this may be due to low survey effort. Not yet recorded breeding in the county.*	*Rare across the northwest. A migratory species.*
Brown long-eared bat	*Likely to be in the area. There is a recent record of this species within 10km of the site.*	*Common and widespread Frequently recorded.*	*Common and widespread Frequently recorded across the Northwest.*
Natterer's bat	*Likely to be in the area, although this species favours woodland habitat, which is infrequent in the landscape.*	*Scattered distribution in Cumbria.*	*Widespread and scattered across the Northwest.*
Noctule	*Present*	*Widespread and frequently recorded.*	*Common and widespread. Frequently recorded in the Northwest.*
Whiskered bat	*Present but likely rare*	*Present*	*Widespread.*

Brandt's bat	*Rare / absent*	*Present*	*Widespread.*
Alcathoe's bat	*Unknown*	*Unknown*	*Widespread. Likely under-recorded.*
Daubenton's	*Presence is likely due to the riparian habitat present.*	*Widespread, frequently recorded near water.*	*Widespread*
Serotine	*Rare / absent*	*Unknown*	*Restricted to south and southwest Britain, rarely recorded in the northwest.*
Leislers	*Rare*	*Unknown*	*Rare, but widespread in Britain. Present in the northwest.*
Barbastelle	*Unlikely to be present in the area. This species is a woodland-specialist and there is a lack of this habitat present.*	*Unknown*	*Present south of a line from North Wales to the Wash.*

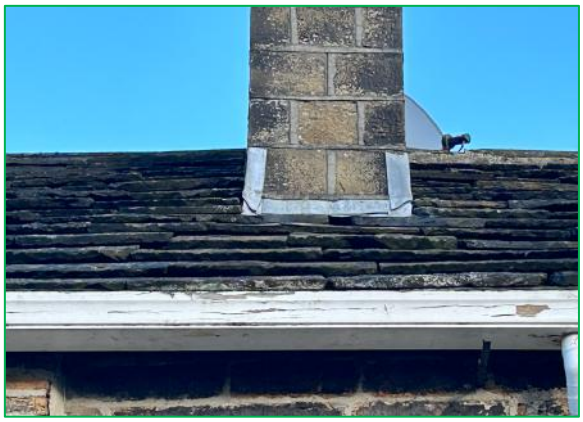
7.2 Preliminary Roost Assessment

7.2.1 The building inspection and bat roost assessment was undertaken in daylight on 9th January 2023.

The House

7.2.2 **The house is considered to have high suitability for bats.**

7.2.3 Externally there are numerous crevices and gaps beneath the roof slates that may provide potential roosting opportunities for bats. There are also crevices beneath lead flashing around the chimneys and around the dormer windows on the south elevation that may provide roosting opportunities for crevice-dwelling bats such as pipistrelle.



Showing crevices under the slates on the south elevation

7.2.4 The extensive south elevation of the roof is highly favourable to bats as it will heat up in the sunshine.

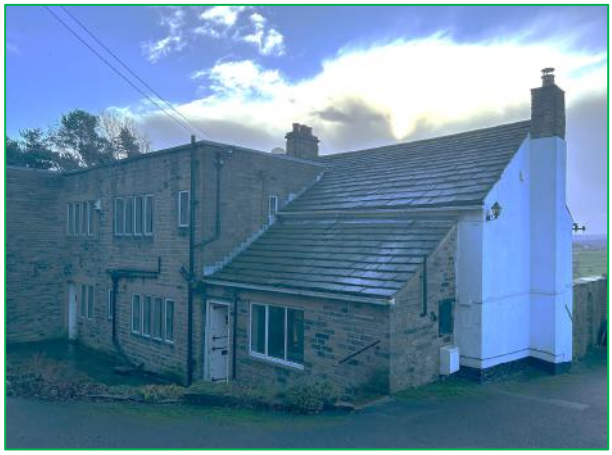
7.2.5 The internal loft space is small, approximately 1.5m to the apex and is divided by internal stone walls. This space is likely too small to support bats that favour roosting in voids, such as brown long-eared bat.

7.2.6 No evidence of bats was found in the loft void, but only the section to the east of the building was safely accessible. Dense cobwebs suggest that bats have not been flying internally, however.

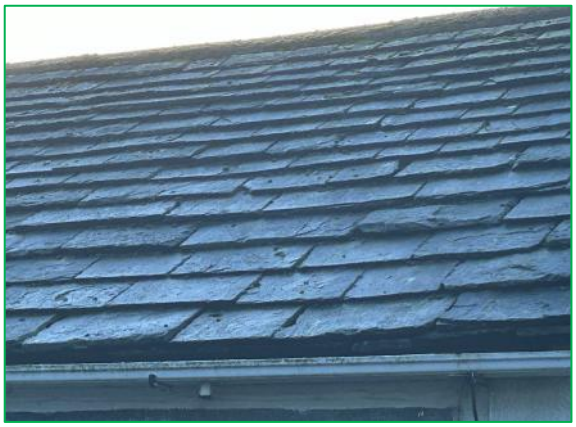
7.2.7 Further survey work will be required to determine the presence or absence of a bat roost within the roof structure of the house prior to the start of construction works. The high quality of the surrounding habitat increases the likelihood that the structure would be used by bats.

7.2.8 The garage is considered to have negligible suitability for bats as the flat roof does not provide any potential roosting opportunities for bats and, whilst the lean-to is accessible for bats, the single-skin corrugated roofing and wooden panels do not provide any potential roosting opportunities.

Showing the shallow loft void in the house



The north elevation of the house



Showing gaps under the slates on the north elevation of the house

The garage, which is considered to have negligible suitability for bats

The Outbuilding

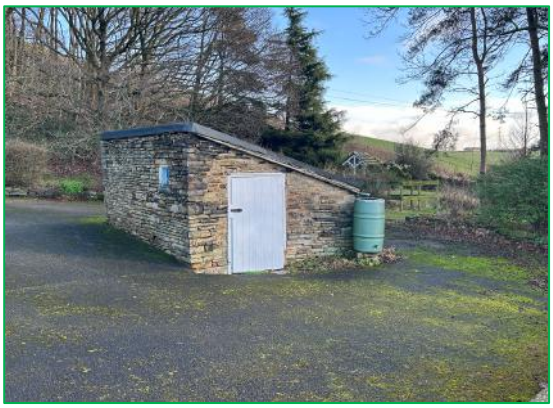
7.2.9 **The outbuilding is considered to have very low- negligible suitability for bats.**

7.2.10 Externally there are crevices in the stonework that may provide potential roosting opportunities for bats, but these were checked with a torch at the time of survey and no bats or evidence of use by bats were found.

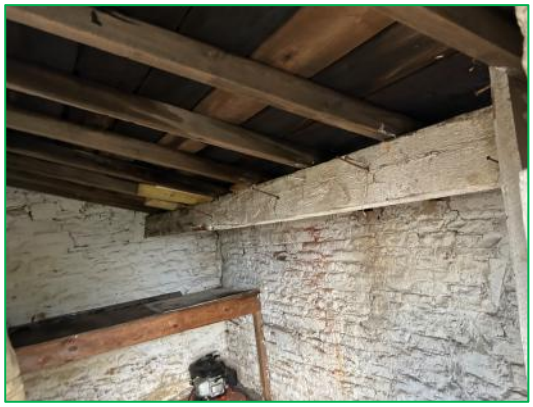
7.2.11 The roof structure is well-fitted, but there are some gaps that may allow bats to enter the interior. Upon inspection, however, there was no evidence of use by bats internally.

7.2.12 Internally there do not appear to be any suitable roosting opportunities as the walls and roof are sealed with no potential roost features.

7.2.13 Overall, the likelihood of use by bats is considered to be very low- negligible. However, to reduce the risk to negligible, precautionary measures are proposed prior to the start of works to the building.



The outbuilding



The interior of the outbuilding

8. Appraisal

8.0.1 The Preliminary Roost Assessment of the house and outbuilding at Whinney Close Farm was undertaken to determine the suitability of the buildings for roosting bats and to determine the likely impact of the proposed works on bats.

8.0.2 The house was considered to have high suitability for bats due to the numerous potential roost features within the roof structure, whilst the outbuilding was considered to have very low – negligible suitability for bats. The proposals for the house may impact upon roosting bats and further survey work in the spring/summer months will be required to determine the presence or absence of a bat roost prior to the start of works.

9. Recommendations

9.1. Further survey work

9.1.1. The house is considered to have suitability to support roosting bats. In order to determine the species present and the status of the roost it is necessary to undertake further survey work.

- Three evening and/or dawn surveys should be undertaken between May – August.

9.1.2. The survey work will inform any necessary mitigation.

9.1.3. If a bat roost is confirmed present, it will be necessary to apply for and attain a European Protected Species Mitigation (EPSM) licence prior to the start of works.

9.1.4. An EPSM licence (issued by Natural England) would detail the necessary mitigation and procedures of work required to ensure that no bats are harmed during the works and that the conservation status of the species is retained following the works.

9.1.5. The outbuilding is considered to have very low – negligible suitability to support roosting bats. In order to reduce the risk of impact to bats to negligible, the following is recommended prior to works or demolition to the outbuilding:

- Crevices in the stonework are checked for bats with the use of a torch prior to the start of works.
- The structure is demolished by hand whilst checking for bats during removal of roof materials and stone.
- If bats are found or if there is any concern that a bat may be present, an ecologist must be contacted for advice.

10. References

- BING maps (2023) http://www.bing.com/mapspreview
- Collins, J. (ed.) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). The Bat Conservation Trust, London. ISBN-13 978-1-872745-96-1
- Google maps (Accessed 2023) https://www.google.co.uk/maps
- MAGIC Map (Accessed 2023) http://www.magic.gov.uk/MagicMap.aspx. DEFRA.

• APPENDIX A: Wildlife Legislation and Planning Policy

UK AND EU LEGISLATION

10.1. KEY LEGISLATION

10.1.1. Key legislation regarding the protection of bats:

- Wildlife and Countryside Act 1981 (as amended)
- The Countryside and Rights of Way Act (CROW), 2000
- The Natural Environment and Rural Communities Act (NERC, 2006)
- Conservation of Habitats and Species Regulations 2017 (as amended)

10.2. WILDLIFE AND COUNTRYSIDE ACT 1981 (AS AMENDED)

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

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

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

10.3. COUNTRYSIDE AND RIGHTS OF WAY ACT 2000

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

10.4. CONSERVATION OF HABITATS AND SPECIES REGULATIONS 2017 (AS AMENDED)

10.4.1. The Conservation of Habitats and Species Regulations 2017 (as amended) consolidate all the various amendments made to the Conservation (Natural Habitats, &c.) Regulations 1994 in respect of England and Wales.

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

10.4.3. The Regulations provide for the designation and protection of European Sites and European Protected Species, including bats.

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

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

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

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

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

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

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

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

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

Planning Authorities: A Duty to Conserve Biodiversity

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

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

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

Species of Principal Importance

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

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

PLANNING POLICY

10.7. NATIONAL PLANNING POLICY FRAMEWORK

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

10.7.2. The National Planning Policy Framework (NPPF, 2021) encourages Local Planning Authorities to conserve and enhance biodiversity.

Chapter 15, Para 174 of NPPF states: *''The planning system should contribute to and enhance the natural and local environment by:*

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

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10.7.4. Para 180 identifies that plans should do the following to protect and enhance biodiversity and geodiversity:

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

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

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

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

10.7.6. The local planning authority has a responsibility, therefore, to obtain all information regarding

the potential for protected species on a site prior to making a decision about a proposal.

10.8. ODPM CIRCULAR 06/2005: BIODIVERSITY AND GEOLOGICAL CONSERVATION

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