

Research &
Evidence



The
Wildlife
Trusts

Planning & Development: Nature isn't the problem

.....
An analysis of bats and newts in
planning & development appeals

May 2025



Summary

Despite rhetoric from Ministers that pin the blame for slow development on bats and newts, new research shows that these protected species are rarely a factor in planning appeal decisions. In 2024, bats and great crested newts were a factor in just 3.3% of planning appeal decisions.

Background

Keir Starmer and Rachel Reeves have been blaming bats and newts for delays to the development of much-needed new homes. But are bats and newts really getting in the way of the Government's development objectives? The Wildlife Trusts commissioned some research to find out.

Ecologists at Wilder Ecology analysed the 17,433 planning appeals decisions made in 2024 in England using an online appeal database to see how many mentioned the words "bat" or "great crested newt". The reason for the mentions of bat or newt was also recorded.

What is a planning appeal?

Developers can appeal planning decisions where a local council has refused to allow a development to go ahead, or when the council takes too long to make a decision.

A Government-appointed planning inspector will look at the proposed development, and what the public and stakeholders have said to decide if they will grant permission or not for the development.

Online databases of planning appeals can be searched using key words.

KEY INFORMATION

This paper is the result of work carried out in 2025, by SWT Trading Ltd: Wilder Ecology, under contract to the Royal Society of Wildlife Trusts.

It presents a planning appeals review on the impact of bats and great crested newts on planning decisions.

It has been published by The Wildlife Trusts as part of a strategic commitment to generate, share and use good evidence, and to be open about the data, evidence and reasoning that underpin the federation's decisions, policies and actions.

This paper has been published as part of a series launched in 2025, to fulfill a commitment made in The Wildlife Trusts' Collective Framework on Data, Research & Evidence, a copy of which can be obtained by e-mailing evidence@wildlifetrusts.org.

CITATION

The Wildlife Trusts (2025)
Planning and Development:
Nature isn't the Problem.
Analysis prepared by Johanna Green and Ellen Shailes for SWT Trading Ltd: Wilder Ecology, Brooke House, Ashbocking, Ipswich, Suffolk, IP6 9JY

Find out more at:
www.wildlifetrusts.org/

Key findings (01/01/24 - 31/12/24)

- Great crested newts were relevant in 140 or just 0.8% of planning appeals in 2024 [table 1].
- Bats were relevant in 432 or just 2.48% of planning appeals [table 1].
- In combination, bats and newts were relevant in up to 3.3% of planning appeals (*including cases where both species groups may have been mentioned in a single appeal).

The top 3 reasons why mentions of bats and newts were considered a relevant factor were:

1. Reason for planning refusal/appeal,
2. Further surveys required,
3. No Preliminary Ecological Appraisal submitted.

The top 3 reasons why mentions of bats and newts were not a relevant factor were:

1. Mentioned in conditions,
2. Mentioned in other matters/considerations,
3. Mentioned but not relevant to decision

Table 1

	Bats	Great crested newt
Mentioned outcome unknown	16 (0.09%)	2 (0.01%)
Mentioned and relevant	432 (2.48%)	140 (0.80%)
Mentioned and irrelevant	834 (4.78%)	136 (0.78%)
Not mentioned	16151 (92.65%)	17155 (98.41%)

Conclusions

This research provides evidence that legal protections for bats and newts are not holding up most developments. Reducing legal protections for bats and great crested newts will not help the UK Government meet its development targets. Providing guidance that ensures those seeking planning permission provide the necessary environmental information alongside their planning application could help speed up planning decisions.

Appendix

Impacts of bats and great crested newts on planning decisions: planning appeals review - Report by Wilder Ecology

Report Title	Impact of bats and great crested newts on planning decisions: planning appeals review
Project number	156b/24
Client	The Wildlife Trusts
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Report status	Final
Date of Issue	02/05/2025

Document control & Version history			
Version	Date	By whom	Summary of changes
0.1	15/04/2025	Johanna Green	First draft
1.0	02/05/2025	Johanna Green	Final v.1
2.0	16/05/2025	Johanna Green	Additional data added 3.2, 3.4, and corrections with regard to B. Pullinger comments 09/05/2025
3.0	16/05/2025	Becky Pullinger	Due to a comparatively lower number of planning appeals mentioning great crested newts, Wilder Ecology analysed all planning appeals from 2021-2024. To enable comparisons with numbers for bats, only the 2024 data for great created newts has been included in this document, however similar trends were found in the data between 2021 and 2023. This data is available on request.

Disclaimer

The information, data, advice and opinions which have been prepared and provided are true and have been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management’s Code of Professional Conduct. We confirm that the opinions expressed are our true and professional *bona fide* opinions.

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EXECUTIVE SUMMARY

SWT Trading Ltd: Wilder Ecology was commissioned by The Wildlife Trusts to carry out a review of recent planning appeals that have mentioned two species, either great crested newts or bats. A search was conducted of planning appeals in England, data from Planning Inspectorate Appeals Casework Portal was acquired via a subscription to [appealfinder.co.uk](https://www.appealfinder.co.uk).

All planning appeals with the date range 01/01/24 - 31/12/24 were searched. A total of 17433 planning appeals were observed. Analysis of the appeals revealed that 1.59% of those mentioned great crested newts and 7.35% of those appeals mentioned bats.

In only 0.8% of all appeals in the date range great crested newts were considered to be relevant to the appeal decision and in only 2.48% of all appeals in the date range bats were considered to be relevant to the appeal decision. A combination of the two together within the dataset was cited in only 158 of cases, 0.9%. This means that in some cases, appeals may have included decisions where both bats and great crested newts were relevant, but these have not been counted separately which means the 3.3% may be an overestimate. This suggests that in only a small percentage of planning appeals great crested newts and bats are contributing to delays and in the majority of the cases where great crested newts/ bats were considered relevant to the appeal, concerns regarding great crested newts/bats were raised alongside a wide range of other concerns about the original planning application.

1. INTRODUCTION

This report has been prepared by SWT Trading Ltd: Wilder Ecology, the ecological consultancy of the Suffolk Wildlife Trust, for The Wildlife Trusts. The data for planning appeals is held on the Planning Inspectorate Appeals Casework Portal and access can be sought utilising a paid subscription to appealfinder.co.uk. The aim of the review is to understand how often newts and bats can be considered relevant to submitted planning appeals and planning appeal decisions, whether they are allowed or dismissed. This can then be used as a measure to consider whether newts and bats are contributing to delays in the planning process.

This report comprises the results of a review of planning appeals citing great crested newts (2024) and bats (2024).

2. METHODOLOGY

2.1 Data search

A search was conducted of planning appeals in England using appealfinder.co.uk. Planning appeals for great crested newts (great crested newts) were searched using the search keyword 'great crested newt' and planning appeals for bats were searched using the search keyword 'bat'. A date range of 01/01/24-31/12/24 was used. To refine the search each Local Planning Authority (LPA) was searched alphabetically due to the way in which appealfinder.co.uk displays appeal documents, with only the 'top ranked 150' appeals being displayed, searching LPAs alphabetically allowed access to view all appeal documents where great crested newts or bats were mentioned.

2.2 Data analysis

Each appeal document retrieved where great crested newts or bats were mentioned was entered into an excel spreadsheet. Each appeal document was assessed to determine whether great crested newts or bats were relevant to the appeal decision and the reasons they were relevant to the appeal decision. Decisions regarding whether great crested newts and bats were relevant to the appeal were taken on a case-by-case basis, due to the complexity of the

reasons for cases being appealed. In most cases, great crested newts and bats were considered to be relevant to the decision if they were mentioned in the 'main issues' and 'reasons' sections of the appeal document, however in some cases great crested newts or bats were mentioned in the 'main issues' and 'reasons' sections but were considered to be irrelevant to the appeal decision. For example, if bat boxes were mentioned in the 'reasons' section, but otherwise bats were not relevant to the appeal decision – this would then be classed as irrelevant. In most cases, great crested newts and bats were considered to be irrelevant to the decision if they were not mentioned in the 'main issues' and 'reasons' sections of the appeal document. In some cases, it was not possible to access the appeal document through either appealfinder.co.uk or the planning authority planning portal, in these cases it was not possible to assess whether great crested newts or bats were relevant to the appeal decision. In these cases, the appeals were recorded as unknown and were not included in the number of decisions regarded as relevant.

A list of reasons for great crested newts or bats being relevant/irrelevant to the appeal decision was created based on an assessment of appeal documents retrieved during the search. Reasons great crested newts or bats were considered relevant to the appeal include:

- 'Reason for planning refusal/appeal'
- 'Further surveys required'
- 'Breach of planning control'
- 'Impacts to protected site'
- 'Lack of mitigation/compensation/DLL'
- 'Preliminary Ecological Appraisal (PEA)/surveys out of date'
- 'No PEA submitted'
- 'Inadequate PEA/surveys'

Reasons great crested newts or bats were considered irrelevant to the appeal include:

- 'Great crested newts/Bats mentioned in conditions'
- 'Great crested newts/Bats mentioned in application description'
- 'Great crested newts/Bats mentioned in other matters/considerations'

- 'Great crested newts/Bats mentioned in preliminary matters'
- 'Great crested newts/Bats mentioned in background'
- 'Great crested newts/Bats mentioned in core documents'
- 'Great crested newts/Bats mentioned but not relevant to decision'
- 'Issue not determinative for appeal'
- 'Does not mention great crested newts/Bats'

The appeal decision is stated clearly at the start of each appeal document. Appeal decisions fall into one of the following categories:

- Allowed
- Allowed (Secretary of State 'called in')
- Dismissed
- Dismissed (Secretary of State 'called in')
- Split decision
- Notice upheld
- Notice varied and upheld
- Quashed on legal grounds

2.3 Limitations

The data search picked up some false positive results whereby either bat or newt was recorded within the place name, address or other words/phrases within the appeal, for example the search using the keyword 'bat' picked up some appeals that mentioned 'cricket bat willow' with no other mention of bats within the appeal documents.

In some cases, it was not possible to access the appeal documents through either appealfinder.co.uk or the LPA planning portal, in these cases it was not possible to assess whether great crested newts or bats were relevant to the appeal decision. Both types of examples were excluded from the analysis of relevant decisions.

3. RESULTS

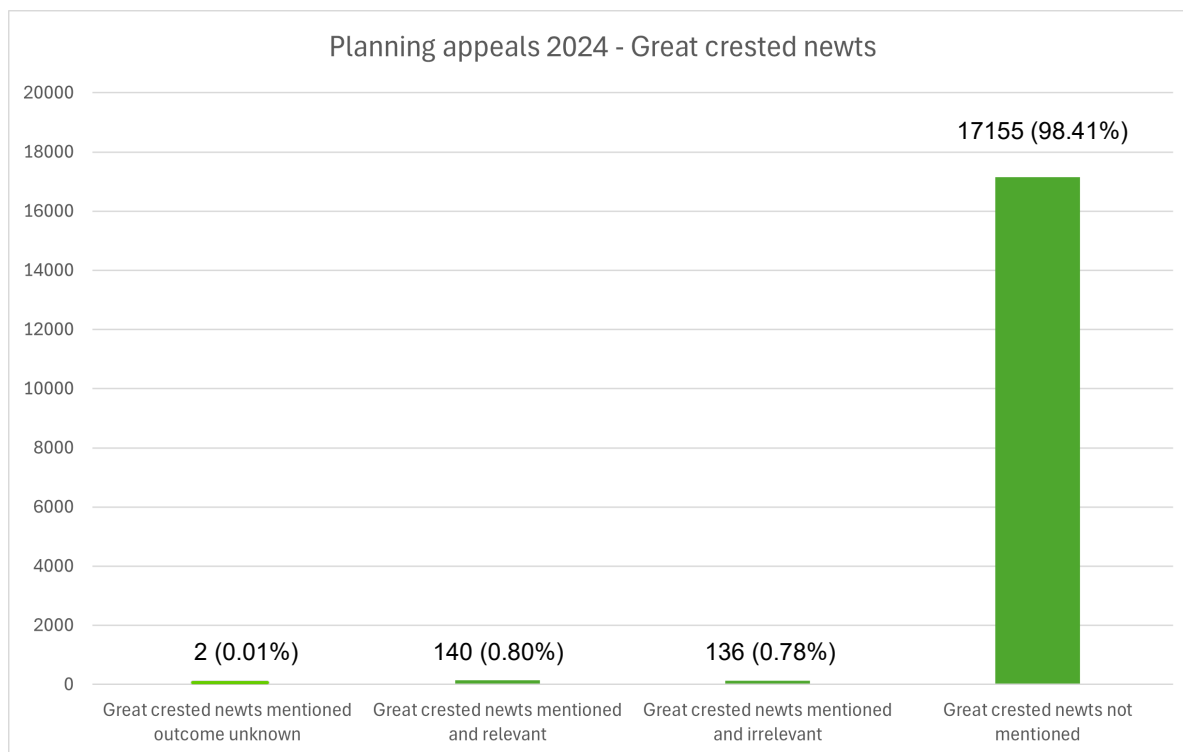
Data extracted from the appeals was analysed to assign reasons and summarised into the relevant or irrelevant categories and the percentage of the total appeals mentioning either great crested newts or bats was calculated. Further breakdown of the categorised relevant or irrelevant reasons was analysed to identify the occurrence of the proportion of reasons within those categories.

3.1 Appeals citing great crested newts

The review of planning appeals showed that a small percentage of planning appeals mentioned great crested newts and in an even smaller percentage of planning appeals great crested newts were relevant to the appeal decision.

Within the date range 01/01/24 – 31/12/24, 17433 appeals were made in total and 278 (1.59% of all appeals) mentioned great crested newts. Out of those 278 appeals mentioning great crested newts, there were 140 cases (0.8% of all appeals) where great crested newts were considered to be relevant to the decision for one of the reasons outlined in the methodology. Of the remaining appeals mentioning great crested newts; 136 (0.78%) were found to be considered irrelevant and in 2 (0.01%) of appeals the outcome was unknown. See Figure 1. for an overview of this data.

Figure 1. Planning appeals mentioning great crested newts within the date range 01/01/24 – 31/12/24



Out of the 140 appeals where great crested newts were considered relevant to the decision, 104 appeals were dismissed, and 28 appeals were allowed. See Table 1. For dismissed appeals where great crested newts were considered relevant to the decision, there were a variety of reasons that great crested newts were relevant. The most common reason great crested newts were considered relevant to the decision was that further surveys were required, see Table 2.

Table 1. Outcome of appeals and relevance of great crested newts to decision

Outcome of appeal	great crested newts relevant to decision		
	Yes	No	unknown
Allowed	28	88	0
Allowed (Secretary of State 'called in')	0	5	0
Dismissed	103	42	2
Dismissed (Secretary of State 'called in')	1	1	0
Split decision	0	0	0
Notice upheld	0	0	0
Notice varied and upheld	5	0	0
Quashed on legal grounds	3	0	0
Total	140	136	2

Table 2. Reasons for appeals being dismissed where great crested newts considered relevant to decision

Reason relevant (great crested newts)	Dismissed	Dismissed (Secretary of State 'called in')	Total
Reason for planning refusal/appeal	20	1	21
Further surveys required	46	0	46
Breach of planning control	0	0	0
Impacts to protected site	7	0	7
Lack of mitigation/compensation/DLL	9	0	9
PEA/surveys out of date	0	0	0
No PEA submitted	16	0	16
Inadequate PEA/surveys	5	0	5

Out of the 278 appeals where great crested newts are mentioned, there are 136 (48.92% of appeals) where great crested newts are considered to be irrelevant to the decision for one of the reasons outlined in the methodology. Out of the 136 cases where great crested newts are irrelevant to the decision, in 69 cases (24.82 % of appeals mentioning great crested newts) great crested newts are mentioned in the conditions and 40 cases (14.39% of appeals mentioning great crested newts) great crested newts are mentioned in the other matters/considerations. See Table 3. and Table 4. for a breakdown of reasons great crested newts relevant/irrelevant to decision.

There were 2 cases (0.72% of appeals mentioning great crested newts) where it was not possible to access the appeal document through either appealfinder.co.uk or the LPA planning portal.

Table 3. Breakdown of reasons great crested newts relevant to decision

Reason relevant (great crested newts)	Number	% of appeals mentioning great crested newts
Reason for planning refusal/appeal	47	16.91
Further surveys required	47	16.91
Breach of planning control	0	0
Impacts to protected site	14	5.04
Lack of mitigation/compensation/DLL	9	3.24
PEA/surveys out of date	1	0.36
No PEA submitted	17	6.12
Inadequate PEA/surveys	5	1.8
Total relevant to decision	140	50.36

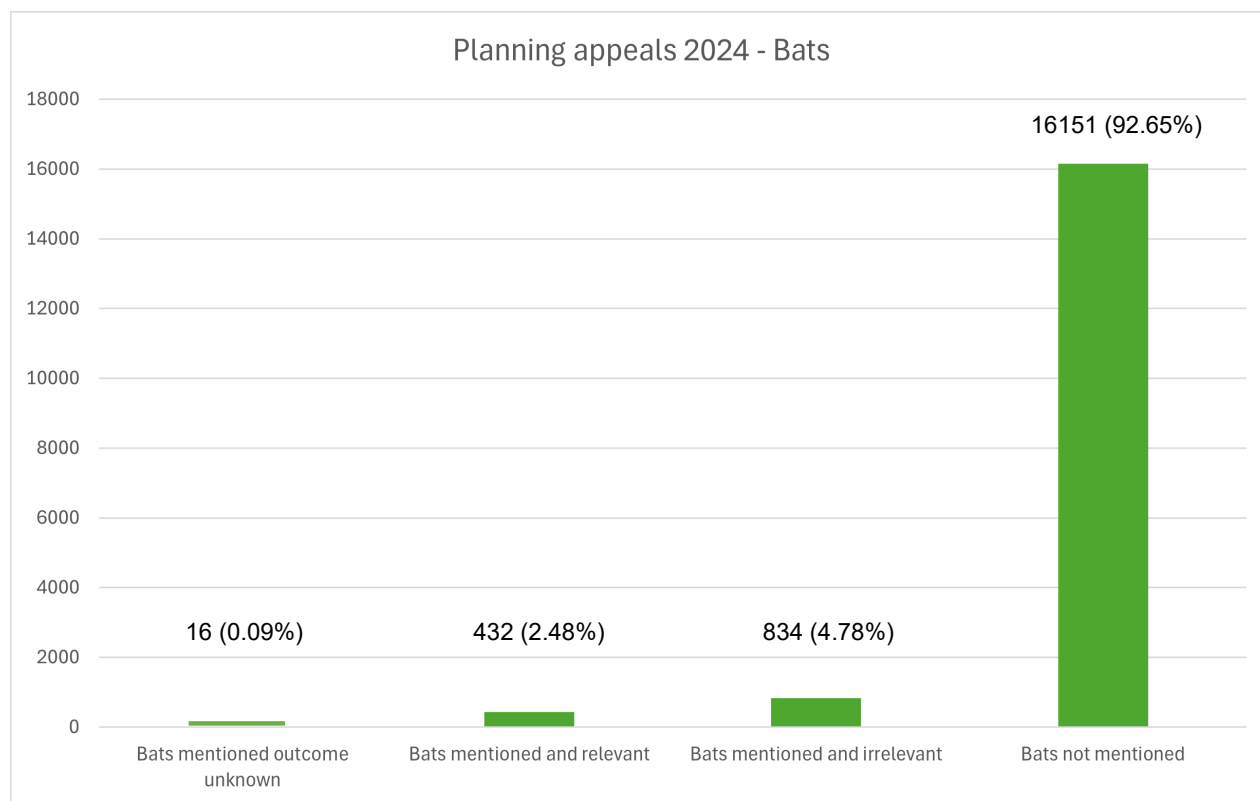
Table 4. Breakdown of reasons great crested newts irrelevant to decision

Reason irrelevant (great crested newts)	Number	% of appeals mentioning great crested newts
great crested newts mentioned in conditions	69	24.82
great crested newts mentioned in application description	1	0.36
great crested newts mentioned in other matters/considerations	40	14.39
great crested newts mentioned in preliminary matters	4	1.44
great crested newts mentioned in background	2	0.72
great crested newts mentioned in core documents	1	0.36
great crested newts mentioned but not relevant to decision	16	5.76
Issue not determinative for appeal	2	0.72
Does not mention great crested newts	1	0.36
Total irrelevant to decision	136	48.92

3.2 Appeals citing bats

Within the date range 01/01/24 – 31/12/24, 17433 appeals were made in total and 1282 (7.35% of all appeals) mentioned the word 'bat'. Out of the 1282 appeals mentioning bats, there were 432 cases (2.48% of all appeals) where bats were considered to be relevant to the decision for one of the reasons outlined in the methodology. Of the remaining appeals mentioning bats, 834 were considered irrelevant and in 16 appeals the outcome was unknown. See Figure 2. for an overview of this data.

Figure 2. Planning appeals mentioning bats within the date range 01/01/24 – 31/12/24



Out of the 432 appeals where bats were considered relevant to the decision, 336 appeals were dismissed, and 77 appeals were allowed. See Table 5. For dismissed appeals where bats were considered relevant to the decision, there were a variety of reasons that bats were relevant. Like great crested newts, the most common reason bats were considered relevant to the decision was that further surveys were required, see Table 6.

Table 5. Outcome of appeals and relevance of bats to decision

Outcome of appeal	Bats relevant to decision		
	Yes	No	unknown
Allowed	75	589	8
Allowed (Secretary of State 'called in')	2	15	1
Dismissed	335	204	6
Dismissed (Secretary of State 'called in')	1	4	0
Split decision	6	6	0
Notice upheld	2	0	0
Notice varied and upheld	9	12	1
Quashed on legal grounds	2	4	0
Total	432	834	16

Table 6. Reasons for appeals being dismissed where bats considered relevant to decision

Reason relevant (Bats)	Dismissed	Dismissed (Secretary of State 'called in')	Total
Reason for planning refusal/appeal	91	0	91
Further surveys required	98	0	98
Breach of planning control	0	0	0
Impacts to protected site	27	1	28
Lack of mitigation/compensation/DLL	15	0	15
PEA/surveys out of date	23	0	23
No PEA submitted	54	0	54
Inadequate PEA/surveys	27	0	27

Out of the 1282 appeals where bats are mentioned, there are 834 cases (4.78% of all appeals) where bats are considered to be irrelevant to the decision for one of the reasons outlined in the methodology. Out of the 834 cases where bats are irrelevant to the decision, in 499 (38.92% of appeals mentioning bats) bats are mentioned in the conditions and 132 (10.30% of appeals mentioning bats) bats are mentioned in the other matters/considerations. See Table 7. and Table 8. for breakdown of appeals with reasons Bats relevant/irrelevant to decision.

There were 16 cases (1.25% of appeals mentioning bats) where it was not possible to access the appeal document through either appealfinder.co.uk or the LPA planning portal.

Table 7. Breakdown of appeals with reasons bats relevant to decision

Reason relevant (bats)	Number	% of appeals mentioning bats
Reason for planning refusal/appeal	148	11.54
Further surveys required	107	8.35
Breach of planning control	3	0.23
Impacts to protected site	44	3.43
Lack of mitigation/compensation/DLL	16	1.25
PEA/surveys out of date	23	1.79
No PEA submitted	56	4.37
Inadequate PEA/surveys	35	2.73
Total relevant to decision	432	33.70

Table 8. Breakdown of appeals with reasons bats irrelevant to decision

Reason irrelevant (bats)	Number	% of appeals mentioning bats
Bats mentioned in conditions	499	38.92
Bats mentioned in application description	16	1.25
Bats mentioned in other matters/considerations	132	10.30
Bats mentioned in preliminary matters	5	0.39
Bats mentioned in background	0	0
Bats mentioned in core documents	1	0.08
Bats mentioned but not relevant to decision	173	13.49
Issue not determinative for appeal	0	0
Does not mention Bats	8	0.62
Total irrelevant to decision	834	65.05

3.3 Comparison of number of appeals citing great crested newts and bats

A comparison in the number of appeals citing both great crested newts and bats was conducted. Table 9 demonstrates the number of appeals citing either great crested newts or bats or both across the 01/01/24 - 31/12/24 dataset. These 158 appeals are a subset of those mentioning either bats or newts, meaning there may be some double counting of relevant decisions between the two groups, however this could not be analysed in the time available.

Table 9. Comparison of number of appeals and % citing great crested newts and bats

Year	Total appeals	Great crested newts	Bats	Great crested newts and bats
2024	17433	278 (1.59%)	1282 (7.35%)	158 (0.91%)

4. DISCUSSION

Appeals with missing information

In appeal cases where great crested newts/bats were considered relevant to the appeal decision and the cases were dismissed the majority of these cases great crested newts/bat were relevant due to there being missing information from the original planning application that is required in accordance with planning policy and wildlife regulations. For example, in many cases information was missing such as: no Preliminary Ecological Appraisal (PEA) being submitted, further surveys required, inadequate and/or out-of-date surveys/PEA submitted and lack of suitable compensation, mitigation or required District Level Licensing agreement. Circular 06/2005 is commonly referenced by planning inspectors in the 'reasons' sections of appeal documents. The CIEEM advice note on the lifespan of ecological reports and surveys³ is also commonly reference by planning inspectors. These are all issues which it should be possible to resolve at the planning application stage if there is good communication between applicants and planning officers throughout the planning process, to ensure that applicants understand that this information is required prior to planning permission being granted.

²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7692/147570.pdf

³ <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>

5. CONCLUSION

A review of planning appeals was conducted to reveal whether great crested newts or bats contributed to delays within planning. During this review 17433 planning appeals in total were assessed. Overall, the number of appeal cases where great crested newts/bats are mentioned in 2024 is low, with only 1.59% of planning appeal cases mentioning great crested newts and only 7.35% mentioning bats. This number is significantly lower when you consider appeal cases where great crested newts/ bats were considered relevant to the appeal. In only 0.8% of all appeals in the date range great crested newts were considered to be relevant to the appeal decision and in only 2.48% of all appeals in the date range, bats were considered to be relevant to the appeal decision.

Missing information from the original planning application was found to be the most significant reason that made the species relevant to the appeal decision, in over 50% of cases for both species. This is a situation that could be avoided at the planning application stage.

6. REFERENCES

- <https://appealfinder.co.uk/faqs.php>
- https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7692/147570.pdf
- <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>

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