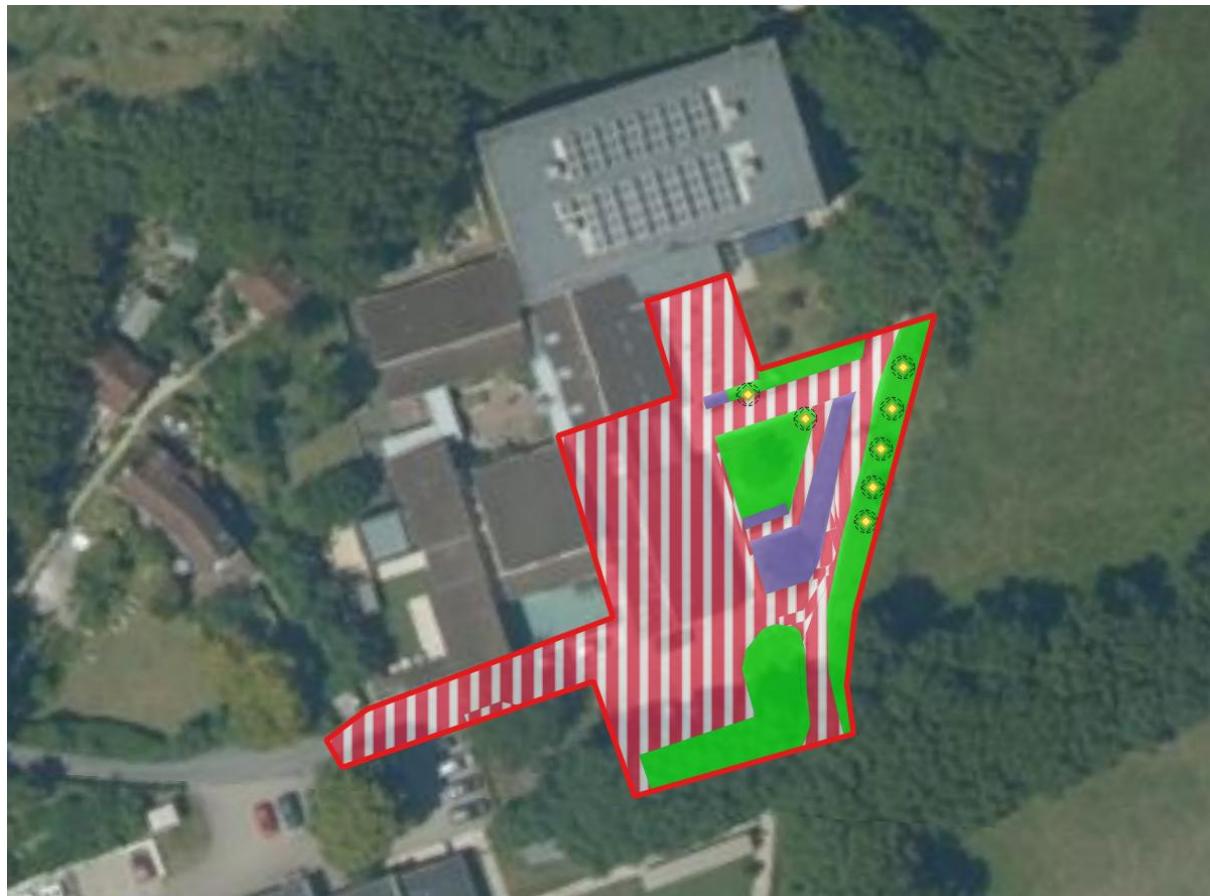


PRELIMINARY ECOLOGICAL APPRAISAL

BELONGING AND INCLUSION HUB, CARN GWAVEL, ST MARY'S, ISLES OF SCILLY



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Author: James Faulconbridge BSc (Hons), MRes, MCIEEM

Contact: ios.ecology@gmail.com

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1. Introduction

1.1. Background to Surveys

The proposal seeks to construct a new Belonging and Inclusion hub at the Carn Gwavel complex on St Mary's, Isles of Scilly.

An Ecological Appraisal of the site was undertaken on 18th November 2025 in order to assess the ecological impacts of the scheme.

The proposed redline is illustrated in Map 01.



Map 01 – showing the proposed site indicated by the redline.

2. Site Location and Description

2.1. Site Location

The site comprises an area of existing hard and soft landscaping to the east of the Children's Services building centred on SV 91077 10361 (see Map 01).

2.2. Site Description (Overview)

The site is dominated by existing hardstanding with areas of amenity grassland and non-native shrub planting which form the soft landscaping at the entrance to the existing building. A number of young oak trees are present within the amenity grassland sward within the redline. An adjacent offsite elm tree line is present along the southern boundary.

2.3. Relevant Designations

There are no statutory or non-statutory designated sites within the site boundary itself.

Two sites which are designated at a European level lie within 1km of the site. These are:

- **Isles of Scilly SAC Complex** – At its closest point, the SAC lies 280m to the south of the site. Encompassing the coastline around St Mary's, the SAC is designated for its nationally important numbers of Grey Seal and the nationally rare Shore Dock. Annex 1 habitats that are the primary reason for site selection include mudflats; inter-tidal sandflats; reefs and sub-tidal sandbanks.
- **Isles of Scilly SPA Complex** – At its closest point, the SPA lies 230m to the south of the site. Encompassing the coastline around St Mary's, the SPA is designated for its internationally important seabird assemblage of 13 species including internationally important numbers of lesser black-backed gull and nationally important numbers of European storm petrel and European shag.

Two Sites of Special Scientific Interest (SSSI), a national level designation, lie within 1km of the site:

- **Lower Moors SSSI** – Lower Moors SSSI, situated 100m to the north of the site, is a topogenous mire, whereby seasonal fluctuations of freshwater from rainfall cause the partial breakdown of plant material, which then turns to peat. The site has several, small shallow open water areas which are known to be important feeding areas for passage and over-wintering migrants and waders.

- **Peninnis Head SSSI** – Situated 570m south of the site lies Peninnis Head SSSI, designated primarily for its geology including prominent granite cliffs and tors but it also supports maritime heathland, maritime grassland and scrub habitats together with populations of rare plant and lichen species.

3. Survey Methodology

3.1. Desktop Survey

A full desktop study was undertaken for the presence of bats based on the list of roosts and other records held by the Isles of Scilly Bat Group.

Background Data previously sourced from the Environmental Records Centre for Cornwall and the Isles of Scilly (ERCCIS) within a 1km radius of the site in 2024 was used to inform records of Protected Species; Protected Sites and Priority Species and Habitats.

The desk study also included accessing the Multi-Agency Geographic Information for the Countryside (MAGIC)¹ database in order to establish the presence of statutory designated sites, including all internationally and nationally designated sites such as Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Ramsar sites and Sites of Special Scientific Interest (SSSIs) within 1km of the site.

Other resources used include aerial photography to identify the presence of habitats in close proximity to the site. This assists in the assessment of the potential of the site and its surrounding habitat to support protected species.

3.2. Vegetation and Habitat Assessment

The habitat survey was undertaken in accordance with the UK Habitat Classification (UKHab)² methodology, which provides a consistent and standardised framework for classifying habitats across the UK.

The survey involved the identification and mapping of habitat types using the primary UKHab habitat categories, supplemented with secondary codes where necessary to capture specific features such as dominant species or habitat condition. Habitat boundaries are mapped and supported by target notes describing key features, vegetation composition, notable ecological characteristics including distinctions between native and non-native vegetation, and the identification of features such as mosaics or transitional areas.

3.3. Bats

A separate Preliminary Roosting Assessment (PRA) survey was undertaken on the existing Children's Services building which the proposed new structure would tie in with – this information is not repeated in this PEA for clarity but can be found in the PRA report which accompanies this application.

¹ <http://defra.magic.gov.uk>

² UKHab Ltd. (2023). *UK Habitat Classification – Version 2.01*.

3.4. Birds

The assessment of breeding and wintering birds on the site was based on the suitability of habitat present, evidence of nesting such as old or currently active nests and the presence of bird species that may potentially nest within the available habitat.

3.5. Mammals

Suitable habitat for mammals including hedgehog is noted where appropriate.

This is in order to inform Reasonable Avoidance Measures (RAMs) to ensure that they are not killed, injured or inhumanely treated as a result of the proposed development works.

3.6. Other Protected Species

An assessment of potential and suitability for other protected species was made based on the habitats present both on- and offsite; the local status of these species; and the background records.

St Mary's is widely understood not to support many of the protected species which are usually included in mainland PEA assessments including great crested newts; badgers; reptiles; dormouse; white-clawed crayfish; otter or watervole. This is supported by the Data Search information from the Environmental Records Centre for Cornwall and the Isles of Scilly.

No further protected species survey methodologies were required to support a comprehensive Ecological Assessment at this site.

3.7. Surveyor Competence

The PEA survey and reporting were undertaken by James Faulconbridge MRes MCIEEM trading as IOS Ecology.

James is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM); he is a Licensed Bat Worker (Class Licence Level 2) and has over 16 years' experience undertaking a range of ecological surveys and assessing the factors that affect ecology in relation to construction and the built environment.

3.8. Survey Date and Seasonal Considerations

The PEA survey was undertaken on 18th November 2025.

This timeframe is considered appropriate to undertake botanical assessments of the habitat types present within the site as well as consideration of potential for protected and notable species typically included within the scope of a PEA.

3.9. Zone of Influence

The Zone of Influence (ZOI) is the area within which the ecological impacts arising from a proposed development are likely to be significant. Due to the nature of the proposed development the ZOI is identified as the site and the habitats which immediately bound it.

The sensitivity and value of offsite statutory and non-statutory sites mean that the potential for impacts arising from the proposed development should be considered within a wider ZOI. Therefore, scoping for direct and indirect impacts to designated sites is conducted within a ZOI of 1km of the site.

3.10. Assessment of Ecological Value

The ecological values provided within this report are based around both the professional judgement of the author and current published relevant guidance, including "Guidelines for Ecological Impact Assessment in the United Kingdom."³

³ CIEEM (2016). Guidelines for Ecological Impact Assessment in the UK and Ireland. 2nd Edition. Chartered Institute of Ecology and Environmental Management. Winchester.

4. Ecological Appraisal

4.1. Onsite Habitats

The habitats present within the site are illustrated in Map 03.



Map 03 – Showing the broad habitats identified within the site. Reproduced in accordance with Google's Fair Use Policy.

The habitats identified are described below.

Table 01 – Habitat descriptions following UKHab classification system for area habitats within the site.

Target Note	Description
TN1	<p>Habitat Type: Ornamental Shrub Planting (Introduced Shrub)</p> <p>A linear block of ornamental and naturalised shrub species including tamarisk (<i>Tamarix gallica</i>), fuchsia (<i>Fuchsia magellanica</i>), karo saplings (<i>Pittosporum crassifolium</i>), grey willow (<i>Salix cinerea</i>), and bramble (<i>Rubus fruticosus agg.</i>). The understory contains ivy (<i>Hedera hibernica</i>), lords-and-ladies (<i>Arum maculatum</i>) and three-cornered leek (<i>Allium triquetrum</i>), with patches of montbretia (<i>Crocosmia × crocosmiiflora</i>), African lily (<i>Agapanthus praecox</i>), alexanders (<i>Smyrnium olusatrum</i>) and bristly ox-tongue (<i>Helminthotheca echioides</i>) occurring within the ground layer.</p> <p>The habitat represents a managed block of ornamental/introduced</p>

Target Note	Description
	<p>scrub with naturalised and invasive non-native species present.</p> <p>Primary UKHab Code: u1b Introduced shrub vegetation; Secondary Codes: 524 Invasive non-native species;</p>
TN2	<p>Habitat Type: Amenity Grassland (Modified Grassland)</p> <p>A closely mown amenity sward dominated by perennial rye-grass (<i>Lolium perenne</i>) with frequent Yorkshire-fog (<i>Holcus lanatus</i>), cocksfoot (<i>Dactylis glomerata</i>) and fescue (<i>Festuca</i> spp.). A suite of common forbs is present throughout, including white clover (<i>Trifolium repens</i>), ribwort plantain (<i>Plantago lanceolata</i>), creeping buttercup (<i>Ranunculus repens</i>), daisy (<i>Bellis perennis</i>), dandelion (<i>Taraxacum officinale</i> agg.), sorrel (<i>Rumex acetosa</i>), sheep's-sorrel (<i>Rumex acetosella</i>), violet (<i>Viola</i> spp.), yarrow (<i>Achillea millefolium</i>), hogweed (<i>Heracleum sphondylium</i>), shepherd's-purse (<i>Capsella bursa-pastoris</i>), smooth sow-thistle (<i>Sonchus oleraceus</i>) and dove's-foot cranesbill (<i>Geranium molle</i>). Mosses are frequent.</p> <p>The habitat represents a relatively species-diverse modified grassland maintained through regular mowing.</p> <p>Individual young oak trees (<i>Quercus robur</i>) are present where mapped.</p> <p>Primary UKHab Code: g4 Modified grassland; Secondary Codes: 515 Mown; 604 Scattered trees;</p>



Photo 01 – Showing the amenity grassland sward.



Photo 02 – Showing the ornamental shrub planting



Photo 03 – Showing one of the smaller sections of ornamental shrub planting with amenity grassland behind



Photo 04 – Showing the strip of amenity grassland on the eastern boundary of the site with small oak trees set within. Ornamental shrub planting is visible on the RHS.

4.2. Nesting Birds

4.2.1. Nesting Habitat

The ornamental shrub habitat (TN1) within the survey site is likely to provide suitable nesting habitat for common bird species

4.2.2. Foraging Habitat

All habitats on site are likely to provide foraging habitat for common bird species as part of a wider resource landscape.

4.3. Bats

The potential of the site to support roosting bats is addressed in the PRA which accompanies this report. This information is not repeated here for brevity, but can be summarised as follows:

- Roost potential within the redline is confined to the existing Children's Services building and addressed in the PRA, which concludes negligible risk to roosts arising from the proposed development;
- No loss or severance of key commuting features is proposed; existing tree lines and connective habitats are retained;
- Only small areas of low-value amenity and ornamental habitat are lost; any change in local foraging resource is *de minimis* within the context of the landscape availability.

4.4. Hedgehog

The ornamental shrub habitats (TN1) within the site may provide suitable places for nests or shelter for hedgehogs, and the amenity grassland (TN2) may provide foraging habitat

4.5. Other Ecological Receptors

The habitats onsite are likely to support a wide range of **invertebrates**, as well as common small mammal species such as **white-toothed shrew**.

The habitats present within the site, combined with consideration of the species present on St Mary's, suggest that no further species would require consideration in order to ensure legislative compliance during the proposed works to the site.

5. Evaluation

5.1. Proposals

The proposals comprise the construction of a new single-storey structure to the east/south-east of the existing Children's Services building, together with associated internal adjustments and external works. The extension will be tied into the existing structure with a linking section of roof. External changes include the adjustment and extension of paved areas, installation of a pergola-style canopy between the two buildings, construction of a covered external play area and minor path realignments.

These works will result in the removal of a section of existing amenity grassland and ornamental planting within the footprint of the new structure. Further minor loss of grassland along with two small oak trees will be associated with the realignment of the path to the east.

5.2. Assessment of Ecological Impacts

5.2.1. Statutory and non-statutory Sites

Provided standard good practice is observed during the construction phase, the proposed development would not impact directly or indirectly upon the designated sites identified in the background search.

This assessment is based on their physical separation, the presence of intervening habitats, and the lack of direct or indirect impact pathways such as hydrology.

Standard construction-phase measures to control impacts arising from dust, pollution, noise, lighting and disturbance must be observed.

Operational use of the hub will not introduce new impact pathways beyond the existing Carn Gwavel complex, and therefore no likely significant effect on designated site features is anticipated.

5.2.2. Habitats

The proposals would result in the loss of a small area of amenity grassland, the ornamental shrub planting and two small oak trees.

The new building would include a sedum roof and small areas of new introduced shrubs in the landscaping.

Overall, a net loss of both amenity grassland and ornamental shrub planting would occur. These habitats are of low ecological value and the location of the building on the edge of an area of open landscape further reduce the relative importance of these areas. In line with the requirements of Biodiversity Net Gain however, their loss should be addressed to secure a 10% enhancement.

5.2.3. Birds

The site provides suitable habitats for use by common nesting bird species associated with the ornamental shrub habitats and the roof structure of the existing Children's Services building. There is also a low risk that the individual oak trees within the amenity grassland may support nesting birds though these are structurally suboptimal due to their small size.

If works affect suitable habitats during the breeding season, they could result in the short-term disturbance, damage or destruction of nests and the potential killing of adults or chicks/eggs if measures are not taken to avoid this.

In the long term, there would be a small reduction in the availability of nesting sites due to the small scale loss of ornamental shrub planting – this is likely to be restricted to individual nesting pairs.

5.2.4. Hedgehogs

Ground works and clearance could impact upon hedgehogs if there are nests or places of shelter within the ornamental planting.

This could lead to killing or injuring of hedgehogs in the absence of an appropriate working methodology to avoid this.

6. Recommendations

6.1. Further Survey Requirements

The ecological baseline presented in this report, alongside the PRA relating to the existing Children's Services building, is considered to be sufficient to assess the impact of the proposals upon other ecological receptors.

6.2. Timing of Works

6.2.1. Nesting Birds

In order to ensure legislative compliance, the contractors undertaking the works must ensure that nesting birds are not disturbed in accordance with requirements under the Wildlife and Countryside Act (1981)⁴.

The most reliable means of ensuring nesting birds are not impacted by the works is for clearance and development works affecting relevant areas to be conducted outside the bird breeding season of March to September inclusive. Development works can be undertaken outside of the breeding season without constraints relating to breeding birds although vegetation clearance works should proceed with due vigilance to the risk of late-nesting attempts.

If works affecting suitable nesting areas are undertaken outside of the nesting season to a stage where the nesting habitat is removed, then breeding birds will find alternative offsite nesting opportunities. In this way, works begun during the winter can proceed into the spring/summer with a minimal risk of causing disturbance or damage. If this approach is taken, it is recommended than an ecologist assesses and confirms this is appropriate.

6.2.2. Hedgehogs

The timing of works outlined in Section 6.2.1 above for nesting birds would also be suitable to ensure that hedgehogs are not disturbed during the most sensitive times of year when they may have dependent young.

Hedgehogs are understood not to typically hibernate on Scilly due to the mild climate and subsequent year-round availability of limited foraging even during the winter. Those who offer care and rehabilitation for this species on Scilly understand them to enter periods of brief torpor for several days during colder periods but regularly return to activity to forage. For this reason, it is not considered necessary to avoid the winter period⁵ when undertaking clearance works in habitats which might support hedgehogs, though it is recommended that this should be targeted for periods when overnight temperatures do not drop below 8°C overnight.

⁴ HMSO (1981). Wildlife and Countryside Act 1981 (as amended). HMSO, London.

⁵ People's Trust for Endangered Species and British Hedgehog Preservation Society. (2022). *Hedgehogs and Development: A Guide for Developers and Planners*

6.3. Pre-Commencement Inspections

6.3.1. Nesting Birds

If works are scheduled to commence during the breeding season, a nesting bird survey would need to be carried out by a suitably qualified person prior to commencement. Careful observation of any potential nesting sites would be required to ensure that the parent birds are not visiting a nest and provisioning the young. Nests are only protected if they are active (i.e. being used to rear young) or in the process of being built.

- Where active nests are identified, works affecting these areas must be delayed until the chicks have fledged the nest.
- Once it is confirmed that nests are absent or no longer active, vegetation should be removed carefully and by hand as a precaution.

6.4. Reasonable Avoidance Measures (RAMS)

6.4.1. Nesting Birds

Measures to protect retained habitats which might support nesting birds should be built into the development plans. This may include barriers where required, and signs identifying areas where contractors should avoid. This should be advised by the ecologist, as required.

6.4.2. Hedgehogs

Hedgehogs are protected under the Wild Mammals Protection Act 1996⁶, which prohibits causing unnecessary suffering. If works disturb or destroy habitat occupied by hedgehogs this could lead to killing or injuring of this species, potentially contravening the legislation.

An appropriate method of works during the clearance phase would ensure that any hedgehogs present within the construction area would be identified before they are harmed.

Measures to achieve this in a humane manner include:

- Careful vegetation clearance: Using hand tools to remove the ornamental shrub habitat to identify any hedgehogs which may be present within the area;
- Trenching Safeguards – Escape ramps should be installed in any open trenches left overnight to ensure that hedgehogs do not become trapped in open excavations;

⁶ HMSO (1996) Wild Mammals (Protection) Act 1996. HMSO, London.

- Relocation: If a hedgehog is found, it should be carefully relocated to a designated safe area with similar shelter nearby, at least 20 meters from the works zone under the advice of the ecologist.

6.5. Invasive Non-Native Species

Under the Wildlife and Countryside Act, 1981⁷, a number of alien plant species are listed in Schedule 9 Part II. These are species which have become naturalised in Britain, usually as garden escapees. Section 14 (2) of the Act states that an offence is committed “*if any person plants or otherwise causes to grow in the wild any plant*” in Schedule 9.

- Species confirmed within the site footprint include three-cornered leek and montbretia, both of which are ubiquitous on St Mary’s.

It is incumbent on a landowner to ensure that any actions of land management or development do not result in the plant being spread either within the existing site or elsewhere. Working practices during construction should be designed to ensure this. This might include measures such as:

- keeping topsoil from infested areas segregated and reused only within the same footprint;
- ensuring plant material is collected and disposed of appropriately rather than moved around site.

6.6. Biodiversity Net Gain

A Biodiversity Net Gain report including mapping and completion of the metric will accompany this application.

6.7. Survey Validity and Update

The surveys were completed in November 2025. Many species are transient in their use of habitats, and apparently minor changes in condition or use of the site can affect suitability. However in the absence of significant changes in condition or use of the site, the amenity nature and character of the site suggest that:

- The PEA assessment can be considered valid for a period of 18 months after the survey was completed, until May 2027.

If works are not completed by this date, the ecology surveys should be updated as required.

⁷ HMSO (1981, as amended). Wildlife and Countryside Act 1981. HMSO, London.

6.8. Construction Ecological Management Plan

A Construction Ecological Management Plan (CEMP) should be produced and should specifically address:

- Measures to protect nesting birds including timing of works;
- RAMs to minimise impacts to species such as hedgehog;
- Measures to address or minimise the risk of spreading invasive non-native species including three-cornered leek and montbretia;
- Measures to ensure that the works cause minimal impact to the adjacent habitats and avoid issues such as soil compaction.

Appendix 1 – Relevant Legislation

The Habitat Regulations 2017 (as amended)

The Conservation of Habitats and Species Regulations 2017 (as amended) or the 'Habitat Regulations 2017 (as amended)', ensures wild animals of a European Protected Species and their breeding sites or resting places are protected under Regulation 43. Such wild animals of a European Protected Species include great crested newts, otters, dormice and all species of bat. It is an offence to deliberately capture, injure or kill any such wild animal and in the case of great crested newts, deliberately take or destroy their eggs. It is also an offence to deliberately damage or destroy a breeding site or resting place of any such wild animal.

Wild animals of a European Protected Species are also protected from disturbance under Regulation 43. Disturbance of such wild animals includes in particular any disturbance which is likely:

(a) To impair their ability -

- to survive, to breed or reproduce, or to rear or nurture their young; or*
- 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.

The Wildlife and Countryside Act (as amended) and Countryside and Right of Way Act (CRoW) Act 2000 (as amended)

The Wildlife and Countryside Act 1981 (as amended) and the CRoW Act 2000 (as amended) afford protection to wild birds in England and Wales under Part 1. It is an offence to intentionally kill, injure or take any wild bird. It is also an offence to intentionally take, damage or destroy the nest of any wild bird whilst it is in use or being built, or intentionally take or destroy their eggs. If the wild bird is included on the Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), it is additionally an offence to intentionally or recklessly disturb the wild bird whilst on the nest during the breeding season.

Certain species of animal, such as the water vole, are offered 'full protection' under the Wildlife and Countryside Act 1981 (as amended) and the CRoW Act 2000 (as amended) by being included in Schedule 5 in respect of certain offences under Section 9. Such offences include:

9(1) Intentional killing, injuring or taking of a Schedule 5 animal;

9(4a) Intentional or reckless damage to, destruction of or obstruction of any structure or place used by a Schedule 5 animal for shelter or protection;

9(4b) Intentional or reckless disturbance of a Schedule 5 animal occupying such a structure or place.

Widespread species of native reptiles occurring within England and Wales such as the adder or common lizard are protected against intentional killing and injuring under the Wildlife and Countryside Act 1981 (as amended) only. Animals of a European Protected Species are now only protected under offences 9(4a) and 9(4b) of Section 9, the main legislative tool covering such animals is under the 'Habitats Directive 2010 (as amended)'.

The Hedgerow Regulations 1997

Under the Hedgerow Regulations 1997, it is an offence to remove most hedgerows without the issuing of a Hedgerow Removal Notice from the Local Planning Authority. 'Important hedgerows' are those protected under the 1997 Regulations if they are over 30 years old and satisfy one of the criteria under Part II, Schedule 1, based on archaeology and history or wildlife and landscape.

In the case of 'Important' hedgerows, the Local Planning Authority will only issue a Hedgerow Removal Notice if there are sufficient circumstances to justify its removal. If sufficient circumstances do not exist, then the Local Planning Authority will issue a Hedgerow Retention Notice and the 'Important' hedgerow will be protected under the 1997 Regulations. Unauthorised removal of the 'Important' hedgerow may result in a fine and/or a requirement for the hedgerow to be replaced.

Natural Environment and Rural Communities Act 2006

The Natural Environment and Rural Communities (NERC) Act came into force on 1st Oct 2006. Section 41 (S41) 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 in England.

The S41 list is used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under Section 41 of the Natural Environment and Rural Communities Act 2006, to have regard to the conservation of biodiversity in England, when carrying out their normal functions.

Fifty-six habitats of principal importance and 943 species of principal importance are included on the S41 list. The habitats and species on the S41 list are included within the UK Biodiversity Action Plan (UK BAP) as requiring conservation action. The requirement for action continues to be regarded as a conservation priority in the subsequent UK Post 2010 Biodiversity Framework. At a local level the actions and targets are still referred to as BAPs.