

Re Planning Application FUL/2024/ 0001

Objection

The barbastelle bat – European Protected Species

“The barbastelle is a UK Biodiversity Action Plan species which means it is a conservation priority on both a local and national scale.” (Bat Conservation Trust)

This rare and vulnerable species has been identified at 11 key locations within the scheme boundary where the habitat features likely to sustain the population were intersected or impacted by the Proposed Scheme. According to bat static detector surveys areas of commuting routes and foraging activity suggest a roost nearby.

“Existing and potential roost sites should be protected from disturbance and development” (Natural England ENDS report March 2024 Definition of Favourable Conservation Status for the Barbastelle Bat)

Government Guidance Bats: Protection and licences

“Disturbing a protected species includes a deliberate activity that affects

- A group’s ability to **survive**, breed or raise young
- The species numbers or range in the local area

Activities that can harm bats include

- **Removing commuting habitats like hedgerows, water courses or woodland**
- **Changing or removing bats’ foraging area**

Environmental Statement Chapter 8 Ecology

6.3.8 Habitats of Principle Importance (HPI)

- Wet woodland
- Developing woodland (lowland deciduous mixed woodland)
- Hedgerows (priority habitat)
- Ponds (priority habitat)

All these habitats form the mosaic within the scheme boundary which are important for barbastelle bats.

6.3.10

All 6 hedgerows meet the criteria for inclusion as HPI as they contain more than 80% native species

While barbastelle activity was recorded at all 11 points considered crucial because of the road design and route, the greatest activity was at the eastern boundary of Sheep’s Course Wood, due to be the location of a haul road for construction activities and gas main conversion; hedgerow south of Chequers Lane which is to be removed where the proposed WWHAR crosses Chequers Lane; along a ditch running east to west along arable field boundaries and a line of mature oak and ash trees, which run north to south with woodland to the south east and scattered mature oak trees. The proposed road is to intersect the ditch and line of trees to the west. The tree line to the north of North Runcton Common also registered a level of barbastelle activity. The planned removal of these important features will prevent any foraging and will disrupt commuting routes.

“Fidelity to foraging sites (females) extends across years so that bats returning to maternity roosts following hibernation **continue to use the same hunting grounds.**” (NE ENDS report p. 13)

“The habitat required for maintaining populations of barbastelle bats is a combination of maternity roosts, temporary roosts and hibernation sites **and that required for foraging**” (NE ENDS report p. 9)

“New woodlands are unlikely to provide sufficient natural roosting opportunities to support a colony for perhaps 50 years or more” (NE ENDS report p.20)

Removal of hedgerow on Chequers Lane and Rectory Lane and tree line north of North Runcton Common will result in loss of prime foraging habitat.

“Barbastelle bats generally avoid built up areas, **appear sensitive to disturbance** and are one of the most light averse species.” (NE ENDS report)

The disturbance to the east and west of Sheep’s Course Wood and in the vicinity of Hardwick Farm will be considerable, both areas showing barbastelle activity.

“Artificial lighting and associated urban expansion also negatively affect connectivity and movement between colonies.”

“The trend towards increasing levels of light pollution, **especially in road environments**, a considerable threat to light-shy bat species.” (NE ENDS report p.21)

Light pollution will also adversely impact the primary prey for the barbastelle – moths.

Hardwick Farm, within 50 metres of the scheme, is likely to result in loss of commuting habitat and an increase in light pollution. (WWHAR ES Chapter 1 Appendix 1 EIA Scoping report Annex D)

In conclusion

- The removal of trees and hedgerows disrupts bats’ commuting routes
- Key foraging habitats to which bats habitually return will be lost
- Huge disturbance during construction phase to a species sensitive to disturbance
- Long term harm from light pollution
- Habitat fragmented by WWHAR could result in road kill

Mitigation measures are difficult. Barbastelle bats prefer ancient/veteran trees to roost. Bat boxes, therefore, are rarely used. Newly planted trees will not replace favoured roosting sites for some 50 years. There is no mention in the plans for a green bridge or appropriately designed underpass to afford some mitigation. This was recommended in F51f Appendix 6 1.6 bullet point 2.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3374807/> Deals with road crossing mitigation for bats. Green bridges and underpasses that follow bats’ commuting routes are most successful. Gantries are not.

In the light of all this, the Planning Authority must refuse planning permission if the proposal would harm a protected species.

I also draw the planning committee’s attention to the Gunning Principles:

4. Conscientious consideration must be given to the consultation responses before a decision is made. Decision makers should be able to provide evidence that they took consultation responses into account.