

From: Earley, Amelia < >
Sent: Thursday, May 4, 2023 1:46 PM
To: Lee Bowering < >
Subject: 23/P/0664/OUT - Land To North Of Rectory Farm, Yatton

Dear Lee,

Thank you for consulting Natural England on the above application. Please see below our comments regarding designated sites.

North Somerset and Mendip Bats SAC – Objection

Natural England object to this application in current form. The current proposed mitigation does not demonstrate additionality and an adverse effect on the integrity of the SAC therefore cannot be ruled out beyond reasonable scientific doubt. We would welcome a site visit to better understanding of the whole site in context and to discuss the proposed mitigation.

The application site is in Band B of the Consultation Zone for the North Somerset and Mendip Bats SAC, this indicates the potential importance of habitats on site to bats associated with the SAC. The site is approximately 2km from the nearest SSSI component of the SAC and is adjacent the Strawberry Line, a commuting corridor known to be important for SAC bat populations.

Bat surveys have recorded remarkable numbers of horseshoe bat calls with exceptionally high use of the site by lesser horseshoe bats with 3240 calls recorded and high use by greater horseshoe bats with 409 calls recorded during static detector surveys. Both species were recorded on every detector in every month of survey demonstrating consistent use of the site by horseshoe bats. Furthermore, greater horseshoe activity peaked during June and July which is characteristic of foraging activity from bats associated with a maternity roost. The extensive use of the site by horseshoe bats suggests that the site is of great importance to sustaining the favourable conservation status of SAC bat populations.

We do not consider that the current mitigation proposals are acceptable. The offsite mitigation area shown by the blue line boundary in the Ecological Impact Assessment includes the offsite mitigation area for 21/P/0236/OUT – Land at Rectory Farm. Habitat enhancement being delivered as part of the mitigation for 21/P/0236/OUT cannot contribute to the mitigation for this application and therefore must not be included in the HEP. Bat surveys are also required for the whole offsite mitigation area, currently surveys only cover the northern field.

Results of static detector surveys of the northern offsite mitigation field have recorded significant use of the offsite mitigation area site by horseshoe bats with foraging by greater horseshoe bats recorded during transect surveys. This demonstrates this site already provides a foraging resource for horseshoe bats. The offsite land is currently grazed pasture, a key foraging habitat for horseshoe bats. We are concerned that the proposed management of this area would not result in an increase in prey abundance and therefore does not provide certainty that the application would not result in a net loss of foraging habitat.

On a separate matter, proposals would sever access to the existing night roost on the Titan Ladders site on the eastern boundary of the application site. Due to the suitability of this roost for horseshoe bats and the loss of access for horseshoe bats, presence/absence surveys are required in line with bat survey guidelines.

HRA Required

Despite the proximity of the application to European Sites, the consultation documents provided do not include information to demonstrate that the requirements of regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) have been considered by your authority, i.e. the consultation does not include a Habitats Regulations Assessment.

It is Natural England's advice that the proposal is not directly connected with or necessary for the management of the European site. Your authority should therefore determine whether the proposal is likely to have a significant effect on any European site, proceeding to the Appropriate Assessment stage where significant effects cannot be ruled out. Natural England must be consulted on any appropriate assessment your authority may decide to make.

Kind regards,
Amelia

Amelia Earley (she/her)
Planning Lead Advisor
Wessex Team
www.gov.uk/natural-england



This message has been sent using TLS 1.2

This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.