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Subject:

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19 July 2026 16:42
Planning
DC/25/2114

Categories:

Comments Received

DC/25/2114

Objection to Ecological Assessment – Barbastelle Bat Activity and Habitat Connectivity

Dear Mr Holmes

I wish to raise a fundamental objection to the ecological conclusions submitted in support of this application, particularly in relation to the confirmed use of the site by Barbastelle bats.

Key concerns

The application site lies entirely within the **River Adur Water Meadows & Wyckham Wood Local Wildlife Site (LWS)**, a designation which recognises the ecological importance of this area.

This is not an area of low ecological value. The applicant's own ecological surveys confirm that the site is used by **Barbastelle bats** one of the UK's rarest and most specialised bat species.

Despite this evidence, Eco Co-op conclude:

"There is not considered to be any risk of causing severance of habitat connectivity for bats..."

This conclusion does not appear to be consistent with the evidence provided.

Confirmed Barbastelle Bat Activity

The applicant's own surveys recorded:

- **Barbastelle activity on 48 occasions** across surveys undertaken in 2022 and 2025;
- The recorded activity was identified as **commuting behaviour**

This is a significant finding

This is not a situation where the presence of bats is merely suspected or considered possible. The applicant's evidence confirms that Barbastelles are actively using this landscape to move between habitats.

The conclusion that the development would create “***no risk of causing severance of habitat connectivity***” therefore requires justification.

Barbastelles Depend Upon Connected Landscapes

Barbastelles are not comparable with common bat species. They are highly specialised and depend upon well-connected landscapes containing:

- Established flightlines;
- Woodland edges, hedgerows and habitat corridors;
- Access routes to wider foraging areas.

Natural England states:

“Connectivity is the **key** to flightlines.”

Natural England also explains:

“Female barbastelles disperse from woodland along established routes or flightlines to foraging areas that may be **several kilometres away**.”

Research undertaken in West Sussex has demonstrated that Barbastelle flightlines can extend over several kilometres, with average flightline lengths for pregnant females of approximately eight kilometres.

Natural England further recognises that:

“By following shaded woodland tracks and overgrown hedges, several kilometres can be covered by bats...”

This demonstrates that **habitats which may appear ordinary can provide essential commuting routes** and contribute to wider landscape connectivity.

Protected Species and the Precautionary Principle

Barbastelle bats are a legally protected species. Protection is not limited solely to known roost sites; it must also consider the wider ecological networks upon which they depend, including:

- Established commuting routes;
- Habitat connectivity;
- The potential for disruption, fragmentation or severance.

In this case:

- The land lies entirely within a designated Local Wildlife Site;
- A rare protected species has been recorded;
- Active commuting behaviour has been confirmed.

Given these circumstances, the **Precautionary Principle should apply**.

Conclusion

The applicant's own ecological evidence demonstrates that:

- The site lies within the River Adur Water Meadows & Wyckham Wood Local Wildlife Site;
- Barbastelle bats have been recorded using the site;
- The activity recorded included **commuting** behaviour;
- 48 Barbastelle passes were recorded.

Natural England's guidance demonstrates that Barbastelles **depend** upon connected landscapes and established flightlines.

The conclusion that the proposal would create "***no risk of causing severance of habitat connectivity for bats***" is therefore not adequately supported by the evidence available.

This is not simply a proposal affecting ordinary residential land. It is a development within a designated ecological site that has been confirmed as being used by a rare and highly specialised protected species.

I also wish to draw attention to the **Declaration for River Recovery Report** highlighting the importance of:

"Increasing connectivity within the river channel, with the floodplain, and across the wider landscape."

3. The Declaration



Horsha District Counci

Appendix 1 Declaration for River Recovery
horsham.gov.uk

The proposed development should therefore be considered in the context of protecting and strengthening ecological connectivity, rather than assuming that no impact will occur.

I respectfully request that this application is refused on ecological grounds.

Yours faithfully

[Redacted Signature]

Oxcroft

Church Farm Walk

Sent from my iPad