From: Natalie Arscott <natalie@aewc.co.uk>
Sent: 02 May 2025 15:34:10 UTC+01:00
To: "Halima.Chowdhury" <Halima.Chowdhury@horsham.gov.uk>; "placeservicesecology@essex.gov.uk" <placeservicesecology@essex.gov.uk>
Cc: "Charlotte Catton-Giltinane" <c.catton-giltinane@batchellermonkhouse.com>
Subject: DC/25/0336 - Response to Ecology Consultee Comments
Attachments: Ecology Consultee Comment.pdf

Dear Halima and Sue at Place Services,

I am emailing in response to the comments regarding bats for application DC/25/0336 for Land South of Horsham Road, Five Oaks (see attached).

We note that the site lies within the wider conservation areas of The Mens SAC and Ebernoe Common SAC, and the important need to ensure their qualifying species (barbastelle and Bechstein's bats) are not adversely impacted by the proposals.

In this instance, we consider that a stage 2 HRA Appropriate Assessment would be disproportionate to the likelihood of impacts, based on the characteristics of the site and the proposals.

For context, we (AEWC Ltd) are a consultancy with a specialism in bats and advanced bat surveys. We have undertaken extensive radiotracking projects for barbastelle and Bechstein's bats and therefore have a detailed understanding of habitat preferences and foraging and commuting behaviour. Our director, Daniel Whitby, is an author of the current bat survey guidelines. He has reviewed the comments regarding this project and is in agreement that the proposed works will not have any likely effect of barbastelle or Bechstein's bats.

Our reasons for concluding that there will be no likely effects are as follows:

- The on-site hedgerow to be impacted is of low suitability to bats as a key commuting route, especially rare and light-averse species that favour closed and edge habitats. The hedgerow is regularly cut back and has a canopy width of only 1m and a height no greater than 2m. There are no trees along the hedgerow. As such, it offers minimal shelter for bats to commute along. The hedgerow also runs along a busy main road, which will generate regular noise and light disturbance from traffic, especially at dusk when bats are most dependent on sheltered linear features for commuting. Based on the hedgerow structure and the level of disturbance, it is considered that there is a negligible likelihood that this hedgerow would be adopted as a major commuting route for barbastelle and Bechstein's bats from maternity roosts to foraging grounds. In close proximity to the south of the site are continuous, mature belts of trees that connect woodland pockets across the landscape and are situated away from disturbance. These tree lines have much higher suitability for use by commuting bats, and it is considered that these would be the favoured commuting routes over the on-site hedgerow.

- The proposal is for the removal of a 5m length of hedgerow for a new site access. There are existing breaks in the hedgerow, greater than 5m in length, to the east and west of the site, where the field adjoins developed areas, and the hedgerow comes to an end altogether to the

west. Any bats that are solely using this hedgerow to commute along this stretch of the landscape will already need to be crossing gaps greater than 5m in the hedgerow or crossing the road (8m wide), indicating that the addition of a new 5m gap would not act as barrier to commuting.

- There is an identical, continuous hedgerow adjacent to the north of Horsham Road, running parallel to the onsite hedgerow. This offers a linear habitat feature of equal suitability for bats to the on-site hedgerow, crossing the same landscape, and therefore will be a continued route available for bats regardless of works to the hedgerow to the south of the road.

- It has been proposed that two new trees will be planted at the edges of the new gateway. The canopies of these trees will provide additional sheltered habitat for bats and will serve to bridge the gap to some extent.

- No lighting is proposed for the gateway. As such, whilst there will be a gap in the hedgerow, there are no other deterrents that would prevent commuting bats from crossing this gap. As shown in points 1 & 2, the hedgerow is highly unlikely to be used by bat species that are highly dependent on sheltered habitats and will not cross a 5m gap in a hedgerow.

If you have any queries, please do not hesitate to contact me.

Kind regards,

Natalie

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