Surrey Wildlife Trust
Ecology Services

Date: 23/11/2023

Our reference: 6180-A

Stacey Robbins

Wealden District Council

By email

Dear Stacey

## Re: Review of bat addendum report

SWT Ecology Services received a bat addendum report for land at Downlands Farm, Uckfield, dated 13th November 2023.

In my evidence (CD 1/44; paragraph 7.3.21) I indicated that results from the September and October 2023 surveys had not been submitted. The bat addendum report presents the findings of the assessment, and a summary of the survey results from earlier surveys.

In sections 7.3.23 – 7.3.30 I indicated my concern that impacts to rare bat species, namely barbaselle and Bechstein's (and other species in the *Myotis* genus) were sensitive to lighting and as such the proposed dark area map (CD 2/12) had not sufficiently accounted for requirements for these species and species group.

### Summary of survey results

A summary of the survey results relating to barbastelle and *Myotis* species (that includes Bechstein's) is detailed in Table 1.

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British Assessment Bureau UKAS MANAGEMENT SYSTEMS 8289 ISO 9001 QUALITY MANAGEMENT
British Assessment Bureau UKAS MANAGEMENT SYSTEMS 8289 ISO 14001 ENVIRONMENTAL MANAGEMENT
British Assessment Bureau UKAS MANAGEMENT SYSTEMS 8289 ISO 45001 HEALTH & SAFETY MANAGEMENT

**Table 1: Summary of barbastelle and *Myotis* static monitoring bat results**

| Location | Survey method | Woodland parcel | Barbastelle (2019-2020) (no. registrations) | Barbastelle (2023 | | Myotis species | |
|---|---|---|---|---|---|---|---|
| | | | | Dates recorded | No. registrations | Dates Recorded | No. registrations |
| 1 (SD1) | Static | W6b | 0 | 10th August 2023 – 7th September 2023 | 13 | 4th May 2023 – 12th October 2023 | 240 |
| 2 (SD2) | Static | SC3 (near northern boundary) | 1 (July) | 13th August 2023 – 8th October 2023 | 15 | 5th May 2023 – 12th October 2023 | 138 |
| 4 (SD4) | Static | W3 | 0 | 13th August 2023 – 10th September 2023 | 15 | 7th May 2023 – 7th September 2023 | 20 |
| 5 (SD5) | Static | W6a | 0 | 6th September 2023 | 1 | 4th May 2023 – 14th October 2023 | 163 |

*Myotis* species were recorded during the walked transects and no barbastelle were recorded within these.

### Survey locations

Section 2.3 of the addendum report deals with survey limitations and deals with health and safety requirements which impacts the survey locations. This was not identified as limitation in CD1/14 (PDF p. 182; section 2.4 of the baseline ecological appraisal). As a minimum the placement of static monitoring devices are not restricted by this limitation as they can be placed during daylight hours.

### Evaluation

An assessment of the barbastelle is done in section 3.4.9 of the bat addendum report. Reference is made to low registrations of barbastelle, however this would be expected given it is a rare species. I agree that the timings of the recording (August – October) suggest post-breeding movements. Given the importance and rarity of the species, I would expect a further analysis of the data, specifically looking at the timings of the movements to determine whether these reflect a nearby roost (i.e. whether bats were recorded at or near the peak emergence time for the species, which would suggest a nearby roost), or the site is used for commuting and foraging. The lack of such a detailed analysis of the data means it is not possible to conclude whether a roost is likely to be present within the site boundary.

Notwithstanding this, to ensure the protection of barbastelle bats, adequate analysis and mitigation is required regarding their movement corridors and the addendum does not provide this. Dispersal corridors from breeding to other sites (e.g. hibernation, foraging and commuting) is equally as importance as the roosts themselves.

Section 3.4.18 concludes that the bat assemblage has not changed since the 2019 surveys, however a significant rise in barbastelle activity has been recorded (refer to Table 1 above to show the comparisons) and this should be formally assessed in the context of the Ecological Impact Assessment. More weight should be provided to the rarity and distribution of the species rather than the number of registrations.

Further analysis of the results in the context of W6b should also be provided. Specifically, this is the copse of woodland that was delisted from the AWI. Although currently not a dark zone, the number of registrations is highest here, and significantly higher than the 2019/2020 results. The dark corridors should be revised to reflect the changing use, and specifically consider the future lighting impacts of this area.

In relation to Bechstein's this species is not specifically mentioned in the addendum report. As discussed in my evidence, distinguishing between different *Myotis* species is not possible with bat detectors. A method of dealing with this limitation is not addressed in the bat addendum report. Whilst I have referenced Bechstein's, which is an Annex II species under the Conservation of Habitats and Species Regulations 2017, as amended, other rare *Myotis* species occur in Sussex, including alcathoe and greater mouse-eared.

Section 3.4.7 presents an analysis of the *Myotis* species suggesting this genus was recorded infrequently. Given the genus includes rare species assessing the genus as a whole and not considering the impact of the proposals on the rarer species is inadequate. The results of the bat addendum report does not alter my conclusions as detailed in section 7.3.35.

Kind regards

Gabrielle Graham BSc (Hons) MSc MCIEEM CEcol – Managing Director