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From: David Priddis

Date: 11/01/2019 10:01 (GMT+00:00)

To: Jackie Fraser

Subject: Re: Mitcheldean Neighbourhood Development Plan

Dear Jackie,

Thank you for the e-mail.

As you are probably well aware, some of the most important horseshoe bat roosts (Greater and Lesser) are Sites of Special Scientific Interest (SSSI's) and are also incorporated into a Special Area of Conservation (SAC) under (currently!!) the European Habitats Directive, incorporated into UK Law through the UK Habitats Regulations. SAC's should have very strong protection.

Some SSSI's are Summer Maternity roosts and the areas around them are most important for the bats to forage for insects. This especially applies to females during pregnancy and lactation as well as for juvenile bats, which feed initially near a roost..

Other SSSI's, including Wigpool Common and Westbury Brook Ironstone mine, are designated as Winter Hibernation Sites and are also part of the SAC. What is often not realised is that bats may feed any night of the year if they are likely to catch more insects than the energy reserves catching them. GHB's tend to feed more during Winter than LHB's.

Horseshoe bats do NOT feed in housing estates, although some species such as Pipistrelle bats do. Horseshoe bats hate and avoid light and street lights. They need hedges and trees to feed around and LHB's take food directly off the surfaces of leaves, 'gleaning' as well as hawking them when in flight. GHB's also like grazed areas and eat dung beetles..

Horseshoe bats do not like flying in the open and rely on hedgerows and walls, etc. to fly along side when commuting.

Natural England (NE) are in the process of producing a map of the key feeding areas around these major roosts, "Core Sustenance Zones" (CSZ). It certainly looks as if Carisbrook Road falls well within the CSZ for Wigpool. It is also close to the NU "Hawkwell" Bat roost, which although not a SSSI, yet, is recognised by NE as being necessary to the SAC.

Last September, I had some correspondence with Chris McFarlane and said, in relation to the proposed 'development' at Milkwall, Coleford, which is very close to another hibernacula, (Similar comments may apply at your site)

The Planning Inspector correctly Conditioned the Allocations Plan Approval to say there must be no impact on the Bat SAC; this is exactly what the Habitats Regulations require. If the site is currently used by horseshoe bats, mitigation will be very difficult indeed, as I pointed out in my evidence to the Planning Inspector. I do not believe there is any such thing as a 'horseshoe bat friendly housing estate'! The most damaging impact on these bats is development and to the best of my knowledge housing areas are not used by horseshoe bats for foraging, partly, I believe, because of lack of available food/foraging and partly because of increased light.

If a proposed 'development' site is currently used for bat foraging, I simply do not see how mitigation could be carried out since you could not bring a replacement area of foraging land including hedgerows and woodland from somewhere else and place it next to the SSSI site. It is pointless suggesting bat boxes, as horseshoe bats do not use them. New roosts would not help as it is the loss of foraging/feeding that would need addressing. This is why I and others objected so strongly to this and some other sites, being included in the Allocations Plan.

I did commence this e-mail a few weeks ago, but then Christmas took over - sorry. Please note that the Northern United "Hawkwell" LH bat roost, although not an SSSI is recognised as being important to the SA and therefore should be treated as an SSSI. It is the largest LHB summer roost now in the FoD.

Hope this may help a bit.

Best wishes
David

-----Original Message-----

From: Jackie Fraser
To: David Priddis
Sent: Sun, 16 Dec 2018 8:56
Subject: Mitcheldean Neighbourhood Development Plan

Hello David,

It was a pleasure to see you again last Wednesday evening at the Foresters Forest event. Lucy and myself are working on our landscape policy for the above plan , which we hope to submit to FODDC early January. We have identified core sustenance zones in the area of Abenhall at the start of the Castiard Vale on the other side of the A4136, and the fields opposite Carisbrook Road running adjacent to Bradley Court road, both are areas which we are proposing to protect from development. We want to emphasize the importance of protecting the Bat population , and we thought a Bat impact risk assessment would help strengthen our proposals.

Is this something you would be able to do for us ? We appreciate how busy you are , we would be very grateful for any help or advice you are able to offer,

Best wishes
Jackie