

Barbastelle bat evidence and cross-boundary assessment

Planning application UTT/26/1635/OP

Submitted by Carl Rolph, Save Church End | 2026-08-23

Please treat this as a supplementary representation concerning application UTT/26/1635/OP, place it on the public planning file and refer it urgently to ECC Ecology.

The Ecological Impact Assessment Addendum submitted for neighbouring application UTT/25/2801/FUL records a barbastelle bat, *Barbastella barbastellus*, on the common boundary area between that site and the Gladman development.

That assessment describes the bat assemblage as being of national importance and records the highest levels of bat activity along the eastern and southern boundaries.

This is reinforced by Gladman's own bat evidence for UTT/26/1635/OP. Its report:

- records 290 barbastelle calls across the application site;
- records 207 barbastelle passes at monitoring location ML4, close to the southern off-site woodland;
- describes barbastelle as a very rare Annex II species; and
- gives the bat assemblage a score of 20 out of 28, which the report itself identifies as the threshold for national importance.

Despite those findings, Gladman subsequently assigns the site only local importance for bats. That conclusion is inconsistent with the results and scoring presented in its own report and must be properly explained.

The evidence from UTT/25/2801/FUL also demonstrates that bat activity does not stop at an application boundary. These two sets of survey results must be assessed together.

Before this application is determined, the applicant should therefore be required to provide a targeted, updated and cross-boundary barbastelle assessment which:

- 1 reconciles the results of UTT/25/2801/FUL with Gladman's own survey evidence;
- 2 identifies the barbastelle flight routes, foraging areas and likely roosting locations associated with the shared boundary, woodland, hedgerows and adjoining land;
- 3 includes appropriate activity, back-tracking and emergence or re-entry surveys sufficient to establish how barbastelles are using this connected landscape;
- 4 explains why a bat assemblage meeting the report's national-importance threshold has subsequently been valued as only locally important;
- 5 assesses the combined effects of habitat loss, severance, construction, increased human activity and lighting across both sites; and

- 6 provides a final lighting design demonstrating enforceable dark corridors connecting the woodland, hedgerows, river corridor and surrounding habitat.

This information is required to understand the development's effects on a rare and protected species. It must not be postponed until after outline permission through a planning condition.

ECC Ecology's holding objection should remain in place until the necessary survey work, cross-boundary assessment and final mitigation evidence have been completed and independently reviewed.

Please confirm that this representation has been added to the public file and referred to ECC Ecology.

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