



Northants Bat Group

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14/00094/OUT
Cottingham Hall area, outline housing application

We object to this application.

I cannot find the BSG ecology report on your website accompanying this application, just a mention of it in the Design and Access report. I did read this report as a Scoping paper when that was submitted in 2013. I did comment to you on it at that time.

- 1) Any desk study carried out by ecologists should be used to design the survey. In this case a data search for bats (Part of the desk study) was undertaken, but only for 1km around the area. This is far too small an area as bats travel much further than that nightly to and from roosts and foraging areas. Bats roosting a mere 2kms away could be severely affected by this development, yet the ecologists would be unaware of their presence, their status or numbers.
- 2) Through their desk study data search the ecologists were informed that there was potential for the nationally rare barbastelle in the area. They recorded “..one or two possible calls..” (see P 15 of their report). With this in mind they really need to discover more about how this hard-to-locate species is using the site. Is it using some of the trees in the area for roosting? Does it regularly forage over the land? Does it commute along regular flight lines? If any of these are the case then the housing development could severely impact on this sensitive species. This

information needs to be discovered before any permission is given for any housing so any special areas can be left undisturbed. Once outline permission has been granted it will not be possible to mitigate properly for this sensitive species. Barbastelle is a national rare bat and requires special protection by law.

- 3) The ecologists also had “..possible calls ...” of serotine and Leisler’s bats. Both these species are rare in Northants with only eight records in 30 years of Leisler’s bats (mostly of single bats) and only four records of serotine, all foraging bats. If they are present then it gives the site special significance and may require no, or only low-key, development so as not to affect these two species. Again, more survey information is required to determine this.
- 4) A number of trees were assessed as having bat roost potential (nine out of 15 were significant) but we have no further information about any bat roosts, the species involved, the numbers of bats using the trees, when they use the trees and their sensitivities to the proposed development plans (varies with species).
- 5) Bat activity assessment. The ecologist has fallen into a common trap with the analysis. Pipistrelles were assessed as having “moderate level of activity”. Against this, the other species were assessed as “low”. No account has been taken of the different population levels of the other species. As an example, noctules have an estimated population in the UK of only 1/30th that of pipistrelles, so one would expect to encounter them far less frequently. Using this example, if pipistrelles were heard 30 times and noctules twice, then the correct analysis for noctule activity should be “high”, not “low”. The ecologist also hasn’t taken account of the population levels of the bat species in this region of Northants (for example, noctule has a patchy distribution and is rare or non-existent in some areas).
- 6) The suggested mitigation of planned lighting and a future proper bat survey on the trees will not protect some species if bats are roosting in the trees, once housing, roads, traffic and all the associated noise and lights are present. More detailed surveying before the outline application is heard could provide better advice as to how many houses at a maximum can be built without disrupting or destroying the bat populations, or which areas of the site should be left as “no-go” zones for development. Some bat species, such as pipistrelles, are more resilient and may cope with such a development, but others are far more sensitive and may leave the area even if their tree remains untouched, due to the nearby disturbances of human activity. Replanting “new habitats” such as hedges and trees to replace those that were in the way seems not to work. Firstly they take many years to mature by which time bats have long gone. The people living in the new housing put demands on the local plantings, so we see hedge lines put in as mitigation and commuting routes for bats being disturbingly illuminated by lamps for “public safety”, shrubs being cut back or removed for similar reasons, and original trees being removed (causing problems with house foundations, dropping branches on paths etc). There seems to be no way to give such mitigation any protection once the development has been completed.

Overall, then, the ecologists have shown that bats nationally and locally rare use the site and there are many mature trees on site that could be used as bat roosts. The area has special importance for bats and a development of this scale could not but have a major impact on bats of the area. Some may be able to move to other, safer areas nearby, but specialised species (the rarer species) have few other places to go, especially around the heavily developed area of Corby (residentially and industrially)

On another matter: in the desk study, the ecologists were informed of dormice in the general area (another Protected Species). There has been no survey to see if they are present in the hedgerows of the area. What would be the effect of the development on them? We cannot know because no surveys were carried out or assessments made.

Phil Richardson