

## South Hams SAC Greater Horseshoe Bat HRA Guidance Consultation Summary

The guidance was subject to a full 8-week consultation beginning in April 2018. Within the early stages of the consultation, a consultation event was held involving key stakeholders, local interest groups and interested residents.

A total of 35 responses were received from the following organisations (individuals not listed):

Abbotskerswell Parish Council	Harberton Parish Council
BSG Ecology	Mineral and Resources Planning Association
Buckfastleigh Town council	Natural England (no comment)
Corylus Ecology	Paignton Neighbourhood Planning Association
CPRE Teignbridge	PCL Planning
Dartington Hall Trust	Rattery Parish Council
Devon Bat Group	Sibelco
Devon Wildlife Trust	South West Water (no comment)
Eagle One Homes Ltd	Torquay Neighbourhood Plan Forum
Green Ecology	Wolborough Residents Association

The following headings provide a summary of the key themes of responses received and the changes made to the document in response to these comments in agreement with the relevant Local Planning Authorities and Natural England. The summary does not necessarily include all comments in detail, but the representations in full are available on the Devon County Council website at:

[www.devon.gov.uk/planning/planning-policies/other-county-policy-and-guidance/south-hams-sac-spd-consultation](http://www.devon.gov.uk/planning/planning-policies/other-county-policy-and-guidance/south-hams-sac-spd-consultation)

### Status

A number of the responses raised concerns regarding the contents of the document and whether it was appropriate to be adopted as SPD rather than DPD. Further comments sought to elevate the status of the SPD to a DPD so that further protection and more prescriptive policy could be adopted to conserve and enhance the SAC. Whilst it is not thought that the document consisted of policy that guided the use of land and therefore could not have been SPD, it was not sufficient to require DPD status. In light of this and Legal Advice sought by the LPAs, the Steering Group agreed to amend the contents of the document to make clear that the document is only intended as a screening document and to seek approval of the document from members as guidance.

The document will not hold any weight in the planning decision process and is intended to be used by those preparing and validating planning applications to determine whether HRA is required and therefore identify the survey effort and potential mitigation that may be required.

### Structure

Various responses commented on the structure of the document and noted that it was legible and clear to follow. However, a small number of responses noted that the document used technical and inaccessible language. In response to this, the guidance has been edited to remove technical terminology and the glossary updated to ensure that necessary technical terms are fully defined.

A number of comments also raised that the purpose of the document was not clear. This point has been addressed through the redrafting of the document as guidance and the purpose made clear.

### **Strategic Flyways**

A main area of concern in the consultation responses was the principle of replacing the strategic flyways concept with the Landscape Connectivity Zone. Concerns included that there was little evidence for doing so and the replacement of strategic flyways would lessen the protection of GHBs from development pressure. Whilst these concerns are acknowledged, the approach taken in the new guidance (i.e. the LCZ) is considered to be more precautionary and better based on evidence than the flyways.

The designation of flyways was based on the best available evidence at the time. A review of this and further evidence demonstrated that GHBs make use of the wider landscape to travel between roosts and therefore protection of commuting routes and connectivity will give a greater level of protection and ensure all developments likely to have a significant effect on the integrity of the South Hams SAC undergo HRA.

### **Landscape Connectivity Zone**

Responses to the consultation raised concerns regarding the chosen boundary of the LCZ and whether this responded appropriately to evidence. The approach to the LCZ consulted upon looked at existing landscape features and a boundary was determined based on a best assumption of where bats may use the landscape to connect between roosts.

In response to the consultation, the boundary of the LCZ has been changed to reflect the maximum average distance that it is known a GHB will fly to connect to alternative roosts and to connect the maternity roosts to the other designated roosts. This approach is considered to be more proportionate and precautionary than the previous approach and provides adequate protection for commuting and connectivity.

Whilst it is acknowledged that there are roosts beyond the boundary of the LCZ which may be important to the South Hams SAC, the guidance is focused on the designated roosts. It is important to note that roosts and GHBs outside of the LCZ will still be protected through legislation.

### **Sustenance Zones**

A small number of responses questioned the size of the Sustenance Zones. The 4km zones have not been changed in response to the consultation as the distance selected is based on evidence as outlined in the guidance.

### **Monitoring and Review**

Responses to the consultation highlighted the need for the document to include detail as to how the approach will be monitored and reviewed. Information has now been included on this topic and a section included on how the proposed approach will be monitored for success and reviewed in light of new evidence.