Comment for planning application WSCC/030/21

Application number Name

WSCC/030/21

Martin Day

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Type of Comment Comments

Objection

I have recently seen the new (supplementary) submission for the Loxwood Clay Pit, which I wish to object to. In the new document the applicant appears to try and address the short comings in their initial proposal.

Where they failed to consider the impact of the development on biodiversity the first time around, they have made a submission focusing solely on the area they propose to plunder for clay.

The Conservation of Habitats and Species Regulations 2017 (England and Wales) makes it illegal to

The Conservation of Habitats and Species Regulations 2017 (England and Wales) makes it illegal to kill, injure, capture, or cause disturbance that affects populations of bats, obstruct access to bat roosts, or damage or destroy bat roosts.

Individual bats are also protected from 'intentional' or 'reckless' disturbance under the Wildlife and Countryside Act 1981.

The potential impact is far wider than their narrow focus analysis, there are implications for the wider woodland around the proposed site, which will be affected by this development and in no uncertain terms.

Given the remote location, the site currently has 'pristine night skies' (which is less an 20% of the UK). Artificial lighting used in the buildings has potential to alter bat feeding behavior (insect are attracted the UV and/or high blue spectral component, specifically in dark areas).

As a nocturnal mammal, the majority of insect abundance happens just after dusk, light can affect when bats emerge to feed and significantly reduce their intake of food and water. This leads to malnutrition and can mean that roosts and pups (young bats) are abandoned.

In addition, lighting draws insect towards it, causing a vacuum in other areas of the wood - which in the long terms can lead to reduction in bat number far beyond the development.

Artificial lighting has also been shown to affect bat movement, especially along natural topographic features like hedges, rivers and edges of woodlands and infrequently managed grassland - all of which apply to the proposed site. It can cause barriers which cut bats off from their foraging grounds and their "commuting" routes.

In addition to this, there will be localized noise pollution from the site and throughout the whole area from the lorries required to move clay and waste (and potentially bricks if the latest proposal is to be believed). A recent PhD research paper from the University of Sussex into the effect of traffic noise on the activity of bats showed a reduction in total bat activity by approximately two thirds.

I find the assertion that there are no bats resident on the land they own somewhat implausible. To expect (or choose to ignore) the rest of the woodland habitat and think it will be unaffected, is quite ridiculous.

The whole proposal is completely out of context with the tranquil, rural setting and is blatant habitat destruction in regards to the sensitive ecosystem required by bats. Normally these kinds of considerations apply to urban developments, not ancient woodland - but it is still the council's duty to conserve our natural habitat from corporate greed.

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Attachments