Deficiencies and Failures in the Assessment of the Bats at Foxbridge

Further Ecology Objections regarding misleading and outdated information on Bats
22/02346/OUT Foxbridge Golf Club
Plaistow & Ifold Parish Council January 2026

We object to this application being decided based on misleading evidence and outdated survey guidance regarding Bats

The Bat surveys fail to identify the significance of Near Threatened / Vulnerable bat species. The surveys were undertaken using 2016 guidelines which are out of date for a decision being made in 2026. Guidelines were updated in 2023 with more rigorous standards

“Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition, 2023), published by the Bat Conservation Trust”

Our key objections are summarised here with detail in the following points:

- **High bat sensitivity not clearly identified**

  Multiple UK Red List and rare bat species were recorded, but their conservation status and significance are not clearly identified or explained.

- **Omission of a recorded red-list species**

  Leisler’s bat (Near Threatened), recorded during surveys, is omitted from the assessment and has not been evaluated or mitigated.

- **Outdated and insufficient survey evidence**

  Surveys relied on superseded 2016 guidance, fall short of current 2023 standards, and involved minimal survey effort given the number and sensitivity of species present.

- **Survey data is now out of date**

  Bat surveys were undertaken in summer 2022 and are now nearly three and a half years old, contrary to professional guidance on survey validity.

- **Key survey components were not undertaken**

  No dusk-to-dawn survey was carried out and only four transect surveys were completed instead of the recommended seven.

- **Failure to assess internal lighting impacts**

  The lighting strategy ignores unavoidable internal light spill from 121 dwellings and a hotel into dark countryside, posing a risk to light-averse bats and commuting corridors.

Point 1; Failure to identify conservation status and significance

The written assessment does not identify which recorded bat species are UK Red List species, nor does it explain the implications for each bat species of their conservation status.

This means that the significance of recording Near Threatened / Vulnerable bat species is not clearly communicated to decision-makers. A councillor reading the report could reasonably be unaware that red-listed bat species were recorded on the site at all.

This represents a failure to clearly signpost ecological sensitivity and undermines informed decision-making.

The finding of multiple Red List species (Serotine, Barbastelle, Leisler's) alongside endangered Bechstein's and rare Alcathoe (both found by the applicant as recorded locally), plus 7 other species of bat, highlights a crucial 'Hot-spot' for bats. (See Transect Survey results in Appendix G of Ecological Appraisal May 23).

The 'Ecologist's Appraisal May 23' fails to mention if any of the species of bat were of any higher conservation concern than others and did not name any of them as Red listed, in either the Bat Mitigation Strategy or the Ecological Appraisal.

Finding 12 species in a single area is a major discovery. A 65-acre site is relatively small for such a diverse bat community, suggesting it provides unique features like rich foraging grounds, diverse roosting opportunities (old trees, buildings), and connectivity to other habitats. The site therefore serves as a vital habitat island. Such a site would be a top priority for protection and management to support these vulnerable and threatened populations of bat.

Point 2; The omission in the Ecological Appraisal report and the Bat Mitigation Strategy that Leisler bats were found in two of the 4 transect surveys.

This species of bat is 'Near Threatened.'

The ecologist summarised the survey findings as follows in 3.2.8 on page 15 of Ecological Appraisal May 23, with no mention of the Leisler's

Bats
There are records of 11 species of bats including Common pipistrelle, Soprano pipistrelle, Serotine, Alcothoe, Natterers, Brown long eared, Barbastelle, Bechstein's, Daubenton's, Whiskered and Noctule.

Despite being clearly identified in the annotated survey diagrams, this red-listed species is absent from:

- the baseline ecological description,
- the impact assessment, and the mitigation and conclusions.

This species' presence has therefore not been assessed, and no species-specific impacts or mitigation measures have been considered for them.

Point 3 - Survey effort and age of data

Point 3A – Bat Transect Surveys: Use of Outdated Guidance

The Bat Transect Survey data submitted for the Golf Course cannot be relied upon because the surveys were undertaken in accordance with outdated 2016 guidance and do not comply with current 2023 survey standards.

The Ecological Appraisal (May 2023) confirms (Section 3.3.2.6, page 22) that bat activity transect surveys were carried out following Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd Edition, 2016). That guidance has since been superseded by Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition, 2023), published by the Bat Conservation Trust, which sets out substantially more rigorous requirements for survey design, coverage, interpretation, and reporting.

As a result, the submitted surveys fall short of current best practice and cannot be considered robust evidence for decision-making.

Below are the material differences between the 2016 and 2023 guidance

The 2023 Bat Conservation Trust guidance introduces a materially higher standard in five key respects:

1. There is a much stronger emphasis on purpose and decision-making. Transect surveys must now be explicitly designed to answer defined ecological and planning questions—such as identifying commuting routes, assessing site boundaries and off-site impacts, and informing layout and lighting decisions. Simply presenting transect results as a generic "baseline" is no longer sufficient. Survey findings must be interpreted in context, explaining both what they demonstrate and what they cannot conclude.

2. The 2023 guidance places far greater weight on spatial coverage, particularly along site boundaries and adjacent habitats. It recognises that planning red-line boundaries are ecologically artificial and requires survey effort to include site edges and off-site features such as hedgerows, woodland margins, and watercourses, especially where impacts (including lighting) extend beyond the application site. This is directly relevant here, as bats were recorded flying along all site boundaries.

3. Expectations around survey effort and adequacy have been strengthened. The 2023 guidance makes clear that minimum survey effort is not automatically sufficient and that effort must be proportionate to ecological risk,

species sensitivity, and potential impacts. Where red-listed or light-averse species are present, greater survey effort and a more precautionary interpretation are expected.

4. The treatment of limitations and uncertainty is significantly more explicit. Consultants are now required to clearly identify data gaps, explain what surveys cannot determine, and avoid over-confidence in low-activity or negative results. The guidance cautions against downplaying the functional importance of habitats—particularly linear features—based on limited detections.

5. transect data are now expected to be fully integrated with other impact pathways, most notably lighting. The 2023 guidance explicitly requires bat activity surveys to inform lighting assessments, dark corridor protection, and boundary treatments, recognising that transects alone may underestimate lighting effects if interpreted in isolation.

Conclusion: In light of the above, bat activity transect surveys undertaken solely in accordance with the 2016 guidance:

- Rely on superseded standards
- Apply a less precautionary approach
- Risk under-representing boundary and off-site impacts
- Fall short of current expectations for interpretation, transparency, and decision-making relevance

Accordingly, the Bat Transect Survey data submitted for this application cannot be afforded significant weight and should not be relied upon to support conclusions regarding bat activity, habitat function, or the acceptability of the proposed development.

Point 3B; The bat surveys are now out of date, having taken place in the summer of 2022, nearly 3 1/2 years ago.

CIEEM advice note that ecological surveys over 3 years old are “unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated”

https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf

Point 3C; No dusk to dawn survey was conducted.

The ecologist concluded that he would deviate from the 2016 (now superseded) guidelines. Page 23, 3.3.2.7 of the Ecological Appraisal May 23; ‘*A deviation from recommended survey effort of a dusk to dawn has been adopted, as the proposal does not impact upon any of the adjacent ancient woodland that presents suitable habitat nor will any of the foraging features on the site, with the exception of conifers.’*

Point 3D; Only 4 transect surveys were undertaken, instead of the recommended 7 monthly surveys from April to October (see page 19 of Ecological Appraisal May 23)

The bat surveys relied upon were undertaken in 2022, with only one activity survey per month over four months. This represents minimal survey effort, particularly given the number of species recorded and the presence of UK Red List bats.

Point 4; Reliance on Natural England advice

It is noted that Natural England has not objected to the proposed mitigation. However, Natural England's advice is necessarily based on the information provided to it.

Given that;

- The data from the Bat Transect Surveys cannot be relied upon as they were conducted in accordance with outdated 2016 guidance and does not comply with current 2023 survey standards
- One red-listed bat species, the Leisler recorded on the site, is not mentioned in the written assessment
- The conservation status of the 10-12 bat species is not identified or discussed despite there being three Red Listed species of bat
- The insufficient bat survey data is anyway now invalid, as it is nearly 3 and a half years old.

Accordingly, Natural England's response cannot reasonably be relied upon as confirmation that the bat survey evidence is complete, or that impacts on all protected species have been fully assessed.

Point 5 – Failure to fully consider the effects of internal light spill into the countryside

The applicant's lighting strategy places most emphasis on the control of external lighting and not light spill from accommodation. They propose external downward-facing luminaires, and a maximum illumination threshold of 0.5 lux at sensitive ecological features. However, they seek to ensure safe pedestrian movement by targeting an average of 10 lux on pedestrian routes, these routes of course run across the whole site. In addition security lighting "limited to specific risk areas" will be operated between 23:00 and 07:00, presumably the many ponds on site linked by pedestrian routes would be considered a risk to pedestrians at night (coming back from the restaurant for instance), so it's difficult to see how lighting near these ponds and on the pedestrian walkways won't negatively impact Bats. It proposes that no lighting will be installed within 20-metre buffer zones adjacent to woodland and boundary hedgerows, and that light levels at bat commuting and foraging features—including ponds, hedgerows, and woodland—will not exceed 0.5 lux.

The applicant acknowledges the potential ecological harm of poorly controlled artificial lighting and states that uncontrolled sources such as vehicle

headlights will be limited to the car park and of short duration. Recreational lighting from torches is considered negligible, and residential light spill is suggested to be capable of mitigation, this is overly simplistic and completely unachievable in reality.

The approach fundamentally fails to address the primary and unavoidable source of light pollution arising from the development: internal lighting from 121 residential units and a 50-bedroom hotel, accommodating potentially in excess of 800 occupants on any given night. Unlike external lighting, internal domestic and hotel lighting is not controllable, enforceable, or capable of meaningful mitigation through planning conditions. Once the development is occupied, residents and hotel guests will reasonably leave lights on and curtains or blinds open, resulting in substantial and continuous light spill from windows, glazed doors, and upper-storey rooms. This is entirely normal and foreseeable human behaviour and cannot be regulated or reliably mitigated in practice.

The site lies immediately adjacent to woodland and currently dark, unlit countryside, where baseline light levels are extremely low. In such a pristine rural context, any assumption that lighting impacts—particularly cumulative window light from a development of this scale—will be contained within the site boundary is unrealistic. The combined effect of internal lighting across multiple buildings would inevitably extend well beyond the site, permanently altering baseline darkness levels and the character of the surrounding countryside.

This issue is particularly acute given the confirmed bat interest on and around the site. Surveys undertaken over a three-year period recorded Barbastelle, Serotine, and Leisler's bats (all red-listed species), together with seven additional bat species, commuting and foraging along all four site boundaries. These findings demonstrate that the site edges function as active and sensitive bat corridors. In addition, Bechstein's bat and Alcathoe bat are known to be present in the surrounding area, further increasing ecological sensitivity.

These species are well documented as light-averse, particularly along woodland edges, hedgerows, and other linear landscape features. The introduction of widespread, permanent internal light spill would therefore create a functional light barrier, disrupting established commuting routes, fragmenting habitat, and resulting in effective habitat loss through avoidance behaviour. Published research shows that light-averse bat species alter behaviour at illuminance levels as low as 0.1 lux, with avoidance effects recorded at distances of 50–100 metres from light sources. In a currently dark rural landscape, cumulative internal window light from a development of this scale would therefore be sufficient to disrupt bat activity well beyond the site boundary.

The applicant's proposed mitigation ultimately relies on assumptions about future occupier behaviour, which the applicant itself acknowledges cannot be

enforced. This approach is incompatible with the precautionary principle, particularly where the impacts are permanent, cumulative, and irreversible. As a result, the proposal has failed to demonstrate that it would avoid harm to protected species or preserve the dark rural character of the area.

For these reasons, the lighting strategy is inadequate, and the application does not provide sufficient certainty that unacceptable ecological harm arising from internal light spill can be avoided.

See Appendix A for supporting evidence.

Point 6; Planning risk and conclusion

Taken together, the above issues demonstrate that the application is supported by an incomplete and outdated ecological evidence base. The Local Planning Authority cannot be satisfied that impacts on all protected species have been adequately assessed, nor that the proposed mitigation is appropriate for all bat species recorded on the site.

Determination of the application in its current form would expose the authority to significant legal and policy risk.

We light of the above we respectfully request that the application be refused.

From 'Advice for Planning Authorities regarding protected species and development ; https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications

Appendix A

Evidence on bat sensitivity to internal window light (summary)

A1. Sensitivity to very low light levels

Multiple UK and European studies demonstrate behavioural changes in bats at extremely low illuminance levels:

Avoidance recorded at ~0.1 lux (approximately full moonlight)

Consistent disruption below 1 lux

Some species affected at <0.1 lux

These levels are routinely exceeded by domestic window light well beyond the building façade, particularly in otherwise dark landscapes.

A2. Distance effects

Research measuring bat activity at increasing distances from light sources has identified:

Avoidance effects at 10–25 metres

Clear reductions in activity at 25–50 metres

Detectable impacts up to 100 metres, depending on species and ambient darkness

These distances relate to single light sources; residential developments introduce dozens or hundreds of light points acting cumulatively.

A3. Why internal window light is especially harmful

Internal lighting is often more ecologically damaging than external lighting because it:

Is unshielded

Emits horizontally and upwards

Is frequently brighter than external “eco” lighting

Remains on for long and unpredictable periods

Creates sky glow and edge illumination, not just ground lighting

UK planning guidance explicitly recognises light spill from windows as an ecological risk, while also acknowledging that it is not realistically enforceable once occupied.

A4. Species relevance

The bat species recorded on and around the site are among the most light-averse in the UK, particularly:

Barbastelle – exceptionally light-averse

Bechstein’s bat – strongly associated with dark woodland interiors and edges

Serotine and Leisler’s bats – sensitive to light barriers along commuting routes

These species are documented as being disrupted by light levels well below typical domestic window emissions.

A5. Supporting research and guidance

The above conclusions are supported by:

Peer-reviewed studies demonstrating lighting-related disruption of commuting routes and corridor use

Research showing avoidance behaviour at very low lux levels and at distances far beyond light sources

UK and European guidance requiring a precautionary approach, particularly where mitigation depends on human behaviour.

Core peer-reviewed research (behavioural evidence)

Stone et al. (2009) – Street lighting disturbs commuting bats
- Demonstrated clear avoidance behaviour in bats exposed to artificial lighting
- Showed disruption of commuting routes, not just foraging
- Established that lighting can act as a barrier, even without killing bats

Stone, E.L. et al. (2012) Conserving energy at a cost to biodiversity?–
- Lighting as a legal and ecological risk
- Confirmed that slow-flying and woodland bats are particularly light-averse
- Explicitly linked lighting impacts to potential legal offences under European bat protection law

Rowse, E.G. et al. (2018) Effects of dimming LED street lights on bat activity. Royal Society Open Science
- Distance and corridor effects
- Measured bat activity at increasing distances from lighting
- Found reduced activity tens of metres away
- Emphasised the importance of dark refuges and corridors

Zeale, M.R.K. et al. (2018) Experimentally manipulating light spectra reveals the importance of dark corridors for commuting bats
- Experimentally demonstrated that bats actively choose dark routes
- Even low-level lighting altered route choice
- Reinforced that linear features must remain dark

Fure, A. (2006), cited in Bats and lighting reviews
- Found Myotis species (which includes Bechstein's) avoided areas above ~0.1 lux
- This is roughly full moonlight
- Typical domestic window light exceeds this level well beyond the façade

Guidance Note 08: Bats and Artificial Lighting in the UK (BCT / ILP).
- Bats can be affected at ≤0.1 lux
- Lighting impacts include spill from buildings and windows
- Recognises that domestic lighting is difficult or impossible to control
- Requires a precautionary approach where light-averse species are present

Voigt, C.C. et al. (2018) Guidelines for consideration of bats in lighting projects. EUROBATS.