

Sent to Community Engagement Fusion  
25 March 2021  
By Email

Thank you for responding to our questions regarding bat licences at Jones' Hill Wood. We have considered the information and sought the advice of an independent ecologist. This has raised a number of issues and questions, which I have set out below. I would be grateful for a response at your earliest convenience, not least as Phase 2 work is due to begin next month.

1. Bat surveys should follow the government approved guidelines published by the Bat Conservation Trust. We believe your surveys to date fall short of these guidelines. Moreover, we don't believe that the presence of protestors is an adequate excuse for failure to conduct bat surveys to the required standards: protestors were not present in 2019 and they are not present now. HS2 solicitors have confirmed the wood was first surveyed (BT1 = ground based) in 2013, then again in 2016 (BT2 = climber with an endoscope). Over three years were therefore available to carry out adequate survey work and protestor activity should have been anticipated.

***Question: why have bat surveys not been conducted in line with best practice and what measures does HS2 expect to put in place to remedy this failing?***

2. The correct bat survey period is May through to September – not April to October. Some bats may still be hibernating in April (sometimes into May) and, although bats can fly in October, many will have started hibernating by then. In addition, given suitable weather conditions, some bats, in limited numbers, may emerge throughout the winter to forage and top up fat reserves.

***Question: Please can you share with us the bat survey results from October 2020. Buckinghamshire Council has informed us that this included four static bat detectors. A list of bat species recorded will suffice at this stage.***

3. The independent ecologist believes that, based on the information currently available, the DEFRA LP4 licence conditions, particularly for Barbastelle, have not been met. In addition, all licence applications should be made at least six months ahead of scheduled work. This suggests your programme of Phase 2 work scheduled for April next month - is scheduled far too early (and appropriate surveys - point 2 above - will not be possible before then).

***Question: What measures will be put in place to ensure the necessary licence conditions for Barbastelle bats are met before Phase 2 work commences? Please can you share the timetable for this work.***

4. Barbastelle bats are early evening foragers, so are particularly dependant on a dense holly understorey to protect them from predators (for example sparrowhawks during light evenings and owls later on). We are therefore concerned that:

- Some of the understorey clearance being undertaken during Phase 1 will be affecting the baseline conditions on which any licence application should have been based
- Without sufficient understorey, roosts will become unviable as bats will be more vulnerable to predation
- during the active season, Barbastelle bats use many different roosts and need an interconnected understorey around all roost trees
- new woodland planting will not be suitable for mitigation as it will not afford suitable dense understorey for protection.

***Question: I would be grateful if you would set out what mitigation is in place to address our concerns above.***

5. The effectiveness of mitigation measures will be dependent on suitable long-term protection of the remaining woodland.

***Question: Is HS2 entering into a long-term legal agreement with the woodland owners to ensure mitigation is appropriately managed?***

I look forward to hearing from you.

Kind regards, Elaine

Dr Elaine King  
Chief Executive Officer  
Chilterns Conservation Board