

London Bat Group

A Bat Conservation Trust Partner Group



London Bat Group
c/o Richard Gowing (Chairperson)



Dear Sir/Madam,

Response to Haringey's Site Allocations DPD Reg 18 Consultation Document (January 2014).

London Bat Group is concerned about Haringey's draft site allocation proposal 'HG3: Former Highgate Rail station'. We feel that the HG3 proposal which includes 'education, tourist and community uses, with small scale commercial and retail' development may be incompatible with the biodiversity conservation interest of the site, principally, the population of hibernating bats that is present.

London Bat Group's grounds for opposing proposal HG3 are as follows:

- A population of several species of bat is known to use at least two of the former railway tunnels for hibernating.
- Proposals for recreational and commercial development are highly likely to lead to physical disturbance to hibernating bats in the tunnels caused by introduction of artificial lighting and/or increased noise and vibration.
- Proposals for recreational and commercial development are likely to alter the micro-climatic conditions in the tunnels which would make them unsuitable for hibernating bats and thus this feature could be lost.
- Underground bat hibernation sites are extremely uncommon in London and the bat species which have been recorded in the tunnels are some of the more rarely encountered species in London. Hence the Highgate Tunnels are considered by London Bat Group to be of metropolitan importance to conservation of London's biodiversity.
- Should the hibernation roost be affected, there is unlikely to be a feasible means of mitigating or compensating this loss as it is a unique conservation resource in London.
- The proposals may be incompatible with strict legislation protecting bats. In particular the requirements to maintain the favourable conservation status of bat populations.
- The proposals may contradict National Planning Policy Framework aspirations and Haringey Local Development Plan policies which seek to encourage conservation of protected species and species of principal importance for the conservation of

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biodiversity as identified in Section 40 of the Natural Environment and Rural Communities Act 2006.

Specific objections to the wording used in the site allocations DPD on page 9:

- *“Although the site has strong landscape and wildlife protection designations, much of its quality is not great as landscape or habitat.” – As stated above, we consider the bat hibernation habitat in the Highgate tunnels to be of metropolitan importance for bat conservation as it is a unique resource in London.*
- *“While the tunnels are inhabited by protected bats, both are double tunnels, and elsewhere public access has been achieved without harm to bat habitats. It should be possible to open at least one of each tunnel to pedestrians and cycles.” – London Bat Group is not aware of evidence to support the statement that public access can be provided in the Highgate tunnels without harm to bat habitats. Certainly any change to the partially closed nature of both tunnels could change the micro-climate and lead to loss of the hibernation roost.*

Legislation and planning policy relevant to London Bat Group’s objection to proposal HG3 is as follows:

- The Conservation of Habitats and Species Regulations, 2010 – offers strict protection to bats and their roosts.
- The Wildlife and Countryside Act 1981, (as amended) – offers strict protection to bats and their roosts.
- The Natural Environment and Rural Communities Act, 2006 – Section 40 of this Act requires all public bodies to have regard to biodiversity conservation when carrying out their functions, in particular species and habitats of principal importance which are listed on Section 41 of the Act (applies to several of London’s bat species).
- The National Planning Policy Framework – seeks to ensure planning policies promote the protection and recovery of priority species linked to national and local targets.
- Haringey Local Plan Policies – in particular Strategic Policy SP13 which states that *“All development shall protect and improve sites of biodiversity and nature conservation...”*.

Recommendations

In order to secure the biodiversity interest of the site, the London Bat Group would like to see the site allocation proposals reconsidered in light of the above considerations. At the very least, London Bat Group would like to see evidence to justify some of the statements made in the site allocations DPD and for all bat features which require protection to be clearly marked on the proposals map. Given its sensitivity, a full Ecological Impact Assessment should be undertaken of any development proposals for the site. Given the

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strict legal protection afforded to bats, if it is not possible to fully protect bat hibernation features (both from direct and indirect impacts), or if there is any uncertainty, a precautionary approach should be adopted which may include discounting any development in the tunnels themselves.

Yours faithfully,

Richard Gowing (Chairperson) on behalf of the London Bat Group