Statement to Taits Hill Road Appeal on Behalf of Stinchcombe Parish Council

22nd April 2026

1.0 Introduction, Qualifications and Experience

Thank you for giving Stinchcombe Parish Council the opportunity to speak to the Appeal. Although we have provided two written submissions in advance of the Appeal opening, there are several points we wished to highlight today, including one to which we have repeatedly referred and to which we have had no response from the Appellants.

My name is Dr Stephanie Wray. I am a resident of Stinchcombe and I am part of the small team responding to this application. I have been asked to speak on behalf of the Parish Council today as my qualifications are relevant to our statement and I hope, Sir, that this will allow you to give some weight to my professional opinion.

I am an Ecologist and Sustainability Specialist. I hold a PhD in Ecology from the University of Bristol and have worked for over 30 years in the field of Ecology and EIA in the planning and construction industries. I am a Chartered Ecologist, Chartered Environmentalist and a Fellow and Past President of the Chartered Institute of Ecology and Environmental Management (CIEEM). My specialism is in the ecology of Bats. I developed the first training course for consultants on Bats and Development, held Natural England bat licences for over 20 years, in 2025, I co-authored the CIEEM "Bat Mitigation Guidelines", and am a member of Natural England's Expert Panel on Bats. I am also the Chair of wildlife charity The Mammal Society which leads on evidence-based conservation of British mammal species.

2.0 Outline of Concerns

Stinchcombe Parish Council has several concerns regarding the Appeal site, including:

- the unsustainable nature of Stinchcombe village which, as a Tier 4 settlement, is unable to accept such a quantum of development (an increase of over 40% in the number of households);
- traffic issues and the basing of critical planning decisions on flawed traffic data provided by the Appellant; and
- unacceptable landscape impacts in the setting of a protected landscape. Landscape harm is not the same as visual impact and cannot, in our opinion, be mitigated by tree planting.

These three issues have been raised in our submissions, and I do not propose to repeat our concerns today, but simply to state that, while we have reviewed the responses carefully, nothing the Appellant has produced has changed our view. Several of the responses in the Appellant's rebuttal evidence to our submission are unclear, for example why a crash on 27th February 2026 would not be reported in data correct to 5th March 2026. Although the Appellants have provided selective responses to parts of our submission, we do not consider that there has been any meaningful rebuttal of the key issues.

We remain concerned regarding the two very different speed survey results produced by the Appellant and the Community Speedwatch camera. In the Appellant's Rebuttal Proof of Evidence, produced by PJA, it states in response to our submission that "*it ….has been noted previously the [Speedwatch] camera is located some 110m from the proposed access, so the data gathered does not present an accurate speed of vehicles passing the site entrance, within the visibility envelope*." Of course not being located at the entrance, the Speedwatch camera cannot claim to represent an accurate record of the speed of vehicles passing the site entrance specifically. In fact, it probably represents a slight underestimate of speeds at the site entrance. The camera is located further into the village than the site entrance and records vehicles coming into Stinchcombe from open countryside. We would expect vehicles to (hopefully) slow down a little from the speed they were doing past the site entrance in open countryside as they enter the village. It would certainly be very unusual driver behaviour to speed up on entering a built-up area. For this reason, we remain extremely concerned about the reliability of the Appellant's traffic data, since on 28th November, at least 31 vehicles were recorded speeding at over 44mph at a location so close to the site entrance that it seems highly improbable that a fully functioning traffic count in that location could record none at all.

The Appellant stated that "*A 7-day survey is normally used, but as the survey equipment was vandalised, the survey company believed if they reinstalled the equipment, it would likely happen again. As noted earlier, the requirement is for at least 200 records in each direction and over 25,000 were in fact recorded. We have confirmation from the survey company that the data recorded prior to the equipment being vandalised was robust and it has been agreed as representative with GCC*". We again raise the question as to why the 3-day survey with damaged equipment is being accorded so much weight and agreed as representative, when there is a wealth of data from the community speedwatch camera demonstrating that it is not? We can only conclude that the true data from our camera does not tell the story that the Appellant wishes to hear.

Surveys are continuing using our camera, and the estimated 85th percentile speed for the 30 days from 1 March was 40.1 mph.

There is one further issue which was raised in both of our previous submissions, which I believe has not been given sufficient consideration by the Parties to this Appeal, and that therefore I wanted to explain clearly today, so that you can consider it, Sir, in your deliberations. It is the potential impacts of the Appeal proposals on greater horseshoe bats and the Woodchester Park SSSI.

3.0. Planning Background

Woodchester Park is designated as a Site of Special Scientific Interest (SSSI) under the Wildlife and Countryside Act (1981) and consent is needed for any 'operations likely to damage' the SSSI.

Paragraph 193b of the National Planning Policy Framework (NPPF) states that development on **or affecting** SSSI should be **avoided.** Permission should only be granted if the **benefits clearly outweigh the impacts** on the SSSI **and** the impacts can be mitigated or compensated. (My emphasis).

This is a high bar. As some of our most protected sites, of national importance, a development would have to have national or significant regional benefits to outweigh an impact on a SSSI. Even if such benefits could be proven, an effective mitigation or compensation plan would need to be implemented to offset any impacts.

4.0 Woodchester Park SSSI

Woodchester Park is a 500-acre SSSI, close to Nympsfield, approximately 7km from the Appeal Site. The site is largely wooded and forms part of the Cotswold Beechwoods Special Area of Conservation (SAC). It is also home to an important colony of Greater Horseshoe bats (*Rhinolophus ferrumequinum*) which is one of the reasons for the site's SSSI notification.

5.0 Conservation Status and Ecology of Greater Horseshoe Bats

Greater Horseshoe bats are one of Britain's rarest species of bat, and are restricted largely to the southwest of England and to Wales. It is estimated that the species declined in numbers by about 90% in the last century, but there are some signs of population recovery. Greater Horseshoe Bats are strictly protected under Schedule 5 of the Wildlife and Countryside Act (1981) and under the Conservation of Habitats and Species Regulations 2017 (as amended) (The Habitats Regulations). Under Regulation 43 of the Habitat Regulations, it is an offence to deliberately disturb these bats, which

includes any disturbance which is likely to impair their ability to survive, to breed or reproduce, or to rear or nurture their young, or in the case of animals of a hibernating or migratory species, to hibernate or migrate or to affect significantly the local distribution or abundance of the species to which they belong.

The maternity colony of greater horseshoe bats at Woodchester Park is one of the most significant nationally, with over 1000 bats regularly recorded there at the peak of the season in August. (Current national population estimates suggest that there are only 13,000 greater horseshoe bats in the country. In contrast there are estimated to be around 3 million common pipistrelle bats). This is a rare bat by orders of magnitude. The population of greater horseshoe bats at Woodchester Park is one of the best studied in the world, having been monitored for over sixty years.

Greater horseshoe bats are highly mobile and do not spend all year in the same site. The females gather in large numbers in maternity roosts around April, give birth in June / July, and in the autumn disperse again. While they are heavily pregnant and lactating, the female bats tend to forage close to their maternity roost in a "Core Sustenance Zone" of around 3-4km in radius around the SSSI. Male bats, at this time of year, may be roosting singly or in small groups around a wider area. Mating takes place in the autumn, at traditional mating roosts, often occupied by a single territorial male and visited by a number of females. In winter, they hibernate underground in caves and disused stone mines. The bats breeding at Woodchester Park mainly hibernate within 25km of the SSSI, often in the Forest of Dean.

Greater horseshoe bats are landscape-linked flyers; they rarely cross open fields and instead, when moving around the landscape, tend to hug "linear features" like the woodland edges of Coaley Peak and Stinchcombe Hill. These woods act as a continuous corridor for the bats to move south and west from Woodchester Park SSSI.

Greater horseshoe bats also have specific habitat requirements for feeding, being heavily reliant on grazed pasture, preferably cattle grazed. The limestone grasslands and woodlands around Stinchcombe provide very valuable foraging habitat for bats from the SSSI and this route – from Woodchester Park, via Coaley and Stinchcombe, then down to the Severn Vale and across the Severn – is known as the 'scarp route' which a proportion of the bats from Woodchester use to migrate between their hibernation and breeding sites each year. Greater horseshoe bats are a light sensitive species and disruption to the dark corridors they use for commuting or seasonal movements between roosts can act as significant barriers.

6.0 The Appellants Treatment of Greater Horseshoe Bats

The ecological survey provided by the Appellants (Grass Roots Ecology, CD2.9) refers to only two statutory designated sites: Stinchcombe Hill SSSI and the Severn Estuary SPA and Ramsar Site. This report states that "*information on protected/notable species and ecologically designated sites within **a 2km search radius** from the application site was obtained from Gloucestershire Centre for Environmental Records (GCER).*" Woodchester Park SSSI is some **7km** from the Appeal site.

The report goes on to state however that "*information on protected species and statutory designated wildlife sites relating to a wider search area was also obtained where appropriate from inspecting the online National Biodiversity Network (NBN) Atlas and Multi-Agency Geographic Information for the Countryside (MAGIC)*". Both the NBN and MAGIC do hold information in relation to the Woodchester Park SSSI, but this is not reported by the Appellants.

The Appellant's ecologist states that "*this ecological impact assessment has been performed with due regard to the methodology and approach set out in CIEEM's latest guidelines*" (referencing the 2018 Guidelines for Ecological Impact Assessment). Those guidelines, and the current version of the same, revised in 2024, state that the "Zone(s) of Influence (ZoI)" of a project define the spatial scope of an ecological assessment, encompassing all areas and resources potentially affected by a project's biophysical changes, **regardless of distance**. It includes direct impacts (land-take) and indirect impacts (noise, hydrological changes). Importantly, the ZoI must be determined on a case-by-case basis. The examples of birds and bats are typically given as mobile species, where impacts could be observed at some distance from a proposed development site. In my professional opinion, it would be normal practice for protected sites designated for mobile species to be noted in an ecological impact assessment at 10 or even 20km away from a development site, particularly if there was a clear pathway for an impact to occur.

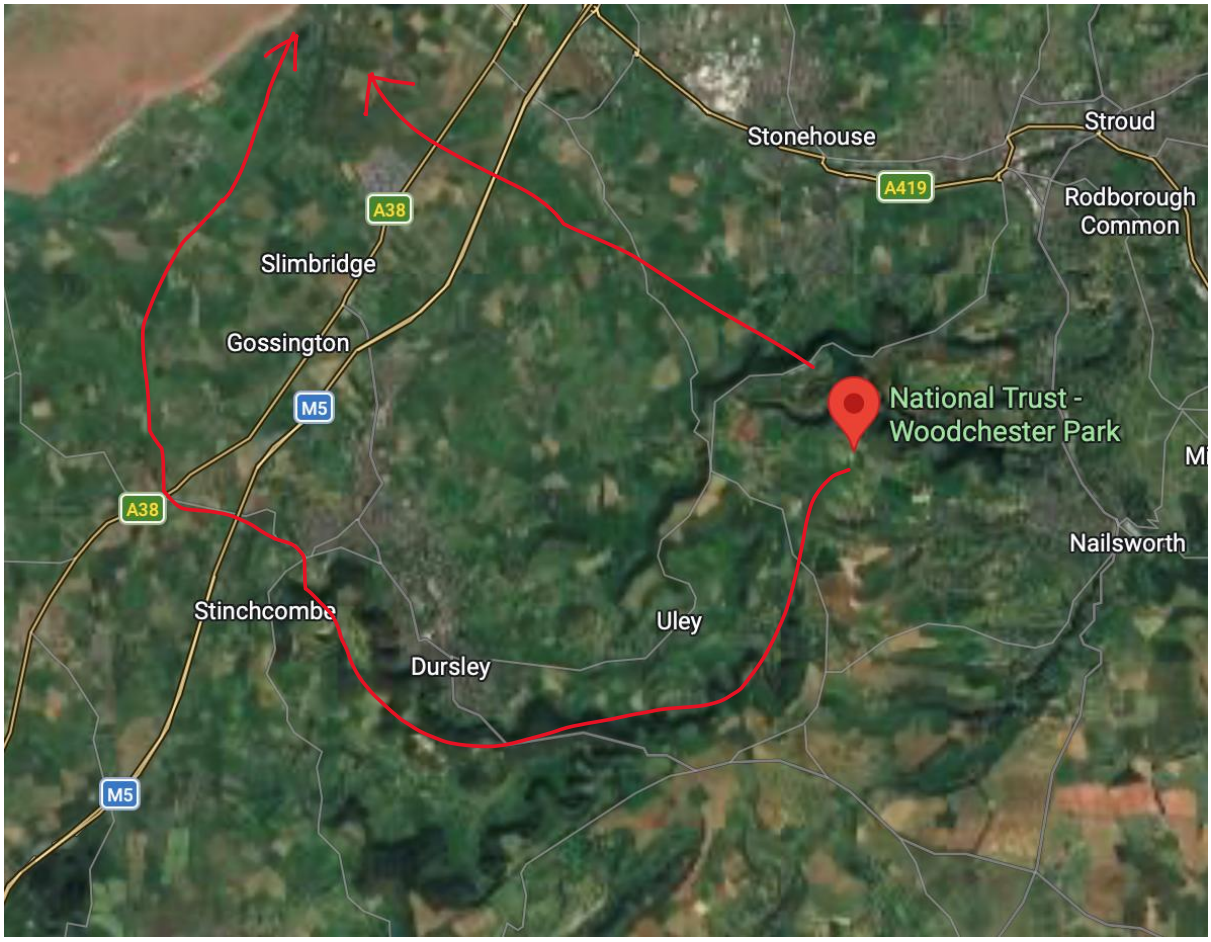
Despite stating that a wider search area was employed for designated sites than the Appellant's basic 2km radius, this does not appear to return any further sites, and none are mentioned in the Grass Roots Ecology report. This omission is very important, as, without that, the significance of further records on greater horseshoe bats on site is subsequently not recognised in the report, **nor in consultee responses to the report**.

As stated above, the Appeal site lies on an important ecological corridor for greater horseshoe bats. It is not within the Core Sustenance Zone for Greater Horseshoe Bats at Woodchester Park, meaning that heavily pregnant and lactating females likely do not use it nightly in mid-summer. However, it may still be of great, or even critical importance for other functions, such as mating roosts in the autumn, or movement corridors, by which bats reach their winter roosts on the other side of the Severn. I

cannot say for certain that these precise hedges on the Appeal site are a vital resource for the bats at Woodchester Park SSSI as I have not carried out appropriately detailed surveys. Critically, neither has the Appellant. However I can say that, in my professional opinion, the dark, canyon-like valley through the site offers the right conditions for such use.

The bat surveys carried out by the Appellant may have been broadly suitable were it not for the location of a nearby SSSI for very rare bats. It appears that the Appellants carried out some mobile transects in 2020 and 2024, supplemented by a survey with a single static detector in one hedge for 158 nights between 11 May and 15 October 2024. Five greater horseshoe bat passes were recorded. On the basis of these surveys, the Appellant's Ecologist concluded that "*the application site is of value to local bat populations at the site-level only*".

This may have been an appropriate conclusion, were it not for the nationally-important colony of rare bats which breeds close by and had been completely missed in the Appellant's desk study. In reality, as has been stated above, the Appeal site forms part of a route between greater horseshoe bats' breeding and hibernation roosts. The fields on either side of Taits Hill represent the first dark corridors for movement down to the Severn Vale that bats following the 'scarp route' from the SSSI would encounter; the brightly lit settlements of Cam and Dursley being impassable to this species. This route would likely be most heavily used by bats in the transitional seasons, April and October. The Appellant's survey has therefore **missed entirely the periods of most significant use**. Furthermore, the echolocation calls of this species are very directional, and depending upon how the detector was set, passes by this species can be readily missed. In my professional opinion, the greater horseshoe bat passes that were recorded by the Appellant – essentially recording the presence of this species in June to September - simply demonstrate that the site is suitable habitat for and is used by this rare species. This could reflect the site being used by male horseshoe bats in smaller numbers at the time of year when females are concentrated at the maternity roost, or simply incidental foraging activity. In light of the importance of this area for greater horseshoe bats, the survey results simply do not support the Appellant's conclusion that the site is of value for bats only at the "site level".



7.0 Potential Impacts

The potential impacts on the greater horseshoe bat population have not been addressed by the Appellants in any of their submissions.

In my professional opinion, there is a risk of disturbance to the bats (*sensu* Reg.43 of the Habitat Regulations) in disrupting their ability to migrate between breeding and hibernation roosts. This impact would be both during the construction phase and during the life of the development, due to increases in lighting, removing the dark corridor required by this species. Depending on the number of bats affected, this could also represent an impact on Woodchester Park SSSI if bats fail to navigate between their breeding and hibernation roosts.

8.0 Conclusions

On the basis of what is before the Appeal, it cannot safely be concluded that there would be no significant impact on greater horseshoe bats or on the Woodchester Park

SSSI. The loss of foraging habitat and barrier effect of scheme lighting on migration routes could represent illegal disturbance to bats or disruption to their local distribution.

The 'biodiversity duty' on public bodies in England was strengthened by the Environment Act (2021) and means that, in determining the Appeal, the Secretary of State must act to deliver policies on nature protection. Sir, we believe this appeal should be dismissed because you do not have before you sufficient ecological information to lawfully assess the effects of the proposals on protected greater horseshoe bats associated with Woodchester Park SSSI. No surveys have been undertaken during key migratory periods (April and the second half of October), when the site may function as part of a wider movement corridor between breeding and hibernation sites. This is a critical evidential gap that goes directly to the principle of development**,** not merely to matters of mitigation. Effective planning decisions must be based on adequate, up-to-date ecological evidence, and it would be inappropriate and legally unsafe to defer this uncertainty to planning conditions at outline stage, since if subsequent surveys revealed significant or even catastrophic impacts on bats, the principle of development would already have been established and irreversible harm could occur.

I am sure that the Appellant will point to the fact that Natural England, the government's nature conservation advisor, has not objected to the proposals. The fact is that Natural England has not objected based on the information provided to them: a report which does not mention the proximity of one of the most important greater horseshoe bat colonies, nor the introduction of a significant quantum of development and artificial light into an important dispersal corridor. I would anticipate that their response would be different if those facts were pointed out.

We are in a biodiversity crisis globally with over a million species at risk of extinction, and most of the species monitored showing 60-70% reduction in population size since the 1970s. The loss of biodiversity in England is not due to deliberate destruction of key sites – it results from thousands of poorly-thought out decisions delivering the 'death of a thousand cuts'. We sincerely hope that this important open space in our village does not become one of those cuts.