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TORBAY LOCAL PLAN SOUTH HAMS SAC GREATER HORSHOE BAT EVIDENCE STUDY:

KEY FINDINGS

TORBAY COUNCIL

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1 BACKGROUND AND SCOPE

This document provides a summary of the key findings of the South Hams SAC Greater Horseshoe bat foraging and commuting habitat study with the objective of informing the development of draft policy for the updated Torbay Local Plan. This includes recommendations for the inclusions of new policy relating to the proposed Juvenile Sustenance Zone (JSZ) comprising most of the land within 4km of the Berry Head maternity and hibernation roosts and additional pinch point areas identified, and for the Regulation 18 allocations or sites assessed under the HELAA which, following this study are considered likely to give rise to significant ecological effects relevant to the HRA on Greater Horseshoe bats and the integrity of the South Hams SAC roosts at Berry Head.

Plans are provided to support the information provided, which at this time should be considered as draft to be finalised along with the main study report.

2 KEY FINDINGS

The Berry Head SAC functionally linked landscape is highly constrained, with limited availability of suitable foraging habitat within the existing sustenance zone. Evidence from the study indicates that habitat located in close proximity to the roost, typically within approximately 1–1.5 km, is of

critical importance, particularly for juvenile and lactating Greater Horseshoe bats, which are more restricted in their foraging range.

Connectivity across the wider landscape is similarly constrained. Movement through Brixham is dependent on a limited number of pinch point routes, which function as critical links between areas of suitable habitat. These routes are highly sensitive to change, and even relatively small-scale alterations have the potential to disrupt functional connectivity.

In this context, a number of Regulation 18 allocations and HELAA sites fall within areas identified as being of high importance for foraging and connectivity. The evidence indicates that development at these locations may not be compatible with the conservation requirements of the SAC, particularly where impacts to habitat availability or connectivity cannot be adequately avoided.

Accordingly, the study identifies a need for enhanced spatial protection within the Local Plan. This includes the establishment of a Juvenile Sustenance Zone (JSZ) to safeguard essential foraging habitat close to the roost, alongside strengthened protection of key pinch point corridors to maintain connectivity across the landscape.

These measures are necessary to reflect the constraints identified through the evidence and to inform the development of Local Plan policy and its supporting Habitats Regulations Assessment.

3 JUVENILE SUSTENANCE ZONE (JSZ)

The South Hams SAC Greater Horseshoe Bat Sustenance Zones identify areas of land functionally linked to each maternity and hibernation roost which make up the network of SAC roosts across South Devon. They reflect the expansive areas of surrounding habitat that Greater Horseshoe bats depend on for foraging and commuting (travelling between roosts and foraging grounds). The zones were formalised in Natural England's 2010 SAC guidance and were updated in 2019, reducing the sizes of zones around hibernation only roost sites. The buffers around the roosts are 4km for maternity roost and 2km for hibernation roosts (South Hams SAC Steering Group, 2019), except for Berry Head where land availability is greatly restricted by the surrounding sea and dense urban development. The Sustenance Zone was extended inland so its area totals roughly the same as a complete 4km radius circle (approximately 9km from centre of the Berry Head SSSI).

This approach presents a key limitation. Due to the restricted availability of land around the Berry Head roost, the existing Sustenance Zone does not adequately reflect the disproportionate importance of suitable foraging habitat located close to the roost. Habitat within this inner area becomes more critical for sustaining the population, particularly as juvenile and lactating bats are constrained in the distances they can travel before needing to return to the roost.

Due to these unique constraints, the establishment of a Juvenile Sustenance Zone (JSZ), afforded additional protection through Torbay Local Plan policy, is proposed to better recognise the critical importance of maintaining the quantity and quality of habitats in close proximity to the maternity and hibernation roosts at Berry Head. The JSZ covers land within 4 km of the Berry Head roosts, providing enhanced protection for foraging habitat relied upon by lactating female bats. This approach is supported by established research on core sustenance zones, which underpins South Hams SAC guidance, and broader evidence on the foraging behaviour of bats associated with maternity roosts.

The 4km zone includes over 3.16km2 (equivalent to a complete 1km radius circle) of land on the eastern side of Brixham accessible by juvenile bats uninterrupted by dense urban development. Evidence from radio-tracking and behavioural studies indicates that Greater Horseshoe bats, particularly juveniles, rely heavily on foraging habitat located within approximately 1–1.5 km of maternity roosts, with much activity concentrated within 1 km. Habitat within this inner zone therefore represents the core nursery habitat, within which prey availability and habitat connectivity are critical to juvenile survival.

4 PINCH POINTS

The South Hams SAC Greater Horseshoe bat HRA guidance defines 'pinch points' as:
"*Known or potential greater horseshoe bat commuting routes which are significantly restricted e.g. due to urban encroachment or proximity to the sea / estuaries. Further restriction to a Pinch Point could significantly impact on the movement of greater horseshoes and potentially have a likely significant effect on the SAC.*"

Berry Head to Sharkham Point SSSI is relatively isolated in the landscape due to its location on a coastal peninsula and the dense urban development of Brixham which has been built up close to the eastern coastline at St Mary's Bay. An existing pinch point area covers the upper section of the

SSSI and much of the adjacent land between the SSSI and residential development of Brixham down to St. Mary's Bay.

Radiotracking carried out in the late 1990s and early 2000s around roost in the South Hams SAC, recorded multiple movements of bats through Brixham including between St Mary's Bay and Southdown Hill area to the east and south-east of Brixham across to the Monksbridge Park area to the east. A review of habitats along these routes through Brixham suggests that bat movement is likely to rely on a sequence of sites acting as stepping-stones, including school playing fields, parks and gardens, and corridors such as treelined roads and hedgerows along roads and property boundaries. This study, which has included an estimate of the suitability of foraging habitat within the Berry Head sustenance zone, suggests an abundance of highly suitable habitat to the east and south-east of Brixham, such as Lupton Park.

In view of the above, proposals on land surrounding Brixham and along likely key flight routes through Brixham are considered likely to have disproportionately high adverse impacts on connectivity between areas of habitat critical to the survival of bats associated with the Berry Head roosts. Even seemingly minor proposals in these locations could result in significant effects on habitat connectivity and bat movement if not subject to careful design and mitigation. Where proposals limit the movement of bats across and around Brixham, this may increase energy expenditure as bats travel further to reach high quality foraging habitat, with potential implications for the viability of the roost population.

To better protect these critical routes through Brixham and around the southern and northern edges of Brixham, additional pinch point corridors have been proposed in these locations. These are shown on the attached map.

5 RECOMMENDATIONS FOR LOCAL POLICY

Within the proposed Greater Horseshoe Bat Juvenile Sustenance Zone (JSZ), the evidence indicates that a precautionary, avoidance-led approach to development is likely to be necessary, reflecting the constrained distribution of suitable foraging habitat associated with the Berry Head roost. In particular, the findings suggest that development resulting in the loss or degradation of suitable foraging habitat within this zone is likely to give rise to adverse ecological effects and should therefore be carefully controlled through Local Plan policy.

Highly suitable habitat comprises land that supports strong prey availability and provides a mosaic of sheltered habitats preferred by Greater Horseshoe bats, including permanent grasslands (in particular grazed pasture), broadleaved or mixed woodland, and hedgerows. While organic cattle-grazed pasture represents optimal foraging habitat, the evidence indicates that the retention of all permanent grassland is important, given its potential to be enhanced to support Greater Horseshoe bats in the future.

The evidence further indicates that development within the JSZ will need to be subject to a high level of scrutiny through the Habitats Regulations Assessment process, particularly in relation to effects on habitat availability and connectivity. A key consideration is the need to maintain the long-term viability of the Berry Head roosts, including avoiding the loss of land that may not currently represent optimal habitat but has the potential to be enhanced to support roost resilience or to offset impacts elsewhere within the zone.

Overall, the findings support an approach in which avoidance of impacts is prioritised and reliance on mitigation is treated with caution, recognising the limited availability of suitable habitat and the sensitivity of the bat population to changes in habitat extent and connectivity.

The following recommendations are provided to inform the development of Local Plan policy:
1) Within the proposed Juvenile Sustenance Zone (JSZ), development should only be supported in wholly exceptional circumstances where:
a) it can be demonstrated that there are no reasonable alternative sites outside the JSZ;
b) impacts have been avoided to the maximum extent possible; and
c) there would be no reduction in the extent, quality, or functional connectivity of suitable habitat.
This approach reflects the need to avoid further reductions in the availability and connectivity of habitat supporting prey for juvenile and lactating female bats, including (but not limited to) permanent grasslands, grazed pasture, broadleaved or mixed woodland, treelines and hedgerows.

2) Within identified pinch point areas or corridors, proposals should avoid the loss of, and minimise indirect impacts (for example from lighting, noise or human disturbance) on, suitable foraging habitat and commuting features, including hedgerows, woodland strips and linear scrub or tree features, in order to maintain functional connectivity.

3) Where habitat loss may exceptionally be justified, replacement habitat should be secured in advance and designed to maintain ecological function, including prey availability and connectivity within the JSZ or pinch point area.

In practice, this is likely to require habitat to be replaced on a like-for-like or better basis, ensuring no reduction in extent, quality or connectivity relative to the affected habitats. The mitigation hierarchy should prioritise on-site provision, with off-site compensation directed towards habitat enhancement within the JSZ where this provides a clear functional benefit in relation to the Berry Head roost.

Within the wider existing Sustenance Zone and Landscape Connectivity Zone, outside of identified pinch point areas, the following approach is recommended:

4) Development that would result in more than minimal loss or degradation of suitable foraging or connective habitat for Greater Horseshoe bats is unlikely to be appropriate within the Sustenance Zone.

This includes land comprising permanent semi-improved or unimproved grassland, grazed pasture, and associated boundary features such as hedgerows, woodland edges and treelines.

5) Development that is compatible with the retention of suitable habitat within the Sustenance Zone and Landscape Connectivity Zone should contribute, where appropriate, to a strategic mitigation approach to support habitat enhancement within the JSZ.

6 ASSESSMENT OF EXISITNG AND POTENTIAL ALLOCATIONS

It is understood that a number of existing Regulation 18 housing and employment allocations (where not already consented or constructed), together with some HELAA sites, may be considered for inclusion within the updated Torbay Local Plan.

The evidence presented in this study indicates that a number of these sites are located within areas of high sensitivity, including the proposed Juvenile Sustenance Zone (JSZ) and identified pinch point areas. Development in these locations has the potential to result in significant adverse effects on Greater Horseshoe bats associated with the Berry Head roosts, particularly where impacts to habitat availability and connectivity cannot be effectively avoided.

The findings also indicate that, in some locations, mitigation measures may be insufficient to address these effects due to the limited availability of alternative or compensatory habitat. Conversely, other sites may present greater opportunity for carefully designed development where impacts are limited, for example, where only small areas of suitable foraging habitat would be

affected, or where habitats are of lower suitability (such as intensively managed grassland or arable land) and key connective features can be retained and appropriately managed.

Regulation 18 Allocations likely to result in unacceptable impacts (very high risk – recommend removal from plan):

1) Monksbridge Park (Reg18: H3BCG.3, HELAA: 21B046, Potential housing capacity: 70) – Within Juvenile Sustenance Zone and at western end of Brixham urban pinch point area. Comprises a large area of permanent grassland and pasture habitat with scattered trees and a network of outgrown hedgerows, considered likely to provide very good suitability foraging habitat. Ecological reports submitted with recent application for this site indicate a relatively high level of Greater Horseshoe bat flight activity, particularly in June which suggests foraging by breeding bats. It's location at the end of the pinch point means that development of this area has a high risk of further restricting movement of bats across Brixham.
   Note – application submitted late-April.

Regulation 18 Allocations likely to result in unacceptable impacts without high-level of mitigation (high risk – recommend removal from plan):

2) St Mary's - Industrial Estate (Reg18: H3B.6, HELAA: 21B010, Potential housing capacity: 20) – Small site comprising existing (possibly derelict) industrial buildings, located just west of Upton Manor Farm Camp Site along Brixham urban pinch point. Proposals would likely result in additional lighting impacts and loss/degradation of connective habitat unless very carefully designed to maintain vegetation and avoid lighting impacts.

3) Copythorne Road (Reg18: H3BCG.4, HELAA: 21B025, Potential housing capacity: 80) - Within Juvenile Sustenance Zone and at western end of Brixham urban pinch point area. Foraging habitat appears to be of lower value comprising grassland ley (Google Earth indicates both fields previously ploughed) but has also been used for sheep grazing and has potential for enhancement. Close to edge of pinch point so requires robust mitigation to protect hedgerow boundary and ensure no loss of habitat connectivity.
   Note – Planning permission obtained, won at appeal. Not yet constructed.

HELAA Sites likely to result in unacceptable impacts (very high risk – recommend removal from plan):

4) Chiseldown Farm, Southdown Hill (HELAA: 21B020, Potential housing capacity: 100) - Site appears to comprise a group of fields comprising permanent grassland (at least some appears to have been fairly recently used for cattle grazing as viewed on Google Earth) with good network of outgrown hedgerows and trees, and an area of broadleaved dominated woodland providing an extensive area of good quality foraging and commuting habitat within the JSZ.
5) Lupton Park Estate (HELAA: 21B028, Potential housing capacity: 500) – A large site broadly comprising five agricultural fields bordered by broadleaved woodland and parkland/wood pasture habitats to the west. It appears to comprise a spit of arable and grazed pasture fields with network of managed hedgerows. Only a small area lies within the JSZ itself, but it includes areas of higher suitability habitat and is also considered a pinch point area critical to maintaining access for bats to the west of Brixham without travelling through urban areas. Development on the edge of Brixham in this location would likely result in loss of important foraging habitat (which borders woodland) and restriction of movement meaning breeding and juvenile bats would have to travel further to access probable optimal foraging habitats associated with parkland to the west.
6) Land off Follafield Park (HELAA: 21B029, Potential housing capacity: 10) - Site appears to comprise field of permanent grassland with good network of outgrown hedgerows and trees providing good quality foraging and commuting habitat within the JSZ.
7) Land behind Golden Close (HELAA: 21B031, Potential housing capacity: 10) - Site appears to comprise field of permanent grassland with good network of outgrown hedgerows and trees providing good quality foraging and commuting habitat within the JSZ.
8) Land at Upton Manor Farm Camp Site, St Mary's Road (HELAA: 21B037, Potential housing capacity: 90) - Site appears to comprise a an intensively managed campsite and another field of unmanaged grassland. It is located along the Brixham urban pinch point and is within the JSZ on the eastern side of Brixham. Proposals would likely result in additional lighting impacts and loss/degradation of suitable foraging habitat and connective habitat within the JSZ.
9) Land South of Centry Court, Centry Road (HELAA: 21B043, Potential housing capacity: 10) – Small field that appears to comprise unmanaged permanent grassland. Located under 1.5km from roosts at Berry Head so could provide important habitat for juvenile bats. Located just outside existing pinch point area.
10) Land South of Wayside (HELAA: 21B017 Potential housing capacity: 20) – Within Juvenile Sustenance Zone and at western end of Brixham urban pinch point area. Comprises mostly permanent grassland with hedgerows. Proposal would result in likely loss of suitable foraging habitat in JSZ and could contribute to reduced connectivity at pinch point in this location.

11) Land between Mathill Road and Laywell Lane (HELAA: 21B027, Potential housing capacity: 15) – Within Juvenile Sustenance Zone and at western end of Brixham urban pinch point area. Appear to comprise permanent grassland with outgrown hedgerows. Proposal would result in loss of suitable foraging habitat in JSZ and could contribute to reduced connectivity at pinch point in this location.
12) Land at Green Lane/Bascombe Road (HELAA: 21B052, Potential housing capacity: 15) – Appear to comprise permanent grassland pasture field bordered by managed hedgerows and disused railway (woodland strip) to south, providing potentially good foraging habitat within the JSZ and also forms part of a continuous corridor of suitable foraging and connective habitats linking from Fishcombe Cove (north-west tip of Brixham) to wider landscape to the west.
13) Land East of Ferrers Green (HELAA: 22BCG002, Potential housing capacity: 30) – Appear to comprise small permanent grassland pasture fields bordered by tight network of outgrown hedgerows, providing likely very good foraging habitat within the JSZ and also forms part of a habitat corridor from Fishcombe Cove. A radiotracked flightpath was recorded across these fields.
14) Triangle West of Bascombe Road, North of disused railway line (HELAA: 21B055, Potential housing capacity: 15) - Appear to comprise permanent grassland pasture field bordered by outgrown hedgerows and disused railway woodland strip to the south, providing likely good foraging habitat within the JSZ and also forms part of a habitat corridor from Fishcombe Cove.

HELAA Sites likely to result in unacceptable impacts without high-level of mitigation (high risk – recommend removal from plan):

15) Laywell Old Peoples Home (HELAA: 21B032, Potential housing capacity: 10) – Small site that appears to comprise existing building and large gardens with treeline located close to eastern boundary, located along Brixham urban pinch point. Could result in additional lighting impacts and loss/degradation of connective habitat if redeveloped unless very carefully designed to maintain vegetation and avoid lighting impacts.
16) Field South of Copythorne Road (HELAA: 25BCG001, Potential housing capacity: N/A / Unknown) - Within Juvenile Sustenance Zone and at western end of Brixham urban pinch point area. Foraging habitat appears to be of lower value comprising arable or grassland ley. Close to edge of pinch point so requires robust mitigation to protect hedgerow boundary and ensure no loss of habitat connectivity.
17) Land West of Ferrers Green (HELAA: 22BCG001, Potential housing capacity: 30) – Site that appears to comprises a series of small grazed pasture fields with outgrown hedgerows

providing likely highly suitable foraging habitat just outside the JSZ. Under our recommended policy guidance this site would be unacceptable due to extensive loss of highly suitable habitat.

Key

- Torbay District Boundary
- Regulation 18 Housing Allocations
- Regulation 18 Employment Allocations
- All sites assessed under the Torbay Housing and Economic Land Availability Assessment (HELAA)

Juvenile Sustenance Zone:

- Proposed Juvenile Sustenance Zone (JSZ) - 4km roost buffer

Pinch Points:

- Existing Pinch Point Areas
- Proposed additional Pinch Point Areas

0 0.25 0.5 0.75 1 km

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Figure: DRAFT Proposed Juvenile Sustenance Zone (JSZ) and additional Pinch Point Corridors

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