**Kent Bat Groups objection to the Planning and Infrastructure Bill**

I am a writing on behalf of the Kent Bat Group to express our strong objections to the proposed Planning and Infrastructure Bill.

The aims of the Bill specifically in relation to nature recovery are to accelerate development projects while also supporting environmental improvements through a strategic approach to nature restoration.

Secretary Angela Rayner stated that ‘the Bill will not have the effect of reducing the level of environmental protection provided for by any existing environmental law.’, but in its current form it will do just that. Eliminating the necessity for a site-specific survey, critical for documenting the presence of European Protected Species like bats, will lead to them being injured and/or killed. This would violate The Conservation of Habitats and Species Regulations 2017, which remains in effect. Nor on that basis can the Bill achieve its intended goal to ‘contribute to an overall improvement in the conservation status of the identified environmental feature.’ (protected species).

These views are reinforced by The Chartered Institute of Ecology and Environmental Management who, have pointed out the flaws in the Bill’s drafting for both the environment and the economy and have said*, ‘As we have previously highlighted, the core principle behind the Bill – identifying environmental challenges early and addressing them proactively through state-led intervention – could, in theory, be a positive step towards the government’s twin goals of streamlined delivery of critical development and better outcomes for nature.*

*However, the execution of this concept is critically flawed. As currently drafted, the Bill threatens to cause unnecessary and irreparable ecological harm while simultaneously imposing additional costs, uncertainty and delays on developers due to the uncertainty around the nature and scope of the proposed Environmental Delivery Plans (EDPs).*

*The proposed Bill, whilst containing some important principles which would be of benefit to both the economy and the environment, is currently significantly flawed and needs an urgent rethink. In our view, the Bill is a regression on current levels of environmental protections.’*

The Bat Conservation Trust has also provided expert advice, including a detailed briefing to the Secretary of State for Housing and the Environment, highlighting solutions that balance environmental protection with economic interests. Unfortunately, the guidance has been ignored. Additionally, misinformation is being propagated to advance this Bill, such as the incorrect notion that bats and newts are obstructing the planning processes.

Removing references to the Bat Survey Guidelines from planning decisions is yet another action that threatens these species. The guidelines were put in place to ensure the effective conservation of bats and their roosts, providing a framework for conducting surveys, assessing potential impacts, and implementing mitigation measures, all while complying with legal obligations and best practices.

Bats and other vulnerable species have been protected since the Wildlife and Countryside Act 1981 due to their severe decline prior to legislation. Despite this protection, four of our 18 bat species are at imminent risk of national extinction, with two more classified as near threatened. This Bill in its current draft would have catastrophic repercussions, as development and construction are among the greatest threat to bats. Many bat species rely on buildings and are faithful to certain sites, returning annually to breed and roost. The loss of a single colony can devastate a local population, and since bats breed slowly, rehabilitation can take considerable time, if it occurs at all.

Nor should we undervalue bats, they are incredibly important for ecosystems and human well-being, playing a vital role in pest control which contributes to healthy environments and agricultural productivity.

The State of Nature Report 2023 highlighted massive losses in our UK biodiversity over the last 50 years and estimates that one in six species is at risk of extinction. We do not want our children and grandchildren to grow up in an even more nature depleted country.

Finally, numerous reviews have confirmed that existing current nature protections are fit for purpose and that development delays stem from poor planning rather than the presence of bats or other protected species. For these reasons, we strongly urge you to object to this Bill in its present form.