

West Kent Badger Group



LTC DCO Deadline 1 (D1)

West Kent Badger Group is affiliated to the national Badger Trust. The group aims to protect badgers and promote their welfare across West Kent. For more information visit <https://wkgb.org.uk/>

Badgers are protected under the Protection of Badgers Act 1992. The badger is also listed under Schedule 6 of the Wildlife and Countryside Act 1981. Undertaking any activity which could result in damage to a badger sett or disturbance to any occupying badger may constitute an offence. Natural England may issue licences to disturb or close badger setts, but this is a last resort and must be done with great care

WKBG has several concerns about the proposals submitted. These are summarised below. Appendix A to this document contains detailed information relating to specific setts and proposed mitigation:

- The impact on badgers is huge and needs to be very carefully considered.
- The areas were last surveyed for badgers in March 2020. The sites should be surveyed, and mitigation proposed, no more than 12 months before construction starts.
- The surveys did not include the extension of order limits in 2022. These new areas need to be surveyed.
- Some landowners refused access to surveyors and in some locations dense vegetation prevented a full survey, so the survey data is not complete
- The assessment on badger clan territory is not sufficient given the scale of the impact, more work is required on clan boundaries. Bait marking has been insufficient.
- It has not been established when the outlier, subsidiary and annex setts are used throughout the year. Therefore, the applicant is unable to say that closing any of these setts will not harm badgers. Without this information WKBG must oppose the closure of the setts as the applicant is unable to prove badgers will not be harmed.
- In relation to the outlying setts, no information is available detailing the main sett that it relates to, consequently WKBG opposes the closure of the setts.
- The documents do not provide the reasons for some of the setts being closed.

- The proposed mitigation for some setts is unworkable. The proposed relocation of one sett is unviable. Some setts that are not planned for closure will not be viable (see detail in appendix)
- WKBG has good local knowledge about badgers and their habitat. This should be considered when proposing mitigation.
- Badgers are nocturnal. No account has been made for disturbance from night-time construction: noise, vibration and bright lights
- The exclusion zones need to be reconsidered – they are insufficient in some cases
- Habitat connectivity and fragmentation needs to be considered
- Further detail should be provided on the green bridges. Thong Lane South green bridge seems to end at of what will be a busy road – how would wildlife safely cross?
- Given the extensive loss of foraging habitat during construction, little consideration has been given to where foraging would take place while construction is underway
- There will be increased levels of traffic on local roads and trunk roads like the A227, which already has a high number of wildlife casualties. The impact of this on badgers and other wildlife has not been considered. Additional mitigation measures within and outside of the development boundary may be required.
- Some of the mitigation measures are likely to increase the number badgers crossing roads, this needs careful consideration.
- The A122 will increase pollution in the area. No assessment has been made on the impact this will have on badgers.
- Overall, the applicant has failed to provide enough information and mitigation measures to demonstrate that badgers will not be harmed as a result of the new crossing.
- The following information in the document is out of date, the badger cull has seen badgers almost wiped out in some areas. In Kent it is clear from the number rescues that the WKBG is doing that longer periods of dry weather are impacting badger populations.

3.1.5 Badgers are on the increase in Britain, with a national population survey finding that there was an 88% rise in the badger population between 1985 and 2011 (Judge et al., 2014). The Mammal Society estimate that in 2018 there are approximately 562,000 badgers found within Great Britain, making badgers the most common carnivore found in the country (Mathews et al., 2018). In Essex, badgers are at their highest population than at any previous time and are widespread across the county (Dobson and Tansley, 2014). In Kent, badgers are widespread across the county and are found wherever suitable habitat is present (Young et al., 2015).