



Preliminary Ecological Appraisal and Preliminary Roost Assessment

11-15 South Street, Havant, Hants, PO9 1BU

Jonathan Heather

Status	Issue	Name	Date
Draft	1	Annabel Sharpe BSc (Hons) Graduate Ecologist. Bat Class License, level 1.	06/05/2023
Reviewed	1.1	Lizi Pimlott BSc (Hons) MSc MCIEEM MRSB, Principal Ecologist	09/05/2023
Final	2	Annabel Sharpe BSc (Hons) Graduate Ecologist. Bat Class License, level 1.	09/05/2023

Arbtech Consultant's Contact Details:

Annabel Sharpe
Graduate Ecologist
Tel: 07749498206 Email: Annabelsharpe@arbtech.co.uk
<https://arbtech.co.uk>

Limitations and Copyright

Arbtech Consulting Limited has prepared this report for the sole use of the above-named client or their agents in accordance with our General Terms and Conditions, under which our services are performed. It is expressly stated that no other warranty, expressed or implied, is made as to the professional advice included in this report or any other services provided by us. This report may not be relied upon by any other party without the prior and express written agreement of Arbtech Consulting Limited. The conclusions and recommendations contained in this report are based upon information provided by third parties. Information obtained from third parties has not been independently verified by Arbtech Consulting Limited.

© This report is the copyright of Arbtech Consulting Limited. Any unauthorised reproduction or usage by any person other than the addressee is strictly prohibited.

Industry Guidelines and Standards

This report has been written with due consideration to:

- Chartered Institute of Ecology and Environmental Management (2017). Guidelines for Preliminary Ecological Appraisal. 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Version 1.1. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2017). Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2020). Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK. 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- British Standard 42020 (2013). Biodiversity – Code of Practice for Planning and Development.
- British Standard 8683:2021 (2021). Process for Designing and Implementing Biodiversity Net Gain.

Proportionality

The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, the decision-maker should only request supporting information and conservation measures that are relevant, necessary and material to the application in question. Similarly, the decision-maker and their consultees should ensure that any comments and advice made over an application are also proportionate.

The desk studies and field surveys undertaken to provide a Preliminary Ecological Appraisal (PEA) might in some cases be all that is necessary.

(BS 42020, 2013)

Executive Summary

Arbtech Consulting Limited was instructed by Jonathan Heather to undertake a Preliminary Roost Assessment (PRA) at 11-15 South street, Havant, Hants, PO9 1BU (hereafter referred to as “the site”). The survey was required to inform a planning application for 17 no. residential unit scheme (11 no. new build mix of townhouses and flats and 6 no. conversion of existing commercial premises to flats) (hereafter referred to as “the proposed development”).

The following is work you will need to commission to obtain planning permission and to comply with legislation. Further information, along with opportunities for biodiversity enhancement, are outlined in Table 8 of this report.

Feature	Survey Results Summary	Impact Assessment	Recommendations
Designated sites	There are 6 statutory sites within 2km of the site, the closest being Chichester and Langstone Harbours SSSI Ramsar and SAC located 1.05km from the site. The site lies within the impact risk zone for Chichester Harbour SSSI and residential developments are listed as a possible high risk for this designation. Presence of non-statutory sites cannot be ascertained without data from the local record center. However, due to the built up nature of the site and immediate surroundings, it's considered unlikely that any such sites would be present in the immediate vicinity.	No impacts to designated sites are anticipated due to the small scale and distance of the proposed development from such sites (where known) as well as the urban location of the site with surrounding physical barriers. Construction impacts to designated sites unlikely due to the distance of statutory designated sites and the built up surroundings indicating that no non-statutory sites are present in the immediate vicinity. The proposed development will result in a net increase in residential dwellings. This may increase recreational pressure on nearby designated sites including Chichester Harbour SSSI.	The HRA Stage 1 Screening Report (Arbtech, 2022) identified the possible risk to nearby European sites posed by recreational disturbance but concludes that these can be addressed via the LPA HRA mechanisms. The provision of homeowner packs outlining the presence of nearby designated sites and advice for reducing impacts to these areas would further lower any risk to these areas
Habitats and flora	There are no notable habitats within the site but deciduous priority listed woodland habitats are present within 1km of the site, the closest being 244m northeast of the site. Habitats on site have negligible value, comprising of buildings and developed land with minimal vegetation present.	The site will see a loss of a small number of young sycamore trees, but the remainder of the site is unvegetated, and therefore impacts to biodiversity is minimal. Proposed tree and shrub planting is recommended as part of the works and would compensate for any losses	Tree and shrub planting of new landscaping in the area should be native or nectar rich/fruitley species that would benefit local wildlife.

Roosting bats B3	Building B3 has low value for roosting bats.	The proposed development will result in the demolition of this building. This would result in the destruction of any bat roosts present and could cause disturbance, death or injury to bats.	One bat emergence or re-entry survey is required during the active bat season (optimal May to August, suboptimal September) to confirm presence or likely-absence of a bat roost in the building. Infra-red cameras should be used as an aid. Three surveyors are required to provide full coverage of the building. If bat roosts are confirmed in the building two additional surveys may be required to characterise the roost and to inform an EPSL application to Natural England. Surveys should be a minimum of two weeks apart. The EPSL application requires that surveys have been undertaken within the most recent active bat season and planning permission must have been granted and all relevant wildlife-related conditions have been discharged prior to submission.
Roosting bats B4	Building B4 has low value for roosting bats.	The proposed development will result in the renovation and conversion of this building. This could result in damage to any bat roosts present as this will involve some roof repairs and alterations to the structure and could cause a disturbance, death or injury to bats.	One bat emergence and re-entry surveys are required during the active bat season (optimal May to August, suboptimal September) to confirm presence or likely absence of a bat roost in the building. Both of the surveys should be completed during the optimal survey period mid-May to August inclusive. Infra-red cameras should be used as an aid. Surveys should be a minimum of two weeks apart. Two surveyors are required to provide full coverage of the building. If bat roosts are confirmed in the building two additional survey may be required to characterise the roost and to inform an EPSL application to Natural England. The EPSL application requires that surveys have been undertaken within the most recent active bat season and planning permission must have been granted and all relevant wildlife-related conditions have been discharged prior to submission.

Roosting bats B5 and B6	B5 and B6 contains roost features that could support roosting bats. A full PRA was not done on this building as they wont be directly impacted by the proposed works.	B5 and B6 will not be altered or modified as part of the proposal but may experience some light and noise disturbance from nearby works, due to the proximity to B1.	Owing to the nature of the proposed development and the low potential for impacts to bat roosts, further bat surveys are considered to be disproportionate. It is anticipated that any risk to bats can be reduced to an acceptably low level through the implementation of a precautionary working method during and post-development. This will include the following measures: • Works should avoid altering the roof space of B5. If this cannot be avoided then a bat emergence or re-entry survey is required during the active bat season (optimal May to August, suboptimal September) to confirm the presence or likely absence of a bat roost in the building. • Avoid any light spilling onto the roof space of B5 during works and after works are complete. Ensure any scaffold used around B1 does not obstruct B5.
Birds	There are active bird nests under the archway of B1 from feral pigeons. There are also indications that birds have been going inside B3 as well. Due to the structure of several of the buildings, there may be other nests hidden elsewhere.	There will be demolition of several buildings on the site and alterations of others. The loss of such habitats is likely to be inconsequential to local bird populations owing to their low value and the presence of more extensive habitats locally. However, the proposed development could result in the destruction or the disturbance and subsequent abandonment of active bird nests.	Works should be undertaken outside the period 1st March to 31st August. If this timeframe cannot be avoided, a close inspection of the buildings should be undertaken immediately, by qualified ecologist, prior to the commencement of work. All active nests will need to be retained until the young have fledged.
Hedgehog.	The habitat on site is of poor value for hedgehogs with very few grass and herb species for foraging. However, one tenant noted that they do regularly feed a hedgehog most nights, indicating that one may be regularly onto the site, attracted by this food opportunity.	There will be heavy construction work in this area, including the demolition of several existing buildings. This is likely to be inconsequential to local hedgehog populations owing to their low value and the presence of more extensive habitat locally. However, construction activities could result in the death or injury of hedgehogs, if present.	A precautionary working method will be implemented during construction, full details in table 8.

Contents

1.0 Introduction and Context 8

1.1 Background 8

1.2 Site Location and Landscape Context 8

1.3 Scope of the Report 8

2.0 Methodology 10

2.1 Desk Study 10

2.2 Field Survey 10

2.3 Limitations 11

3.0 Results and Evaluation.....13

3.1 Designated Sites 13

3.2 Field Survey Results 15

4.0 Conclusions, Impacts and Recommendations 39

4.1 Informative Guidelines 39

4.2 Evaluation 39

5.0 Bibliography 44

Appendix 1: Proposed Development Plan..... 47

Appendix 2: Site Location Plan 48

Appendix 3a: Habitat Survey Plan 49

Appendix 3b: PRA Plan 50

Appendix 3c: Proposed BERS Plan..... 51

Appendix 4: Legislation and Planning Policy 52

1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed by Jonathan Heather to undertake a Preliminary Roost Assessment (PRA) at 11-15 South street, Havant, Hants, PO9 1BU (hereafter referred to as “the site”). The survey was required to inform a planning application for 17 no. residential unit scheme (11 no. new build mix of townhouses and flats and 6 no. conversion of existing commercial premises to flats) (hereafter referred to as “the proposed development”).

A plan showing the proposed development is provided in Appendix 1.

The aim of the PEA was to obtain data on existing ecological conditions, and to conduct a preliminary assessment of the likely significance of ecological impacts on the proposed development. The aim of the PRA was to determine the presence or evaluate the likelihood of the presence of roosting bats, and to gain an understanding of how bats could use the site for roosting, foraging or commuting.

A Habitat Regulations Assessment (HRA) Stage 1 Screening report was completed by Arbtech in November 2022.. Recreational disturbances was identified as a risk to Chichester and Langstone Harbours SPA and Solent Maritime SAC, however this can be mitigated via Havant District Council’s HRA mechanism

1.2 Site Location and Landscape Context

The site is located at National Grid Reference SU71068218 and has an area of approximately 0.2ha comprising existing commercial and residential buildings. It is surrounded by residential and commercial buildings in all directions. St Faith’s Church and graveyard is adjacent to the northwest. Residential houses and gardens are situated to the southeast. The wider landscape comprises of park areas 230m northwest and 166m southwest, each adorned with trees. The A27 is 320m south and the rail line lays 380m north. A site location plan is provided in Appendix 2.

1.3 Scope of the Report

The PEA element of this report describes the baseline ecological conditions at the site, evaluates habitats within the survey area in the context of the wider environment and describes the suitability of those habitats for notable or protected species. It identifies possible ecological constraints as a result of the proposed development and summarises the requirements for further surveys and mitigation measures to inform subsequent mitigation proposals, achieve planning or other statutory consent and to comply with wildlife legislation.

The PRA element of this report provides a description of all features suitable for roosting, foraging and commuting bats and evaluates those features in the context of the site and wider environment. It further documents any physical evidence collected or recorded during the site survey that establishes the presence of roosting bats. It provides information on possible constraints to the proposed development as a result of bats and summarises the requirements for any further surveys to inform subsequent mitigation proposals, achieve planning or other statutory consent and to comply with wildlife legislation.

To achieve this, the following steps have been taken:

- A desk study has been carried out.

- A field survey has been undertaken to record baseline information on the site and surrounding area including habitat types and their suitability for notable or protected species, including roosting bats.
- Invasive plant and animal species (such as those listed on Schedule 9 of the Wildlife & Countryside Act) have been identified.
- Potential impacts on features of value, as a result of the proposed development, have been identified.
- Recommendations for further surveys and mitigation have been made.
- Opportunities for the enhancement of the site for biodiversity have been set out.

2.0 Methodology

2.1 Desk Study

The desk study included a review of the magic.gov.uk database for statutory designated sites within a 2km radius of the site. Landscape value and the presence of notable habitats as well as granted European Protected Species Licence (EPSL) and notable species records held on magic.gov.uk database has also been considered where these are within influencing distance of the site.

2.2 Field Survey

The survey was undertaken by Annabel Sharpe Graduate Ecologist, license number 2023-11145-CL17-BAT on 28/04/2023

Preliminary Ecological Appraisal

An extended habitat survey was undertaken, following the methodology set out in *UK Habitat Classification User Manual* (UK Habitat Classification Working Group, 2018). All land parcels are described and mapped and, where appropriate, target notes provide supplementary information on habitat conditions, features too small to map to scale, species composition, structure and management. Botanical species lists were compiled with reference to the DAFOR scale (D = Dominant; A = Abundant, F = Frequent, O = Occasional, R = Rare).

During the survey, habitats were assessed for their suitability to support protected species, and field signs indicating their presence recorded. The assessment takes into consideration the findings of the desk study, the habitat conditions on site and in the context of the surrounding landscape, and the ecology of the protected species.

Preliminary Roost Assessment

The PRA focussed on 4 built structures and 3 trees which will be affected by the proposed development as well as providing an overview of the wider site and the surrounding landscape for bat roosting, foraging and commuting habitat.

For any surveyed buildings

A non-intrusive visual appraisal was undertaken from the ground, using binoculars to inspect the external features of the buildings for features which bats could use for roosting, including access or egress points and for signs of bat use including droppings, scratch marks, insect remains and urine smear marks. An internal inspection of the buildings was also made, including the living areas and any accessible roof spaces, using a torch and ladders. The surveyor paid particular attention to the floor and flat surfaces, window shutters and frames, lintels above doors and windows, and carried out a detailed search of numerous features within the roof space

For any surveyed trees

A visual inspection was undertaken from ground level using binoculars and, where accessible and safe to do so, an internal inspection of any features which bats could use for roosting was completed using an endoscope, torch and ladders.

Suitability Assessment

Built structures and trees were categorised according to the likelihood of bats being present and the types of roost that the identified features could support. This is summarised in Table 1 and Table 2 below. Roost suitability is classified as high, moderate, low and negligible and dictates any further surveys required before works can proceed.

Table 1: Features of a building that are correlated with use by bats

Classification	Feature of building and its context
Moderate to high	Buildings or structures with features of particular significance for larger numbers of roosting bats e.g. mines, caves, tunnels, icehouses and cellars. Habitat on site and surrounding landscape of high quality for foraging bats e.g. broadleaved woodland, tree-lined watercourses and grazed parkland. Site is connected with the wider landscape by strong linear features that would be used by commuting bats e.g. river and or stream valleys and hedgerows. Site is proximate to known or likely roosts (based on historical data). Buildings with high suitability could support roosts of high conservation value such as maternity or hibernation roosts.
Low	A small number of possible roost sites or features, used sporadically by individual or small numbers of bats. Potential roost features may be suboptimal for reasons such as shallow depth, poor thermal qualities or upwards orientation with exposure to inclement weather or predators. Habitat suitable for foraging in close proximity, but isolated in the landscape. Or an isolated site not connected by prominent linear features. Few features suitable for roosting, minor foraging or commuting.
Negligible	Unsuitable for use by bats.

Table 2: Features of a tree that are correlated with use by bats

Classification	Feature of tree and its context
Moderate to high	A tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. Trees with high suitability could support roosts of high conservation value such as maternity or hibernation roosts.
Low	A tree of sufficient size and age to contain potential roosting features but with none seen from the ground or features seen with only very limited roosting potential to be used sporadically by individual or small numbers of bats. Potential roost features may be suboptimal for reasons such as shallow depth, poor thermal qualities or upwards orientation with exposure to inclement weather or predators.
Negligible	Unsuitable for use by bats.

2.3 Limitations

It should be noted that whilst every effort has been made to describe the baseline conditions within the survey area, and evaluate these features, this report does not provide a complete characterisation of the site. This assessment provides a preliminary view of the likelihood of protected species being present. This is based on suitability of the habitats on the site and in the wider landscape, the ecology and biology of species as currently understood, and the known distribution of species as recovered during the searches of historical biological records.

A biological records data search has not been undertaken. However, given the location of the site, the nature of the habitats present and the assessed suitability of the site for protected or notable species, it is not anticipated that the purchase of biological records data will add any significant weight or alter the conclusions and recommendations outlined in this report.

There was no upstairs access to the part of the building noted as 15a, despite attempts at arrangement, however due to the building type and condition, this is not expected to weight heavily on the PRA conclusion of this part of the building.

There is limited viewing of the north elevation of the building of B4 or the south roof elevations of B3, this is due to building height and proximity to other buildings, which would obscure any viewing of possible roosting features.

There were no access attempts to the loft space of the building of B3, this is due to questionable stability and the presence of asbestos in this loft area. This would mean any feature or potential evidence would be missed in this space.

Due to the volume of items stored within B2 and B3 it made searching for evidence difficult. These buildings also experience the regular movement of items, including sweeping as part of routine activities. This could have disrupted or removed any potential bat evidence.

These limitations have been taken into account during the evaluation of the site and the requirement for further surveys and mitigation.

3.0 Results and Evaluation

3.1 Designated Sites

Details of any statutory designated sites within a 2km radius of the site, including their reasons for notification, are provided in Table 3 below.

The site lies within the impact risk zone for Chichester Harbour Site of Special Scientific Interest (SSSI). Residential developments are listed as a possible high risk with regard to this designation.

Presence of non-statutory sites cannot be ascertained without data from the local record center. However, due to the built up nature of the site and immediate surroundings, it's considered unlikely that any such sites would be present in the immediate vicinity.

Table 3: Statutory designated sites within 2km radius of the site

Designated site name	Distance from site	Reasons for notification from Natural England
Chichester and Langstone Harbours (Ramsar)	1.05km south	<u>Ramsar Criterion 1</u> -Two large estuarine basins linked by the channel which divides Hayling Island from the main Hampshire coastline. The site includes intertidal mudflats, saltmarsh, sand and single spits and sand dunes <u>Ramsar Criterion 5</u> Species peak count in winter 76480 waterfowl. <u>Ramsar Criterion 6</u> Qualifying species/populations with peak counts in spring and autumn -Ring plover 853 individuals Black tailed godwit- 906 individuals Common redshank- 2577 individuals Species with peak counts in winter Dark-bellied brent goose- 12987 individuals Common shelduck 1468 individuals Grey Plover 3043 individuals Dunlin 33436 individuals Species identified for future consideration. Little Tern

Designated site name	Distance from site	Reasons for notification from Natural England
Chichester and Langstone Harbours Special Protection areas (SPA)	1.05km south	Species referred to in Article 4 of Directive 2009/147/EC and listed in Annex II of Directive 92/43/EEC and listed at being on site. A054- Pintail A056 -Shoveler A052 -Teal A050 -Wigeon A169-Turnstone A675-Brant goose A144-Sanderling A672- Dunlin A137-Ringed plover A157-Bar-tailed godwit A069-Red-brested Merganser A160- Curlew A141- Grey Plover A195- Little tern A193- Common tern A191- Sandwich tern A048- Shelduck A162- Redshank
Solent Maritime Special Area of Conservation (SAC)	1.05km south	<u>Annex 1 habitats that are a primary reason for designation</u> 1130- Estuaries 1320- Spartina Swards 1330- Atlantic salt meadows. <u>Annex1 habitats that are a qualifying feature.</u> 1110 <u>Sandbanks which are slightly covered by sea water all the time</u> 1140 <u>Mudflats and sandflats not covered by seawater at low tide</u> 1150 <u>Coastal lagoons</u> * Priority feature 1210 <u>Annual vegetation of drift lines</u> 1220 <u>Perennial vegetation of stony banks</u> 1310 <u>Salicornia and other annuals colonizing mud and sand</u> 2120 <u>"Shifting dunes along the shoreline with Ammophila arenaria ("white dunes")"</u> <u>Annex 2 species that are present as a qualifying feature.</u> 1016- Desmoulin whorl snail.
Chichester Harbour Site of Special Scientific Interest (SSSI)	1.05km south	Chichester Harbour is a large estuarine basin in which at low water extensive mud and sandflats are exposed, drained by channels which unite to make a common exit to the sea. The site is of particular significance for wintering wildfowl and waders and also breeding birds both within the Harbour and in the surrounding permanent pasture fields and woodlands. There is a wide range of habitats which have important plant communities.
Langstone Harbour SSSI	1.2km southwest	Langstone Harbour is a tidal basin which at high water resembles an almost landlocked lake. At low water extensive mud flats are exposed, drained by three main channels which unite to make a common and narrow exit to the sea. The harbour includes one of the largest areas of mixed saltmarsh on the south coast. The marshes embrace a variety of habitats – brackish marsh, fresh marsh, a large lagoon with associated reed Phragmites beds, Agrostis stolonifera grassland and scrub. It is a vital high water wader roost for the Harbour and a major feeding ground for Brent geese after the Zostera beds in the Harbour have been consumed.

Designated site name	Distance from site	Reasons for notification from Natural England
Warblington Meadows SSSI	1.5km southeast	Warblington Meadow Site of Special Scientific Interest is an unimproved grazing marsh adjoining Chichester Harbour and is of special interest for its gradation from freshwater, baserich marsh to old reclaimed saltmarsh, and for its rich associated flora, with a total of 158 species of flowering plants having been recorded up to the time of notification.

3.2 Field Survey Results

The results of the field survey are illustrated in Appendix 3. The weather conditions recorded at the time of the survey are shown in Table 4.

Table 4: Weather conditions during the survey

Date:	28/04/2023
Temperature	15°C
Humidity	89%
Cloud Cover	100%
Wind	6mph
Rain	None

Habitats and Flora

The following habitats are present within and adjacent to the site:

- U1b5- Buildings
- U1b- Developed land, sealed surface
- U1e-69- Built linear feature, fence.
- U1e-68- Built linear feature, mortared wall.

A description and photographs of each habitat are provided in Table 5.

No protected or non-native invasive plant species (as listed under Schedules 8 or 9 of the Wildlife and Countryside Act 1981) were identified on the site.

Table 5: Description and photographs of habitats within and adjacent to the site

Habitat type	Habitat description	Photograph
U1B5-11 90, 109 Buildings, scattered trees, commercial buildings, residential	This photograph shows one of the buildings on site. The site comprises several buildings with a mix of commercial and residential usage. Full details of these buildings are included in the PRA section of this report. Development plans will see some of these buildings demolished, and others will be converted to provide multiple residential dwellings and no longer serve a commercial purpose. This photograph also shows the three scattered young trees on site, which are all self-seeded sycamore trees.	

U1b- 89 Developed land, sealed surface- Car park. U1e-68 Built linear feature- mortared wall	This photograph shows the sealed surface area adjacent to and between the buildings on site. This is a tarmac area to serve as an access point and a car-parking area for commercial buildings. This photograph also shows the mortared wall that is part of the site boundary. A few herb species are growing at the site boundary, such as common dandelion and daisies, where there are gaps within the tarmac, as well as common ivy on some of the walls. The ecological value of this area is poor. The area seen in this photograph will go under development for several new residential dwellings in this space.	
--	--	---

Fauna

Bats

The results of the PRA are provided in Table 6.

Table 6: Assessment of the suitability of the site for bats

Feature	Description	Photographs
Historical records	There is one EPSL within 2km of the site. This is located 1.05km to the west. 2014-1826-EPS-MIT and was listed for the destruction of a resting place for a common pipistrelle. Conversations with several of the current tenants note that they have seen bats in the early evening times flying above and near the site, especially around June. This could also indicate species like pipistrelle which are known to emerge before times of darkness.	

Bat foraging and commuting habitat	The site itself offers poor foraging habitat for any bats. There is a lack of substantial trees and shrubs, with the only ones present being 3 young sycamore trees. There is a foraging habitat off-site, with a church graveyard directly northwest, and a variety of large residential gardens directly to the southeast. This would provide foraging opportunities to any bats dispersing from nearby buildings. This photograph shows the churchyard which is opposite the site.	
B1 – Northern and eastern elevation.	This photograph shows the north and east elevation of B1. B1- also known as 15A and B is a flat-roof building. Its walls are red brick, and the doors and windows are PVC. It's a combined commercial and residential dwelling. There were no roosting features observed at this elevation. A search, focusing on windowsills, door frames, and the base of the walls did not yield any bat-dropping evidence.	

B1 – southern elevation	This photograph shows the southern elevation of B1. There were no roosting features observed at this elevation, nor was any evidence of bat occupation found.	 arbtech Apr 28, 2023 10:11:48 am
B1 – western elevation	This photograph is of the western elevation of B1, showing it and the adjacent commercial building known as B5/13 No roosting features were observed at this elevation of B1, a search conducted on lower windows and doors did not yield any bat evidence.	 arbtech Apr 28, 2023 10:38:15 am

B1 – interior	This photograph shows the interior of the part of B1 known as 15b, which is the commercial part of the building. B1 has no interior void space within the flat-roof structure.	
B1 – suitability assessment	B1 has a negligible suitability for roosting bats, there is no internal void structure to support void-dwelling bats, and a lack of external roosting features that would benefit crevice-dwelling bat species.	N/A

B2- Western elevation

These photographs show the western elevation of B2.

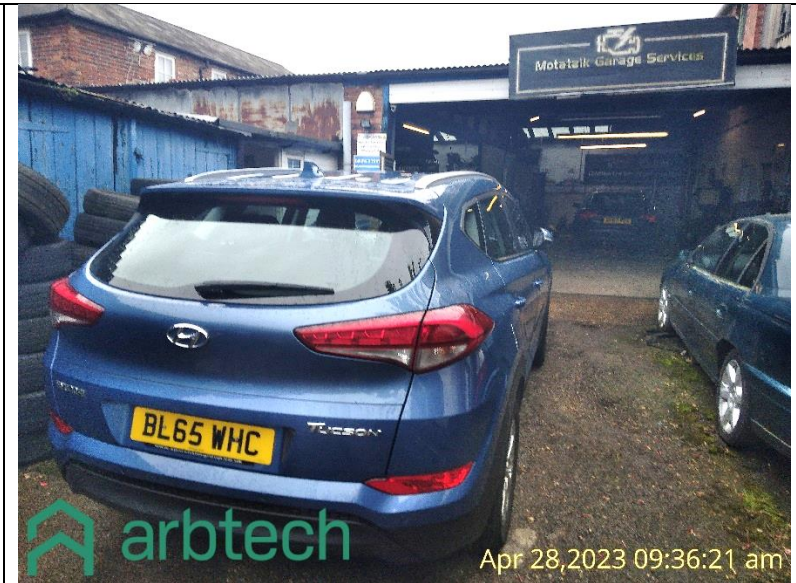
B2, known as building 15, is an L-shaped, 1-storey building, used as a commercial car garage. It is constructed out of multiple materials, including red-brick walls, corrugated metal walls and roofing, wooden doors, and PVC plastics.

This building experiences a high level of disturbance throughout due to the nature of the building's usage.

The building has poor thermal properties due to the metal roofing, which would be unsuitable for roosting bats.

The barge board area was of mixed material but had no significant spacing or lifting to provide roosting space for a bat.

The garage is closed up at night, which does not leave open access to the internal space.



B2 – Southern elevation	This photograph is of the southern elevation showing the mixed construction of B1, with the combined brick, wood, and corrugated metal construction. No roosting features suitable for bats were observed at this elevation.	
B2- Northern elevation	This photograph is of the northern elevation of B2, (lower brick wall) No roosting features were seen within the brick walls of this elevation. There was no significant spacing under the corrugated metal roof to provide roosting space.	

B1 – interior	This photograph shows the interior space of B2. There is no separated void space within this interior. It has a high volume of light as the rear of the building has multiple sky-light windows letting in a high volume of natural light during the day. The building also experiences a high volume of noise disturbance throughout the day, due to the nature of this building's usage. A search was conducted but no evidence of bat occupation was seen. However, it was noted that this area experiences a high level of movement of items as part of the commercial operations, which may have caused a loss in bat evidence. The roofing area and beams were all constructed out of metal, which is unsuitable for roosting bats. No direct access point into this internal space was observed from the inside.	
B2- Suitability	B2 has negligible suitability for roosting bats, the internal space is unsuitable for roosting void bats, and there is a lack of suitable roosting space externally for crevice-dwelling bats. The roofing materials have poor thermal properties for supporting roosting bats. The building experiences a high volume of noise, light and human disturbance in all internal spaces regularly. No evidence of bat activity was observed externally or internally.	N/A

B3- Western elevation.

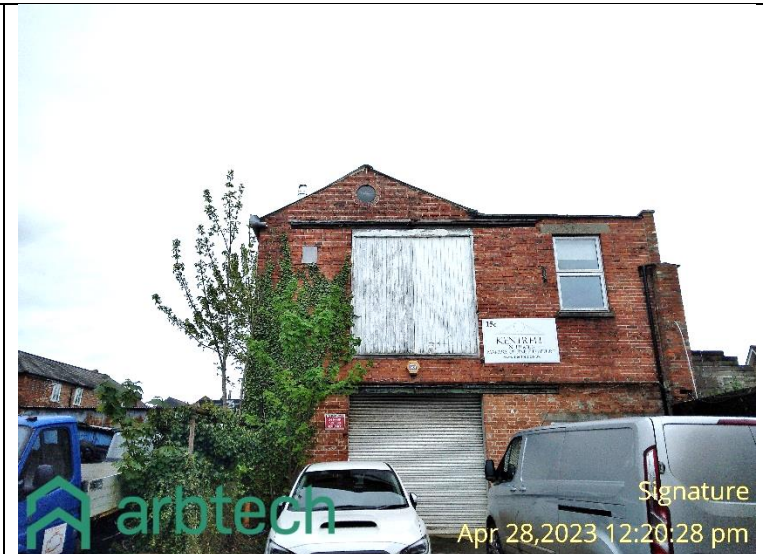
These photographs are of the western elevation, known as building 15C. This is a two-storey, red-brick building and was part of the historic brewery buildings.

Unlike all other elevations. The northern wall is constructed out of corrugated materials, as is the roof of this building. The roof is a combined single-pitched and flat roof.

The lower door is PVC, with a metal shutter door, while there is an upper large door made of wood. All other windows around are a combination of wooden window frames and PVC.

There was notable spacing at the top of the gable-end wall, where no barge board is present. Parts of the cement have crumbled, leaving multiple gaps, as the second photograph shows. This could provide access points to any internal place.

It cannot be established how deep these holes go, based on the PRA. The depth could be suitable to support roosting bats.



B3- Southern elevation	This photograph shows the southern elevation of B3, which is the building highlighted opposite. No roosting features could be seen at this elevation. However, the top of the flat roof, along with the angle to view the condition of the pitched roof of this building could not be observed at this elevation, meaning that potential roosting features could have been missed.	
-------------------------------	---	---

B3- Eastern elevation	This photograph shows the eastern elevation of B3, which is the building highlighted in the top photograph. Like the western elevation, there are significant gaps at the top of the gable end, between the wall and the roof, as the below photograph shows. This space is significant enough to provide roosting access points. It's unknown how deep this spacing is or where it leads to. There is the possibility this spacing leads under the roof, into any internal void space, or allows direct access into any wall cavity. No roosting features were observed around the doors and windows of this elevation.	 The top photograph shows the eastern elevation of a two-story brick building. A blue rectangular box highlights a section of the building's facade, specifically the area above a white roller door and between two windows. The bottom photograph is a close-up of the roofline, showing a significant gap between the brick wall and the roof structure. Both photos include an 'arbtech' logo and a timestamp.
------------------------------	---	---

B3- Northern elevation.

These photographs are of the northern elevation of B3, highlighted in the top photograph.

The north elevation is constructed with walls of corrugated materials at this elevation.

The windows at this elevation are constructed with wood and metal frames.

There are notable gaps within this corrugated material, where some allow direct access into the internal space of B3.

One space is a notable hole, as photographed opposite.

Further spaces were noted and photographed from the inside which demonstrates unobstructed access.

Not all of the corrugated material has observed roosting space, for it was noted that in many places this had been blocked at the base.

The flashing around the chimney and vent flumes on the roof was in good condition.



B3 Interior	B3 does have an upper loft space area, as the top photograph shows. Access to this loft space was not conducted. This loft area was known to have asbestos present. From the floor inspection, this loft area is observed to be substantially dark. There is an internal ridge beam in this space, no lining was observed between then roofing material and this void space. There were noted bird droppings, circled opposite in blue, which could indicate nesting activity in this space. The building is used as a furniture and woodworking shop and experiences a high level of noise and activity. The windows of this building let in a lot of natural light throughout the day and would be unsuitable on the upper and lower floors as a daytime roost. A search was conducted on the upper and lower floor for any bat evidence. It was noted not only was there a high volume of items, but this experiences a lot of disturbance. This includes regularly moving items, regular sweeping, and spraying sawdust and paint dust frequently with the commercial works. All of this could cause a loss or hiding of any bat evidence in this space.	
-------------	---	--

	The bottom photograph demonstrates how the spacing of the corrugated material of the northern wall has spaces that allow direct access inside B3. This could easily be accessed by a roosting bat.	
B3 Suitability	B3 has a low suitability for roosting bats. Though features are seen on this building, including those providing direct internal access, the thermal properties of the building's materials would reduce overall suitability. This building also experiences a lot of noise, vibration and light disturbance throughout the day, including heavy machinery such as extractors.	n/a

B4- Western elevation.	This photograph is of the western elevation of b4, highlighted here. B4 is a double gable-end, pitched roof at the western elevation, with a small, hipped roof at the eastern elevation. It is two storeys tall, constructed out of red brick. The tiles are clay tiles. Windows and doors are PVC with a metal shutter over the lower access doors. There were no features seen at the western elevations. There were no views of the northern roof elevations of B4, due to the angle and proximity of the building to B3.	
-------------------------------	---	---

B4- Southern elevation.

These photographs are of the southern elevations of B4. The tiles of this roof have significant lifting across the elevation as the below photograph shows. The spacing and warping of the clay tiles seen are suitable for roosting bats, particularly crevice-dwelling species.

Over 50 lifted tiles were noted at this elevation.

There was no other roosting feature seen at this elevation around the window, doors, or at the eaves of this building.



B4- Eastern elevation.

These photographs are of the eastern elevation of B4, the building highlighted opposite.

There was notable lifting at the top, amongst the hipped roof, as the closer-up photographs show below. There were other notable lifted tiles on the hipped roof.

These spaces would be suitable for roosting bats, particularly crevice-dwelling species.

No other roosting features were noted within the walls or around the window at this elevation.

Due to the lack of view of the northern elevation of B4, it's expected that many clay tiles on that elevation are in similar conditions to the east and south, with suitable roosting features for bats.



		
--	--	---

B4- Interior	These photographs show the interior of B4- The interior space is divided into two, with open access between the two. The eastern section is smaller, measuring 5m wide, 5m long, and 1.1m high. This section has a window letting in natural light and has been covered in boards on the walls and ceiling, which has lowered the overall height. The larger area is far darker, measuring 5m wide, 15m long and 2.7m high. The loft area of this space is covered in sarking boards, but where some have come loose this exposes a non-breathable lining underneath. The sarking boards have covered up the ridge beam of this building, but in places, this has warped and opened gaps larger than 3cm at the ridgeline. The building has exposed supporting struts and beams. There is no evidence of insulation in this space, and the floors have been boarded. A search by torchlight did not produce any bat evidence within this space, with a focus on supporting beams, under the gaps in the ridgeline and against the gable-end walls.	 The top photograph shows a narrow, dark interior space with wooden beams and a window. A yellow sign is visible on the wall. The bottom photograph shows a larger, darker interior space with wooden beams and a window. A black object is hanging from the ceiling. Both photographs have an 'arbtech' watermark and a timestamp: 'Apr 28, 2023 10:22:05 am' and 'Apr 28, 2023 10:29:45 am'.
B4 suitability	B4 has a low suitability. The multiple externally lifted tiles could support a substantial number of bats. Though this was only viewable on the south and east elevation, it could be suspected the north elevation tiles are in similar condition. This would be suitable for urban-tolerant species such as pipistrelles, which are listed within 2km of the site on nearby EPSL.	

	There are no direct habitats on site, or good quality commuting habitats. The breathable membrane with sarking boards over the top could suggest that movement under these tiles are restricted and poses a risk to roosting bats due to entanglement. Therefore it's not expected that this building is supporting a high number of bats. There are foraging grounds within 100m of this building such as gardens directly southwest of this building, and the churchyard within 100m to the northwest.	
--	--	--

B5- Eastern elevations.

B5 is a building connected to B1/15a which includes a two-storey structure, and a smaller one-storey structure. This building will not have alterations as part of the proposal but is near the works.

This building is a listed building.

The roofing tiles across this building are noted as having multiple roosting features. The closer photograph demonstrates the condition of the lower building. This building has undergone re-roofing in recent years, with evidence of repairs at the hip tiles.

No ecology surveys for this building could be found.

These photographs show the elevations that would be facing any proposed work and movement of construction vehicles in this area. This structure will be close to work conducted on B1.

A full PRA has not been completed as these buildings won't be directly impacted by the proposed works.



B6-
Neighbouring
building

This photograph shows a neighbouring building, which wall is part of the eastern wall boundary of the site. This building has notable holes within the eaves of the structure, as shown opposite.

There will be no alterations to this structure but may experience noise and light disturbance if this is being used by roosting bats, especially during construction, and may experience potential blockage by scaffold or large stored machinery during times of work.

A full PRA has not been completed as these buildings won't be directly impacted by the proposed works.



Other Species

An assessment of the suitability of the site for protected or notable species is provided in Table 7.

Table 7: Assessment of the suitability of the site for protected or notable species

Species	Assessment of suitability
Hedgehog	There is a lack of suitable habitat for foraging hedgehogs on site. However, a conversation with a tenant reveals they often leave food out to feed hedgehogs during the active season. This would attract hedgehogs onto the site, despite the lack of habitat.
Birds	There is evidence of nesting birds on the site, with an active nest of feral pigeons noted within the access archway and several other unoccupied nests. There is evidence of birds having accessed building 15c with bird droppings noted on the loft entrance, though the current tenants explained they had blocked the window where they had been entering the building. Videos were shown from current tenants showing bird of prey activity such as sparrowhawk, but no buildings on site were concluded as an ideal nesting place for this species. However, this could indicate further nests may be in unknown locations. There are many features on buildings that can support urban species such as house sparrows.
Other species	Due to the lack of habitats on site and the location within an urban setting of a town centre. It's not expected that the site would support any other significant species, such as badgers, otters, dormice, amphibians, or reptiles. It's not expected that the site would hold significant value for invertebrates as well.

4.0 Conclusions, Impacts and Recommendations

4.1 Informative Guidelines

A summary of the relevant legislation and planning policies is provided in Appendix 4.

Likelihood of the Presence of Protected Species

Where physical evidence of the presence of protected species is indeterminate during the survey, the habitats on site are evaluated as to their likelihood to provide sheltering, roosting, foraging, basking or nesting habitat.

Where this report supports a planning application, the ecological interest of the study area (i.e. the area covered by the desk study and field survey) and the proposed development has also been evaluated in terms of the planning policies relating to biodiversity.

4.2 Evaluation

Taking the desk study and field survey results into account, Table 8 presents an evaluation of the ecological value of the site and also details any ecological constraints identified in relation to the proposed development which will comprise planning application for 17 no. residential unit scheme (11 no. new build mix of townhouses and flats and 6 no. conversion of existing commercial premises to flats).

Table 8: Evaluation of the site and any ecological constraints

Feature	Survey Results Summary	Impact Assessment	Recommendations	Biodiversity Enhancement Opportunities ¹
Designated sites	There are 6 statutory sites within 2km of the site, the closest being Chichester and Langstone Harbours SSSI Ramsar and SAC located 1.05km from the site. The site lies within the impact risk zone for Chichester Harbour SSSI and residential developments	No impacts to designated sites are anticipated due to the small scale and distance of the proposed development from such sites (where known) as well as the urban location of the site with surrounding physical barriers. Construction impacts to designated sites unlikely due to the distance of statutory designated sites and the built up surroundings	The HRA Stage 1 Screening Report (Arbtech, 2022) identified the possible risk to nearby European sites posed by recreational disturbance but concludes that these can be addressed via the LPA HRA mechanisms. The provision of homeowner packs outlining the presence of nearby designated sites and advice for reducing impacts to these areas would further lower any risk to these areas	None.

¹ The Local Planning Authority has a duty to ask for enhancements under the NPPF (2021).

	are listed as a possible high risk for this designation. Presence of non-statutory sites cannot be ascertained without data from the local record center. However, due to the built up nature of the site and immediate surroundings, it's considered unlikely that any such sites would be present in the immediate vicinity.	indicating that no non-statutory sites are present in the immediate vicinity. The proposed development will result in a net increase in residential dwellings. This may increase recreational pressure on nearby designated sites including Chichester Harbour SSSI.		
Habitats and flora	There are no notable habitats within the site but deciduous priority listed woodland habitats are present within 1km of the site, the closest being 244m northeast of the site. Habitats on site have negligible value, comprising of buildings and developed land with minimal vegetation present.	The site will see a loss of a small number of young sycamore trees, but the remainder of the site is unvegetated, and therefore impacts to biodiversity is minimal. Proposed tree and shrub planting is recommended as part of the works and would compensate for any losses	Tree and shrub planting of new landscaping in the area should be native or nectar rich/fruited species that would benefit local wildlife.	Possibility to incorporate green walls or green roofing into the new buildings.
Roosting bats B1 and B2	Building B1 and B2 has negligible value for roosting bats due to a lack of potential roost features.	Bats are very unlikely to be roosting within this building and as such, there are not anticipated to be any impacts on roosting bats as a result of the conversion and upper extension of this building.	In the unlikely event that a bat or evidence of bats is discovered during the development all work must stop and a bat licensed ecologist contacted for further advice.	To be confirmed upon completion of surveys on other buildings.
Roosting bats B3	Building B3 has low value for roosting bats.	The proposed development will result in the demolition of this building. This would result in the destruction of any bat roosts present and could cause disturbance, death or injury to bats.	One bat emergence or re-entry survey is required during the active bat season (optimal May to August, suboptimal September) to confirm presence or likely-absence of a bat roost in the building. Infra-red cameras should be used as an aid.	To be confirmed upon completion of the surveys.

			Three surveyors are required to provide full coverage of the building. If bat roosts are confirmed in the building two additional surveys may be required to characterise the roost and to inform an EPSL application to Natural England. Surveys should be a minimum of two weeks apart. The EPSL application requires that surveys have been undertaken within the most recent active bat season and planning permission must have been granted and all relevant wildlife-related conditions have been discharged prior to submission.	
Roosting bats B4	Building B4 has low value for roosting bats.	The proposed development will result in the renovation and conversion of this building. This could result in damage to any bat roosts present as this will involve some roof repairs and alterations to the structure and could cause a disturbance, death or injury to bats.	One bat emergence and re-entry surveys are required during the active bat season (optimal May to August, suboptimal September) to confirm presence or likely absence of a bat roost in the building. Both of the surveys should be completed during the optimal survey period mid-May to August inclusive. Infra-red cameras should be used as an aid. Surveys should be a minimum of two weeks apart. Two surveyors are required to provide full coverage of the building. If bat roosts are confirmed in the building two additional survey may be required to characterise the roost and to inform an EPSL application to Natural England. The EPSL application requires that surveys have been undertaken within the most recent active bat season and planning permission must have been granted and all relevant wildlife-related conditions have been discharged prior to submission.	To be confirmed upon completion of the surveys.
Roosting bats B5 and B6	B5 and B6 contains roost features that could support roosting bats. A full PRA was not done on this building as they wont be directly impacted by the proposed works.	B5 and B6 will not be altered or modified as part of the proposal but may experience some light and noise disturbance from nearby works, due to the proximity to B1.	Owing to the nature of the proposed development and the low potential for impacts to bat roosts, further bat surveys are considered to be disproportionate. It is anticipated that any risk to bats can be reduced to an acceptably low level through the implementation of a precautionary working method during and post-development. This will include the following measures: • Works should avoid altering the roof space of B5. If this cannot be avoided then a bat emergence or re-entry survey is required	

			during the active bat season (optimal May to August, suboptimal September) to confirm the presence or likely absence of a bat roost in the building. • Avoid any light spilling onto the roof space of B5 during works and after works are complete. • Ensure any scaffold used around B1 does not obstruct B5.	
Hedgehog	The habitat on site is of poor value for hedgehogs with very few grass and herb species for foraging. However, one tenant noted that they do regularly feed a hedgehog most nights, indicating that one may be regularly onto the site, attracted by this food opportunity.	There will be heavy construction work in this area, including the demolition of several existing buildings. This is likely to be inconsequential to local hedgehog populations owing to their low value and the presence of more extensive habitat locally. However, construction activities could result in the death or injury of hedgehogs, if present. New tree and shrub planting proposed will benefit hedgehogs.	A precautionary working method will be implemented during construction, including the following measures: • Any excavations will be covered overnight, or a ramp will be installed to enable any trapped animals to escape. • Any chemicals or pollutants used or created by the development should be stored and disposed of correctly according to COSHH regulations. • If any hedgehogs are found in the working area these should be allowed to disperse of their own accord or, if at immediate risk, should be moved by hand to a sheltered, vegetated area away from disturbance.	Tree and shrub planting as part of landscaping will benefit hedgehogs. Ensure there are gaps within any fencing to allow movement of hedgehogs across the site.
Birds	There are active bird nests under the archway of B1 from feral pigeons. There are also indications that birds have been going inside B3 as well. Due to the structure of several of the buildings, there may be other nests hidden elsewhere.	There will be demolition of several buildings on the site and alterations of others. The loss of such habitats is likely to be inconsequential to local bird populations owing to their low value and the presence of more extensive habitats locally. However, the proposed development could result in the destruction or the disturbance and subsequent abandonment of active bird nests.	Works should be undertaken outside the period 1st March to 31st August. If this timeframe cannot be avoided, a close inspection of the buildings should be undertaken immediately, by qualified ecologist, prior to the commencement of work. All active nests will need to be retained until the young have fledged.	The installation of 4 bird boxes at the site will provide additional nesting habitat for birds. The bird boxes will be installed on new buildings as well installed on the walls of retained buildings. General purpose bird boxes should be positioned 3m above ground level where they will be sheltered from prevailing wind, rain and strong sunlight. Species-specific bird boxes should be installed in line with manufacturers specifications.

				The installation of swift bricks is recommended within the new buildings, particularly on those on the southern boundary, at a height at least 5m.
Other species	The site has poor habitat for supporting other species on site. It's not anticipated that the site supports species such as amphibians, reptiles, otters, water voles, or badgers.	No impacts are anticipated on other species as a result of the proposed development. New tree and shrub planting will enhance the site for invertebrates.	None.	Incorporating pollinator friendly planting, green roofs and walls or installed insect bricks and boxes will all aid in benefiting invertebrates.

5.0 Bibliography

- Biggs, J., Ewald, N., Valentini, A., Gaboriaud, C., Dejean, T., Griffiths, R., Foster, J., Wilkinson, J., Arnell, A., Brotherton, P., Williams, P. and Dunn, F. (2014). Using eDNA to Develop a National Citizen Science-based Monitoring Programme for the Great Crested Newt (*Triturus cristatus*). Biological Conservation. 183. 10.1016/j.biocon.2014.11.029.
- Bright, P., Morris, P., Mitchell-Jones, T. and Wroot, S. (2006). The Dormouse Conservation Handbook Second Edition.
- British Standard 42020 (2013). Biodiversity – Code of Practice for Planning and Development.
- British Standard 8683:2021 (2021). Process for Designing and Implementing Biodiversity Net Gain.
- Chanin, P. (2003). Ecology of the European Otter. Conserving Natura 2000 Rivers Ecology Series No. 10. Natural England, Peterborough.
- Chartered Institute of Ecology and Environmental Management (2017). Guidelines for Preliminary Ecological Appraisal. 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2017). Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Version 1.1. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2020). Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK. 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- Collins, J. (2016). Bat Surveys for Professional Ecologists —Good Practice Guidelines, 3rd edition, Bat Conservation Trust, London.
- Defra (2007). Hedgerow Survey Handbook. A Standard Procedure for Local Surveys in the UK. Defra, London.
- Edgar, P., Foster, J. and Baker, J (2010). Reptile Habitat Management Handbook. Amphibian and Reptile Conservation, Bournemouth
<http://downloads.gigl.org.uk/website/Reptile%20Habitat%20Management%20Handbook.pdf>
- Garland, L. & Markham, S. (2008) Is Important Bat Foraging and Commuting Habitat Legally Protected? <http://biodiversitybydesign.co.uk/cmsAdmin/uploads/protection-for-bat-habitat-sep-2007.pdf>
- Gent, T. and Gibson, S. (2003). Herpetofauna Workers' Manual. JNCC, Peterborough.
- Gilbert, G., Gibbons, D.W., and Evans, J. (1998) Bird Monitoring Methods: A Manual of Techniques for UK Key Species. The Royal Society for the protection of Birds, Sandy, Bedfordshire, England.
- Google Earth. Accessed on 01/05/23
- Harris, S., Cresswell, P. and Jefferies, D.J. (1989). Surveying badgers. Mammal Society, London.

- HMSO: Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 <https://www.legislation.gov.uk/uksi/2019/579/contents/made>
- HMSO: Countryside & Rights of Way Act (2000) <http://jncc.defra.gov.uk/page-1378>
- HMSO: Natural Environmental and Rural Communities Act (2006) <http://www.legislation.gov.uk/ukpga/2006/16/contents>
- HMSO: The Protection of Badgers Act 1992 (as amended) <http://www.legislation.gov.uk/ukpga/1992/51/contents>
- HMSO: Wildlife and Countryside Act 1981 (as amended 01.04.1996) <http://jncc.defra.gov.uk/page-1377>
- Institution of Lighting Professionals (2018). Guidance Note 08/18 Bats and Artificial Lighting in the UK. Bats and the Built Environment Series Publication: http://www.bats.org.uk/news.php/406/new_guidance_on_bats_and_lighting.
- JNCC (2004). Bat Workers Manual, 3rd Edition. <http://jncc.defra.gov.uk/page-2861>
- Joint Nature Conservation Committee (2010). Handbook for Phase 1 habitat survey a technique for environmental audit. http://jncc.defra.gov.uk/PDF/pub10_handbookforphase1habitatsurvey.pdf
- Langton, T., Beckett, C. and Foster, J (2001). Great Crested Newt Conservation Handbook. Froglife. Suffolk. http://www.froglife.org/wp-content/uploads/2013/06/GCN-Conservation-Handbook_compressed.pdf
- Magic Database. <http://www.magic.gov.uk/MagicMap.aspx> Accessed on 01/05/23
- Mitchell-Jones, A.J. (2004). Bat Mitigation Guidelines. English Nature, Peterborough.
- National Planning Policy Framework (2021). <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- Natural England Designated Sites View. <https://designatedsites.naturalengland.org.uk/SiteSearch.aspx> Accessed on 01/05/23.
- Natural England (2005). Organising Surveys to Determine Site Quality for Invertebrates: A Framework Guide for Ecologists. Natural England, Peterborough.
- Natural England (2007). Badgers and Development a Guide to Best Practice and Licensing. Natural England. Bristol. <http://www.wildlifeco.co.uk/wp-content/uploads/2014/03/badgers-and-development.pdf>
- Oldham R.S., Keeble J., Swan M.J.S. and Jeffcote M. (2000). Evaluating the Suitability of Habitat for the Great Crested Newt (*Triturus cristatus*). Herpetological Journal 10(4), 143-155. <https://www.thebhs.org/publications/the-herpetological-journal/volume-10-number-4-october-2000/1617-03-evaluating-the-suitability-of-habitat-for-the-great-crested-newt-triturus-cristatus/file>
- Panks, S., White., N., Newsome, A., Potter, J., Heydon, M., Mayhew, E., Alvarez, M., Russell, T., Scott, S.J., Heaver, M., Scott, S.H., Treweek, J., Butcher, B. and Stone, D. (2021). Biodiversity Metric 3.0: Auditing and Accounting for Biodiversity – Technical Supplement. Natural England.
- Stanbury, A., Eaton, M., Aebischer, N., Balmer, D., Brown, A., Douse, A., Lindley, P., McCulloch, N., Noble, D., and Win I. 2021. The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain. British Birds 114: 723-747.
- Strachan, R., Moorhouse, T. and Gelling, M. (2011). Water Vole Conservation Handbook. Third Edition. Wildlife Conservation Research Unit, Oxford.

- UK Habitat Classification Working Group (2018). UK Habitat Classification User Manual at <http://ecountability.co.uk/ukhabworkinggroup-ukhab>
- Wray, S., Wells, D., Long, E. and Mitchell-Jones, T (2010). Valuing Bats in Ecological Impact Assessment. IEEM In-Practice. Number 70 (December 2010). Pp. 23-25.

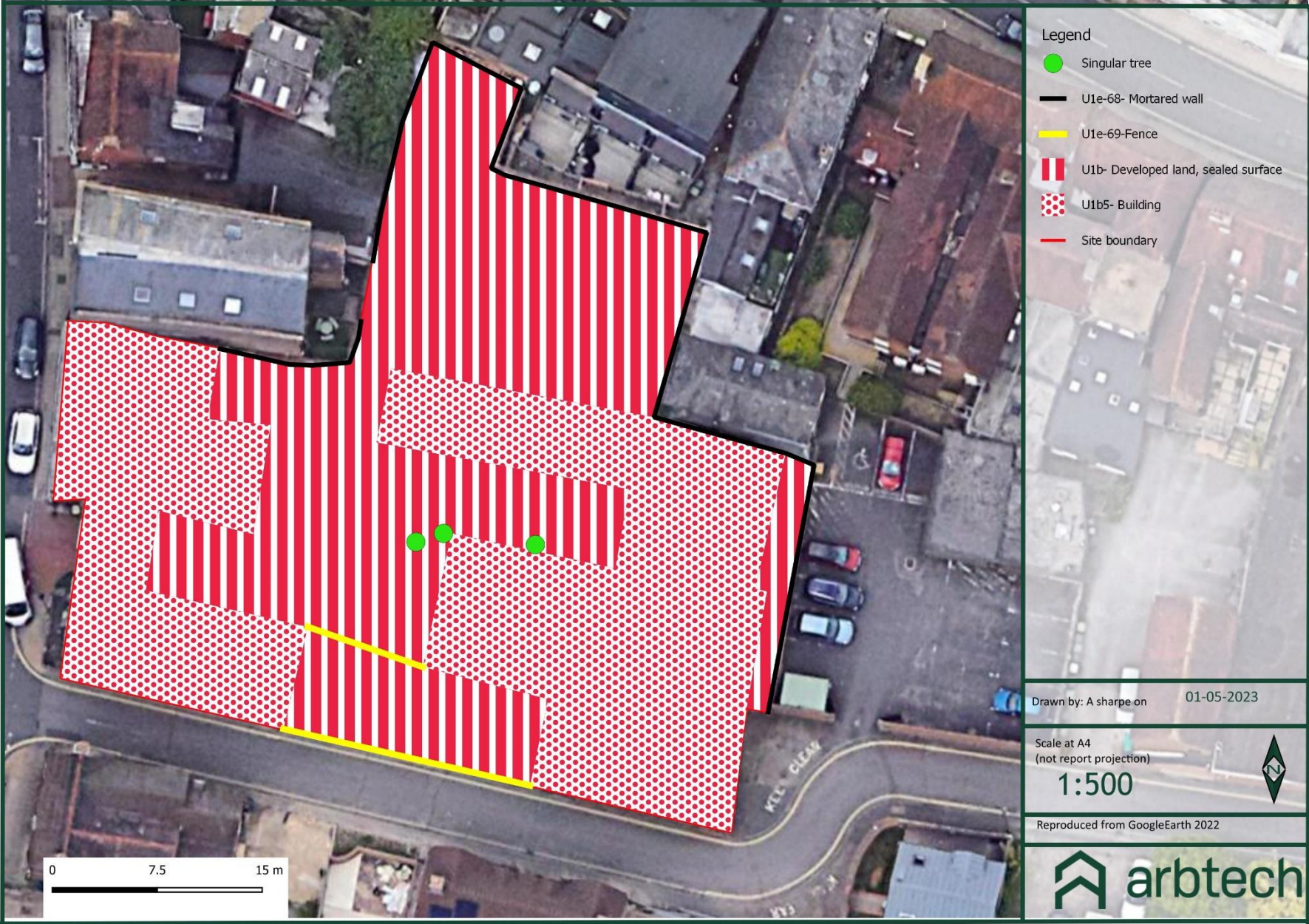
Appendix 1: Proposed Development Plan



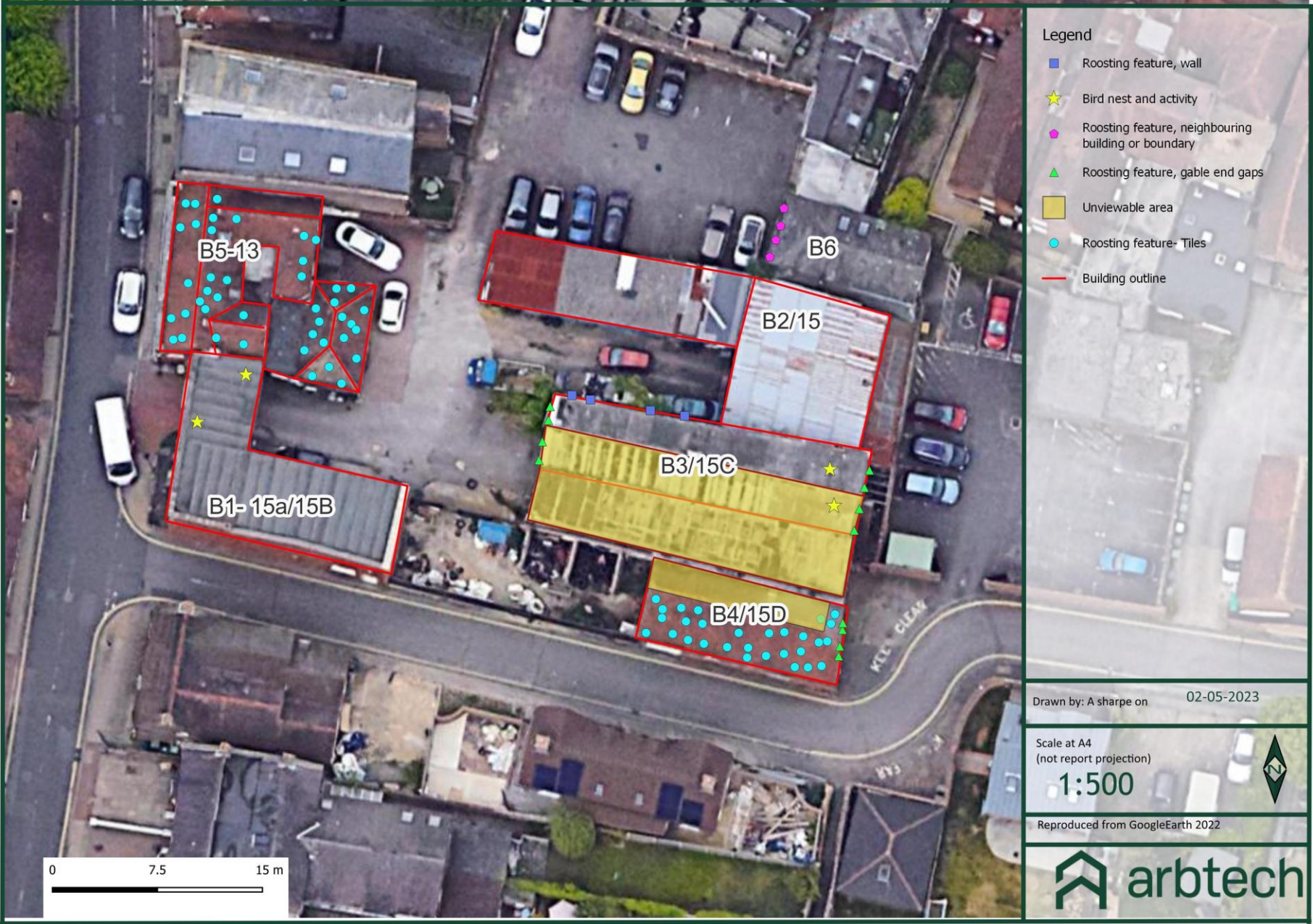
Appendix 2: Site Location Plan



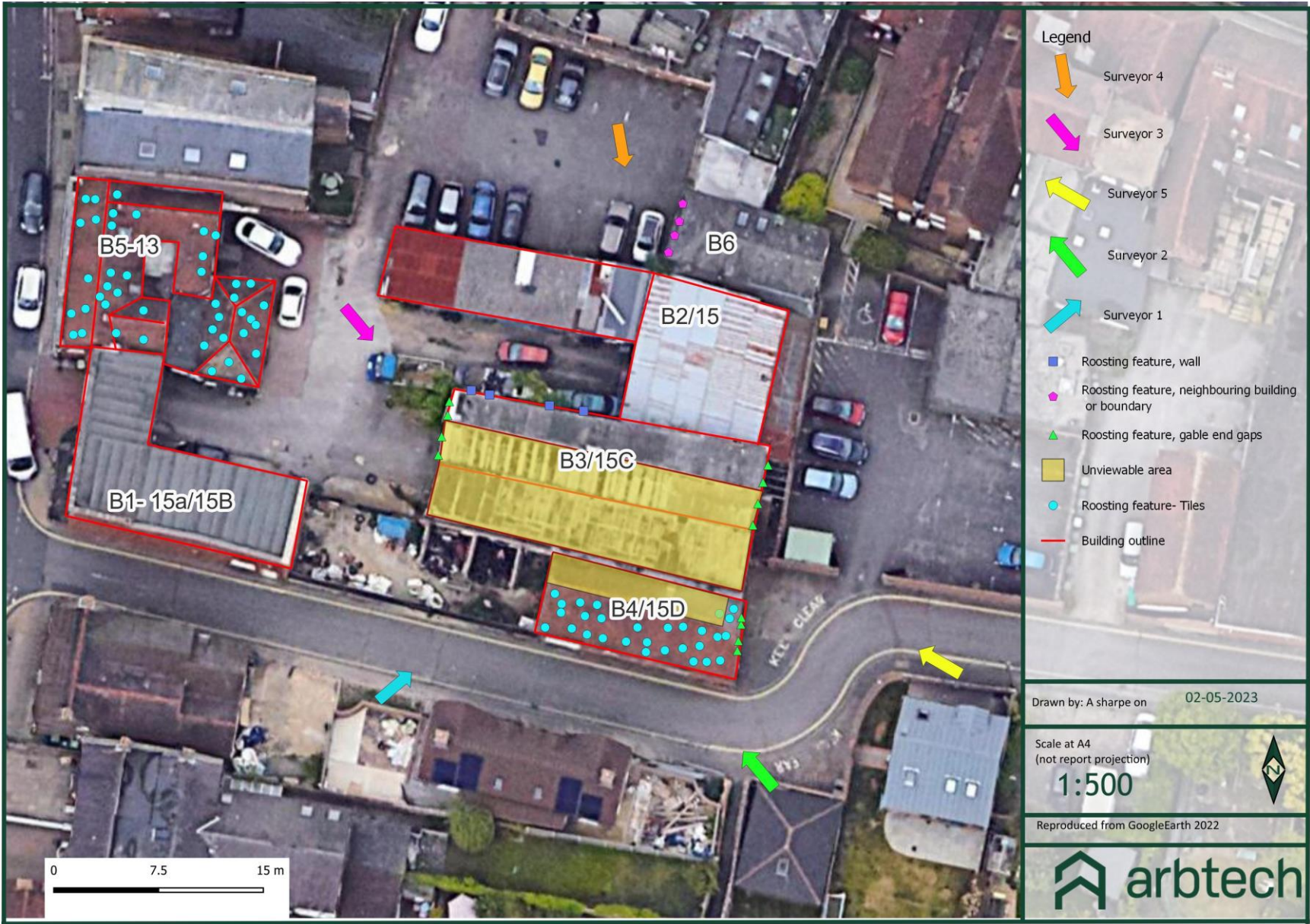
Appendix 3a: Habitat Survey Plan



Appendix 3b: PRA Plan



Appendix 3c: Proposed BERS Plan



Appendix 4: Legislation and Planning Policy

LEGAL PROTECTION

National and European Legislation Afforded to Habitats

International Statutory Designations

Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) are sites of European importance and are designated under the EC Habitats Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora (the Habitats Directive) and the EC Birds Directive 2009/147/EC on the conservation of wild birds (the Wild Birds Directive) respectively. Both form part of the wider Natura 2000 network across Europe.

Under the Habitats Directive Article 3 requires the establishment of a network of important conservation sites (SACs) across Europe. Over 1000 animal and plant species, as well as 200 habitat types, listed in the directive's annexes are protected in various ways:

Annex II species (about 900): core areas of their habitat are designated as Sites of Community importance (SCIs) and included in the Natura 2000 network. These sites must be managed in accordance with the ecological needs of the species.

Annex IV species (over 400, including many Annex II species): a strict protection regime must be applied across their entire natural range, both within and outside Natura 2000 sites.

Annex V species (over 90): their exploitation and taking in the wild is compatible with maintaining them in a favourable conservation status.

SPAs are classified under Article 2 of the Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds both for rare bird species (as listed on Annex I) and for important migratory species.

The Conservation of Habitats and Species Regulations 2017 (as amended) form the legal basis for the implementation of the Habitats and Birds Directives in terrestrial areas and territorial waters out to 12 nautical miles in England and Wales (including the inshore marine area) and to a limited extent in Scotland and Northern Ireland.

Ramsar sites are designated under the Convention on Wetlands of International Importance, agreed in Ramsar, Iran, in 1971. The Convention covers all aspects of wetland conservation and recognises the importance of wetland ecosystems in relation to global biodiversity conservation. The Convention refers to wetlands as “*areas of marsh, fen, peatland or water, whether natural or artificial, permanent or temporary, with water that is static or flowing, fresh, brackish or salt, including areas of marine water the depth of which at low tide does not exceed six metres*”. However, they may also include riparian and coastal zones. Ramsar sites are statutorily protected under the Wildlife & Countryside Act 1981 (as amended 01.04.1996) with further protection provided by the Countryside and Rights of Way (CROW) Act 2000. Policy statements have been issued by the Government in England and Wales highlighting the special status of Ramsar sites. The Government in England and Wales has issued policy statements which ensure that Ramsar sites are afforded the same protection as areas designated under the EC Birds and Habitats Directives as part of the Natura 2000 network (e.g. SACs & SPAs). Further provisions for the protection and management of SSSIs have been introduced by the Nature Conservation (Scotland) Act 2004.

National Statutory Designations

Sites of Special Scientific Interest (SSSI) are designated by nature conservation agencies in order to conserve key flora, fauna, geological or physio-geographical features within the UK. The original designations were under the National Parks and Access to the Countryside Act 1949 but SSSIs were then re-designated under the Wildlife & Countryside Act 1981 (as amended). As well as reinforcing other national designations (including National Nature Reserves), the system also provides statutory protection for terrestrial and coastal sites which are important within the European Natura 2000 network and globally.

Local Statutory Designations

Local authorities in consultation with the relevant nature conservation agency can declare Local Nature Reserves (LNRs) under the National Parks and Access to the Countryside Act 1949. LNRs are designated for flora, fauna or geological interest and are managed locally to retain these features and provide research, education and recreational opportunities.

Non- Statutory Designations

All non-statutorily designated sites are referred to as Local Wildlife Sites (LWS) and can be designated by the local authority for supporting local conservation interest. Combined with statutory designation, these sites are considered within Local Development Frameworks under the Town and Country Planning system and are a material consideration during the determination of planning applications. The protection afforded to these sites varies depending on the local authority involved.

Regionally Important Geological Sites (RIGs) are the most important geological and geomorphological areas outside of statutory designations. These sites are also a material consideration during the determination of planning applications.

The Hedgerow Regulations 1997

The Hedgerow Regulations 1997 are designed to protect 'important' countryside hedgerows. Importance is defined by whether the hedgerow (a) has existed for 30 years or more; or (b) satisfies at least one of the criteria listed in Part II of Schedule 1 of the Regulations.

Under the Regulations, it is against the law to remove or destroy hedgerows on or adjacent to common land, village greens, SSSIs (including all terrestrial SACs, NNRs and SPAs), LNRs, land used for agriculture or forestry and land used for the keeping or breeding of horses, ponies or donkeys without the permission of the local authority. Hedgerows 'within or marking the boundary of the curtilage of a dwelling-house' are excluded.

National and European Legislation Afforded to Species

The Conservation of Habitats and Species Regulations 2017 (as amended)

The Conservation of Habitats and Species Regulations 2017 (as amended) aims to promote the maintenance of biodiversity by requiring the Secretary of State to take measures to maintain or restore wild species listed within the Regulations at a favourable conservation status.

The Regulations make it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2, or pick, collect, cut, uproot, destroy, or trade in the plants listed in Schedule 4. However, these actions can be made lawful through the granting of licenses by the appropriate authorities. Licenses may be granted for a number of purposes (such as science and education, conservation, preserving public health and safety), but only after the appropriate authority is satisfied that there are no satisfactory alternatives and that such actions will have no detrimental effect on wild population of the species concerned.

The Wildlife and Countryside Act (WCA) 1981 (as amended)

The Wildlife and Countryside Act (WCA) 1981 (as amended) implements the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention 1979, implemented 1982) and implements the species protection requirements of EC Birds Directive 2009/147/EC on the conservation of wild birds in Great Britain (the birds Directive). The WCA 1981 has been subject to a number of amendments, the most important of which are through the Countryside and Rights of Way (CRoW) Act (2000).

Other legislative Acts affording protection to wildlife and their habitats include:

- Deer Act 1991
- Natural Environment & Rural Communities (NERC) Act 2006
- Protection of Badgers Act 1992
- Wild Mammals (Protection) Act 1996

Badgers

Badgers *Meles meles* are protected under The Protection of Badgers Act 1992 which makes it an offence to:

- Wilfully kill, injure, take, or attempt to kill, injure or take a badger
- Cruelly ill-treat a badger, including use of tongs and digging
- Possess or control a dead badger or any part thereof
- Intentionally or recklessly damage, destroy or obstruct access to a badger sett or any part thereof
- Intentionally or recklessly disturb a badger when it is occupying a badger sett
- Intentionally or recklessly cause a dog to enter a badger sett
- Sell or offers for sale, possesses or has under his control, a live badger

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

A development licence will be required from the relevant countryside agency (i.e. Natural England) for any development works likely to affect an active badger sett, or to disturb badgers whilst they occupy a sett. Guidance has been issued by the countryside agencies to define what would constitute a licensable activity. It is not possible to obtain a licence to translocate badgers.

Birds

With certain exceptions, all birds, their nests and eggs are protected under Sections 1-8 of the WCA. Among other things, this makes it an offence to:

- Intentionally kill, injure or take any wild bird
- Intentionally take, damage or destroy the nest of any wild bird while it is in use or being built
- Intentionally take or destroy an egg of any wild bird
- Sell, offer or expose for sale, have in his possession or transport for the purpose of sale any wild bird (dead or alive) or bird egg or part thereof.

Certain species of bird, for example the barn owl, bittern and kingfisher receive additional protection under Schedule 1 of the WCA and are commonly referred to as “Schedule 1” birds.

This affords them protection against:

- Intentional or reckless disturbance while it is building a nest or is in, on or near a nest containing eggs or young
- Intentional or reckless disturbance of dependent young of such a bird

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

Works should be planned to avoid the possibility of killing or injuring any wild bird or damaging or destroying their nests. The most effective way to reduce the likelihood of nest destruction in particular is to undertake work outside the main bird nesting season which typically runs from March to August. Where this is not feasible, it will be necessary to have any areas of suitable habitat thoroughly checked for nests prior to vegetation clearance.

Schedule 1 birds are additionally protected against disturbance during the nesting season. Thus, it will be necessary to ensure that no potentially disturbing works are undertaken in the vicinity of the nest. The most effective way to avoid disturbance is to postpone works until the young have fledged. If this is not feasible, it may be possible to maintain an appropriate buffer zone or standoff around the nest.

Amphibians and Reptiles

The sand lizard *Lacerta agilis*, smooth snake *Coronella austriaca*, natterjack toad *Epidalea calamita*, pool frog *Pelophylax lessonae* and great crested newt *Triturus cristatus* receive full protection under Habitats Regulations through their inclusion on Schedule 2. Regulation 41 prohibits:

- Deliberate killing, injuring or capturing of Schedule 2 species
- Deliberate disturbance of species in such a way as:
 - To impair their ability to survive, breed, or reproduce, or to rear or nurture young;
 - To impair their ability to hibernate or migrate
 - To affect significantly the local distribution or abundance of the species
- Damage or destruction of a breeding site or resting place

With the exception of the pool frog, these species are also listed on Schedule 5 of the WCA and they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection
- Selling, offering or exposing for sale, possession or transporting for purpose of sale.

Other native species of reptiles are protected solely under Schedule 5, Section 9(1) & (5) of the WCA, i.e. the adder *Vipera berus*, grass snake *Natrix natrix*, common lizard *Zootoca vivipara* and slow-worm *Anguis fragilis*. It is prohibited to:

- Intentionally or recklessly kill or injure these species.

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

A European Protected Species Licence (EPSL) issued by the relevant countryside agency (i.e. Natural England) will be required for works likely to affect the breeding sites or resting places amphibian and reptile species protected under Habitats Regulations. A licence will also be required for operations liable to result in a level of disturbance which might impair their ability to undertake those activities mentioned above (e.g. survive, breed, rear young and hibernate). The licences are to allow derogation from the relevant legislation, but also to enable appropriate mitigation measures to be put in place and their efficacy to be monitored.

Although not licensable, appropriate mitigation measures may also be required to prevent the intentional killing or injury of adder, grass snake, common lizard and slow worm, thus avoiding contravention of the WCA.

Water Voles

The water vole *Arvicola terrestris* is fully protected under Schedule 5 of the WCA. This makes it an offence to:

- Intentionally kill, injure or take (capture) water voles
- Intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection
- Intentionally or recklessly disturb water voles while they are occupying a structure or place used for shelter or protection

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

If development works are likely to affect habitats known to support water voles, the relevant countryside agency (i.e. Natural England) must be consulted. It must be shown that means by which the proposal can be re-designed to avoid contravening the legislation have been fully explored e.g. the use of alternative sites, appropriate timing of works to avoid times of the year in which water voles are most vulnerable, and measures to ensure minimal habitat loss. Conservation licences for the capture and translocation of water voles may be issued by the relevant countryside agency for the purpose of development activities if it can be shown that the activity has been properly planned and executed and thereby contributes to the conservation of the population. The licence will then only be granted to a suitably experienced person if it can be shown that adequate surveys have been undertaken to inform appropriate mitigation measures. Identification and preparation of a suitable receptor site will be necessary prior to the commencement of works.

Otters

Otters *Lutra lutra* are fully protected under the Conservation Regulations through their inclusion on Schedule 2. Regulation 41 prohibits:

- Deliberate killing, injuring or capturing of Schedule 2 species
- Deliberate disturbance of species in such a way as:
 - To impair their ability to survive, breed, or reproduce, or to rear or nurture young;
 - To impair their ability to hibernate or migrate
 - To affect significantly the local distribution or abundance of the species
- Damage or destruction of a breeding site or resting place

Otters are also currently protected under the WCA through their inclusion on Schedule 5. Under this Act, they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

A European Protected Species Licence (EPSL) issued by the relevant countryside agency (i.e. Natural England) will be required for works likely to affect otter breeding or resting places (often referred to as holts, couches or dens) or for operations likely to result in a level of disturbance which might impair their ability to undertake those activities mentioned above (e.g. survive, breed, and rear young). The licence is to allow derogation from the relevant legislation but also to enable appropriate mitigation measures to be put in place and their efficacy to be monitored

Bats

All species are fully protected by Habitats Regulations 2010 as they are listed on Schedule 2. Regulation 41 prohibits:

- Deliberate killing, injuring or capturing of Schedule 2 species (e.g. All bats)
- Deliberate disturbance of bat species in such a way as:
 - To impair their ability to survive, breed, or reproduce, or to rear or nurture young;
 - To impair their ability to hibernate or migrate
 - To affect significantly the local distribution or abundance of the species
- Damage or destruction of a breeding site or resting place

Bats are afforded the following additional protection through the WCA as they are included on Schedule 5:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

A European Protected Species Licence (EPSL) issued by the relevant countryside agency (i.e. Natural England) will be required for works are likely to affect a bat roost or an operation which are likely to result in an illegal level of disturbance to the species will require an EPSL. The licence is to allow derogation from the legislation through the application of appropriate mitigation measures and monitoring.

Hazel Dormice

Hazel dormice *Muscardinus avellanarius* are fully protected under Habitats Regulations through their inclusion on Schedule 2. Regulation 41 prohibits:

- Deliberate killing, injuring or capturing of Schedule 2 species
- Deliberate disturbance of species in such a way as:
 - To impair their ability to survive, breed, or reproduce, or to rear or nurture young;
 - To impair their ability to hibernate or migrate

- To affect significantly the local distribution or abundance of the species
- Damage or destruction of a breeding site or resting place

Dormice are also protected under the WCA through their inclusion on Schedule 5. Under this Act, they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

Works which are liable to affect a dormice habitat or an operation which are likely to result in an illegal level of disturbance to the species will require a European Protected Species Licence (EPSL) issued by the relevant countryside agency (i.e. Natural England). The licence is to allow derogation from the legislation through the application of appropriate mitigation measures and monitoring.

White Clawed Crayfish

There is a considerable amount of legislation in place in an attempt to protect the White-clawed crayfish *Austropotamobius pallipes*. This species is listed under the European Union's (EU) Habitat and Species Directive and is listed under Schedule 5 of the Wildlife and Countryside Act (1981). This makes it an offence to:

- Protected against intentional or reckless taking
- Protected against selling, offering or advertising for sale, possessing or transporting for the purpose of sale

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

The relevant countryside agency (i.e. Natural England) will need to be consulted about development which could impact on a watercourse or wetland known to support white clawed crayfish. Conservation licences for the capture and translocation of crayfish can be issued if it can be shown that the activity has been properly planned and executed and thereby contributes to the conservation of the population. The licence will only be granted to a suitably experienced person if it can be shown that adequate surveys have been undertaken to inform appropriate mitigation measures. Identification and preparation of a suitable receptor site will be necessary prior to the commencement of the works.

Wild Mammals (Protection Act) 1996

All wild mammals are protected against intentional acts of cruelty under the above legislation. This makes it an offence to mutilate, kick, beat, nail or otherwise impale, stab, burn, stone, crush, drown, drag or asphyxiate any wild mammal with intent to inflict unnecessary suffering.

To avoid possible contravention, due care and attention should be taken when carrying out works (for example operations near burrows or nests) with the potential to affect any wild mammal in this way, regardless of whether they are legally protected through other conservation legislation or not.

Legislation Afforded to Plants

With certain exceptions, all wild plants are protected under the WCA. This makes it an offence for an 'unauthorised' person to intentionally (or recklessly in Scotland) uproot wild plants. An authorised person can be the owner of the land on which the action is taken, or anybody authorised by them.

Certain rare species of plant, for example some species of orchid, are also fully protected under Schedule 8 of the Wildlife and Countryside Act 1981 (as amended). This prohibits any person from:

- Intentionally picking, uprooting or destruction of any wild Schedule 8 species
- Selling, offering or exposing for sale, or possessing or transporting for the purpose of sale, any wild live or dead Schedule 8 plant species or part thereof
- In addition to the UK legislation outlined above, several plant species are fully protected under Schedule 5 of The Conservation of Habitats and Species Regulations 2010. These are species of European importance. Regulation 45 makes it an offence to:
 - Deliberately pick, collect, cut, uproot or destroy a wild Schedule 5 species
 - Be in possession of, or control, transport, sell or exchange, or offer for sale or exchange any wild live or dead Schedule 5 species or anything derived from such a plant.

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

A European Protected Species Licence (EPSL) will be required from the relevant countryside agency (i.e. Natural England) for works which are likely to affect species of plants listed on Schedule 5 of the Conservation of Habitats and Species Regulations 2010. The licence is to allow derogation from the legislation through the application of appropriate mitigation measures and monitoring.

Invasive Species

Part II of Schedule 9 of the WCA lists non-native invasive plant species for which it is a criminal offence in England to plant or cause to grow in the wild due to their impact on native wildlife.

Species included (but not limited to):

- Japanese knotweed *Fallopia japonica*
- Giant hogweed *Heracleum mantegazzianum*
- Himalayan balsam *Impatiens glandulifera*

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

It is not an offence for plants listed in Part II of Schedule 9 of the WCA 1981 to be present on the development site, however, it is an offence to cause them to spread. Therefore, if any of the species are present on site and construction activities may result in further spread (e.g. earthworks, vehicle movements) then it will be necessary to design and implement appropriate mitigation prior to construction commencing.

Injurious weeds

Under the Weeds Act 1959 any landowner or occupier may be required prevent the spread of certain 'injurious weeds' including (but not limited to):

- Spear thistle *Cirsium vulgare*
- Creeping thistle *Cirsium arvense*
- Curled dock *Rumex crispus*
- Broad-leaved dock *Rumex obtusifolius*
- Common ragwort *Senecio jacobaea*

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

It is a criminal offence to fail to comply with a notice requiring such action to be taken. The Ragwort Control Act 2003 establishes a ragwort control code of practice as common ragwort is poisonous to horses and other livestock. This code provides best practice guidelines and is not legally binding.

NATIONAL PLANNING POLICY***Environment Act 2021***

The Environment Act 2021 (EA 2021) received Royal Assent on 9 November 2021 and is expected to become fully mandated within the next couple of years. The Act principally creates a post Brexit framework to protect and enhance the natural environment. Through amendments to the Town and Country Planning Act 1990, the Act will require all planning permissions in England (subject to exemptions which is likely to include householder applications) to be granted subject to a new general pre-commencement condition that requires approval of a biodiversity net gain plan. This will ensure the delivery of a minimum of 10% measurable biodiversity net gain. The principal tool to calculate this will be the Defra Biodiversity 3.0 Metric. Works to enhance habitats can be carried out either onsite or offsite or through the purchase of 'biodiversity credits' from the Secretary of State. However, this flexibility may be removed (subject to regulations) if the onsite habitat is 'irreplaceable'. Both onsite and offsite enhancements must be maintained for at least 30 years after completion of a development (which period may be amended).

National Planning Policy Framework 2021

The National Planning Policy Framework promotes sustainable development. The Framework specifies the need for protection of designated sites and priority habitats and species. An emphasis is also made on the need for ecological infrastructure through protection, restoration and re-creation. The protection and recovery of priority species (considered likely to be those listed as species of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006) is also listed as a requirement of planning policy.

In determining a planning application, planning authorities should aim to conserve and enhance biodiversity by ensuring that: designated sites are protected from harm; there is appropriate mitigation or compensation where significant harm cannot be avoided; measurable gains in biodiversity in and around developments are incorporated; and planning permission is refused for development resulting in the loss or deterioration of irreplaceable habitats including aged or veteran trees and also ancient woodland.

The Natural Environment and Rural Communities Act 2006 and the Biodiversity Duty

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'.

Section 41 of the Act requires the Secretary of State to publish a list of habitats and species which are of 'principal importance for the conservation of biodiversity'. This list is intended to assist decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications. A developer must show that their protection has been adequately addressed within a development proposal.

LOCAL PLANNING POLICY***Havant Borough Local Plan 2022***

The Havant Borough Local plan can be viewed here

<https://www.havant.gov.uk/local-plan>

The following planning policies have implications for developers in relation to bats:

- 5.160- Biodiversity net gain

Almost any development can achieve biodiversity net gain. Even small developments can include the use of design features to integrate biodiversity attributes into the building itself. At least every new dwelling, or commercial developments that involve the construction of a new building can include boxes or bricks for bats and birds, and other features can additionally be incorporated within larger developments .

- E15- Protected species

Havant Borough is very important for bat species and supports some rare and very rare species. Bechstein's bat is an extremely rare bat species found in nationally-important numbers in south-east Hampshire. Recent surveys have shown that a breeding population occurs throughout suitable habitat in the Rowlands Castle-Horndean area and is likely to occur more widely where suitable wooded habitat is present

Havant Biodiversity Action Plan

The Havant Biodiversity Action Plan can be viewed here: <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.havantfoe.org.uk/wp-content/uploads/Havant-Borough-Council-Havant-Biodiversity-Action-Plan-2011.pdf>

The following habitats have been identified on or surrounding the site (based on the site survey and a review of the magic.gov.uk database) and are included in the plan:

- Urban green space

The following species could be present on the site or in the surrounding area (based on the site survey and a review of the magic.gov.uk database) and are included in the plan:

- House sparrow
- Brown long-eared Bat
- Common pipistrelle
- Soprano Pipistrelle
- Hedgehog

EUROPEAN PROTECTED SPECIES POLICIES

In December 2016 Natural England officially introduced the four licensing policies throughout England. The four policies seek to achieve better outcomes for European Protected Species (EPS) and reduce unnecessary costs, delays and uncertainty that can be inherent in the current standard EPS licensing system. The policies are summarised as follows:

- Policy 1; provides greater flexibility in exclusion and relocation activities, where there is investment in habitat provision;
- Policy 2; provides greater flexibility in the location of compensatory habitat;
- Policy 3; provides greater flexibility on exclusion measures where this will allow EPS to use temporary habitat; and,
- Policy 4; provides a reduced survey effort in circumstances where the impacts of development can be confidently predicted.

The four policies have been designed to have a net benefit for EPS by improving populations overall and not just protecting individuals within development sites. Most notably Natural England now recognises that the Habitats Regulations legal framework now applies to 'local populations' of EPS and not individuals/site populations.