

From: "Norton, Tristan" <Tristan.Norton@hants.gov.uk>

Date: Monday, 29 April 2019 at 12:01

To: "Eaves, David" <David.Eaves@havant.gov.uk>

Cc: Havant Planning and Development Mailbox New
<planning.developmentnew@havant.gov.uk>

Subject: APP/19/00007 Camp Field (land to the west of Havant Crematorium), Bartons Road, Havant 19.0281

Dear David,

APP/19/00007 | Outline Application for access with all other matters reserved, for up to 72 new homes plus associated green infrastructure including community orchard | Camp Field (land to the west of Havant Crematorium), Bartons Road, Havant 19.0281

Thank you for consulting me on this outline application. Please accept my apologies for the delay in responding.

The application is accompanied by a Phase 2 Ecology Surveys report, a Biodiversity Mitigation and Enhancement Plan and an Appropriate Assessment Screening Statement (The Ecology Co-op, November 2018).

The site itself comprises a large field of arable land which has been improved grassland in the recent past. The site is of limited ecological value in terms of vegetation communities.

The obvious key constraint here is the presence of Bechstein's bats. The survey effort employed at the application site is acceptable, and included trapping surveys to identify mouse-eared bats. Surveys carried out by the applicant recorded no Bechstein's bats present within the application site in 2018. However, trapping and radio-tracking surveys undertaken by Portsmouth Water in July 2018 recorded a roosting female within Bartons Copse. In addition, a maternity roost of at least 38 bats was recorded at Bartons Copse in 2009. I would request that the ecologist provides an opinion on whether the surveys carried out by Portsmouth Water in July 2018 need incorporating into this assessment.

Despite the absence of Bechstein's bats during trapping surveys in relation to this application, Bartons Copse is clearly an important component of the wider landscape for this rare species and the species was found to roost in the Copse in summer 2018.

Bat tracking surveys carried out by Portsmouth Water in 2018 demonstrate that Bartons Copse is functionally linked to Southleigh Forest and Havant Thicket, with the same female bat roosting in all three areas and foraging within land between them. This provides further evidence that this bat species is reliant on dispersed woodland blocks and, crucially, the habitats between them. From a review of aerial mapping and the results of several years of survey results, it would appear that the route of Whichers Gate Road, running between Havant Thicket, Bartons Copse and Southleigh Forest, is a key commuting and foraging corridor for Bechstein's bats. I would request that the applicant's ecologist provides an opinion on the suitability of proposed mitigation measures (also see below) in light of the more-recent (and previous) records of Bechstein's bat at Bartons Copse, and the linkage between that site and the surrounding population. I would recommend that the ecologist approaches Portsmouth Water's Biodiversity Specialist in order to obtain additional data which will inform this assessment.

Bat surveys recorded relatively high percentages of mouse-eared species on the application site (up to 30% in some periods), albeit that the trapping surveys encountered no Bechstein's. Given the 2018 radio-tracking results, the species is evidently present and has been missed by this proposal's studies. I would therefore request further discussion of how this proposal might impact the wider population of Bechstein's bat. I would draw attention to mitigation proposals for this species resulting from surveys for the Land East of Horndean application (EHDC ref: 55562/005).

In addition to Bechstein's bat, surveys also recorded a diverse bat assemblage which includes two other rare/uncommon species. The fifth confirmed example of Alcaethoe's bat for Hampshire was trapped at the eastern edge of the site in August 2017, and western barbastelle was recorded in April and May 2018 and September 2017. These additional interesting bat records highlight the importance of the site (and indeed the surrounding landscape), which must be considered to be of at least County importance.

In terms of other protected or notable species, the site is relatively unconstrained. Some evidence of badger activity has been recorded from the woodland edge but no setts have been identified. Surveys have recorded the probable absence of hazel dormice and great crested newt. Bird surveys have recorded a typical assemblage of woodland bird species at the site boundaries, but no evidence of ground-nesting farmland birds. Reptiles appear to be absent.

Given that the primary ecological interest at this site is its bat assemblage, it is imperative that the proposed development does not compromise the continued presence of bat species. The proposed 18m-wide buffer between the developed area and the ancient woodland edge is welcome: this area must be devoid of any lighting

whatsoever and I would request that a detailed lighting strategy is provided now so that potential issues can be highlighted at the earliest opportunity. It will be essential to ensure that any lighting recommendations are discussed with Hampshire County Council to ensure that requirements for lighting standards and ecological constraints are compatible (experience from a nearby site suggest that this is an issue that needs careful attention at the outline stage). I would add that the more-extensive greenspace outside the buffer could provide valuable foraging/commuting habitat if it remains mostly unlit.

It is proposed to plant the woodland buffer with a native shrub mix, creating a softer edge than at present. This is welcome in principle and should provide additional bat foraging habitat whilst preventing informal access into the woodland. I would request that details of the woodland boundary treatment are provided: is the entire boundary with the woodland currently fenced? If not, will it be? Bartons Copse currently has no public access and there are no rights of way within the woodland. It would be problematical if informal public access to the woodland was facilitated by this proposal.

I would also raise concerns in respect to the potential for further development within the northern section of the site. Whilst this is outside the current proposal, built development closer to the woodland would be highly undesirable given the very obvious bat interest in this area. The cumulative impacts of various current and future development sites in this general area must be taken into consideration when assessing the impacts on bats in the landscape. It is incumbent upon applicants to ensure that these cumulative impacts are investigated and, where necessary, mitigation/compensation includes off-site measures which will protect/enhance bat habitat at a landscape scale.

In summary, whilst recognising that detailed survey effort has been employed at this site in relation to bats, the surveys did not highlight the presence of Bechstein's bat. This species was indeed recorded at Bartons Copse in summer 2018 and this woodland is an essential component of Bechstein's habitat within the landscape. Although no direct impacts to the woodland are proposed, I would request that the current assessment takes account of the presence of Bechstein's bat and clarifies how its presence might impact the proposed mitigation.

If you have any queries please don't hesitate to contact me.

Kind regards,

Tristan

Tristan Norton

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