

## Houghton, Michelle

---

**From:** Norton, Tristan <Tristan.Norton@hants.gov.uk>  
**Sent:** 27 October 2021 11:46  
**To:** Ellis, Adrian  
**Cc:** Havant Planning and Development Mailbox New  
**Subject:** APP/21/00893 Land north of Long Copse Lane, Emsworth, PO10 7UN 21.1064

**CAUTION:** This email came from outside of the council - only open links and attachments that you're expecting.

Dear Adrian,

**APP/21/00893 | Outline planning application for demolition of the existing buildings and the erection of a new residential scheme (C3 use of approximately 210 dwellings to include affordable housing) and associated landscaping, access and supporting infrastructure, all other matters reserved. | Land north of Long Copse Lane, Emsworth, PO10 7UN 21.1064**

Thank you for consulting me on this application. Thank you for your patience.

The application is accompanied by an Ecological Impact Assessment (Davidson-Watts Ecology, August 2021) and a series of appendices containing results and evaluation of various ecological surveys undertaken at the site between 2016 and 2021. I have also reviewed associated documents including the Lighting Assessment (WSP, August 2021) and the arboricultural assessment (Barrell, August 2021). I have been involved in pre-application discussions in relation to this site for several years and am therefore familiar with the site and its ecological sensitivities.

The site comprises a series of horse-grazed paddocks with associated boundary hedgerows. It is immediately adjacent to substantial areas of ancient woodland to the north and west. The site contains generally species-poor improved grassland of limited botanical value. The site contains a small area of woodland, Colman's Copse, at its south-western corner, and is bordered to the west and north by ancient woodland. A series of typical agricultural hedgerows are present within the paddock area. The northern and eastern boundaries contain a small tributary of the River Ems.

A comprehensive series of ecological surveys have been carried out since 2016 and have provided a sound ecological baseline. I do not consider that further ecological surveys are required at this stage, although there are outstanding bat survey results to be provided (see Ecological Impact Assessment (Davidson-Watts Ecology August 2021) section 3.7.19).

### Bats

The bat surveys since 2017 have been conducted by a recognised expert and have employed advanced techniques such as trapping and radio-tracking to determine the presence of the very rare Bechstein's Bats. Other surveys include roost assessments of buildings and trees, automated monitoring, and walked transects. I am content that the information submitted in respect to bats is robust (the required post-May survey data 2021 notwithstanding). I agree that the most notable ecological feature is the presence of a breeding population of Bechstein's bat in the surrounding landscape. This species has been known at the site since 2009, with a large maternity roost recorded in that year within the site's boundaries. Detailed surveys in relation to this application have established that the site is still of high importance to Bechstein's bats, with maternity roosts in the surrounding landscape identified and key foraging habitat and commuting routes noted. It is notable that Bechstein's bats in this landscape, as illuminated by this study and previous studies carried out in relation to other development sites, rely on roosting sites away from large, established woodlands. This is likely to be a reflection of the general absence of suitable roosting sites within many of the larger woodland blocks in the landscape. The dependence of this, and other, bat

species on hedgerow connections is highlighted. It should be noted that the site has been shown to support a diverse assemblage of other bat species, including the uncommon Barbastelle and the little-known Alcaethoe's Bat. Whilst my comments here relate primarily to Bechstein's Bat (in light of its particular importance nationally and locally) it is clear that there is potential for this proposal to impact many bat species. Whilst they differ in their ecology, all bat species have the same broad habitat requirements.

The potential impacts to this nationally important population of Bechstein's bats is set out in section 5 of the submitted Bat Trapping & Radio-Tracking Baseline Report & Evaluation (Davidson-Watts Ecology, August 2021). In the absence of mitigating measures it is clear that the proposed development would have a detrimental impact on Bechstein's Bat roosting, foraging and commuting habitat. The Bechstein's Bat population in Havant Borough is assumed to be functionally linked to larger populations in West Sussex and therefore to the Singleton & Cocking Tunnels Special Area of Conservation (SAC). The SAC is designated due to winter populations of Bechstein's and Barbastelle bats. Evidence from bat tracking studies has shown that another bat species from the SAC has travelled to Havant borough and therefore a functional link between the SAC and the Bechstein's Bat populations in this part of the borough is highly likely. Given this assumed linkage, it will be necessary for a Habitats Regulations Assessment (HRA) to include details of any likely significant effect on the Singleton & Cocking Tunnels SAC.

No Bechstein's Bat roosts have been identified within the proposed site between 2016 and 2021. In 2009 a large maternity roost was recorded within a small copse at the south-western corner of the site: this is the largest single Bechstein's roost recorded in the borough. Confirmed or assumed maternity roost locations were recorded in 2017 and 2021 near Westbourne and Hermitage, to the south/south-east of the application site, both within either individual hedgerow trees or trees within a small woodland. In addition, maternity and non-breeding roosts were identified within woodland at Long Copse Hill to the north of the proposed development site. It is clear that the site sits within an area supporting roosts of this rare bat species.

It is understood from other studies of Bechstein's Bats in the borough that there is a general lack of suitable tree roosting sites within much of the managed woodland in the wider landscape: many of the Bechstein's roosts identified have been within isolated trees or those within a parkland setting. This is highly suggestive of local woodlands being less suitable for roosting.

The evidence from the radio-tracking studies since 2016 have highlighted the critical importance of the River Ems corridor to the east of the site. It is apparent that bats from roosts within Long Copse Hill, as well as the roosts further south near Westbourne and Hermitage, that the Ems corridor is an established commuting route.

Proposed mitigation, compensation and enhancement entails the establishment of unlit, wide buffers to the site boundaries. This includes a dedicated 'bat buffer' along the entire western and northern boundaries, extending to c.35m at its maximum. The principle of these boundary buffers is welcome, although I would like to see additional detail of how these will be achieved and managed. There is potential for 'inaccessible' buffer areas to be degraded by their proximity to residential development. Similarly, it is critical that the adjacent ancient woodland areas are not subject to recreational pressure arising from new development: increased footfall, domestic pets, litter and other damaging activities will inevitably reduce the ecological value of these important woodlands. The potential impact of lighting on these buffers is also of concern. The submitted Lighting Assessment includes outline details of proposed lighting, but the level of detail required to assess the impacts of lighting on the proposed buffer and adjacent habitats is not provided. It is hoped to provide unlit areas adjacent to the buffers but this is not guaranteed.

Off-site enhancement measures are proposed, situated c.2km to the north-west. These comprise the creation of wooded buffers and linkage between Southleigh Forest and Stansted Forest. These

areas of habitat creation will serve to address nutrient neutrality requirements as well as providing a valuable connection between the two large woodland blocks. I welcome these off-site enhancements and consider that they will provide a benefit to bats and other species in the landscape. There is also a proposal to install bat roosting boxes within surrounding woodlands in order to increase the number of roosting opportunities: this is welcome.

#### Hazel Dormouse

Evidence of Hazel Dormouse presence has been recorded along the northern boundary of the site and it is assumed that this species could occur within any dense woody vegetation locally.

#### Badger

No evidence of Badgers has been recorded on site and it is concluded that this species does not occur.

#### Great Crested Newt

Surveys have recorded no evidence of Great Crested Newts within ponds on the site. The species is considered to be absent.

#### Breeding Birds

A standard assemblage of breeding bird species has been recorded within and adjacent to the site. This includes several species considered to be of conservation concern at the national level. Most species are associated with woody habitats, although nesting House Sparrows are present within on-site buildings.

#### Reptiles

Surveys have recorded small populations of Grass Snake and Slow-worm within the margins of the site.

#### Summary

In summary, whilst I am generally content with the detailed ecological information provided there are further details that I consider essential for understanding the potential impacts of this proposal on ecological receptors. The outline nature of the submission means that certain details such as lighting and landscape are not addressed in full. Given the importance of some ecological receptors within the development's zone of influence, it is my view that these matters are critical in judging the likely effects of this proposal on key ecological receptors. With respect to lighting, the submitted assessment provides some very welcome text on the proposed lighting strategy and its adherence to industry best-practice guidance on bats and lighting. I consider that further information is required to provide reassurance that these aspirations are deliverable and that proposals achieve the desired outcome of ensuring that key bat habitat is protected and enhanced. A lighting plan with contours and critically, vertical spillage, is necessary to fully understand how the site will interact with the adjacent woodland, proposed woodland buffer and retained boundary habitats. The protection of adjacent woodland habitat is essential in determining the acceptability of the proposal.

NPPF, Circular 06/2005 and Natural England Standing Advice on Protected Species, require that planning decisions are based on full, up-to-date ecological information and it is essential that all necessary survey, assessment and mitigation information is available to the LPA prior to determination, particularly in the case of protected species, which are a material planning consideration. This will enable the LPA to determine the application on the basis of full knowledge about the ecological impacts of the proposal and to ensure that any impacts can and will be mitigated, and are acceptable.

I hope the above is suitable – if you have any queries please don't hesitate to contact me.

Kind regards,

Tristan

**Tristan Norton**

**Senior Ecologist  
Ecology Team**

Specialist Environment Services  
Economy, Transport and Environment Department  
Hampshire County Council  
Elizabeth II Court West  
The Castle, Winchester  
Hampshire SO23 8UD  
Direct Line: 01962 832335  
Mobile: 07784 261774  
E-mail: [tristan.norton@hants.gov.uk](mailto:tristan.norton@hants.gov.uk); [www.hants.gov.uk/biodiversity](http://www.hants.gov.uk/biodiversity)

### **Coronavirus (Covid-19)**

Hampshire County Council's response to the Covid-19 is available here (<https://www.hants.gov.uk/socialcareandhealth/coronavirus>).

In line with Government advice to reduce non-essential travel and work from home where possible, Ecology officers are now working remotely. Whilst we will endeavour to conduct our services in a timely manner and to meet statutory timescales where we can, there may be some impact to the services we deliver. We will ensure that we keep all applicants / interested parties informed of any further impacts to our services should they arise. The Council's response also means that no non-essential site visits or face to face meetings will be undertaken until further notice. Essential and contractual surveys may continue take place where there is no risk to the surveyor or the public, and in line with Government advice. This will be reviewed on an on-going basis.



**Hampshire Services offers a range of professional consultancy services to partner organisations.** Specialist Environment Services provides data, advice and assessments for ecology, heritage and landscape.

[www.hants.gov.uk/sharedexpertise](http://www.hants.gov.uk/sharedexpertise)



Please consider the environment before printing this email.

---

**From:** Eaves, David <[David.Eaves@havant.gov.uk](mailto:David.Eaves@havant.gov.uk)>  
**Sent:** 01 April 2021 14:42  
**To:** Norton, Tristan <[Tristan.Norton@hants.gov.uk](mailto:Tristan.Norton@hants.gov.uk)>  
**Subject:** APP/20/01223 48 Sinah Lane, Hayling Island, PO11 0HH HRA/AA

Hi Tristan

Re: Demolition of existing dwelling and erection of replacement dwelling including new summer house and garage with ancillary accommodation, new gabion wall to replace the existing block wall (sea defence) together with new driveway access with associated landscaping.

Further to my phone message of today, just a quick check with you please, I am not sure whether we need to carry out a HRA/AA in relation to this application re impact on SPA/Protected Species.

A phase 1 Ecological Assessment & Bat Roost Assessment was submitted and I have your consultation response.

There are impacts on bats and potential impacts from the sea wall construction phase on the SPA . Mitigation is required and the Ecological report makes recommendations in that regard that I see you are happy with and will be conditioned.

Do we therefore need to do a HRA/AA in consultation with NE or can we issue the permission with appropriate conditions. If possible could we discuss this, I can be contacted on my work number.

Many thanks

David

David Eaves  
Principal Planning Officer  
Planning Services  
Havant Borough Council  
Public Service Plaza  
Civic Centre Road  
Havant  
PO9 2AX  
Direct Line: 02392 446549  
[David.eaves@havant.gov.uk](mailto:David.eaves@havant.gov.uk)  
[www.havant.gov.uk](http://www.havant.gov.uk)  
[www.facebook.com/havantboroughcouncil](https://www.facebook.com/havantboroughcouncil)  
[www.twitter.com/havantborough](https://www.twitter.com/havantborough)

If you are requesting information under the Freedom of Information Act, Environmental Information Regulations or Data Protection Act then please redirect your email to [customer.services@havant.gov.uk](mailto:customer.services@havant.gov.uk). Any statutory timeframe for a response for requests will not commence until the request is received by the Customer Services Team.

Information in this message is confidential and may be privileged. It is intended solely for the person to whom it is addressed. If you are not the intended recipient, please notify the sender and delete the message from your system immediately.