

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 22.0309**

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. The application now includes a Shadow Habitats Regulations Assessment (Pegasus, March 2022) with appendices covering topics such as lighting, an Biodiversity Enhancement Management Plan (BEMP) and a Construction Environment Management Plan (CEMP). 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. I have also taken account of detailed comments by certain relevant bodies such as the Hampshire Bat Group. Following initial submission, further information was requested on certain aspects of the ecological mitigation, compensation and enhancement strategy in order that the LPA had greater certainty that the considerable ecological constraints were being addressed robustly. It is important for me to note that there has been positive engagement with the applicant's ecological advisors throughout the pre-application stage and I welcome the provision of regular updates and opportunities to review and critique ecological information.

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. The proposal will entail the loss of much of the grassland and a significant percentage of hedgerow habitat. The proximity of new housing to high value woodland habitats is a significant potential negative impact.

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. Changes in species occurrence/abundance over time are expected, and it is notable that this is evident in respect to bats at this site.

## 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: these surveys are in accordance with national guidelines and with the requirements of local plan policy. 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 as robust as it can be. 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 do differ in their ecology, all bat species have the same broad habitat requirements: areas of open and wooded habitats with good interconnectivity and the presence of suitable tree and building roosting locations.

The potential impacts to this nationally important population of Bechstein's bats are set out in section 5 of the submitted Bat Trapping & Radio-Tracking Baseline Report & Evaluation (Davidson-Watts Ecology, August 2021) and the submitted Shadow HRA. 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, the

submitted HRA includes details of potential effects on the Singleton & Cocking Tunnels SAC.

The linkage between the SAC and Havant borough in terms of Bechstein's and Barbastelle bats is not yet proven but is based on a reasonable assumption given the ecology and distribution of bat populations within the borough and adjacent areas of West Sussex. The HRA concludes that a likely significant effect on the SAC is unlikely, based primarily on the provision of a comprehensive on- and off-site mitigation, compensation and enhancement strategy. The HRA includes an in-combination assessment, detailing a number of other developments potentially impacting suitable bat habitat. These other developments have each entailed surveys for bat species including Bechstein's and Barbastelle and include habitat mitigation, compensation and enhancement measures. As stated in previous responses, I am generally content that the submitted mitigation, compensation and enhancement package is acceptable on ecological grounds. Comparisons with the Havant Thicket Winter Storage Reservoir site are understandable but the sites are not comparable: the reservoir proposal entails the direct loss of substantial areas of ancient woodland, grassland, scrub, hedgerows and watercourses and is by far the most significant impact to bat habitat in the landscape. Mitigation for that site comprises extensive on- and off-site compensatory habitat. This proposal does not entail loss of woodland habitat, with the bulk of habitat losses relating to improved grassland and hedgerows. Whilst this is not insignificant, and there is no doubt that bat species do utilise improved pasture for foraging, the direct habitat losses are relatively limited and the most significant habitats such as woodland are retained and buffered. There are of course associated indirect impacts to bats and their habitat.

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 for bats from roosts within Long Copse Hill, as well as the roosts further south near Westbourne and Hermitage, the Ems corridor is an established commuting route.

The site has been shown to support Barbastelle bats, with a small number of contacts recorded during all periods of bat activity surveys. Smaller mouse-eared *Myotis* species have also been recorded, including the scarce Alcahoie Bat. Barbastelle is an uncommon but widespread species in southern England, with records from most areas of Hampshire. The species is reliant on woodlands for roosting and will forage/commute long distances using field boundaries. Alcahoie Bat is a little-known and recently described species in Britain, associated with woodland habitats. The number of records is increasing as ecologists and bat surveyors become more familiar with its identification. These two species, as well as Bechstein's and the various other species recorded at the site and its surrounds, are not unexpected occurrences at such a site. The overall bat assemblage at the site is of high conservation value.

Proposed mitigation, compensation and enhancement entails the establishment of unlit, wide buffers to the site boundaries, incorporating native species plantings, wildflower grassland and planted swale features. This includes a dedicated 'bat buffer' along the entire western and northern boundaries, extending to c.35m at its maximum, as well as north/south and east/west corridors within the site. The principle of the boundary buffers is welcome. 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 attached BEMP provides additional details on the objectives, establishment and ongoing management of ecological compensation/enhancement areas across the site and helpfully divides the site into zones. The key objective overall is the buffering of woodland habitats at the site's boundaries. Substantial unlit buffer zones are proposed, extending to c.30m. I note the objections from consultees such as the Woodland Trust, with recommendations for buffers extending to 50m. There is at present no statutory recommended buffer width for ancient woodland and I do consider that 30m is a satisfactory width, both to provide protection for trees and to provide an unlit bat corridor. The quality of any buffer, irrespective of width, is primarily dependent on its treatment and unlit buffers containing native vegetation are likely to be effective if at c.30m width.

The submitted lighting strategy demonstrates that the proposed buffers will be generally unlit, with lux levels of between 0 and 0.2/0.4 within the buffers and levels of 1lux at the boundary. It is apparent that the lighting strategy has, as requested, been devised with ecological receptors in mind and I welcome the provision of substantial unlit/darkened buffers.

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. I note that this proposal has the support of the landowner, the Stansted Park Foundation. 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.

The demolition of buildings will impact a recorded Soprano Pipistrelle roost and therefore a European Protected Species Licence will be required. Mitigation for this relatively low status roost will comprise the provision of tree-mounted bat boxes and the new dwellings will incorporate a number of integral bat roosting features. It is the responsibility of the applicant to obtain any necessary licence and to ensure that the development is implemented in accordance with any licence conditions.

#### 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. The loss of significant lengths of hedgerow habitat will undoubtedly impact this species through habitat loss, and there is clearly potential for construction- and operational-phase impacts from noise, visual disturbance, lighting and predation. The loss of Dormouse habitat will, presumably, necessitate a European Protected Species Licence and it is the responsibility of the applicant to obtain any necessary licence and to ensure that the development is implemented in accordance with any licence conditions. Mitigation/compensation for Dormouse impacts will entail the planting of c.275m of new hedgerow habitat within the buffer zones, and the off-site woodland planting is likely to benefit this species in terms of both habitat area and habitat connectivity. Dormice will undoubtedly occur within the ancient woodlands in the adjacent areas and therefore construction-phase disturbance needs to be considered seriously, as does post-development disturbance of habitat.

#### 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. The proposed mitigation/compensation planting on and off-site will provide suitable nesting habitat for many bird species. I would expect the built areas to incorporate nesting opportunities for declining bird species, especially Common Swift: I request that a suitably ambitious number of integral nest features for Common Swift are included alongside those features already recommended.

### Reptiles

Surveys have recorded small populations of Grass Snake and Slow-worm within the margins of the site. I am in agreement with the proposed habitat manipulation methods as the most effective way to prevent direct harm to reptiles, and concur that the proposed buffers and swales will provide suitable reptile habitat. The construction period will require the use of an Ecological Clerk of Works to ensure that avoidance and mitigation measures are implemented robustly.

### Summary

In summary, I am content with the detailed ecological survey and assessment information provided and consider that the details of proposed mitigation, compensation and enhancement are satisfactory. The outline nature of the submission means that certain details such as landscaping are not addressed in full, although some details are provided. Personally I would like to see greater use of relevant native species within all landscaping areas, rather than fairly standard ornamental species: I would recommend that the applicant's ecologist reviews the landscaping specification to determine if any proposed species pose an invasive threat to the adjacent woodland habitats, and to suggest further native species/locally relevant plantings.

I consider it essential that there is a robust mechanism for ongoing monitoring of proposed ecological compensation/enhancement measures by the Local Planning Authority and the ability to ensure that, should issues arise, the site operator is required to remedy any issues.

At this stage, sufficient information has been provided. If you are minded to grant permission can I suggest that a fully-detailed Ecological Mitigation, Compensation and Enhancement Strategy is provided prior to commencement. This should include full, finalised details of all ecological measures for habitats and species. It should provide

explicit details of the location, type, timing, management and monitoring/reporting of all mitigation/compensation/enhancement measures and these should be in accordance with/complementary to other aspects of the scheme such as lighting, landscaping, drainage and arboriculture.

*Prior to the commencement of development activities, a fully-detailed Ecological Mitigation, Compensation and Enhancement Strategy shall be submitted to and approved in writing by the Local Planning Authority. This strategy shall be in accordance with the measures detailed within Ecological Impact Assessment (Davidson-Watts Ecology, August 2021), the Shadow Habitats Regulations Assessment and appendices (Pegasus, March 2022), the Biodiversity Enhancement Management Plan (BEMP) (Davidson-Watts Ecology, March 2022) and the Construction Environment Management Plan (CEMP) (February 2022) unless otherwise agreed in writing by the local planning authority. The strategy shall include (but not necessarily be restricted to): details of all habitat and species mitigation measures; details of the location, composition and ongoing management, monitoring and reporting of all compensatory or enhancement habitat (on- and off-site); location, type and number of all bat/bird boxes and other ecological enhancements; details of lighting. All ecological mitigation/compensation/enhancement measures shall be installed/implemented in strict accordance with ecologist's instructions and retained in a location and condition suited to their intended function. Reason: to protect and enhance biodiversity in accordance with the Conservation Regulations 2017, the Wildlife & Countryside Act 1981 (as amended), the NERC Act 2006, NPPF and Policy CS 11 of the Havant Borough Core Strategy March 2011.*

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

Kind regards,

Tristan

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