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1st December 2015

**Your Ref: APP/15/01156
Our Ref: 13.60.3.30**

Dear Daphney

PROPOSAL:

APPROVAL OF RESERVED MATTERS IN RESPECT TO PLOT 2 PHASE 1 OF OUTLINE APPLICATION APP/15/00732 (NEW EMPLOYMENT USES, HOTEL AND ACCESS ROAD) COMPRISING CONSTRUCTION OF B8 WAREHOUSE AND DISTRIBUTION BUILDING(18,037 SQ M) TO BE CONSTRUCTED IN 2 PHASES, WITH A MAXIMUM HEIGHT NOT EXCEEDING THE 42M AOD CONTOUR (THE DESIGN FOR PLOT 2 INCORPORATING REVISION TO PREVIOUSLY APPROVED PARAMETER PLAN FORMING PART OF THE ENVIRONMENTAL STATEMENT DATED MARCH 2012).

LOCATION:

PLOT 2, DUNSBURY HILL FARM, PARK LANE, COWPLAIN, WATERLOOVILLE

STATUTORY DESIGNATED SITES:

**CHICHESTER & LANGSTONE HARBOURS – RAMSAR, SPECIAL PROTECTION AREA (SPA)
SOLENT MARITIME – SPECIAL AREA OF CONSERVATION
LANGSTONE HARBOUR – SITE OF SPECIAL SCIENTIFIC INTEREST (SSSI)**

NON-STATUTORY DESIGNATED SITES (SITES OF IMPORTANCE OF NATURE CONSERVATION):

NEVILLE'S PARK WEST WOOD, NEVILLE'S PARK EAST WOOD, NEVILLE'S PARK AREAS – 2, 3 & 4 – 10, BUSHY LEASE, CHERRY TREE ROW, DUNSBURY HILL WOOD & BEECH WOOD EAST.

Thank you for providing the additional ecological information¹ supporting this Reserved Matters Application. Having now had the opportunity to review this information, and also the comments made by Tristan Norton the county ecologist, the Trust has little further to add. However, we would like to reiterate the concerns raised by Tristan Norton, with regard to the illumination of the woodland edge, and the potential impacts that may occur on all bat species, but in particular the Bechstein's bat.

We note that reference is made to the Bat Conservation Trust's Interim Lighting Strategy² and the use of narrow spectrum light sources and the avoidance of white and blue wavelengths will be adopted.

¹ ATKINS (Nov 2015) – Dunsbury Hill Farm, Havant – Reserved Matters Application – Plot 2 Ecological Impact Assessment

² Bat Conservation Trust (2014). *Artificial lighting and wildlife Interim Guidance*: Recommendations to help minimise the impact artificial lighting.

However it is worth noting that many bat species generally avoid external lighting and the illumination of important foraging habitats, such as woodland edges and hedgerows, can be particularly harmful (BCT, 2014). This point has also been highlighted by the county ecologist.

As you will be aware the site proposals as a whole will result in a change from what has been a largely rural and unlit environment, to one that is largely industrial and as we understand it, the site will be operational 24hrs a day. We are therefore concerned at the current proposed increase in light levels not just in relation to this application, but across the whole site and the potential impacts that this may have on foraging and also roosting bats.

Given the significance of Bechstein's bat in the local area we request further information on the following;

- A detailed assessment exploring how this species is using the wider landscape in order to ensure that established foraging routes are not cut off; and
- An assessment of all trees along the woodland edge of the proposed site in order to establish the suitability of any trees with bat roost potential, and how these might be impacted by the increased level of illumination. It should be noted that any increase in lighting around a roost site is likely to impact on the viability of that roost in the future.

Our particular concerns with Bechstein's bat relate to the fact that there is very little information detailing how the species is able to adapt to increased light levels. The population in the south-east corner of Hampshire has only recently been discovered and there are indications that the species is using sub-optimal habitat (such as open grassland) which may indicate that it is already under stress from habitat loss and/or fragmentation. Some very specific mitigation measures have been incorporated into the Land East of Horndean development but this development has yet to be built and therefore it is not known whether they will work and the species will be put under further stress. Therefore it is crucial that detailed studies are carried out before irreversible impacts occur on the species.

The above advice is given based on the information made available at this time and may change should further or amended details be submitted. We trust that you will find our comments helpful in determining this application and if you wish to discuss these matters further, then please do not hesitate to do so. I also ask that you keep the Trust informed of the progress and outcome of this application.

Yours sincerely



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