

Dear Daphney,

APP/14/00863 Demolition of existing buildings and erection of 55 dwellings; comprising 6No. 2 bed flats; 2 bed houses; 33No. 3 bed houses; 6No. 4 bed houses and 1No. 5 bed house; together with access, landscaping, car parking and open space. Land north of Barton's Road, Havant 14.1325

Thank you for re-consulting me on this application. In summary, after the recent submission of additional information from the applicant's ecological advisors, I consider that sufficient detail has been provided on the issue of bat identification but I do still have concerns over the overall extent of mitigation.

I have now received further information from White Young Green (email to me dated 17th November 2014) which addresses the issue of *Myotis* bat calls and the previous lack of any detailed analysis of these. You will recall that I had requested further investigation due to the potential for the very rare Bechstein's bat to occur at this site. I have also seen a formal consultation response from Mr Trevor Codlin at the Hampshire & Isle of Wight Wildlife Trust (HIOWT) dated 8th December 2014 which sets out the Trust's continued concerns over the proposals: I have sympathy for these concerns but do not entirely agree with them.

Bats

I am pleased to see that WYG have now been able to undertake further analyses of bat echolocation recordings in order to identify the *Myotis* species using the site and it is worth stating that this effort has been made. These analyses have provided a confident identification for the majority of bat calls. It is concluded, based on the analyses, that none of the calls show the characteristics of Bechstein's bat. Whilst acknowledging the extreme caution one must display when dealing with this species (recommended survey guidelines suggest trapping as the preferred survey method), I must also consider the likelihood of the application site being used routinely by Bechstein's bats and also whether the proposed mitigation would be amended by the knowledge that this species was present. Comparisons with the Land East of Horndean application site are not entirely valid – that site is huge, includes or is immediately adjacent to several large roosts, contains extensive areas of optimal Bechstein's bat habitat and has the potential to result in population-level impacts to bats. This site does not have that potential I believe.

Surveys carried out to best practice guidance have recorded no bat roosts within the site and good effort has been made to identify to species level all bat echolocation calls. Overall, whilst of course it would be most useful to request bat trapping and radio-tracking data, I cannot find too much fault in the outcome of the surveys and consider that as long as suitable mitigation is proposed bats would likely continue to utilise this site. The situation in respect to our knowledge of Bechstein's bats in Hampshire is evolving and all parties (LPAs, the Trust and consultants) are still learning how best to approach this species: ideally all applications within a certain radius of known roosts would have a set methodology for assessing presence/absence but until such a strategic approach is adopted across planning authorities the LPA must to a large degree defer to those who have knowledge of the site and its ecological features. In this instance, given the level of bat survey works undertaken I do not see that requesting detailed trapping and radio-tracking surveys

during 2015 would be justified if meaningful mitigation can be secured at this stage: we have a level of data which most sites do not have and therefore mitigation can be provided based on hard data. The issue therefore in my opinion lies not with survey data but with deficiencies in mitigation.

Mitigation

I repeat my statement that the level of boundary buffering along the eastern boundary appears minimal. The existing vegetation along plots 29 to 37 is still subsumed into a series of garden plots with, apparently, no buffer in many areas and simply a 1m high post and wire fence. This clearly raises potential for ongoing degradation of the boundary vegetation through inappropriate management, dumping of garden waste etc. I would therefore query again why minimal protection has been given to the retained eastern and western boundaries if, as is stated within the D&A statement, these features are to be 'retained and safeguarded'. The site layout plan looks very green but simply shows existing vegetation. If the loss of the mature oak trees within the site itself is to be accepted, it is not unreasonable to expect that retained boundary features should be given stronger protection and buffering, especially when bat surveys have clearly demonstrated that the site is used by a good number of bat species.

There is now apparently a 15m unlit buffer along the entire northern boundary where the site abuts Barton's Copse. The latest site layout (Bright Space Architects, submitted 28th Nov 2014) doesn't really demonstrate this, nor do any of the other landscape plans show this amendment. The 15m buffer appears to simply contain the maximum crown spread of the existing trees and therefore is not really new mitigation/compensation but rather retention. There is no detail on lighting – how is an unlit northern buffer to be secured if no detail is provided? Overall there is the tendency for the mitigation to be fitted around the site layout rather than vice versa: design impacting features rather than features influencing design.

Trees

I understand that HBC's Arboricultural Officer maintains an objection on the grounds of tree removal and that these comments are echoed by the Landscape Officer. Whilst these comments do not appear on the application webpages, I would like to add my concerns over the loss of mature oak trees at this site. These trees have been assessed for their bat roosting potential and found not to support bats, but this issue aside, it is most regrettable that mature trees such as these cannot be accommodated within this proposal. Such specimens are of intrinsic ecological value and will undoubtedly provide habitat for numerous organisms for several centuries to come if left in situ.

I trust that the above is suitable – as ever, if you have any queries please don't hesitate to contact me.

Kind regards,
Tristan
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Ecology Team