

Michelle Houghton

From: Norton, Tristan [Tristan.Norton@hants.gov.uk]
Sent: 15 October 2014 11:34
To: Daphney Haywood
Cc: Planning and Development Shared Mailbox; Havant Auto-Reply
Subject: APP/14/00863 Land north of Barton's Road, Havant 14.1325

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 consulting me on this application. Please accept my apologies for the delay in responding to you. In summary, I consider that clarification is required in terms of the species of bat recorded within the site and the level of mitigation proposed.

I provided a detailed pre-application consultation response for this site on 8th July 2014. Unfortunately, it would appear that the comments I made at that time in respect to the potential presence of the rare Bechstein's bat have not been adequately addressed.

The application is accompanied an Extended Phase 1 Habitat Survey report (White Young Green, June 2013), a Reptile Presence/Likely Absence Survey report (WYG, April 2014) and a Bat Survey report (August 2014) which detail a range of ecological surveys carried out at the application site over the last year or so. Overall, the reports are of a good standard and provide a sound assessment of the current ecological value of the application site.

The site comprises predominantly semi-improved grassland (which is not species-rich) with areas of scattered scrub (native and ornamental), trees, hardstanding and a series of buildings of varying design. None of the habitats on site are considered to be of particular ecological value. Nevertheless, the Phase 1 survey identified potential for legally-protected species to occur, namely roosting, foraging and commuting bats and common reptiles. Surveys for these species were undertaken during 2013.

Bats

An updated HBIC data search has now highlighted the confirmed presence of the very rare Bechstein's bat from within very close proximity to the site: there is a record from 2009 of this species from within c.500m, as well as further records in the wider landscape (including large maternity roosts). Clearly, the Phase 2 bat survey works undertaken to date have provided some very useful information on the range of bat species within the site and the likelihood of them roosting (none of the trees or buildings are considered to support roosts). I repeat however that there are number of bat calls attributed to an unidentified *Myotis* bat species (indeed, unidentified *Myotis* species were regularly the third most numerous species encountered during the transect surveys of 2013) and I would therefore suggest that some further investigation of *Myotis* bat calls would be prudent, so as to at least attempt to identify whether the application site supports foraging/commuting Bechstein's bat (which would seem to be a distinct possibility given the confirmed presence of this species locally). Its presence may have implications in terms of assessing the overall value of the site for foraging/commuting bats e.g. the presence of individuals of this species would raise the site's importance to at least County level.

I am not convinced by the statement that the reason no detailed call analysis has been carried out is because *Myotis* bat calls are difficult. Yes, they are tricky but that provides all the more reason

to attempt to identify them, especially when there are seven species involved and one of those is the rarest and has been recorded locally. Again, there is a population of one of the rarest bats in Europe in close proximity to this site and every possibility that the bats foraging within the site (and not yet identified) may be from this species. Further detail is required on this issue.

Reptiles

Reptile surveys have identified very small populations of three common species – slow-worm, viviparous lizard and grass snake – and a sensible reptile mitigation strategy is proposed. I have no issues with the proposed reptile mitigation.

Overall Mitigation

The level of boundary buffering, especially along the eastern boundary, appears minimal. The existing vegetation along the eastern boundary is subsumed into a series of rear garden plots with, apparently, no buffer 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 also note that your landscape consultee has raised issues with the reduced provision of trees within the site layout and that the consultee arboriculturist also has concerns. I would therefore query 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'. As per my comments at pre-application stage, this detailed application should include detailed information relating to ecological mitigation: it does not, and so further detail is required if the LPA is to have confidence that all ecological constraints are understood and impacts are either avoided or adequately mitigated.

In summary, I consider that further clarification is required in terms of bat species – it should in my opinion be possible to provide additional comment on the species of *Myotis* bat recorded on site, particularly when the very rare Bechstein's bat is known to occur locally. This information is necessary in determining the value of the site and the level of ecological mitigation (particularly boundary treatments) required.

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

Kind regards,

Tristan

Tristan Norton

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