



Daphney Haywood  
Havant Borough Council  
Public Service Plaza  
Civic Centre Road  
Havant  
Hampshire  
PO9 2AX

Beechcroft House  
Vicarage Lane  
Curdrige  
Hampshire  
SO32 2DP

By email only:  
daphney.haywood@havant.gov.uk  
tristan.norton@hants.gov.uk

e [feedback@hiwwt.org.uk](mailto:feedback@hiwwt.org.uk)  
t 01489 774400  
[www.hiwwt.org.uk](http://www.hiwwt.org.uk)

**8<sup>th</sup> December 2014**

**Your Ref: APP/14/00863**

**Our Ref: 13.70.3.33**

Dear Ms Haywood

**PROPOSAL:**

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 (17 UNITS WITHIN EAST HAMPSHIRE DISTRICT) JOINT APPLICATION WITH HAVANT BOROUGH COUNCIL AND EAST HAMPSHIRE DISTRICT COUNCIL, HAVANT BOROUGH COUNCIL IS THE LEAD AUTHORITY.

**LOCATION:**

LAND NORTH OF EASTLEIGH HOUSE COTTAGES, BARTONS ROAD, HAVANT

**DESIGNATED SITES:**

**BARTON'S COPSE AND THE SLIP – SITE OF IMPORTANCE FOR NATURE CONSERVATION (SINC)(1A)**

Thank you for your email of 4<sup>th</sup> December 2014 which included additional information from the applicants ecologist (in the form of an email to the County Ecologist, Tristan Norton) on the subject of the potential presence of the rare Bechstein's bat *Myotis bechsteinii* at the above site. We welcome the efforts that the applicants' ecologists have gone to in attempting to identify the species' presence from sound files recorded on remote bat detectors. However we do still have concerns with the robustness of using this approach to identify the species.

Radio-tracking survey work carried out in 2009 recorded the presence of a Bechstein's bat maternity roost in Barton's Copse, within 500m of the proposed development site. In addition, other roost sites were recorded in the local area, making the area one of the only known locations for the species in Hampshire, outside of the New Forest National Park. The lack of any statutory protection, other than European Protected Species legislation, combined with the unprecedented number of planning applications in the area, makes this population extremely vulnerable.

Bechstein's bat is considered to be principally a woodland bat species, although radio-tracking data has shown it to also forage over open pasture/parkland habitats. However, due to similarities

in the call structure with other bats of the *Myotis* genus, its quiet echolocation and preference for feeding in dense foliage or in the high canopy, it is a difficult species to locate. Attempts to identify the species' presence using aural bat detection alone, is not considered reliable, and where the species is known or suspected of being present, bat capture surveys should be carried out.

The Applicant's ecologists are very aware of the difficulties in identifying the species since they are currently working on the Land East of Horndean application (55562/001), where Bechstein's bat was also recorded during the 2009 radio-tracking surveys. Bat capture and radio-tracking surveys have been required to support this application due to the known presence of Bechstein's bat. Paragraph 2.4 of the supporting bat report<sup>1</sup> states *"Due to the difficult nature of locating bat roosts in trees, determining the breeding status and **confirming the actual species of acoustically similar Myotis bats (especially Bechstein's bats as they have quiet echolocation calls)**[our emphasis], the primary method to meet this project's aims was through trapping and radio tracking individual bats to locate maternity and other roost types, and to determine home ranges and habitat use"*.

The difficulty in locating this species through the use of aural bat detection may account for its scarcity. However, capture surveys using acoustic lures have been instrumental in identifying the species in previously unknown locations, the Rowlands Castle area being one of those. Given that the species has been recorded within 500m of this site, we consider that appropriate precautions should be taken to ensure that the proposals will not impact on the conservation status of the species. We again acknowledge the efforts that have been made to mitigate any potential impacts, such as increase the buffer to the woodland edge to 15m. However, the impacts arising from residential developments in close proximity to ancient woodland sites have been well documented. These impacts may encroach further into the woodland thereby impacting on the species, were it still present.

The additional information provided by the applicants ecologist also states *"**Where quality of recordings allowed** [our emphasis] further analysis to species level, those species previously identified as *Myotis* spp. were considered most likely to be whiskered / Brandt's. No Bechstein's were identified during the more detailed analysis of the survey data."* As we have already stated, Bechstein's bat call can be difficult to pick up due to the fact that the species has a very quiet echolocation. As a result of this, it is entirely possible that any Bechstein's bat calls recorded will in fact be of the poorest quality since they are the quietest, and will therefore not allow identification to species level.

This additional information also states that *"the trees that are proposed to be felled have been assessed and none of them appeared to support woodpecker holes which are the features that Bechstein's tend to use"*. Just because Bechstein's bats have a tendency to use woodpecker holes, that does not mean that they will exclusively and therefore the absence of woodpecker holes does not confirm the absence of Bechstein's bat. The radio-tracking surveys carried out during 2009 recorded bats in a variety of roosting locations, and certainly not exclusively within woodpecker holes. In addition, the bat report in support of the Land East of Horndean application, Table 3.10 shows that only one of the seven roosts identified was in a woodpecker hole, although four were unidentified.

## Conclusion

It is evident that whilst the applicants' ecologists have provided some very useful additional information, we do not consider this sufficient to determine, beyond all reasonable doubt, that Bechstein's bats do not use the site, and therefore will not be adversely impacted by the proposals. We consider that the only way to accurately assess the potential impacts of these proposals on this species is to establish presence/likely absence in the first instance, followed by

<sup>1</sup> WYG (2014) Highwood Land (Horndean) Limited and CALA Homes (South Home Counties) Ltd . Land East of Horndean – Bat Survey Report

additional surveys as required. These surveys should use methods that are appropriate for the species, therefore we maintain our request that further capture sessions, at the very least, are carried out.

The above advice is given based on the information made available at this time and may change should further or amended details be submitted. 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**



**Trevor Codlin**  
**Senior Planning Ecologist**  
**My Direct Dial: 01489 774457**  
**Fax: 01489 774401**  
**Main Switchboard: 01489 774400**  
**Email: [Trevor.Codlin@hiwwt.org.uk](mailto:Trevor.Codlin@hiwwt.org.uk)**