From: Havant Borough Tree Wardens

An independent network of volunteers, part of The Tree Council's national Tree Warden Scheme TM

Regarding Land Rear of 15-27 Horndean Rd, Emsworth

We appreciate the Metis Homes acknowledgment of "the wish to protect the ecological value of the site and wider land" (Alistair Harris 25.05.19), and that the Metis application seeks to offer *"an opportunity to deliver a high quality bespoke development in the immediate term which can deliver adequate mitigation and indeed enhancement of the biodiversity at the site (within the red line)."*

In order to achieve this goal, we are grateful to have this chance to bring to Metis Homes, and to Havant Borough Council officers and DMC Committee, seemingly overlooked material considerations that will need particular attention and conditions attached if biodiversity harm is to be avoided.

1. **Veteran and Notable Trees**

We are disappointed that despite our submitted comments, the Metis arboricultural impact assessment makes no reference to the Veteran status of two of the boundary oaks (Ancient Tree Inventory tree ID 195912, and tree ID 195923) *https://ati.woodlandtrust.org.uk).*

Though the NPPF advises developers to make reference to ATI records I cannot find a reference that this has been done.

If Havant Borough Council is wishing to *build better* going forward then the status of these trees needs to be acknowledged in the construction conditions. Perhaps their status and their contribution to biodiversity should also be highlighted as positive attributes to the development in both the marketing literature and any management documents for the site.

Both verified Veterans require a construction and post-construction phase Root Protection Area (RPA) of at least 15x the tree's diameter.
Updated Standing Advice Nov. 2017 Natural England & Forestry Commission.

There are also three near-Veteran (Notable) trees in this hedge-bank line of oaks that also require a higher level of RPA. These are also recorded on the ATI with the ID numbers of 195932, 195516 and 195519.

2. Bat sightings and flight lines

A series of overnight full spectrum recordings by static bat detector were made during early August 2020 from a set-up in adjoining private gardens east of the site. (These were noted in our submitted comment of 7 October 2020).

These recordings were sent for analysis to the Hampshire Country Bat Recorder and Chairman of the Hampshire Bat Group, Nik Knight. They have since been verified and entered into his records. They will be sent to the Hants Biodiversity Record Centre for synchronisation into County records later this year, but may be referred to c/o Nik Knight in the meantime.

Confirmed species: Noctule, Leisler's serotine, Brown long-eared bat, Common and Soprano pipistrelle, and Barbastelle. Barbastelle is a UK Biodiversity Action Plan (BAP) species. *The Bat Conservation Trust is the lead partner for the barbastelle BAP. Further information at* www.ukbap.org.uk

Further surveys are clearly necessary as Myotis species calls were also recorded but too indistinct on those occasions to say if Bechstein's or Daubenton's bat.

Exactly which myotis species and the use they are making of the trees on site must be established to prevent harm, as also recorded were the concentration of bat flight lines in and along the boundary tree line and the area of dense scrub over the derelict stable in the field.

It is highly likely that the veteran and notable oaks are roost sites. This also calls for further survey work, as roosts are not in permanent or predictable use by bats.
It should also be noted that removal of any tree, or creating a gap in the line forming a foraging route would prevent bats from using that route effectively.

(Current law protects all UK bat species and their roosts).

3. Light pollution

The majority of the bat species recorded using the field are very light averse. Artificial light is harmful to other wildlife, particularly birds.

Light pollution can negatively impact the survival of nocturnal creatures such as bats, causing them to abandon maternity roosts and affect their success in obtaining insect prey. It can also expose them to predation from domestic cats and other nocturnal hunters such as owls.

Appropriate conditions regarding artificial light pollution must be set at the planning stage for the construction site and incorporated into any management documents for estate. *National Planning Policy Framework, Paragraph: 002, Reference ID: 31-002-20140306*

We would be delighted if, as part of a bespoke site-specific management regime, these factors are considered and result in successful bat and tree protection strategies, delivered in perpetuity as proposed by Metis for the benefit of residents and the environment.