

I wish to object to planning application APP/20/00757 concerning TPO trees at Southleigh Park House, Eastleigh Road, Havant.

In my expert opinion, this site is of national importance for bat conservation. There are very few areas in the United Kingdom where so many rare species of bat have been recorded. All these rare species are totally dependent on the presence of mature trees of a range of species for their roost sites, feeding resources and commuting routes.

This application needs to be seen in the context of other very damaging development proposals in the immediate area. The cumulative effect is likely to render some of the bat populations no longer viable in this area. Any reduction of the broad band of trees currently standing in the area shown on the site plans is likely to cause increase in light pollution around the remaining trees, adversely affecting the behaviour of these light-adverse nocturnal mammals.

There are 17 breeding species of bats in the UK and 14 of those have been recorded on this application site or the immediate surroundings. These include the Bechstein's bat (which is subject to special consideration in the latest draft of the Havant Local Plan 2036) and western barbastelle, both given the highest level of protection under Annex II of the Habitats Directive. Another exceptionally rare species, the alcathoe bat, has been recorded on the adjacent crematorium site and has only been found in a handful of sites in this country since its first discovery in 2010.

We know from the bat surveys by national experts working in Havant and East Hampshire that Bechstein's bats particularly favour crevices in old oak and yew trees for their roosts. Thus, it is of grave concern that destruction of mature specimens of those species is being requested.

I note that the county ecologist has not been given an opportunity to comment on this current application, despite his known concern for the conservation of rare bats in this area. In his comments on the previous application, he drew particular attention to the rare species actually recorded within the grounds of Southleigh Park House and the issue of light pollution.

The applicant admits in the application form that these trees are not dangerous or causing subsidence. The applicant refers back to the decision made to the previous planning application APP/17/00863. In the Council's decision notice dated 30th January 2019, conditions 13 and 19 require development to proceed in strict accordance with the ecological mitigation, compensation and enhancement measures detailed within the Ecological Assessment (ECOSA, March 2018). Since that report by ecological consultants was written, further knowledge has been gained about the importance of this site for rare bat species.

We are most fortunate in the Havant Borough to have such an exceptional hotspot of bat diversity. It is impossible to see how any net biodiversity gain can be achieved if TPO status is removed from these trees.

Mr N Knight, MA, CBiol, MRSB
Hampshire County Bat Recorder