Building a Better Future Plan - Representation Form

Part A - Personal Details

Please indicate whether you are completing this form yourself or if you are an agent completing this on behalf of a client
I am completing this form myself

Part A - Personal Details (Completing form on own behalf)

Please provide the following personal details. Please note that these details are required for all representations and your information will be shared with the Planning Inspectorate. The personal data you provide will be used to ensure that representations comply with government guidance and that they can be used as part of the Local Plan examination process. More information on how we use your personal information can be found as part of the 'Planning Policy' privacy notice is available here.

Title	Dr.
First Name	David
Last Name	Mason

[redacted]

Please provide the following details where applicable and/or relevant
No Response

Part A - Personal Details (Agent on client's behalf)

If an agent is appointed, please provide the following information: Please note that these details are required for all representations and your information will be shared with the Planning Inspectorate. The personal data you provide will be used to ensure that representations comply with government guidance and that they can be used as part of the Local Plan examination process. More information on how we use your personal information can be found as part of the 'Planning Policy' privacy notice is available here.
No Response

Please provide the following information about the client for whom you are completing this form on their behalf
No Response

Part B - Your representation(s)

Which part of the Building a Better Future Plan does your representation relate to?
Please provide as much detail as possible.
If you wish to make a change to the Policies Map, please comment on the corresponding p olicy, and explain what change you would wish to make. If you would be helpful if you could show this in visual form
A full list of policies and allocations can be found in the contents page(s) of the Publication Plan - you can access this document here.

Policy Number	-
Allocation Number	2
Paragraph Number	-
Page Number	95–97

Do you consider the Local Plan is ...
(Please select as appropriate)

	Yes	No
Legally compliant		X
Sound		X

Please give details of why you consider the Building a Better Plan is not legally compliant o r is unsound. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

This box is a summary only. My full representation is the document uploaded with this form; it forms part of this representation and should be provided to the Inspector. This representation concerns the effect of Allocation 2 on the Bechstein's bat population at Southleigh Forest and Long Copse Lane. The Council has accepted, in its evidence to the examination of the withdrawn Local Plan 2036, that the Bechstein's population in the Borough is of at least national significance and that bespoke policy measures are needed to safeguard it, and it named this land as one of the sites where detailed survey effort had been carried out. The promoter's own ecologists record the Southleigh population as one of only three known metapopulations in Hampshire and the role of this site as of national significance. In July 2021 they confirmed a roost cavity on the north-eastern boundary, identified as a likely maternity roost, with an emergence count of nineteen bats. That session does not appear in the Ecological Impact Assessment dated two days later, which reports only the June session and states that no roosts were found within the site. The promoter's own assessment concludes that without sufficient mitigation the development would have a significant adverse impact on the bats using the northern, eastern and western boundaries, at a national level for Bechstein's bat. The allocation does not answer that. The Sustainability Appraisal required, for both parcels, an ecological buffer covering the woodland and the green corridor and a sensitive lighting strategy; criterion (m) carries the buffer for protected species and the SINC only and states no extent, and criterion (c) has been redirected to Dark Night Skies. An Inspector has already found a five-metre buffer and general lighting limits insufficient for seven dwellings on this lane. The Habitats Regulations Assessment screens this allocation in against Singleton and Cocking Tunnels Special Area of Conservation, designated for hibernating Bechstein's bat, on the sole pathway of habitat loss, and then provides no assessment of that site or of bats at all, resting at paragraph 7.8 on Policy 21 alone — the approach its own paragraph 2.18 rules out.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.
You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

That Allocation 2 be deleted from the Plan, with the consequential amendments to Policy 6, the housing trajectory at Appendix 1 and the Policies Map that follow from it. The allocation rests on an evidence base which records the species as present and nationally significant, on a Sustainability Appraisal which made acceptability conditional on mitigation the allocation has since narrowed and redirected, and on an appropriate assessment which screens a Special Area of Conservation in and then assesses neither it nor the species for which it is designated.

If you wish to upload any documents to support your representation, please do so below. Please note that there is a maximum file size of 50MB and you can upload a maximum of 10 files to include with your form.

- File: Plan_26_bats_dcm_v2.pdf - Download

Examination Hearing Session Invitation

If your representation / representations are seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Please note that while this will provide an initial indication of your wish to participate in examination hearing session(s), you may be asked at a later point to confirm your request to participate.
No details on the examination hearing session(s) have yet been determined and will be made available upon the submission of the Building a Better Future Plan to the Planning Inspectorate.

Yes, I wish to participate in examination hearing session(s)

Examination Hearing Session Invitation (2)

You indicated that you wish to participate in the examination hearing session(s). Please outline why you consider this to be necessary.
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in examination hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

The evidence on this allocation is technical and disputed, and much of it is the promoter's own. The promoter and the Council will be represented at the hearing sessions. The points I raise turn on what the promoter's ecological reports do and do not record, on the difference between the mitigation the Sustainability Appraisal required and the mitigation the allocation carries, and on how the Habitats Regulations Assessment treats a Special Area of Conservation it has itself screened in. Each is a matter on which the Council's and the promoter's answers need to be tested, and I am able to do that from the documents. A written representation cannot be tested in the same way.

Future Notification

Do you wish to be notified of any of the following milestones in the Building a Better Future Plan process?
These milestones include:

The Local Plan has been submitted for examination
The publication on the Inspector's Report
The adoption of the Local Plan

If you indicate that you wish to be notified, the email address you provided in Part A of the f orm will be used by the Council to notify you of these milestones.

Yes, I wish to be notified

Comment: ***HBC could not be certain that the development would not have an adverse effect on the Bechstein bat population.***

Bechstein's bat is one of Britain's rarest bats, and indeed also one of Britain's rarest resident mammals. The bat belongs to the genus Myotis and is predominantly associated with ancient broad-leaved woodland, in particular oak and ash. In Britain, they are strictly limited to ancient, deciduous woodlands in southern England and south-east Wales. They are "woodland specialists" entirely reliant on mature, ancient forests. The destruction and fragmentation of these woodlands mean they are highly vulnerable to habitat loss, and in Britain their habitat is declining. The bat is listed as Near Threatened on the global IUCN Red List of Threatened Species. Its Great Britain assessment is Least Concern, but that reflects the absence of evidence of a recent sharp decline together with a rising number of records driven by increased survey effort rather than by population growth; the overall British population trend is unknown. The Council has itself accepted, in its evidence to the examination of the withdrawn Local Plan 2036, that the Bechstein's bat population within the Borough is of at least national significance and that bespoke policy measures are required to safeguard it [16]. The promoter's own bat consultants reached a comparable conclusion about this site, in both of their reports. They record that the Bechstein's population at Southleigh Forest is one of only three known metapopulations of the species in Hampshire, and that the role of this site for that population is of national significance [8][9].

Bechstein's bat is recorded on this land as well as around it. In 2009 radio-tracking carried out for Portsmouth Water traced Bechstein's bats to maternity roosts in the copse off Long Copse Lane, within the allocation boundary. I do not assert that the roost remains in use today: the record is now seventeen years old, and the absence of any more recent survey of this land is itself part of the difficulty. A large population of Bechstein's bats was also confirmed in Southleigh Forest, which directly borders the northern boundary of the site, in the course of the same 2009 Portsmouth Water studies [8][9]. The promoter's own Ecological Impact Assessment records the 2009 data in the same terms. It confirms records of a Bechstein's roost in Hollybank Farm Copse and in Colman's Copse on the site itself, and records a Bechstein's bat roosting in Colman's Copse in 2009 [10]. Colman's Copse lies within the allocation boundary, and the promoter's bat consultants proposed to protect it with buffers of 25 to 35 metres precisely because the 2009 surveys had identified it as a known roosting site [9]. The position in 2021 is recorded in the advanced bat survey report prepared for the promoter by Davidson-Watts Ecology. In July 2021 three female Bechstein's bats roosted together in the same roost, numbered R6 by the surveyors, in Long Copse Hill in Southleigh Forest, for the entire period of the survey session. On that occasion access was possible and the roost cavity was confirmed, and an infrared camera emergence survey recorded a peak count of nineteen bats. The report records R6 as an ash tree at grid reference SU752083 and identifies it as a likely maternity roost [9]. Long Copse Hill is described in the same report as forming part of the Southleigh Forest complex on the north and north-eastern boundary of the site, and the local breeding population is described as centred around it [9]. The Ecological Impact Assessment does not report that July survey. The assessment is dated 11 August 2021, two days after the advanced bat survey report which it appends. It describes only the June 2021 session, states that no roosts were found within the site, identifies a likely maternity roost some 2.5 km to the south at Hermitage, and describes a further survey session as planned for early August 2021. The July session, the confirmed roost cavity on the north-eastern boundary and the count of nineteen bats appear nowhere in it [10]. The roost the assessment does report is recorded in its own appendix with a count of three, footnoted as based on the presence of tagged bats only because there was no access for a count; the roost it

does not report is recorded with a confirmed cavity and a count of nineteen [9]. That matters for the way this allocation is drafted, because its Key Features describe the site as having potential for protected species including Bechstein's bat. The proposed new expanded version of the estate with 325 houses would have a common boundary with the Forest of a significant length (about 450 m) on its north side. On its east side, the estate would border a line of trees about 250 m long running north-south, likely to be a foraging route. The bat is a gleaning bat that forages intensively high up in tree canopies within roughly 1km of its roost [1].

It is likely that the estate would add significantly to pressure on the colony, through increased light, increased noise, reduced food supply, and increased human disturbance.

(1) Light. Bats of the genus Myotis are known to be particularly sensitive to light, and a lit-up section of the foraging route will become a barrier that they will not cross [2]. It may be possible to provide some mitigation for this, but it may not be particularly effective. For example, buffer zones between forest and estate may reduce some of the effects, but even so, if development were to be allowed, there would be nothing to stop residents putting up external lighting, which could nullify the mitigation measures proposed by a developer. This is not simply a matter for a future planning application. The Sustainability Appraisal (Appendix E) required a sensitive lighting strategy for this site as ecological mitigation. For each of the two parcels which make up this allocation it required, in one and the same requirement, an ecological and landscape buffer between the woodland and the developed area to mitigate the impact on protected species, woodland and Southleigh Forest SINC and on the green corridor linking Southleigh Forest with the River Ems and the coastal zone, and that proposals provide a sensitive lighting strategy. Criterion (m) of the allocation carries forward the buffer, but only for protected species and the SINC: the woodland and the green corridor have gone, and no extent is specified. Policy 22 of the Plan separately requires development to avoid the fragmentation of the Local Ecological Network, including across administrative boundaries. The corridor the appraisal identified runs to the River Ems, which is the boundary with Chichester District, and the Statement of Common Ground between the two authorities of June 2026 records that Chichester's Local Plan designates a strategic wildlife corridor on the eastern bank while noting only that both parties recognise the river's importance. The allocation carries no corridor requirement at all [12]. Criterion (c) of Allocation 2 requires a sensitive lighting strategy which demonstrates how development will conserve and enhance the intrinsic quality of the South Downs Dark Night Skies Reserve — a landscape and amenity purpose. Allocation 1 at Southleigh, by contrast, requires at criterion (p) an ecologically sensitive lighting strategy. A dark skies strategy addresses skyglow and the appearance of the night sky; an ecologically sensitive strategy addresses lux levels on commuting routes, roost access and foraging habitat. The requirement the appraisal specified for ecological reasons has been carried into this allocation for a different reason, and the ecological purpose has disappeared. To that extent the allocation is not justified by the evidence base that underpins it. An Inspector has already considered mitigation of this kind, for this species, on this lane. In December 2022, dismissing an appeal for seven dwellings on land adjoining Long Copse Lane at Westbourne, the Inspector found that a five metre buffer proposed without detail, together with limitations on external lighting, was neither appropriate nor detailed enough; that there was a reasonable likelihood the development would affect Bechstein's bat; and that the proposal would therefore harm a protected species, contrary to the development plan and to paragraph 180 of the version of the Framework then in force. The corresponding provision in the December 2024 Framework, against which this

Plan falls to be examined, is differently numbered but to the same effect. Substantial weight was attached to that harm [11]. Criterion (c) of Allocation 2 specifies a lighting strategy directed at a landscape purpose, and criterion (m) requires a buffer whose extent the allocation does not state. That is a lower level of specification than an Inspector has found insufficient for seven dwellings, in an allocation for 325. The Plan's own species policy is also more demanding than its allocation. Policy 25 requires, at criterion (d), that where development will impact woodland, hedgerows or pasture within 3 kilometres of known Bechstein's bat roosts, the impacts on breeding habitat and on habitat used for foraging, commuting and social activities be assessed, and that appropriate buffers be provided to woodlands, trees, hedgerows and other flight corridors. The roost recorded in July 2021 lies on or immediately adjoining the northern boundary of this site, in the woodland the promoter's own report describes as the centre of the local breeding population. That threshold is met many times over, and criterion (m) requires none of it [12].

(2) Noise. Bechstein's bat is a gleaning bat that uses echolocation to navigate, but finds its insect prey passively, by listening for their movements. The rustling sound of the insects produces a series of broadband clicks with peak energy around 12 KHz. Traffic noise also contains considerable energy at this frequency, so will have an effect on the way the bats detect returning echoes. A laboratory study of the pallid bat (Antrozous pallidus) — a gleaning bat which, like Bechstein's, locates its prey by listening for prey-generated sound — found that played-back traffic and compressor noise increased the time the bats needed to locate prey by two to threefold. The effect was present at every exposure level tested, including the quietest, which corresponded to a distance of some 640 metres from the source [3]. Traffic moving around the estate would be much closer than this. In addition, during the building of the estate, there would be substantial additional noise from construction traffic. The promoter's own Ecological Impact Assessment reaches the same conclusion about this site. It states that, without sufficient mitigation, indirect impacts from the development such as construction activities, noise and lighting would be a significant adverse impact on the bats using the northern, eastern and western boundaries of the site: at the local level for the main bat assemblage foraging and commuting there, and at a national level for Bechstein's bat [10]. That is the promoter's assessment of its own scheme, and it is not answered anywhere in the allocation. Nor would the disturbance be brief. The Plan's own housing trajectory at Appendix 1 anticipates no completions on this site before 2032/33, and then delivery spread across seven consecutive years: 30 dwellings in 2032/33, 50 in each of the five years following, and 45 in 2038/39. Construction would extend across at least that period and would begin earlier still [12].

(3) Food supply. Bechstein bats like an environment in which trees are adjacent to grass. Unlike other species of bat, they forage very close to their roosts. They need to eat up to half their body weight in insects each night, and forage where there are lots of insects. Woodland adjacent to traditional pasture such as currently in Hollybank Fields is a good source. The traditional pasture involves horse dung, in which lots of insects breed. This traditional pasture would be largely lost under concrete if the estate was built, which could result in a reduction of the bats' available food supply. This loss would be compounded by the fact that insects are attracted to lit areas from further afield. The insects would therefore tend to congregate in the lit areas within the estate, but the Bechstein's bats would not be able to follow them because they are light-avoiding. There would also be fewer insects in the adjacent unlit habitats. This would further negatively impact the ability of bats like Bechstein's to feed [4].

(4) Human disturbance. The estate would border on Southleigh Forest at Long Copse Hill, and also Colman's Copse north of Long Copse Lane. As the building of the estate would bring humans closer to the bats, it would be more likely that human activities in the forest could disturb the roosts. There have already been press reports of fires being deliberately started in trees in Colman's Copse [5] and Hollybank Woods [6]. A development of 325 dwellings immediately adjoining unmanaged woodland would substantially increase casual and recreational access to it, and the allocation contains no requirement for the management of that pressure. The promoter's own bat consultants identified the same risk. They record that, without mitigation, recreational and general human activity arising from an increase in the local population is likely to have an indirect negative impact on these tree-roosting bats, through the felling or topping of potential roost trees on health and safety grounds, through increased proximity and frequency of disturbance events, and through use of the woodland areas for recreation generally [9]. Allocation 1 at Southleigh requires at criterion (u) that appropriate recreational disturbance mitigation be provided within the site. Allocation 2 contains no equivalent requirement.

It seems that the proposed estate would add significantly to pressure on the colony, through increased light, increased noise, reduced food supply, and increased disturbance. It is likely that these negative effects could not be fully mitigated by a developer's strategy.

A key point from the above is that the bats' foraging areas would be affected by the development because there would be fewer insects in them. Even though the foraging area would not be being physically displaced, it would be changed, because it would hold a reduced food supply. Changing a foraging area of Bechstein bats is listed as an activity that can harm them [7].

Bechstein's bat is a European protected species. Under regulation 43 of the Conservation of Habitats and Species Regulations 2017 it is an offence deliberately to capture, injure, kill or disturb a bat, or to damage or destroy a breeding site or resting place. Foraging habitat is not protected by that offence, but its loss or degradation is a material planning consideration and is among the matters for which a European protected species licence may be required. At the plan-making stage, however, the Council's obligation is a different and prior one: under the same Regulations it must carry out an appropriate assessment of the Plan's implications for European sites.

The Council's obligation to carry out an appropriate assessment has not been discharged for this allocation. The Council's Habitats Regulations Assessment (RA03, July 2026) screens Allocation 2 as likely to have a significant effect, alone as well as in combination, on Singleton & Cocking Tunnels Special Area of Conservation, which is designated for its hibernating populations of Bechstein's bat and western barbastelle. Loss of foraging and commuting habitat is the only pathway on which the allocation is screened in against that site. The appropriate assessment which follows contains no narrative assessment of that Special Area of Conservation, and none of bats at all: Chapter 7 addresses supporting habitat for the Special Protection Areas, recreational disturbance, air quality, coastal squeeze, and water resources and nutrient neutrality. Within Chapter 7 the Special Area of Conservation appears only in a single row of Table 14. That row gives the mitigation for habitat loss at the Special Area of Conservation as a commitment to consideration of the site and of Bechstein's bat within Local Plan policy, resting on Policy 21 and Policy 25, and records the impact on site integrity as none. Paragraph 7.8 then concludes that Policy 21 alone would provide sufficient

safeguard that no development could conceivably take place that would affect a European site without impacts first being understood and mitigation secured. That is the very approach the Assessment rules out at its own paragraph 2.18, which records that it is not sufficient to conclude no significant effect merely because the plan contains a policy protecting European sites, and that any policy relied on to remove uncertainty must be targeted specifically at the issue causing it. The Assessment states the rule at 2.18 and departs from it at 7.8, on the single pathway which concerns Bechstein's bat. It is right to record that Chapter 6 does discuss this Special Area of Conservation: paragraph 6.4 assumes for the purposes of the Assessment that Bechstein's bats in the Plan area are functionally linked to populations within it, and paragraph 6.5 records that the loss of foraging or commuting habitat could affect the ability of bats to forage, travel and socialise to the extent that impacts are felt at the population level. The species is therefore screened in, identified in commentary as capable of population-level effects, and then discharged at appropriate assessment with no assessment of this Special Area of Conservation, of bats, or of this allocation. I should record fairly that Policy 25 of the Plan does contain a provision directed specifically at Bechstein's bat, at its criterion (d), and the Council may say that the Assessment's own test at 2.18 is satisfied by it. But paragraph 7.8 does not rest on Policy 25. It concludes that Policy 21 alone would provide sufficient safeguard, and Policy 21 is directed at protecting the Borough's internationally and nationally designated sites. This land is not within the Special Area of Conservation, which lies some 13 kilometres away in West Sussex, and the pathway screened in is the loss of habitat functionally linked to it rather than harm to a designated site. A policy framed around designated sites does not obviously reach that pathway at all [12]. I invite the Inspector to consider whether an appropriate assessment which screens a European site in against this allocation, provides no narrative assessment of that site or of the species for which it is designated, and discharges it by reference to a policy directed at designated sites on a pathway which does not concern harm to a designated site, discharges the Council's duty under the Conservation of Habitats and Species Regulations 2017. That is a question the Inspector must reach independently of the planning balance, and it is not one the allocation policies can answer.

There is a further difficulty with the allocation as drafted. Its Key Features describe "potential for protected species including (but not limited to) Bechstein's bat". The Sustainability Appraisal which underpins the allocation records Bechstein's bat as known to be present, and the Council's SHELAA records that Bechstein bats are known to occur locally and use the site and adjacent habitats. The appraisal's own methodology scores confirmed presence as a negative effect and unconfirmed presence as uncertain, and this site's negative ecological scores therefore depend on presence being confirmed. That methodology is stated at paragraphs 4.54 and 4.55 of the Sustainability Appraisal report. Sites where species are not confirmed to be present were scored uncertain; sites where protected species have been confirmed to be present on site were scored negative, because such sites are considered to be particularly sensitive. Paragraph 4.53 records that the distinction between species likely to be present and species known to be present was drawn by the Council's own ecologist [14]. The appraisal records the species as present for both parcels which make up this allocation and scores each of them negatively against its biodiversity objective in consequence. The word "potential" is in any event standard wording rather than a finding about this site: the identical phrase appears in the Key Features of Allocation 1 at Southleigh and of Allocation 4 at Helmsley House, sites of 146 hectares and 2.16 hectares respectively. It is not a judgement

about this land. The Council has itself named this land as a place where the presence of the species is understood in detail. In its evidence to the examination of the withdrawn Local Plan 2036 it listed the sites where awareness-raising had led to detailed bespoke Bechstein's bat survey effort, and Land North of Long Copse Lane, then Policy H8, was one of the examples it gave [16]. I recognise that paragraph 4.56 records that no site was marked strongly negative and that the issue was not treated as insurmountable, which is why these sites were still put forward. But the same paragraph makes acceptability conditional: only if the mitigation is delivered as part of the planning proposal will the site be acceptable for development. The mitigation the appraisal specified is what criterion (m) has narrowed and criterion (c) has redirected. The Plan cannot rely on an appraisal premised on confirmed presence while describing the constraint to developers and decision-makers as a possibility. The allocation is to that extent not justified.

In view of all of the above, the Council could not be certain that building the proposed estate would not threaten the long-term viability of this nationally significant colony of rare bats.

Change sought

I ask that Allocation 2 be deleted from the Plan, with the consequential amendments to Policy 6, the housing trajectory at Appendix 1 and the Policies Map that follow from it. The Council has accepted that the Bechstein's bat population in the Borough is of at least national significance. The promoter's own ecologists reached the same conclusion about this site, recorded a confirmed maternity roost with a count of nineteen bats on its north-eastern boundary in July 2021, and concluded that without sufficient mitigation the development would have a significant adverse impact on Bechstein's bat at a national level. The Sustainability Appraisal scored both parcels negatively on the basis that the species is present, and made acceptability conditional on mitigation which the allocation has narrowed and redirected. The appropriate assessment screens the allocation in against a Special Area of Conservation designated for this species and then assesses neither. An allocation resting on that evidence base is not justified, is not consistent with national policy, and should not be in the Plan.

References

1. Miller, H. (2007). Bechstein's Bat Survey. Bat Conservation Trust
2. Stone, E.L. (2013). Bats and lighting: Overview of current evidence and mitigation strategies. University of Bristol.
3. Bunkley, J.P. and Barber, J.R. (2015). Noise reduces foraging efficiency in pallid bats (Antrozous pallidus). Ethology, 121, 1116–1121.
4. Bat Conservation Trust (2009). Bats and lighting in the U.K
5. Daily Telegraph 05/05/2018.
6. Portsmouth Evening News 22/04/2021.
7. https://www.gov.uk/guidance/bats-protection-surveys-and-licences
8. Davidson-Watts Ecology Ltd (2017). Bat Trapping and Radio-tracking: Baseline Report and Evaluation for Land North of Long Copse Lane, Emsworth. Prepared for Land and Partners, 6 October 2017, paragraphs 1.1.1, 4.2.1 and 4.2.2. Appendix F to the Ecological Impact Assessment at [10].

9. Davidson-Watts Ecology Ltd (2021). Advanced Bat Survey Report V2 – Bat Trapping and Radio-tracking: Baseline Report and Evaluation for Land North of Long Copse Lane, Emsworth. Prepared for Land and Partners, 9 August 2021, paragraphs 1.1.1, 3.1.1, 3.3.5, 4.2.2, 5.1.1, 5.1.5 and 5.2.4, and Tables 2 and 3. Appendix G to the Ecological Impact Assessment at [10].
10. Davidson-Watts Ecology Ltd (2021). Long Copse Lane Ecological Impact Assessment, DWE 0766, 11 August 2021, status "Draft ready for submission", paragraphs 3.7.4, 3.7.5, 3.7.22 and 6.4.2. Submitted with outline planning application APP/21/00893 (land north of Long Copse Lane, Emsworth; demolition of existing buildings and erection of approximately 210 dwellings), submitted 23 August 2021, validated 7 September 2021 and withdrawn in June 2025. The application was never determined.
11. Appeal decision APP/L3815/W/22/3290395, land west of The Shire, Long Copse Lane, Westbourne PO10 8FT (Chichester District Council application ref WE/21/02159/FUL), Inspector R J Redford MTCP MRTPI, decision dated 7 December 2022, paragraphs 2, 20 to 22 and 33.
12. Havant Borough Council (2026). Building a Better Future Plan, Publication (Pre-Submission) version, July 2026: Policy 21 International and National Nature Conservation Sites, pp. 200-202; Policy 22 The Local Ecological Network, pp. 209 onwards; Policy 25 Protected and Notable Species, pp. 221-223; Allocation 1 Southleigh, pp. 89-94; Allocation 2 Long Copse Lane, pp. 95-97; Allocation 4 Helmsley House, p. 101; Appendix 1 Housing trajectory, p. 358.
13. Havant Borough Council (2026). Building a Better Future Local Plan Habitats Regulations Assessment (RA03), July 2026, paragraphs 2.18, 6.4, 6.5 and 7.8, Table 14 and the Chapter 7 contents.
14. Havant Borough Council (2026). Sustainability Appraisal (SA) of the Regulation 19 Draft Local Plan (RA02), paragraphs 4.53 to 4.56; Appendix D (full sustainability appraisal of sites), sites EM01 and EM02 against objective SA1 Biodiversity; and Appendix E (summary of negative effects at sites and proposed mitigation), sites EM01 and EM02.
15. Havant Borough Council (2026). Strategic Housing and Economic Land Availability Assessment (HS05), site pro-formas EM01 and EM02.
16. Havant Borough Council (2021). Havant Borough Local Plan Examination Statement, Matter 4: Habitat Regulations and Mitigation Strategy, examination library reference MIQ05, paragraphs 4, 13 and 16.