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	Mr
First Name	Nicholas
Last Name	Knight

[redacted]

Please provide the following details where applicable and/or relevant

Job Title	Hampshire County Bat Recorder
Organisation	Hampshire Bat Group

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 policy, 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	Allocation 2, Land north of Long Copse Lane, Emsworth (printed plan pp. 95–97).
Paragraph Number	-
Page Number	printed plan pp. 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 or 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.

My full representation is the document uploaded with this form; it forms part of this representation and should be provided to the Inspector. I am the Hampshire County Bat Recorder. The county records place both qualifying features of Singleton & Cocking Tunnels Special Area of Conservation — Bechstein's bat and western barbastelle — on this land, and record radio-tracked maternity roosting by Bechstein's bat at a copse off Long Copse Lane. The Council's own Sustainability Appraisal records the species as present; the allocation's Key Features describe it as potential. The buffer and lighting mitigation the Appraisal required has been narrowed in the criteria that carry it. An Inspector dismissing an appeal for seven dwellings on this same lane in December 2022 found comparable mitigation inadequate for this species. The Habitats Regulations Assessment screens the allocation in against the Special Area of Conservation and then assesses neither that site nor bats at all.

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.

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 1 0 files to include with your form.

- File: N_Knight_Bats_Representation_Allocation2.docx - Download

Examination Hearing Session Invitation

If your representation / representations are seeking a modification to the plan, do you consi der 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 exa mination hearing session(s), you may be asked at a later point to confirm your request to p articipate.
No details on the examination hearing session(s) have yet been determined and will be ma de available upon the submission of the Building a Better Future Plan to the Planning Inspe ctorate.

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 out line why you consider this to be necessary.
Please note the Inspector will determine the most appropriate procedure to adopt to hear th ose who have indicated that they wish to participate in examination hearing session(s). Yo u may be asked to confirm your wish to participate when the Inspector has identified the m atters and issues for examination.

I would wish to have the opportunity to appear at the examination hearing sessions in respect of this representation.
It is necessary for me to appear rather than to rely on written representations because the county bat records are held and verified by me. The questions an Inspector is likely to have about them — their provenance and precision, what has and has not been surveyed and when, and what the 2009 radio-tracking established — can be answered only by the recorder who holds them. I gave evidence at the examination of the withdrawn Local Plan 2036 on the same material. I will be continuing to add recent records to our database as they reach me.

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

Havant Borough Council — Building a Better Future Plan

Regulation 19 Pre-Submission consultation

Representation on Allocation 2 — Long Copse Lane, Emsworth

Field	Entry
Respondent	Nik Knight, Hampshire County Bat Recorder
Contact	[address and email]
Allocation Number	2 (Land north of Long Copse Lane)
Page Number	Printed pp. 95–97
Legally compliant?	[Yes / No]
Sound?	No
Test of soundness	Justified (and, so far as the Inspector considers it engaged, legal compliance under the Conservation of Habitats and Species Regulations 2017)
Change sought	Deletion of Allocation 2
Appear at hearings?	Yes

1. Who I am and why I am responding

I am the Hampshire County Bat Recorder and Chairman of Hampshire Bat Group, and I respond here in my capacity as county recorder. In that capacity I hold and verify the county's bat records. Hampshire Bat Group's database is ordinarily synchronised with the Hampshire Biodiversity Information Centre, although there is currently a substantial delay in records entering the databases at HBIC. I return to that below, because it bears on what the Council's assessment of this site can have been based on.

I am responding because I made a submission of verified bat records for this same land to the examination of the withdrawn Havant Borough Local Plan 2036 in June 2021, when it was proposed for allocation as Policy H8, and because the evidence base supporting the current Plan does not, in my view, reflect what is recorded there.

2. What I said at the previous examination, and what has not changed

At the examination of the Havant Local Plan 2036 I made a written submission, references E14 and E15, alongside the evidence document. I set out four concerns. Each of them applies to this Plan.

I said that the Plan seemed unlikely to achieve biodiversity net gain for bats, given the cumulative effects of habitat loss and disturbance, and that fragmentation of the local ecological network — including bat foraging areas and commuting routes — was likely to continue.

I said there had been no real attempt to co-ordinate conservation strategy for bats across the administrative boundaries, despite the efforts of adjacent authorities to establish corridors of connectivity. Chichester District Council's Local Plan designates a strategic wildlife corridor on the eastern bank of the River Ems; the western bank lies in Havant. This Allocation sits between that corridor and Southleigh Forest. That position has not moved in the five years since. The Statement of Common Ground between Chichester District Council and Havant Borough Council of June 2026 records at paragraph 6.30 that Chichester's Local Plan

includes a strategic wildlife corridor on the eastern side of the River Ems and that the western side lies in Havant. The whole of the agreed position that follows, at paragraph 6.31, is that "both parties recognise the importance of the River Ems as a corridor for wildlife". The section of that statement dealing with sites of international importance addresses nutrient neutrality and the Solent Special Protection Areas. Neither Bechstein's bat nor Singleton & Cocking Tunnels SAC is mentioned anywhere in the document.

I welcomed the specific consideration of Bechstein's bat but observed that the other rare species present in the Borough were ignored. Greater horseshoe, western barbastelle and alcathoe are all recorded in Havant. Bechstein's bat, greater horseshoe and western barbastelle are listed in Annex II of the Habitats Regulations, and the Borough has legal responsibilities under the Habitats Regulations for all bat species. The current Allocation again names only Bechstein's bat. Although not listed in Annex II, the alcathoe species is even rarer throughout Europe.

Also in 2021, I recorded that I had seen no evidence of the Bechstein's Bat Planning Protocol referred to at paragraph 5.205 of that Plan, and that planning decisions should be withheld until it was agreed. I am not aware of any such protocol having been agreed in the five years since. The Council's own statement to that examination recorded, at paragraph 11 of its Matter 4 statement, that a Bechstein's Bat Planning Protocol was being developed and was supported by Havant Borough Council, the adjacent local planning authorities and Natural England. If such a protocol now exists it has not come to the attention of myself as the County Bat Recorder. I invite the Council to say whether it has been agreed and, if it has, how this Allocation reflects it.

I identified the Land North of Long Copse Lane, Emsworth as a particularly sensitive area. I take the same view now. Under the Habitats Regulations, an area supporting Bechstein’s and western barbastelle bats should be designated as a SAC, rather than being considered as a development site. With proven maternity roosts of both species close to and within the Long Copse Lane site, this should be considered for SAC designation, or at least be classified as Functionally Linked Land. Since 2021 the cumulative effect of other developments in this area of Havant has caused further loss of established foraging habitat and commuting routes for all the bat species. For example, the completed development of the field adjacent to 54 Long Copse Lane involved the destruction of a designated SINC adjacent to the Ems Valley wildlife corridor in which barbastelle bats had been recorded. This cumulative habitat loss will be further degraded by the development of the Southleigh Park House (Allocation 5) and Southleigh (Allocation 1) sites.

3. The bat records for this land

The current position

As at 3 September 2026 the Hampshire Bat Group database holds, within one kilometre of SU 7502 0811 — Hollybank Farm, Long Copse Lane — **753 records of 14 bat species**. To have fourteen of the seventeen bat species that breed in the United Kingdom recorded within 1 km of this Allocation is an exceptional total for any part of the UK. The records include **71 records of Bechstein's bat, 45 of western barbastelle, 4 of alcathoe bat and 2 of Brandt's bat**. Both qualifying features of Singleton & Cocking Tunnels SAC are recorded here in numbers, and so are two further species of national rarity. Within two kilometres the database holds 2,616 records, and within five kilometres 6,863 records of 15 species, including a record of the greater horseshoe bat.

I should record the present state of the data flow plainly, because it bears on what the Council's assessment can have been based on. Hampshire Bat Group's records are ordinarily synchronised with the Hampshire

Biodiversity Information Centre, and it is to HBIC that an ecological consultancy or a local planning authority would normally address a search. Both organisations are currently migrating to new database software, and there is at present a long delay in records reaching HBIC. **A standard data search of HBIC today would not return the current full set of Hampshire Bat Group records for this area.** I hold that record, and I set the material parts of it out here.

The June 2021 submission

The evidence document I submitted in June 2021 summarised bat surveys relevant to the Local Plan area as at 20 June 2021, by which point 986 bat records had been verified since the equivalent March 2019 document. It recorded that at least 15 of the 17 UK breeding bat species are now known to be present in the Borough, and that Havant together with adjacent areas of East Hampshire and West Sussex forms a remarkable hot spot for bat diversity, with nationally important breeding populations of certain rare species.

These entries concern the land now proposed as Allocation 2 and its immediate surroundings:

Location	Survey	Recorded
Old Dairy Farm — copse off Long Copse Lane	Radio-tracking for Portsmouth Water Company, 2009	Bechstein's bats radio-tracked to maternity roosts — 51 bats, an exceptionally large number of this very rare species
Long Copse	Capture surveys, Davidson-Watts Ecology, 2017	Bechstein's, Natterer's, whiskered, Brandt's, Daubenton's, brown long-eared, soprano pipistrelle. Also bats assigned to the 'small Myotis' complex which might have been alcathoe.
Longacre	Static detector, Hampshire Bat Group, June 2018	Western barbastelle, *Myotis* species, brown long-eared, noctule, common and soprano pipistrelle (recorded within Longacre at its eastern boundary; the promoter's own Biodiversity Enhancement Management Plan describes Longacre at paragraph 1.1.3 as "wrapped on three sides by the application site")
Malvern House	Static detector, HBG, November 2018	*Myotis* species, common pipistrelle, soprano pipistrelle, Nathusius' pipistrelle
Malvern House	Static detector, HBG, July 2019 and September 2020	Western barbastelle in both survey periods, *Myotis* species, Leisler's, long-eared species, noctule, serotine, soprano pipistrelle
54 Long Copse Lane	Static detector, HBG, August and	Western barbastelle, Natterer's,

	September 2019	brown long-eared, serotine, noctule, common, soprano and Nathusius' pipistrelles
Hollybank Woods (adjoining, to the north)	Capture survey, Daniel Whitby, 2005	Bechstein's, with evidence of local breeding. All other Hollybank Woods data withheld

Bechstein's bat and western barbastelle are the two qualifying features of Singleton & Cocking Tunnels SAC. Both are recorded on this land. Bechstein's bat is among the rarest mammals in Britain, and the 2009 radio-tracking located maternity roosts — the most sensitive part of the species' life cycle — at a copse off Long Copse Lane.

The record since

In connection with the Havant Thicket Reservoir project, the Portsmouth Water surveys by ECOSA and their subcontractors have continued from 2009 to the present day. Further work at the Havant Thicket, Staunton Country Park and Gypsy Plain and the mitigation site at Southleigh Forest in 2024 and 2025 again recorded Bechstein's bat in numbers, together with western barbastelle, alcathoe, Natterer's, whiskered and many other bat species. Bechstein's presence in this landscape is evidenced to 2025, not merely to 2009. On the boundary of this Allocation it is evidenced by the promoter's own ecologists, and within the Allocation itself to July 2023, as set out in the paragraph below. Appendix G to the Ecological Impact Assessment submitted with the withdrawn planning application for this land records at paragraph 3.3.5 that in July 2021 three female Bechstein's bats roosted in the same roost, numbered R6, in Long Copse Hill, for the entire period of the survey session; that on that occasion access to the roost was possible and the roost cavity was confirmed; and that the peak count from an infrared camera emergence survey was nineteen bats. Table 3 of that report gives R6 as an ash tree at grid reference SU752083 and identifies it as a likely maternity roost, and a photograph of the roost tree is at its Appendix A. The same report records at paragraph 3.1.5 that one of the bats radio-tracked in 2017, bat 106, carried ring Z4446 and had originally been captured in July 2009 in Long Copse during the Portsmouth Water surveys — a direct individual link between the 2009 dataset and the promoter's own work.

A small-scale bat capture survey by Davidson-Watts Ecology in July 2023 within the Allocation 2 site (at SU749080) included a juvenile and a lactating female Bechstein’s bat. This indication of the continuing breeding population is of particular relevance as Bechstein’s are known to have relatively small core sustenance zones compared to other species.

Survey work at Southleigh Forest has continued over the last three years, and our database now holds radio-tracking data from July and Sept 2024 which located maternity roosts of Bechstein’s and barbastelle bats (both qualifying features of the Singleton & Cocking Tunnels SAC) within a range of less than 2 km of this Allocation: a western barbastelle maternity roost of some twenty to forty bats, radio-tracked over a week, and Bechstein's maternity roosts including one of forty-seven bats. The radio tracking showed individuals of both species to range towards and around this Allocation 2 site.

Static detector surveys from 2019 to 2025 within and adjacent to Allocation 2 have confirmed the continuing presence of western barbastelle. Detector monitoring at Southleigh Forest continued through to November 2025 and contained many barbastelle records. The records from continuation surveys during 2026 are not yet available.

Many of those Bechstein's and barbastelle records post-date every ecological document prepared for the withdrawn planning application on this land, and they post-date the evidence base supporting this Plan.

I wish to make one further point about the records. No roost survey of this land to current good practice has been carried out since the 2009 radio-tracking, and the status of the maternity roosts it located has not been confirmed since. Data searches for protected species should be updated annually, both with HBIC and the Sussex Biodiversity Records Centre. The current Allocations are therefore being made without the most sensitive feature on the record having been checked, and without any requirement that it be checked.

4. Connectivity across the wider landscape

This land does not stand alone. The Portsmouth Water surveys involved radio-tracking bats from the Havant Thicket complex to Southleigh Forest, the Stansted estate and Hollybank Woods — documented movement across the landscape in which this Allocation sits, and in which Bechstein's maternity roosts were located at Long Copse Lane itself.

Western barbastelle, the other qualifying species, recurs in our records along the same axis: at Southleigh Forest, at Longacre, Malvern House and 54 Long Copse Lane, at Maisemore Gardens and Horndean Road in Emsworth, and also within the Stansted estate and at Mill Meadow Farm in Westbourne across the county boundary. The National Bat Monitoring waterways survey has run along the River Ems from Westbourne to Peter Pond since 2010, and bat surveys have been carried out at Brook Meadow since 2009.

Sustainability Appraisal Appendix E identified the mitigation of impacts to the green corridor linking Southleigh Forest with the River Ems and the coastal zone as one of the purposes of the buffer required on this site. That purpose does not appear in the Allocation as drafted. Policy 22 of the Plan requires development to avoid the fragmentation of the Local Ecological Network, including across administrative boundaries. The corridor in question runs to the River Ems, which is that boundary. The Plan therefore contains a policy directed at precisely this connectivity, and an Allocation for the land at its western end which carries no corridor requirement at all.

5. The Plan describes as a possibility what its own evidence base records as fact

The Allocation's Key Features record "Potential for protected species including (but not limited to) Bechstein's bat".

The Council's own evidence says something different. Sustainability Appraisal Appendix D records for EM01 that Bechstein bats "are present", and for EM02 that protected species including Bechstein's bat are "known to be present". The SHELAA pro-formas for both parcels state that Bechstein bats "are known to occur locally and use the site and adjacent habitats".

The distinction matters within the Sustainability Appraisal's own methodology. At paragraphs 4.53 to 4.55 the SA scores as uncertain those sites where species are not confirmed present, and as negative those where protected species have been confirmed present, on the basis that such sites are particularly sensitive; paragraph 4.53 records that the distinction was drawn by the Council's own ecologist. Appendix D scores this site Negative on criteria 1a and 1b. Those scores rest on confirmed presence.

The Key Features text is what a prospective developer is directed to address. Describing a confirmed European protected species interest as a potential one is not a drafting nicety; it sets the terms on which the site will be brought forward.

The same narrowing appears in the species named. The Key Features and criterion (m) address Bechstein's bat alone. Western barbastelle is the second qualifying feature of the same Special Area of Conservation and

has been recorded 155 times at locations within 2 km of the centre of the Allocation 2 site, in survey periods between 2016 and 2025. The much rarer alcathoe bat has been recorded seven times within 2km of the centre of the Allocation 2 site. Three of those seven records come from a single location within the Allocation itself on one night in July 2023, and two of the three are lactating females — the only evidence of alcathoe breeding anywhere in the search area. Furthermore, greater horseshoe has been recorded elsewhere in the Borough. A Key Features text and a criterion drawn around a single species do not reflect the record the Council itself holds, and I raised the same point at the previous examination.

6. The mitigation the Allocation requires is inadequate for this species

Two requirements recorded in the Sustainability Appraisal were narrowed when they were carried into the Allocation.

The buffer. SA Appendix E required an ecological and landscape buffer between the woodland and the developed area, to mitigate impacts on protected species, on woodland, on Southleigh Forest SINC, and on the green corridor linking Southleigh Forest with the River Ems and the coastal zone. Criterion (m) of the Allocation requires a buffer "to mitigate the impact of protected species and Southleigh Forest SINC". Woodland has gone from the stated purpose; so has the green corridor; so has the requirement that the buffer lie between the woodland and the developed area. No width is specified. The Plan's own species policy asks for more than its Allocation does. Policy 25 provides at criterion (d) that where development will impact woodland, wooded parkland, hedgerows, wetlands or pasture within 3km of known Bechstein's bat roosts, surveys appropriate to the species must be undertaken, and applicants must assess impacts on breeding habitat — roost sites and habitat supporting roost sites — and on habitat used for foraging, commuting and social activities, and must provide appropriate buffers to woodlands, trees, hedgerows and other flight corridors. As county recorder I can confirm that the 3km threshold is met on this land many times over; the promoter's own confirmed roost of July 2021 lies on the site boundary itself. Criterion (m) of this Allocation requires none of what Policy 25(d) requires. I should be clear that I do not offer a buffer width as a remedy, and I ask that this deficiency not be treated as one a modification could cure. On this land the constraint is not the dimension of a strip at the edge of a development. The promoter's own confirmed roost R6 lies on the boundary itself; capture records within the site include a lactating female; and Bechstein's bats have small core sustenance zones, so the foraging and commuting resource supporting those roosts is the land proposed for development rather than a margin around it. I do not consider that a buffer can be drawn which leaves that resource intact and still accommodates the quantum allocated.

The lighting strategy. Appendix E required a sensitive lighting strategy as ecological mitigation, in the same cell as the bat and SINC requirements. Criterion (c) requires a 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, requires by contrast "an ecologically sensitive lighting strategy".

The difference is material for these species. Bechstein's bat is among the most light-averse British bats and western barbastelle is comparably sensitive. A dark skies strategy addresses skyglow and the appearance of the night sky. An ecologically sensitive strategy addresses lux levels on commuting routes, at roost access points and over foraging habitat. These are different exercises, and only the second protects the species recorded here.

The current published standard for that second exercise is Guidance Note GN08/23, *Bats and Artificial Lighting at Night*, published in 2023 by the Institution of Lighting Professionals with the Bat Conservation Trust. Criterion (c) does not engage with it.

7. An Inspector has already found comparable mitigation inadequate on this lane

In December 2022 an Inspector dismissed an appeal for seven dwellings at Land west of The Shire, Westbourne, immediately across the borough boundary (APP/L3815/W/22/3290395).

At paragraph 20 the Inspector recorded Chichester District Council's case, advanced on radio-tracked evidence, that the site and its surroundings form part of the flight lines of Bechstein's bat, and identified the southern boundary along Long Copse Lane specifically. That is the lane on which this Allocation fronts. At paragraph 21 he recorded that the appellant's ecological assessment proposed a 5 metre buffer, described without detail, together with limitations on external lighting, and that three plots' rear gardens would abut that boundary with only protective fencing. At paragraph 22 he accepted a reasonable likelihood that the proposal would affect Bechstein's bat, and found the proposed mitigation neither appropriate nor detailed enough.

Seven dwellings were refused, in part, because an unquantified buffer and general lighting limits were not adequate mitigation for this bat on this lane. Allocation 2 proposes 325 dwellings behind a buffer of unstated width, with a lighting strategy framed to the Dark Night Skies Reserve rather than to ecology.

I recognise that this was a section 78 appeal in a different authority, decided on a different development plan and under the 2021 Framework, and that it does not bind this examination. Bats were one of three reasons for dismissal, and the appeal would have failed on countryside location and character alone. I quote it as context. Its relevance is that the radio-tracked evidence concerns this lane, and that the mitigation found wanting there is materially less demanding than what this Allocation requires.

8. The Habitats Regulations Assessment does not engage with these records

I make this point as an ecologist rather than as a planner, and I leave its legal consequences to the Inspector.

The Habitats Regulations Assessment (July 2026) screens Allocation 2 as likely to have a significant effect, alone and in combination, on Singleton & Cocking Tunnels SAC, on the habitat loss pathway, against the qualifying feature "SAC bat species". Its appropriate assessment then provides narrative assessment for supporting habitat, recreational disturbance, air quality, coastal squeeze, and water resources — and none for bats or for that SAC.

At paragraph 6.4 the HRA records that the extent to which SAC bat species occur within the Plan area is unclear, that a direct link between the SAC and habitat in the Borough has been demonstrated only for Natterer's bat, and that Natural England have not formally accepted a functional link. That may be a fair statement of the position across the Borough as a whole. It is not the position on this land, where verified records place both qualifying species on the site, record radio-tracked maternity roosting by one of them, and — in the survey work of the last three years — locate maternity roosts of both within the Southleigh Forest complex immediately to the north. That material was before the Council in 2021, and the more recent part of it is held by me and available on request.

9. Change sought

I ask that Allocation 2 be deleted from the Plan. The county records place both qualifying features of Singleton & Cocking Tunnels Special Area of Conservation on this land, and record radio-tracked maternity roosting by one of them. The Council's own Sustainability Appraisal records the species as present; the Allocation describes it as potential. The mitigation the Appraisal required has been narrowed in the criteria that carry it. An Inspector has already found comparable mitigation inadequate for this species on this lane, for a development of seven dwellings. An Allocation resting on that evidence base is not justified. I propose no alternative modification. A revised criterion — a stated buffer width, or wording aligned with Policy 25(d)

— would not meet my objection, for the reason given in section 6: the constraint is the location of the roosts and of the foraging resource relative to the developable area, and it is not a matter of drafting.

10. Participation at the examination

I would wish to have the opportunity to appear at the examination hearing sessions in respect of this representation.

It is necessary for me to appear rather than to rely on written representations because the county bat records are held and verified by me. The questions an Inspector is likely to have about them — their provenance and precision, what has and has not been surveyed and when, and what the 2009 radio-tracking established — can be answered only by the recorder who holds them. I gave evidence at the examination of the withdrawn Local Plan 2036 on the same material. I will be continuing to add recent records to our database as they reach me.

Nik Knight MBE, MA, MRSB, PGCE

Hampshire County Bat Recorder

Date: 3 September 2026