

Submission by Nik Knight, Hampshire County Bat Recorder Matter 4

E14

As regards the conservation of bats, the Havant Local Plan 2036 seems unlikely to achieve biodiversity net gain owing to the cumulative effects of habitat loss and disturbance. Fragmentation of the local ecological network, including bat foraging areas and commuting routes, is likely to continue. There appears to have been no real attempt to co-ordinate conservation strategy for bats across the administrative boundaries, despite the efforts of adjacent authorities to set up corridors of connectivity. Effective mitigation is unlikely to be achieved.

E15

Since the preparation of the Havant Local Plan 2036, significant extra evidence has accumulated as to the existence of several rare species of bats within the Borough (greater horseshoe, Bechstein's, western barbastelle and alcaholic). I welcome the specific consideration of Bechstein's bat in the Plan, but the other rare species are ignored. Each bat species has its own habitat requirements. The Borough has legal responsibilities under the Habitats Regulations to protect all bat species, with higher expectations for those species listed under Annex II (Bechstein's, western barbastelle, greater horseshoe). Havant has been shown to contain a remarkable assemblage of bats, almost all the UK species, including great rarities. Our knowledge of these bats is very incomplete, so permitting development within and close to these areas risks the planning authorities causing serious negative impact. This has relevance to the entire Borough and particularly sensitive areas include the Land North of Long Copse Lane, Emsworth. As yet I have seen no evidence of the Bechstein's Bat Planning Protocol named paragraph at 5.205. Planning decisions should be withheld until that is agreed.