

APP/18/01226 | Construction of an 81bed, four-storey hotel (Class C1), associated car-parking, landscaping and ancillary works. | Land off Larchwood Avenue (Former Stantons Yard), Larchwood Avenue, Havant

Thank you for consulting me on this planning application and apologies for the delay in responding. This application is supported by a Preliminary Ecological Appraisal by Delta Simons (July 2018). In summary, I have concerns in relation to dormice and request further information to be submitted. My detailed comments are set out below:

It is understood that the site is dominated by areas of hardstanding which are surrounded by wooded strips. These wooded strips are connected to a larger block of woodland and Littlepark Wood (East) SINC and Ancient Woodland further in the south. The Preliminary Ecological Appraisal correctly assesses the site to have potential for dormice. However, the survey methodology is not in accordance with good practice guidelines and therefore the survey results are not considered to be robust enough.

The submitted 'Hazel Dormouse Survey Scope of Works (November 2018)' states that nest tube surveys were carried out between August and November 2018. However, fails to mention when the nest tubes were erected. The tubes would need to remain in place for a minimum of a month in line with good practice guidelines, which allows dormice, if present on site, to find and utilise the tubes.

Furthermore, whilst the memo states that the surveys continued until November, only the results for the months of August, September and October are stated.

It is stated that the tube numbers were increased to allow a sufficient score of 20 to be achieved. Whilst this could be acceptable in some cases, no plans have been provided to indicate the area that was covered by the survey work. It is not acceptable to simply increase the number of tubes in a small area. How far apart were the tubes installed from each other? The site itself is considered to be too small to be able to support more than 10-15 tubes. Therefore, it is necessary to know how big an area outside the site footprint was included in the survey work.

Chanin and Woods research (quoted in paragraph 2.4.19 of the ecology report, and which forms the basis of the established survey points system) does recognise that there can be flexibility during the survey season for when tubes can be deployed. However, the research clearly states that tubes should be installed before the end of July as an absolute minimum, and that *"the probability of detecting dormice is significantly reduced by using such a short period, even though it coincides with a peak in nest tube activity"*.

Dormice are present in the surrounding landscape, along the A3(M) and within Littlepark Wood (West) SINC and Ancient Woodland (260m west). The report states that the A3(M) acts as a barrier to the movement of dormice. This is not correct as dormice are known to cross major roads. Furthermore, lack of records in the vicinity of the site does not confirm absence, but could be due to lack of survey work. The wooded habitat along the boundaries of the site and extending to the south as part of a well-connected wooded habitat, could link the dormouse population along the A3(M). Therefore, given the proximity of a widely-dispersed and well-established

dormouse population in the vicinity and given the limitations of the dormouse survey work, unfortunately I cannot agree that it can be confidently concluded that dormice are absent from the woody habitat along the boundaries of the application site.

Notwithstanding the above, I acknowledge that majority of the trees on site will be retained with small number of trees to be cleared. Given the relatively small area of impact (this however has not been clearly stated in the submitted reports), I am satisfied that the works could to be carried out under a method statement.

Furthermore, the ecology report fails to consider that woodland is a Priority Habitat and therefore should be protected against any indirect impacts arising as a result of the proposed development. Therefore, a landscaped buffer is required along the boundaries of the site to ensure that the retained wooded areas and therefore dormice, if present, are protected against habitat degradation as a result of the proposed works. Provided that the green buffer is included in the soft landscaping proposals with native species of value to dormice, I raise no major concerns.

It is therefore my advice that permission should not be granted until a Dormouse Method Statement is provided to confirm that sufficient measures are in place to ensure that impacts will be mitigated / compensated for as appropriate, including the provision of a green buffer along the retained trees.

Provided that such Method Statement is submitted and the agreed mitigation proposals are implemented, I would have no concerns over these proposals and if you were minded to grant permission, I would suggest that the following condition is also added to the decision notice:

- Prior to commencement, a detailed scheme of biodiversity enhancements to be incorporated into the development shall be submitted for written approval to the Local Planning Authority. Development shall subsequently proceed in accordance with any such approved details. **Reason:** to enhance biodiversity in accordance with NPPF and the Natural Environment and Rural Communities Act 2006.

Please also note that based on the consultation response from Natural England dated 20 December 2018, the SRMP contribution would be required.

Please do not hesitate to contact me if you require any further information.

Kind regards,

Maral

Maral Miri (MSc, CEnv, MCIEEM)

**Senior Ecologist
Ecology Team**