

Dear Sally,

APP/14/01300 Erection of four storey hotel (including restaurant for hotel guests only) with associated car parking and landscaping; and air conditioning units in compounds, with access from the private access road to Langstone Technology Park. Land Adjacent to, Langstone Technology Park, 2B Langstone Road, Havant 15.0068

Thank you for consulting me on this application. In summary, I consider that some clarification is required in terms of potential ecological impact.

The application is accompanied by an Extended Phase 1 Habitat Survey report (WYG, April 2012) and a Reptile Presence / Likely Absence Survey Report (WYG, July 2012) – these documents are now approaching three years of age and I would argue that they do not represent what would be considered current knowledge. It is generally expected that ecological reports (in common with any other professional technical submission) should be up to date or at least from a time when it can be expected that site conditions are likely to be broadly comparable to the present. As a point of principle this should ideally be from the current year/survey season or the preceding one. I would therefore request that an updated ecological assessment is provided to inform the LPA's decision.

This is of relevance given the presence of a putative badger burrow entrance (Target Note 2 within report) beneath the mature walnut tree in the north of the site: in 2012 this was assumed to be inactive and so there is clearly potential for badgers to have (re)occupied it in the intervening three years. The walnut tree is to be removed as part of the proposals and so it is imperative that the status of this burrow is ascertained now. Similarly, badger activity may now be evident in other areas of the site. The original ecology report makes it clear that an updating badger survey would be necessary.

The 2012 report states that there are several trees with potential to support roosting bats (albeit low) and which were, at the time of writing, to be retained. The report then goes on to say that *"if plans change and they are required to be removed, then it is recommended that a detailed assessment for bats is made of the trees to be removed, and further nocturnal emergence / swarming surveys may be required to determine the likely presence or absence of roosting bats"*. I would request that the ecological assessment is amended where required in light of the submitted arboricultural assessment (or at least it is made explicit that all trees subject to removal have indeed been fully assessed).

Water vole is known to be present along the Lavant Stream to the west – there are confirmed records from 2013 from the application site banks, demonstrating that the stream corridor is suitable habitat and currently in use. Clearly, given the proposed vegetation removal and new plantings alongside parts of the stream channel (well within the proposed 10m stand-off as evidenced by the submitted Overall Landscape Proposals plan, Indigo, November 2014), there is some potential for ground disturbance which may impact water voles. The loss of native vegetation such as bramble is likely to impact any burrows or sheltered feeding sites along this bank. This needs to be re-assessed, in line with the recommendations within the 2012

report. I would query whether the proposed ornamental shrub plantings (such as various cultivars of dogwood) are appropriate for the Lavant Stream corridor – the use of locally-appropriate native species would be far more beneficial ecologically, as would the retention of bramble scrub.

In summary, there are outstanding ecological issues – this relates chiefly to the fact that the ecological survey data is now nearly three years out of date and conditions are likely to have changed. There are queries in respect to the status of several legally-protected species which require attention. NPPF and Circular 06/2005 require that planning decisions are based on full, up to date information and, in line with Natural England's standing advice, full protected habitat and species information must be available before a decision can be made. Following this guidance, provision of this information should not be deferred as a condition of any planning permission. Without full information at the point of determination it is not possible for the LPA to ensure that any impacts are known and acceptable, to engage with the Habitats Regulations, and to be able to secure any necessary mitigation.

If you have any queries please don't hesitate to contact me.

Kind regards,

Tristan

Tristan Norton

**Senior Ecologist
Ecology Team**

Specialist Environment Services
Economy, Transport and Environment Department