

Delta-Simons Response to Havant Borough Council's Ecologist's Comments

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

Please find Delta-Simons response to the comments provided by Havant Borough Council's Ecologist in relation to the above planning application 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.'

Please refer to Section 3.0 of the Preliminary Ecological Appraisal (PEA) and Dormouse Survey Report dated February 2019 (Delta-Simons report reference 18-0609.03), which provides details on the survey methodology undertaken, which was in accordance with best practice guidance.

'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.'

The Hazel Dormouse Survey Scope of Works (November 2018) was an interim report. Please refer to the PEA and Dormouse Survey Report dated February 2019 for full survey methodology and results. The nest tubes were installed in late July with the monitoring surveys then undertaken monthly between August and November, inclusive.

'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.'

Please refer to the PEA and Dormouse Survey Report dated February 2019 for full survey methodology (Section 3.0) and the accompanying plan which shows the survey area covered (Figure 3). The area covered and spacing of tubes is considered sufficient to support the results and conclusions of the report. Furthermore, we were not able to survey a larger area surrounding the Site due to access constraints.

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".

Please refer to the PEA and Dormouse Survey Report dated February 2019 for full survey methodology (Section 3.0). The nest tubes were deployed in late July and then monitored monthly August-November, inclusive.

'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.'

Please refer to the PEA and Dormouse Survey Report dated February 2019. We acknowledge the records available and the known presence of dormice within the wider area, the suitability of the Site perimeter to support this species, and its connectivity to other suitable habitat. The survey work has been undertaken to establish the presence / likely absence of dormice at the Site and within the immediately adjacent woodland. Please see Section 3.0 of the report for full survey methodologies. The survey results have informed an assessment of the likely impacts on this species (see Section 5.0) and given the anticipated risks, an appropriate precautionary approach has been recommended (Section 6.2).

'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.'

Please refer to the PEA and Dormouse Survey Report dated February 2019. We acknowledge the Priority habitat status of woodland, however, the habitat present at the Site boundaries is limited to an almost a single row of trees (please refer to the Arboricultural Report for more detail) and as such represents the extents of the woodland in that area. Furthermore, the Site has been subject to previous development and existing commercial properties exist to the north, east and south of the Site, already limiting the value of the on-Site boundary habitat. Given the size of the Site, a landscape buffer would not be practical to allow development to proceed. However, recommendations have been made both within the PEA report and Arboricultural report for the protection of those trees to be retained, which as you correctly state are the majority of those trees present currently.

'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 refer to the PEA and Dormouse Survey Report dated February 2019 Section 6.0 in which details of a precautionary approach to Site clearance with regards to dormice is provided and recommendations are made to enhance the Site in accordance with national and local planning policy. Planting at the Site will include native species, or of those of known value to wildlife, and a variety of bird, bat and dormouse boxes are proposed to both compensate for the minor loss of habitat as a result of the proposals, and also to enhance it beyond its current value.

Yours sincerely
Delta-Simons



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