Premier Inn, Old Waitrose Site Littlehampton

Cumming Group

Ecological Assessment

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1. Introduction

1.1. Site Background and Proposals

1.1.1. Ecology Solutions was commissioned by Cumming Group in February 2025 to undertake an Ecological Assessment of the Old Waitrose Site, Littlehampton, hereafter known as the site.

1.1.2. The current proposals for the site include the construction of a new Premier Inn hotel with associated infrastructure and green space.

1.1.3. Previously an Ecological Impact Assessment was undertaken by Waterman Infrastructure and Environment Limited in November 2018 and an associated Bat Survey Report was completed by Urban Edge Environmental Consulting in December 2018. This report aims to update this report as eight years have passed since the site was assessed.

1.2. Site Characteristics

1.2.1. The site is approximately 0.56ha in size located in Littlehampton, approximately 10km west of Worthing. The site consists primarily of Hand standing and a former retail unit. With the only vegetation present being a large ornamental planter located in the west of the site.

1.3. Ecological Assessment

1.3.1. This document assesses the ecological interest of the site. The importance of the habitats within the site is evaluated with due consideration given to the guidance published by the Chartered Institute of Ecology and Environmental Management (CIEEM)[1] .

1.3.2. Where necessary, mitigation measures are recommended so as to safeguard any significant existing ecological interest within the site and, where appropriate, potential enhancement measures are put forward and reference made to both national and local biodiversity priorities.

[1] CIEEM (2022). *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*. Version 1.2 – Updated April 2022. Chartered Institute of Ecology and Environmental Management, Winchester.

2. Survey Methodology

2.1. The methodology utilised for the survey work can be split into three areas, namely desk study, habitat survey and faunal survey. These are discussed in more detail below.

2.2. Desk Study

2.2.1. In order to compile background information on the site and the surrounding area, Ecology Solutions contacted Sussex Biodiversity Records Centre for protected species records and recognised statutory and non-statutory designated sites.

2.2.2. The data search area included a 2km radius centred on the site for protected species records. A wider 5km radius centred on the site for information on nationally designated sites and 8km radius for internationally designated sites. The data search was requested and received in March 2025.

2.2.3. Further information on designated sites from a wider search area was obtained from the online Multi-Agency Geographic Information for the Countryside (MAGIC)[2] database, which uses information held by Natural England and other organisations.

2.2.4. This information is reproduced where appropriate on Plan ECO1.

2.3. Habitat Survey

2.3.1. The site was surveyed in February 2025 based on UK Habitat Classification (UKHab)[3] methodology as recommended by Natural England.

2.3.2. UKHab is a comprehensive system for mapping and recording habitats, designed to provide a simple and robust approach to survey and monitoring, and replaces the Phase 1 survey methods. UKHab comprises of a principal hierarchy ranging from level 1 (ecosystems) to level 5 (defined habitats including Annex 1 habitats) when classifying habitats, for this survey, all primary habitats were recorded to level 4 minimum. Secondary habitats are also used to provide further information on a main primary habitat where appropriate.

2.3.3. Using the above method, the site was classified into areas of similar botanical community types, with a representative species list compiled for each habitat identified.

2.3.4. The relative abundance of plant species was assessed according to the DAFOR scale (D=Dominant, A=Abundant, F=Frequent, O=Occasional and R=Rare). The Braun-Blaque scale expresses an abundance score of presence (D=76-100%, A=51-75%, F=26-50%, O=6-25% and R=>1-5%).

[2] https://www.magic.gov.uk
[3] UKHab Ltd (2023) *UK Habitat Classification Version 2.0* (at https://ukhab.org)

2.3.5. It is important to note that all the species that occur in each habitat would not necessarily be detectable during survey work carried out at any given time of the year, since different species are apparent at different seasons.

2.3.6. The UKHab survey was undertaken in February 2025 in suitable weather conditions and a robust botanical inventory has been collated allowing for a robust identification and classification on the habitats present.

2.4. Faunal Survey

2.4.1. Obvious faunal activity recorded during the site survey, such as birds or mammals observed visually or by call, was recorded. Specific attention was paid to any potential use of the site by protected species, priority species or other notable species.

2.4.2. In addition to general observations of faunal activity, a preliminary roost assessment for bats was undertaken.

Badgers

2.4.3. The site and immediate vicinity were subject to specific surveys for Badgers in February 2025.

2.4.4. The surveys comprised two main elements: firstly, searching thoroughly for evidence of Badger setts. If any setts were encountered each sett entrance was noted and plotted, even if the entrance appeared disused. The following information was recorded where present:

i) The number and location of well used or very active entrances if present; these are clear of any debris or vegetation and are obviously in regular use and may, or may not, have been excavated recently.

ii) The number and location of inactive entrances; these are not in regular use and have debris such as leaves and twigs in the entrance or have plants growing in or around the edge of the entrance.

iii) The number of disused entrances; these have not been in use for some time, are partly or completely blocked and cannot be used without considerable clearance. If the entrance has been disused for some time all that may be visible is a depression in the ground where the hole used to be, together with the remains of the spoil heap.

2.4.5. Secondly, any evidence of Badger activity such as well-worn paths, run-throughs, snagged hair, footprints, latrines and foraging signs was sought and if present recorded so as to build up a picture of the use of the site by Badgers.

2.4.6. No suitable habitat was present on site and therefore badgers were ruled out at this stage of the assessment.

Bats

2.4.7. Field surveys and Preliminary Roost Assessment was undertaken with regard to best practice guidelines issued by Natural England (2023[4]), the Joint Nature Conservation Committee (2012[5]) and the Bat Conservation Trust (2023[6]).

2.4.8. Bat emergence surveys were undertaken following the best practise guidelines in May, June and July 2025 to assess the use of the building by bats.

Birds

2.4.9. The site is dominated by hand standing and the building footprint itself. With such little suitable habitat, the requirement for specific bird surveys was ruled out.

Reptiles

2.4.10. No suitable habitat was present for reptiles within the site. Therefore, reptiles were ruled out of the assessment and no presence/absence surveys were undertaken.

[4] Reason, P.F. and Wray, S. (2023) *UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats*. Charted Institute of Ecology and Environmental Management (CIEEM).
[5] Mitchell-Jones, A.J. & McLeish, A.P. (2012). *Bat Workers' Manual.* 3rd edition. Joint Nature Conservation Committee (JNCC).
[6] Collins, J. (2023). *Bat Surveys for Professional Ecologists: Good Practice Guidelines*. 4th Edition. The Bat Conservation Trust, London.

3. Ecological Features

3.1. A habitat survey was undertaken within the site by Ecology Solutions in February 2025 recording the following habitats:

- Ground Level Planter
- Developed Sealed Surface
  - (i) Building
  - (ii) Hard standing

3.2. The above habitats are illustrated in Plan ECO2.

3.3. Building

The former Waitrose building is the only building on site. The building has a flat roof with a half-hitched sloped side with tiles covering it. The clock tower protrudes the northwestern corner of the roof. It has a pitched roof with tiles and clay tiles hanging down to where the tower meets the main roof building. At the top of the brick wall below the half-hitched roof there is a soffit box extending around the perimeter of the building.

3.4. Ground Level Planter

A raised ornamental planting bed is present along the western boundary, to the west of building B1. The planting is sparse with some bare soil. Species recorded in the planting bed consist of: Himalayan birch *Betula utilis var. jacquemontii*, red robin *Photinia sp*, Ivy *Hedera helix*, climbing hydrangea *hydrangea anomala spp, petolaris,* Buddleia *Buddleia davidii* and Cherry *Prunus sp*.

3.5. Hardstanding

The majority of the site is hardstanding with the northern section being the former Waitrose car park and large areas around the building is paved.

3.6. Background Records

3.6.1 No species listed under the Schedule 8 of the Wildlife and Countryside Act 1981 (as amended) nor in Section 41 of the Natural Environment Rural Communities (NERC) Act 2006 (as amended) were returned by the data search.

Invasive non-native Species (INNS)

3.6.2 No INNS listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) was returned by the data search within the site. The nearest record is of Japanese Knotweed *Fallopia japonica* approximately 740m east of the site on Horsham Road in 2018.

3.6.3 Other Schedule 9 species recorded within 2km of the site consist of Japanese Rose *Rosa rugosa*, Three Cornered Garlic *Allium triquetrum*, Wall Cotoneaster

Cotoneaster horizontalis and Montbretia *Crocosmia pottsii x aurea = C. x crocosmiiflora.*

4. Wildlife use of the Site

4.1. General observations were made during the surveys of any faunal use of the site, with specific attention paid to the potential presence of protected, priority, or otherwise notable species. Specific surveys for bats have and will continue to be undertaken on site.

4.2. Badgers

4.2.1. There was no evidence of Badger activity or setts on the site during the time of the survey. The site offers no foraging and dispersal opportunities for local Badger populations.

Background Records

4.2.2. No records for Badgers from the last 10 years were returned by the data search.

4.3. Bats

Preliminary Roost Assessment

4.3.1. The site was assessed for bat roosting potential, the only place deemed likely to support roosting bats was the former retail unit (B1).

Building B1

4.3.2. Is a former retail unit for Waitrose which is of a large size and has been vacant for at least eight years.

Exterior

4.3.3. Building B1 is a flat toped, half pitched roof with tiles covering it on every side of the building.

4.3.4. A clock tower protrudes above the entrance to the store at the north-western corner of the building. The tower has a pitched roof with all tiles still in place, with a vertical section underneath with hanging clay tiles where the roof joins. A proportion of these tiles were missing on the tower, providing features for bats to use. The walls underneath the half pitched roof are constructed of brick with no clear gaps.

4.3.5. The eastern aspect of the building has three windows along the half-pitched roof with tiles and has a number of gaps around the window frame and lining. On the southern aspect of B1 there are a number of gaps around the windows and tiles missing off the half-pitched roof. No suitable bat features were seen on the western aspect of B1.

4.3.6. Upon inspection there were a number of gaps, crevices and holes present in most aspects of the building. These included missing roofing tiles, the main entrance tower tiles loose and gaps in and around the lining of the windows.

4.3.7. It is noted that since the last Preliminary Roost Assessment undertaken by Urban Edge Environmental Consulting in April 2018 the building has deteriorated considerably.

Interior

4.3.8. Access to the interior, roof and loft spaces of the building for the purposes of the Preliminary Roost Assessment was not possible due to health and safety concerns to do with the deterioration in the structure of the building. However, a thorough survey of the external of the building was carried out alongside a full suite of emergence surveys due to be completed in May, June and July 2025.

4.3.9. Therefore, the Preliminary Roost Assessment concluded that building B1 has high suitability for bats and thus will require three emergence bat surveys with the use of night vision aids. These surveys were completed in May, June and July 2025 under suitable weather conditions following the Bat Conservation Trust's Best Practice Guidelines.

Emergence Surveys

4.3.10. With the building being assessed as a high potential building three emergence surveys with the use of night vision aids were required to confirm presence or absence of bats in the building, the results are as follows.

Table 1- Bat emergence survey dates and weather conditions

Date	Temperature (°C)	Cloud (%)	Precipitation	Wind	Emergence
20/05/25	15	100%	Dry	Gentle Breeze	No
10/06/25	17	30%	Dry	Gentle Breeze	No
01/07/25	21	2%	Dry	Gentle Breeze	No

4.3.11. Over the course of the three emergence surveys no bats were seen to be emerging from the building. While the survey was being conducted levels of bat activity in the local area was also recorded, however this was limited to a small number of common and widespread species solely Noctules *Nyctalus noctule* and Common Pipistrelles *Pipistrellus pipistrellus*.

Background Records

4.3.12. The data search returned 34 records for bats, from the last 10 years. Species records returned include Serotine *Eptesicus serotinus*, Whiskered/Brant's Bat *Myotis mystacinus/brandtii*, Daubenton's Bat *Myotis daubentoniid*, Noctule *Nyctalus noctula* , Brown Long-eared *Plecotus auritus*, Nathusius' Pipistrelle *Pipistrellus nathusii* Common Pipistrelle *Pipistrellus pipistrellus* and Soprano Pipistrelle *Pipistrellus pygmaeus*.

4.3.13. There are four records for unidentified bat species. The closest of these records relates to a location approximately 200m southeast of site in 2022.

4.3.14. Two records for Serotine were returned, the closest of which relates to one individual at a location approximately 170m east of site in 2016. The most recent record relates to a location approximately 1.7km southwest of site in 2018.

4.3.15. A single record for Whiskered/Brant's Bat was returned by the data search and relates to a location approximately 1.4km west of site in 2015.

4.3.16. Two records each of a couple of individuals were returned for Daubenton's Bat, with the closest and most recent record relating to a location 900m west of site in 2019.

4.3.17. Four Natural England European Protected Species (EPS) licences for bats were present within a 2km radius of the site. The closest relates to a licence from 2018, relating to a location approximately 250m east of site which allowed for the damage and destruction of a resting place in regard to Common Pipistrelles. The other licences are over a 1km away from the site in Toddington, they allowed for the damage and destruction of a resting place in relation to Common Pipistrelle, Brown Long-eared, Natterer's bat and Soprano pipistrelle.

4.4. Hedgehogs

4.4.1. No evidence of Hedgehog *Erinaceus europaeus* was recorded on-site in February 2025 and there are no hibernacula features or suitable habitat present to facilitate hibernation of this species on-site. No habitat is present within the site for the foraging and dispersal of Hedgehogs and as such this species can be ruled out. Local data records suggest presence of Hedgehogs in the locality of the site as summarised below.

Background Records

4.4.2. Seventeen records of Hedgehogs were returned by the data search over the past 10 years. The closest record relates to a location approximately 200m south of site in 2017 and the most recent relates to a location 400m east of site in 2020.

4.5. Birds

4.5.1. During the site visit in February 2025, presence of Herring Gull *Larus Argentatus a*, Long-tailed Tit *Aegithalos caudatus*, Blue tit *Cyanistes caeruleus* and Great tit *Parus major* were recorded on site.

4.5.2. The small trees along the western boundary provide the best value habitat for the local bird species but is still extremely limited in nature.

4.5.3. It was considered that the flat roof of the retail unit is subject to minimal disturbance and therefore provides a suitable location for gulls to nest, as they have done in previous years. Herring gulls were recorded using the roof on the initial site visit in February 2025.

4.5.4. Given the urban nature of the site and the lack of habitat present, the need for breeding bird surveys was scoped out.

Background Records

4.5.5. The data search returned 36 notable bird species in 1034 records. The birds are protected under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), Annex 1 of the Birds Directive and / or Section 41 of the NERC Act.

4.5.6. The closet record originates from the River Arun, located approximately 400m south west of the site. The record was of Great Northern Diver *Gavia immer* from 2022.

4.5.7. The next closet record was recorded in a 1km square near to the site. These consisted of Red Kite *Milvus milvus*, Common Scoter *Melanitta nigra*, Kingfisher *Alcedo atthis*, Skylark *Alauda arvensis*, Cetti's Warbler *Cettia cetti*, and Reed Bunting *Emberiza schoeniclus*. The Red Kites were recorded in 2020 and all the other birds in 2015.

5. Ecological Evaluation

5.1. The Principles of Ecological Evaluation

5.1.1. The guidelines for ecological evaluation produced by CIEEM propose an approach that involves professional judgement, but makes use of available guidance and information, such as the distribution and status of the species or features within the locality of the project.

5.1.2. The methods and standards for site evaluation within the British Isles have remained those defined by Ratcliffe[7] . These are broadly used across the United Kingdom to rank sites so priorities for nature conservation can be attained. For example, current Sites of Special Scientific Interest (SSSI) designation maintains a system of data analysis that is roughly tested against Ratcliffe's criteria.

5.1.3. In general terms, these criteria are size, diversity, naturalness, rarity and fragility, while additional secondary criteria of typicalness, potential value, intrinsic appeal, recorded history and the position within the ecological / geographical units are also incorporated into the ranking procedure.

5.1.4. Any assessment should not judge sites in isolation from others, since several habitats may combine to make it worthy of importance to nature conservation.

5.1.5. Further, relying on the national criteria would undoubtedly distort the local variation in assessment and therefore additional factors need to be taken into account, e.g. a woodland type with a comparatively poor species diversity, common in the south of England, may be of importance at its northern limits, say in the border country.

5.1.6. Levels of importance can be determined within a defined geographical context from the immediate site or locality through to the international level.

5.1.7. The legislative and planning policy context are also important considerations and have been given due regard throughout this assessment.

5.2. Habitat Evaluation

Designated Sites

5.2.1. **Statutory Sites**. The site does not fall within and is not adjacent to any statutory designated sites (see Plan ECO1).

West Beach (LNR) and Climping Beach (SSSI)

5.2.2. West Beach LNR and Climping Beach SSSI located 570m south of the site. The SSSI has been designated for its nationally uncommon shingle beach

[7] Ratcliffe, D A (1977). *A Nature Conservation Review: the Selection of Biological Sites of National Importance to Nature Conservation in Britain.* Two Volumes. Cambridge University Press, Cambridge.

habitat as well as supporting a number of wintering birds including Sandling, of European significance. Supporting around 1% of the Western European population.

5.2.3. Vegetation includes sand dune species: Marram-grass *Ammophila arenaria*, Dune fescue grass *Vulpia membranacea*, Red fescue grass *Festuca rubra*, Sand catchfly *Silene conica*, Sand sedge *Carex arenaria*, Viper's bugloss *Echium vulgare. and a locally uncommon* Nottingham catchfly *Silene nutans.*

5.2.4. Overall, the site is considered to be sufficiently removed from the local statutory designated sites. The development proposals are unlikely to result in any significant effect on the features and species of interest.

Nutrient Neutrality

5.2.5. The development is not within or draining into the Nutrient Neutrality catchment of any European sites that have been identified as being sensitive to nutrient pollution. Therefore, no specific mitigation in regard to nutrient neutrality is required.

5.2.6. **Non-statutory Sites**. There are no non-statutory designated sites within or immediately adjacent to the site itself.

5.2.7. The closest non-statutory site is Littlehampton Golf Course & Atherington Beach LWS which is located approximately 530m south of the site. The Local Wildlife Site is approximately 47.5ha in size and consist of coastal sand dunes, coastal vegetated shingle and reedbed. Recording 167 notable species including 50 species of bird, 34 species of flowering plants and 69 species of insects.

5.2.8. There are no other non-statutory LWS within the 2km search area of the site.

5.2.9. It is considered that the nearby LWS is sufficiently removed from the site to be unaffected by development, given standard engineering practice in respect of pollution control and dust suppression which is implemented during the construction phase.

Ancient Woodland

5.2.10. No ancient woodland is present on-site or within a 2km radius of the site. Therefore, there will be no adverse impacts caused to ancient woodland by the development.

Traditional Orchard

5.2.11. There are no Traditional Orchards present on site or within the immediate surrounding area. The nearest one is approximately 450m south east of the site. With there being such a large geographical distance between the site and the traditional orchard, there is perceived to be adverse impacts on this priority habitat.

Biodiversity Net Gain

5.2.12. A Biodiversity Net Gain (BNG) assessment will be undertaken to ensure compliance with statutory requirements. This will be done by evaluating proposed landscape designs against the Biodiversity Metric. This assessment confirms whether the site achieves a net gain in biodiversity, with specific aims such as an increase in habitat and hedgerow units. Any loss in habitats necessitate adjustments to meet trading rules.

5.3. Faunal Evaluation

Badgers

5.3.1. **Legislation.** The Protection of Badgers Act 1992 consolidates the previous Badgers Acts of 1973 and 1991. The legislation aims to protect the species from persecution, rather than being a response to an unfavourable conservation status.

5.3.2. As well as protecting the animal itself, the 1992 Act also makes the intentional or reckless destruction, damage or obstruction of a Badger sett an offence. A sett is defined as "any structure or place, which displays signs indicating current use, by a Badger". 'Current use' is defined by Natural England as any use within the preceding 12 months.

5.3.3. In addition, the intentional elimination of sufficient foraging area to support a known social group of Badgers may, in certain circumstances, be construed as an offence by constituting 'cruel ill treatment' of a Badger.

5.3.4. Local Authorities are therefore obliged to consult Natural England over any application that is likely to adversely affect Badgers.

5.3.5. Any work that disturbs Badgers is illegal without a licence granted by Natural England. Unlike the general conservation legislation, the Badgers Act 1992 makes specific provision for the granting of licences for development purposes, including for the destruction of setts.

5.3.6. Guidance produced by Natural England in 2002, and subsequently amended, developed guidelines on the types of activity that it considers should be licensed within certain distances of sett entrances. Any work on-site must be completed in accordance with that guidance.

5.3.7. **Site Usage**. No active Badger setts or tracks were recorded on the site during the initial survey. A lack of nearby background records for this species contribute to the unlikeliness of Badgers being present on site. Therefore, Badgers have been ruled out at this stage.

5.3.8. **Mitigation and Enhancement Measures**. If any suspected Badger activity is observed during construction, the project's ecological consultancy should be contacted.

5.3.9. Badgers can roam into areas where construction is underway and become trapped in trenches and / or excavate new setts in piles of subsoil or disturb chemicals that may be being used for development. Regular monitoring and

professional ecological guidance are essential to address any issues promptly and legally.

5.3.10. Ensure that any trenches or excavations are covered or fitted with escape ramps at the end of each working day to prevent Badgers from becoming trapped. Avoid leaving piles of subsoil unattended for long periods, as Badgers may attempt to create new setts. If subsoil must be piled up, inspect the piles regularly and, if necessary, fence them off to prevent Badgers from accessing them.

Bats

5.3.11. **Legislation**. All bats are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and included on Schedule 2 of the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations"). These include provisions making it an offence to:

- Deliberately kill, injure or take (capture) bats;
- Deliberately disturb bats in such a way as to:-
- be likely to impair their ability to survive, to breed or rear or nurture their young; or to hibernate or migrate; or
- affect significantly the local distribution or abundance of the species to which they belong;
- To damage or destroy any breeding or resting place used by bats; and
- Intentionally or recklessly obstruct access to any place used by bats for shelter or protection (even if bats are not in residence).

5.3.12. The words deliberately and intentionally include actions where a court can infer that the defendant knew that the action taken would almost inevitably result in an offence, even if that was not the primary purpose of the act.

5.3.13. The offence of damaging (making it worse for the bat) or destroying a breeding site or resting place is an absolute offence. Such actions do not have to be deliberate for an offence to be committed.

5.3.14. In accordance with the Habitats Regulations the licensing authority (Natural England) must apply the three derogation tests as part of the process of considering a licence application. These tests are that:

1. the activity to be licensed must be for imperative reasons of overriding public interest or for public health and safety;
2. there must be no satisfactory alternative; and
3. the favourable conservation status of the species concerned must be maintained.

5.3.15. A Licence will not be required for demolition of building B1 as there is no evidence of bats using the building for roosting.

5.3.16. **Site Usage**. On-site there is extremely limited habitat suitable for foraging bats with no grassland woodland or linear features such hedgerows.

5.3.17. The PRA and three further targeted emergence surveys have ruled out bats using building B1 at the time of surveying.

5.3.18. **Mitigation / Recommendations**. The limited on-site habitat provides limited foraging opportunities for local bat species, with no dispersal opportunities for commuting routes present.

5.3.19. The provision of new introduced shrub and tree planting will heighten the invertebrate suitability of the site, therefore improving food resource for bats.

5.3.20. Consideration will be given to the Bat Conservation Trust and Institute of Lighting Professionals (ILP) Guidance Note 08/23 Bats and Artificial Lighting at Night but given the urban nature of the site lighting is largely unavoidable.

Hedgehogs

5.3.21. **Legislation**. Hedgehog is a species of principal importance for the conservation of biodiversity under Section 41 (England) of the NERC Act 2006.

5.3.22. The NERC Act 2006 requires the Secretary of State to:

… take such steps as appear… to be reasonably practicable to further the conservation of the living organisms and types of habitat included in any list published under this section, or… promote the taking by others of such steps.

5.3.23. **Site Usage**. While no evidence was recorded while undertaking the survey and there are no hibernacula features present, it is considered that the habitats present do not provide opportunities for the foraging and dispersal of the species. As it is known that Hedgehogs are present in the local area from the background data search, occasional use by this species on-site cannot be eliminated.

5.3.24. **Mitigation / Recommendations**. If in the event a Hedgehog is found during construction works, the Hedgehog should be carefully placed in a lidded box (with air holes and vegetation cover) and safely translocated to an area of retained vegetation or within suitable off-site habitats away from construction areas.

5.3.25. Any trenches or deep pits associated with construction that are left open overnight pose a significant risk to dispersing hedgehogs, especially if the trench fills with water. It is recommended that appropriate mitigation measures be put in place during the construction phase to safeguard against entrapment. Specifically, if trenches cannot be covered overnight, a means of escape needs to be provided. This can be achieved by placing planks or similar structures in the trenches to allow hedgehogs and other small animals to climb out safely.

Other Mammals

5.3.26. **Legislation**. Common mammals receive protection under the Wild Mammals (Protection) Act 1996 making it an offence to crush or asphyxiate any wild mammal with intent to inflict unnecessary suffering.

5.3.27. This also extends to the Animal Welfare Act 2006 making it an offence to cause unnecessary suffering or fail to meet the needs of vertebrates in the temporary control of man.

5.3.28. **Site Usage**. The site provides some limited suitable opportunities for several common mammal species.

5.3.29. **Mitigation and Enhancement Measures**. General regard to mammals following standard practise to avoid unnecessary harm and distress when undertaking site clearance works. Any common mammals found, which are not in distress, will be encouraged to disperse to the wider area where suitable habitat is present outside of work zones (same methodology as Hedgehogs).

5.3.30. New landscaping will provide new shelter and foraging opportunities for locally present mammals.

Birds

5.3.31. **Legislation**. Section 1 of the Wildlife and Countryside Act 1981 (as amended) is concerned with the protection of wild birds, whilst Schedule 1 lists species that are protected by special penalties. All species of birds receive general protection whilst nesting.

5.3.32. **Site Usage**. There are a number of small trees within the raised planter along the western boundary, this is the only conventional suitable bird nesting habitat within the site.

5.3.33. **Mitigation / Recommendations**. In order to avoid impacts on nesting birds, and to avoid a potential offence under the Wildlife and Countryside Act 1981 (as amended), clearance of vegetation that is suitable for nesting birds should be undertaken outside of the nesting season (typically March to August inclusive) wherever possible. Where this cannot be achieved, a nest-check survey for birds should be undertaken by an ecologist 24-48 hours prior to vegetation removal. If any nests are confirmed, works should cease immediately, with the nest safeguarded by a 5m buffer and left in situ until the young have fledged.

5.3.34. Should building demolition take place in nesting bird season (typically March to August inclusive) a nesting bird check by a suitably qualified and experienced ecologist is required to ensure no nesting is taking place on the flat roof top of B1.

5.3.35. The proposals will still seek to include bird boxes, including Schwegler 1B bird boxes, or similar to be installed where possible.

Invertebrates

5.3.36. **Site Usage**. It is expected that a limited assemblage of common invertebrate species utilise the little on-site habitats, although there is no reason to suspect the likely presence of any scarce or notable invertebrate species.

5.3.37. **Mitigation / Recommendations**. Proposed landscaping includes new species-rich native planting including a number of native trees and shrubs. Native species are known to support a greater assemblage of invertebrates and will in turn support other wildlife, for example foraging bats. The inclusion of new introduced shrub, whilst not native, will still increase the floristic diversity on-site and partially contribute to invertebrate opportunities.

6. Planning Policy Context

6.1. The planning policy framework that relates to nature conservation at the site, is issued at two main administrative levels: nationally through the NPPF and locally through the Breckland District Council Local Plan. The proposed development will be judged in relation to the policies contained within these documents that concern nature conservation.

6.2. National Policy

National Planning Policy Framework (December 2024)

6.2.1. Guidance on national policy for biodiversity and geological conservation is provided by the National Planning Policy Framework (NPPF), published in March 2012, revised on 24 July 2018, 19 February 2019, 20 July 2021, 5 September 2023, 19 December 2023 and again on in December 2024. It is noted that the NPPF continues to refer to further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system provided by Circular 06/05 (DEFRA / ODPM, 2005) accompanying the now-defunct Planning Policy Statement 9 (PPS9).

6.2.2. The key element of the NPPF is that there should be "a presumption in favour of sustainable development" (paragraphs 10 to 11). It is important to note that this presumption "does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site" (paragraph 195). 'Habitats site' has the same meaning as the term 'European site' as used in the Habitats Regulations 2017.

6.2.3. Hence, the direction of Government policy is clear. That is, the presumption in favour of sustainable development is to apply in circumstances where there is potential for an effect on a European site, if it has been shown that there will be no adverse effect on that designated site as a result of the development in prospect.

6.2.4. A number of policies in the NPPF are comparable to those in PPS9, including reference to minimisation of impacts to biodiversity and provision of net gains to biodiversity (paragraph 187).

6.2.5. The NPPF also considers the strategic approach that Local Authorities should adopt with regard to the protection, maintenance and enhancement of green infrastructure, priority habitats and ecological networks, and the recovery of priority species (paragraph 192).

6.2.6. Paragraphs 192 to 194 of the NPPF comprise a number of principles that Local Authorities should apply, including encouraging opportunities to incorporate biodiversity in and around developments; provision for refusal of planning applications if significant harm cannot be avoided, mitigated or compensated for; applying the protection given to European sites to potential Special Protected Areas (SPA), possible Special Areas of Conservation (SAC), listed or

proposed Ramsar sites and sites identified (or required) as compensatory measures for adverse effects on European sites; and the provision for the refusal for developments resulting in the loss or deterioration of 'irreplaceable' habitats – unless there are 'wholly exceptional reasons' (for instance, infrastructure projects where the public benefit would clearly outweigh the loss or deterioration of habitat) and a suitable compensation strategy exists.

6.2.7. National policy therefore implicitly recognises the importance of biodiversity and that with sensitive planning and design, development and conservation of the natural heritage can co-exist and benefits can, in certain circumstances.

Green Infrastructure Strategy, West Sussex County Council

6.2.8. On page 24 of the strategy, it outlines conserving and enhancing biodiversity by planting more trees to enhance woodlands and ecological corridors. This includes using BNG to encourage the right planting in relevant places utilising native and pollinator friendly species.

Arun Local Plan 2011-2031

6.2.9. The Local Plan, which was adopted in July 2018, is the foundational document within the Arun District Council that aims to set a spatial vision and strategy for the district with clear economic, social and environmental objectives. Relevant policies from this document are detailed individually below.

6.2.10. **Policy ENV SP1 Natural Environment.** This policy aims to encourage and promote the preservation, restoration and enhancement of biodiversity through the development process and through policies for designation sites and Local wildlife sites. Creation of new areas for habitats and species is encouraged.

Littlehampton Neighbourhood Plan 2014-2019

6.2.11. The Neighbourhood Plan, which was adopted in 2014, is the foundational document within the town that aims to set a spatial vision and strategy for the town with clear economic, social and environmental objectives. Relevant policies from this document are detailed individually below.

6.2.12. **Policy 16** sets out the town councils' stance on open spaces detailing that they should only be built on under very special circumstances.

6.2.13. **Section 2.8.3** the plan states they aim to plan for climate change, to work in harmony with the environment to conserve natural resources and increase biodiversity.

6.3. Discussion

6.3.1. The development of the site is not likely to have a significant adverse effect on designated sites in the locality. There is scope within the proposals to deliver the appropriate ecological mitigation and enhancements to support local wildlife and biodiversity. Following the recommendations and enhancements within this report, it is currently considered that development

of the site would be in accordance with relevant planning policy at the national and local level.

7. Summary and Conclusions

7.1. Ecology Solutions was commissioned in February 2025 to undertake an ecological assessment of Premier Inn, Old Waitrose, Littlehampton.

7.2. The current proposals for the site include the construction of a new Premier Inn hotel with associated infrastructure and green space.

7.3. The site was surveyed in February 2025 based on UK Habitat Classification (UKHab) methodology and appraised for protected and notable species suitability.

7.4. The site consists primarily of hardstanding and one building (B1), with some limited ornamental vegetation in a large planter on the western side of the site.

7.5. **Statutory Sites**. There are no statutory designated sites within or directly adjacent to the site boundary. West Beach (LNR) and Climping Beach (SSSI) are the closest statutory designated sites, located 570m south of the site.

7.6. Nutrient neutrality does not pose a constraint to development as the site falls outside the catchment and does not drain into any sites that have been identified as being sensitive to nutrient pollution.

7.7. **Non-statutory Sites**. There are no non-statutory designated sites within or immediately adjacent to the site itself. Non-statutory Sites. The closest non-statutory site is Littlehampton Golf Course & Atherington Beach LWS which is located approximately 530m south of the site.

7.8. **Habitats**. The site comprises of hand standing with very limited vegetation. With such limited vegetation present there is little of ecological interest.

7.9. New planting of Individual trees and introduced shrub will aid in increasing the floral diversity of the site and heighten nectar resource for invertebrates.

7.10. **Badger**. No active Badger setts or tracks were recorded on the site during the initial survey.

7.11. As a precaution, during construction ensure that any trenches or excavations are covered or fitted with escape ramps at the end of each working day to prevent Badgers from becoming trapped. Avoid leaving piles of subsoil unattended for long periods, as Badgers may attempt to create new setts. If subsoil must be piled up, inspect the piles regularly and, if necessary, fence them off to prevent Badgers from accessing them.

7.12. **Bats**. Building B1 is the only location likely to support bats on the site. Three emergence bat surveys have been undertaken on site and have confirmed that no bats are roosting within the building.

7.13. **Hedgehog**. No evidence of Hedgehog was recorded on-site in February 2025 and no hibernacula features suitable for hibernation were identified. While no evidence was recorded, it is considered that Hedgehogs could disperse across the site. It is known that the species is present in the local area and as such the occasional use by this species cannot be eliminated.

7.14. Trenches or deep pits associated with construction that are to be left open overnight should also be provided with a means of escape in case a Hedgehog enters.

7.15. **Birds**. The existing native hedgerows and individual trees provide opportunities for the foraging and nesting of common bird species.

7.16. The development proposals will retain and enhance the ornamental planting on the western boundary, therefore retaining nesting opportunities for birds. New native individual tree planting will ensure opportunities for foraging and nesting birds are increased post-development.

7.17. A nesting bird check will need to be undertaken by a suitably qualified and experienced ecologist prior to building demolition, should it take place during the nesting bird season (March to August inclusive).

7.18. The inclusion of new bird boxes where possible will provide additional nesting opportunities for common species recorded on site.

7.19. **Invertebrates**. It is expected that an assemblage of common invertebrate species utilise the on-site habitats and there is no reason to suspect the likely presence of any scarce or notable invertebrate species.

7.20. The provision of new trees and introduced shrub planting will help to increase suitability for a range of common invertebrate species.

7.21. It is considered that, with the adoption of the safeguards and enhancements detailed within this report, adverse effects can be avoided or adequately mitigated. On the current evidence, there are no insurmountable ecological constraints to bringing the site forward as a sustainable development.

PLANS

PLAN ECO 1

Site Location and
Ecological Designations

KEY:

Site Boundary

Ecological Sites

Sites of Special Scientific Interest

Local Nature Reserves

Local Wildlife Sites

N

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12674: Old Waitrose Site, Littlehampton

ECO 1: Site Location and Ecological Designations

Rev: A
April 2025

PLAN ECO 2

Ecological Features

KEY:

- Site Boundary
- Bat Potential Buildings

Baseline Area Habitats

- Developed Sealed Surface
- Ground Level Planter
- Existing Individual Trees (Small)

N

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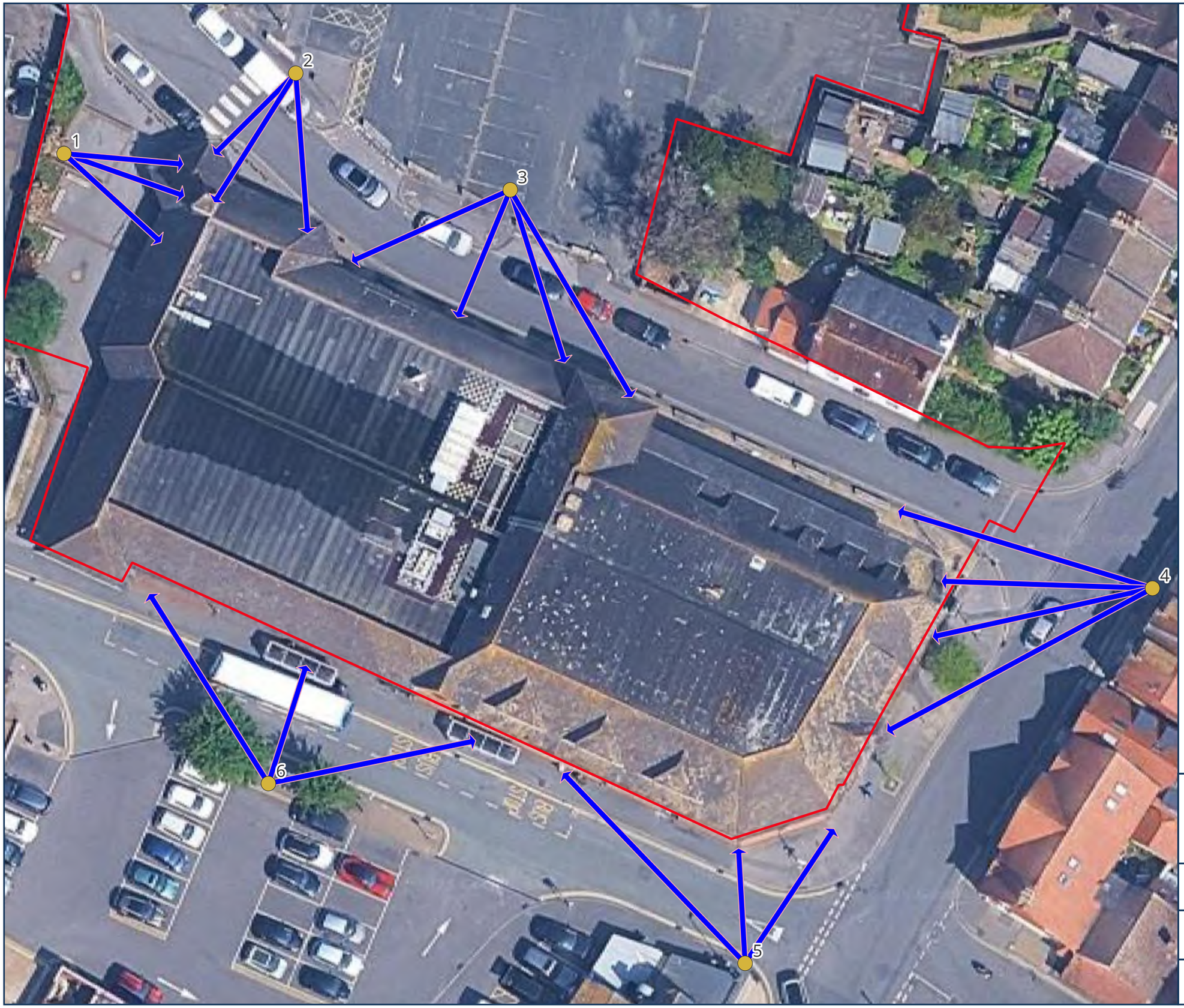
12674: Old Waitrose Site, Littlehampton

ECO 2: Ecological Features

Rev: A
April 2025

PLAN ECO 3

Emergence Survey
Locations



KEY:

- Surveyor Locations
- Arrows
- Site Boundary

N

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12674: WAITROSE, LITTLEHAMPTON

Plan: Emergence bat surveyor locations

Rev: A
June 2025

Appendices

Appendix 1

Landscape Masterplan

INDIGO

KEY

- Existing tree to be retained
- Other existing vegetation retained
- Proposed building building
- Existing car park and road
- Proposed tarmac surface
- Proposed paved surface
- Proposed block banding
- Proposed native tree
- Proposed mixed shrub planting
- Proposed enhancement to existing planting
- Proposed walls

SCALE 1:500 @ A3

0 5 10 20 25m

NORTH

rev	description	date	by	chk
-	First issue	2025-04-08	ES	ES

project
PI LITTLEHAMPTON AVON ROAD

client
WHITBREAD GROUP PLC

drawing title
MASTERPLAN

drawing number	revision	status	scale
1274-MP-01	-	PLANNING	1:500@A3

GENERAL NOTES:
This drawing is to be read in conjunction with all other relevant disciplines drawings, schedules, specifications and supporting information. Any discrepancies are to be reported to Indigo Landscape Architects Limited and resolution sought prior to proceeding. This drawing is subject to copyright.

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INDIGO LANDSCAPE ARCHITECTS LIMITED

Appendix 2

Proposed Site Masterplan

N

0 10 20 30 40 m

Rev	Date	Description	By	Chk

Client
Premier Inn Hotels

1 Brooklands Yard
Southover High Street
Lewes
East Sussex BN7 1HU

01273 479434
www.axiomarchitects.co.uk

AXIOM ARCHITECTS

Project
Anchor Springs
Littlehampton
Premier Inn

Drawing
Proposed Site Plan

Drawing No.	Revision	Date	Scale	Drawn	Checked	Status
6122-P-	002	08/04/25	1:200 @ A1	LB	LB	PLANNING

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