

From: Norton, Tristan <Tristan.Norton@havant.gov.uk>

Sent: 27 September 2023 10:34

To: Eaves, David <David.Eaves@havant.gov.uk>

Cc: Norton, Tristan <Tristan.Norton@havant.gov.uk>

Subject: APP/23/00507 Northney Farm, St Peters Road, Hayling Island, PO11 0RX

Dear David,

APP/23/00507 | Partial Reinstatement and Repair of existing sea wall to a height of 1.4m and Creation of an inner bund with a maximum height of 2.25m to protect habitat for wintering bird populations. | Northney Farm, St Peters Road, Hayling Island, PO11 0RX

Thank you for consulting me on this application.

The application is accompanied by a Bird Survey report (Wild New Forest, March 2023), a Habitats Regulations Assessment (Envirocentre, November 2022), and a Construction Environmental Management Plan (Earlcote, September 2023).

The bird survey applied the same methodology as previous studies, with a series of visits conducted between November 2022 and February 2023. The 2022/23 results are broadly consistent with the previous survey findings, with significant numbers of Curlew and Dark-bellied Brent Geese recorded within the surveyed area (as well as a range of other species). The Curlew were again concentrated on a high-tide roost along the sea wall, and switched between this area and Gutner Point to the south (due to raptor disturbance at Northney). The Brent Geese were observed in very large numbers (a flock of 1650 birds in February 2023 accounts for c.1.5% of the entire UK wintering population) feeding on winter wheat and permanent pasture. The numbers of and regularity of use by Brent Geese and Curlew at the Northney study area reaffirm the site's overall importance for these two key species within the wider Solent system. In summary, I am content that the submitted bird surveys are of high standard, provide a detailed analysis of bird use of the Northney site, and provide meaningful comparisons with previous works here. Northney Farm is demonstrably a very important site for overwintering bird species.

The overriding issue at this site is the deliverability of the proposed works. It is my understanding that the repairs to the sea wall would be unlikely to receive consent from Natural England and would be unlikely to have support from the Environment Agency or Coastal Partners. The proposed sea wall repairs at the eastern edge of SWBGS Site H59C are within Chichester Harbour Site of Special Scientific Interest (SSSI) and would therefore require SSSI consent from Natural England. Given the reluctance to consent works exacerbating coastal squeeze, it is highly unlikely to have NE support. In addition, the works would be within Chichester & Langstone Harbours Special Protection Area (SPA) and the Solent Maritime Special Area of Conservation (SAC) would be unlikely to accord with the stated conservation objectives of those sites. The preferred long-term shoreline management option for this area is some form of managed retreat, and therefore again the proposed sea wall repairs would be at odds with the strategic objectives for this section of coastline. On that basis it seems unlikely that the scheme as proposed is deliverable. Clearly, formal advice from the relevant statutory bodies and key consultees is critical.

I am unable to support this scheme at the present time due to the uncertainty over delivery. Without certainty of delivery it is not possible for Havant Borough Council, as the competent authority under the Habitats Regulations 2017, to conclude that the proposed works are acceptable. I would very strongly recommend that the applicant engages with Natural England and other key consultees.

NPPF, Circular 06/2005 and Natural England Standing Advice, require that planning decisions are based on full, up-to-date ecological information and it is essential that all necessary survey, assessment and mitigation information is available to the Local Planning Authority prior to determination, particularly in the case of protected sites, habitats and species, which are a material planning consideration. This will enable the Local Planning Authority to determine the application on the basis of full knowledge about the potential ecological impacts of the proposal and to ensure that any impacts can and will be mitigated.

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

Kind regards,

Tristan

Tristan Norton

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