

APP/17/01250 | Engineering works to facilitate the construction of three clay-cored sea defence embankments including: 1 no. 350m (approx.) length embankment incorporating the diversion of footpaths No. 45 and No 49, 1 no. 270m (approx) length embankment running along the north to south boundary and 1 no. 130m (approx.) length embankment to the east of Mill Lane); ground raising and associated protection works around Southern Water assets; associated drainage; and the active breach of the existing coastal sea wall to allow the creation of a dynamic inter-tidal habitat. Incorporating S257 application for Diversion of Footpath 45 (runs along existing sea defence providing a route between Harts Farm Way and the junction of Footpaths 49 and 51) and Footpath 49 (runs between Southmoor Lane and the junction of Footpaths 45 and 51). | Land east of Southmoor Lane, Havant 17.2290

Thank you for consulting me on this application. Please accept my apologies for the delay in responding to you.

The proposal is a rare opportunity to provide substantial ecological benefits to the coastal zone in Havant Borough at the same time as addressing issues arising from sea level rise and coastal squeeze. The existing site is of some ecological value in its own right, containing a variety of terrestrial and wetland habitats supporting a diverse range of species. The existing mix of coastal and terrestrial grasslands and scrub will be transformed into predominantly intertidal habitats such as mudflats and saltmarsh.

The substantial habitat loss would, in the opinion of the applicant and Natural England, result in an adverse effect on the integrity of Chichester & Langstone Harbours SPA/Ramsar, even though the post-construction habitat would be of ecological benefit and provide habitat types included within the SPA designation. It has been agreed with NE that the loss of habitat (in this case coastal grazing marsh) can be compensated for by the provision of new habitat at the regional scale. On that basis, NE are content that the proposals accord with the Conservation Regulations 2017.

The application is accompanied by detailed ecological information, covering general habitats, mammals, invertebrates, reptiles and birds. I have read each of the reports/appendices but will restrict detailed comments to only a few areas:

Birds

Bespoke wintering bird surveys have been carried out and these have confirmed that some areas of the application site are of importance to wintering species, although the two larger fields do not support significant numbers of waders or wildfowl. The lack of use by key species such as brent geese and grassland waders is highly likely to be a function of both disturbance (the existing sea wall is frequently used) and habitat management (the larger field especially containing much scrub throughout). The proposed installation of fencing around the entire site is welcome and should hopefully encourage birds to use the site. The breach will also assist in reducing footfall along the sea wall.

The retention of the existing high-tide roost on the spit at the Lavant outfall is welcome: this is a key location within the Langstone area, supporting a good

diversity of wader species. The breached sea wall may potentially provide a 'new' high-tide roosting area, although I would assume that shelter and disturbance are the key factors determining its attractiveness. In common with other consultees I would also suggest that permanent high-tide islands are created rather than rafts: rafts would require regular maintenance whereas islands may only need to be trimmed occasionally.

The 'bay' adjacent to the Lavant outfall spit often supports good numbers of sea duck such as red-breasted merganser as well as species such as goldeneye, wigeon and gadwall. The proposed construction works will hopefully be taking place outside the wintering season and so disturbance should not be an issue.

The change from grassland to intertidal habitats will undoubtedly provide benefits to certain species, particularly coastal waders and wildfowl. It is uncertain whether the realigned site will be attractive to brent geese, although the fenced smaller field to the west (HIWWT reserve) is likely to become more attractive, especially if managed appropriately and containing freshwater scrapes. The borrow pits will necessarily result in initial disturbance of the field but, if habitat management can be modified to make this field more attractive to brent geese in particular, the overall benefits should be very positive.

The timing of any vegetation loss raises potential conflicts between the needs of nesting and wintering birds. There is a need to remove suitable nesting habitat from the construction area outside the breeding season, although this would then result in potential disturbance to wintering bird species. Vegetation works are therefore proposed for February, at the tail end of the wintering season. It would be useful to push this as far into February as possible to ensure that impacts to wintering species are minimised as much as reasonably possible.

Terrestrial habitat loss

The proposals would result in the loss of substantial areas of grassland containing the Nationally Scarce divided sedge, as well as loss of habitat supporting other notable plant species. I would encourage the transplantation of turves containing divided sedge in particular (the Eastern Solent Coastal Partnership has carried out such work at Tipner in Portsmouth). This species spreads via rhizomes and therefore it should be relatively easy to cut, store and transplant turves onto the new embankments. This of course can be supplemented with the proposed coastal grassland seeding.

Reptiles

The site has been shown to support significant numbers of common lizard, as well as a population of slow-worms. As with all presence/absence surveys, numbers observed are highly likely to be an underestimate of the true population (the reptile survey was restricted to edge habitats and boundary features and did not cover field interiors). A substantial area of suitable reptile habitat will be lost as a result of the inundation and physical groundworks. Outline reptile mitigation measures are proposed, entailing a mix of capture and translocation and 'natural' displacement during inundation. No details are currently provided on habitat enhancements.

On balance, whilst the ecological impacts of the proposed works are not insignificant (indeed they are quite profound at the local level), the potential ecological benefits of the proposed works are considerable. If you are minded to grant permission, can I suggest that a fully-detailed pre-commencement ecological mitigation strategy is secured by condition. This document should provide clear and concise details of all measures for mitigating, compensating and enhancing biodiversity at the site. This should include locations, timings, methods and monitoring for all measures. Long-term monitoring of this project will be essential in assessing its success in ecological terms.

Prior to the commencement of development works a detailed Ecological Mitigation Strategy shall be submitted to and agreed in writing by the Local Planning Authority. This shall include, but not be restricted to: details of all habitat management measures; details of measures to avoid harm to protected species; details of ecological enhancement measures for the remainder of the application site; details of ongoing monitoring and reporting. All mitigation, compensation and enhancement features shall be permanently retained and maintained. Reason: to protect biodiversity in accordance with the Conservation Regulations 2017, Wildlife & Countryside Act 1981, the NERC Act (2006), NPPF and Policy CS 11 of the Havant Borough Core Strategy March 2011.

In addition, I would suggest that a pre-commencement Construction Environment Management Plan (CEMP) is secured. This document should provide detailed measures for avoiding/mitigating impacts arising from all construction activities.

Prior to the commencement of development activities, a Construction Environment Management Plan (CEMP) shall be submitted for approval to the Local Planning Authority. The CEMP shall include details of measures to avoid/mitigate impacts to the terrestrial and aquatic environment. Development shall proceed in strict accordance with the approved CEMP. Reason: to protect biodiversity in accordance with the Conservation Regulations 2017, Wildlife & Countryside Act 1981, the NERC Act (2006), NPPF and with and with Policy CS 11 of the Havant Borough Core Strategy March 2011.

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

Kind regards,

Tristan

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