

Dear Lewis,

APP/16/01237 | Demolition of 6,111 square metres of redundant chalets and facilities buildings, use of land for the siting of 204 holiday caravans including 5 caravans for use as staff accommodation, refurbishment of retained single and two storey holiday chalets to form 87 units of holiday accommodation, retain managers bungalow, sales area for 5 caravans, refurbishment of remainder of central facilities building, CCTV cameras, provision of new pedestrian concourse with terraces, splash and dry play areas, multi-games court, adventure golf course and outdoor theatre and new landscaping. Retaining existing pitch and putt golf course to the east of the site. | Mill Rythe Holiday Village, 16 Havant Road, Hayling Island, PO11 0PB 16.2332

Thank you for consulting me on this application. I consider that further ecological information is required prior to determination.

The application is accompanied by a Preliminary Ecological Appraisal (Middlemarch, September 2016), a Preliminary Roost Assessment (Middlemarch, September 2016) and a Habitats Regulations Assessment Screening Report (Middlemarch, September 2016).

Impacts to European designated sites

The application site is immediately adjacent to the Solent Maritime SAC and Chichester & Langstone Harbours SPA and Ramsar site. In addition, the site is also adjacent to a number of sites which feature within the Solent Waders & Brent Goose Strategy (SWBGS) and which offer supporting habitat to overwintering bird species associated with the SPA.

The submitted HRA screening document does not refer to the SWBGS. I would suggest that a review of all SWBGS data is undertaken so that the status of brent geese and other overwintering birds can be assessed robustly. For the purposes of HRA, these areas of supporting habitat should be considered as part of the SPA. Havant Borough Council's requirements in terms of SPA supporting habitat are detailed within Policy DM23 of the Core Strategy 2011. The ecologist will need to determine whether bespoke wintering bird surveys are necessary (these are stated as being necessary but no details are given in section 7.3) – this will need to be informed by existing SWBGS data.

Given the proximity of SPA features (whether the SPA proper to the north or the surrounding supporting habitat) there is clearly potential for impacts arising from both the demolition/construction phase and the operational phase. If demolition/construction is undertaken during the winter months then there is potential for novel disturbance impacts such as noise and human activity which may affect the presence/distribution of SPA bird species locally. There are several published papers on the effects of noise and visual disturbance on coastal bird species (detailing distances and noise levels at which disturbance is evident) and these should be used, in conjunction with data obtained about specific SWBGS sites within the likely zone of influence, to inform the HRA. The most obvious mitigating measure would be to avoid any demolition/construction works within the period October to March inclusive, thereby avoiding the issue of bird disturbance altogether. If works are likely

within this period then specific details of mitigation measures will need to be provided now. This may include measures to reduce visual and noise disturbance e.g. through screening, noise reduction, noise monitoring. These should be site-specific and informed by the SWBGS data.

During the operation of the new holiday park there is clearly potential for (increased) recreational disturbance. The HRA will need to include an analysis of existing access arrangements (e.g. onto the coastal path, towards/within supporting habitat) and provide an objective assessment of whether those patterns of use are likely to change. The use of leaflets is not likely to be effective alone. The proposed layout entails the spread of holiday units throughout the site whereas previously there has been a relatively concentrated area of buildings. The proposals do not include extensive areas of open greenspace within the redeveloped site and so one might expect people (especially with dogs) to seek open space outside the site and closer to the SPA and SWBGS sites.

There may be other issues arising from the redevelopment of the site such as lighting (which may impact birds) and entertainment activities (e.g. increase in outdoor activities with amplified sounds etc.).

The potential for impacts to nearby SAC habitats, or any other habitats of ecological value, should be considered. This may occur via increased trampling (e.g. through greater footfall in specific areas), dog fouling (again, will patterns of usage change?) and drainage.

Bats

The site contains a large number of buildings, all of which are relatively modern in construction. A total of eight buildings are considered to exhibit features which could offer potential for roosting bats and therefore further bat surveys have been recommended. Due to the timing of the initial survey it was not possible to undertake these during 2016 and therefore surveys will have to be carried out in the coming bat survey season. NPPF, Circular 06/2005 and Natural England Standing Advice on Protected Species, 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 LPA prior to determination, particularly in the case of protected species, which are a material planning consideration. This will enable the LPA to determine the application on the basis of full knowledge about the ecological impacts of the proposal and to ensure that any impacts can and will be mitigated, and are acceptable.

Vegetation

The large open field at the site's eastern edge appears to comprise an area of former saltmarsh (creek patterns are clearly visible on 2013 aerial photography, and there appears to be a distinct range of vegetation communities present). Whilst this area is described as improved grassland within the Preliminary Ecological Appraisal I would request further details on the composition of this vegetation: scarce plant species such as spiny retharrow may be present. This area will become the only meaningful open ground within the site and will therefore presumably be subject to much-increased pressure post-development. There may also be impacts to the small lake in the north-east of the site. This brackish waterbody has been shown to support

interesting species such as the County Scarce fennel pondweed. This area of grassland including the lake is also a Site of Importance for Nature Conservation (SINC) and therefore any impacts arising from redevelopment would need to be assessed and adequately mitigated in order to accord with Policy CS 11 of the Core Strategy 2011.

Reptiles

The area of grassland within the east of the site appears suitable for supporting common reptile species and there may be potential for impacts arising from any future use of the site.

In summary, there are outstanding ecological issues at this site and which must be informed by additional survey works at the requisite time. The HRA screening document needs revisiting and should take account of SWBGS data.

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

Kind regards,

Tristan

Tristan Norton

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