

Lewis Oliver
Havant Borough Council
Public Service Plaza
Civic Centre Road
Havant
PO9 2AX

Beechcroft House
Vicarage Lane
Curdridge
Hampshire
SO32 2DP

By email only:
planning.development@havant.gov.uk

e feedback@hiwwt.org.uk
t 01489 774400
www.hiwwt.org.uk

13th January 2016

Your Ref: APP/16/01237
Our Ref: 13.70.3.36.1

Dear L Oliver

PROPOSAL:

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.

LOCATION:

MILL RYTHE HOLIDAY VILLAGE, 16 HAVANT ROAD, HAYLING ISLAND, PO11 0PB

DESIGNATED SITES:

**CHICHESTER AND LANGSTONE HARBOURS – RAMSAR, SPECIAL PROTECTION AREA (SPA);
SOLENT MARITIME – SPECIAL AREA OF CONSERVATION (SAC);
CHICHESTER HARBOUR – SITE OF SPECIAL SCIENTIFIC INTEREST (SSSI);
MILL RYTHE HOLIDAY VILLAGE AND TURNERBURY FARM A & B – SITES OF IMPORTANCE FOR NATURE CONSERVATION (SINC)**

Thank you for consulting the Wildlife Trust on this application. In commenting we have reviewed the following documents;

- Middlemarch (September 2016) Preliminary Ecological Appraisal;
- Middlemarch (September 2016) Preliminary Roost Assessment; and
- Middlemarch (September 2016) Habitats Regulations Assessment (HRA) Screening Report.

We do have some concerns with these proposals, particularly given the proximity of the site to the adjacent SINC and SPA. We consider that insufficient ecological information has been provided to assess the impacts of the proposals on the adjacent nature conservation sites, and as such it will not be possible for the Local Planning Authority to determine this application. We therefore object to the proposals.

Designated Sites

The site is located immediately adjacent to the Chichester and Langstone Harbours Ramsar, SPA, the Chichester Harbour SSSI and the Solent Maritime SAC. In addition, the eastern part of the site is formed by the Mill Rythe Holiday Village SINC. The SPA is designated for the presence of internationally important

numbers of overwintering birds and the SINC is designated in part for providing supporting habitat for overwintering birds associated with the SPA. It is included within the Solent Wader and Brent Goose Strategy (SWBGS) as being 'Important' for brent geese and as such it should be treated as part of the SPA.

Recreational disturbance, including disturbance caused by dogs running off the lead, has been identified as one of the primary issues impacting on the designated sites, and a project (the Solent Recreation Mitigation Partnership (SRMP)) has been set up to mitigate the impacts. The issues are complex and a range of measures have been put in place in an attempt to mitigate the impacts of residential development within 5.6km of the Solent. We acknowledge that there is an existing holiday village at this site, but this development, whilst not a residential development, seeks to attract more visitors to a 'dog friendly' resort where they are likely to seek out the SINC, and adjacent sea wall for their recreation. Without appropriate and robust mitigation measures in place, it is likely that the proposals will increase recreational disturbance on the adjacent part of the SPA and its supporting habitats.

Some 'precautionary recommendations' have been provided in paragraph 12.2 of the HRA screening report, but whilst these may form part of any mitigation strategy they are unlikely to be effective in isolation and in the long term. In the absence of any enforcement measures it is likely that individuals wishing to let their dogs run off the lead will do so, thereby disturbing birds using the SINC and nearby SPA. Further and more robust mitigation measures are therefore considered necessary.

Protected Species and Habitats

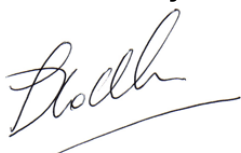
Bats – The preliminary bat report has identified "a small number of access points for bats in some of the buildings" but the surveyor was unable to inspect any buildings internally and as such "the bat roosting potential of the majority of the loft spaces could not be determined". The report recommends that further surveys are carried out during the bat breeding season; however, no such surveys have been carried out. Protected species are a material consideration in planning and current guidance requires that planning decisions are based on up-to-date survey information, an assessment of potential impacts and detailed mitigation measures where required, prior to determination.

Vegetation – Mill Rythe Holiday Village SINC forms the western part of the site and is designated in part due to the presence of coastal habitats (semi-natural coastal and estuarine habitats, including saltmarsh, intertidal mudflats, sand dunes, shingle, brackish pools, grazing marsh and maritime grassland) and supports one or more notable species and a significant population of a species which has a restricted distribution or has substantially declined in population range, in this case spiny retharrow *Ononis spinosa* and dark-bellied brent goose, see above.

The preliminary ecological assessment identifies the SINC as 'amenity grassland' that 'was less regularly managed' and 'interspersed with patches of tall ruderal scrub'. Aerial imagery online clearly indicates that the habitat is more coastal since creek patterns appear to be visible and as such we are concerned that the assessment does not give an accurate reflection of the vegetation present: further information is requested on this matter. In addition, the assessment does not consider the presence of spiny retharrow *Ononis spinosa* or other coastal plant species.

The above advice is given based on the information made available at this time and may change should further or amended details be submitted. We trust that you will find our comments helpful and if you wish to discuss these matters further, please do not hesitate to do so. I also ask that you keep the Trust informed of the progress and outcome of this application.

Yours sincerely



Trevor Codlin MCIEEM
Strategy Lead for Planning & Development

Direct Dial: 01489 774457
Main Switchboard: 01489 774400
Email: Trevor.Codlin@hiwwt.org.uk