

Dear David,

APP/17/00007 | Outline planning application for the erection of up to 210 residential dwellings (including affordable housing) and 0.6ha for apartments with care (C2), structural planting and landscaping, informal public open space, children's play areas, sustainable drainage system (SuDS) vehicular access from St Mary's Road and associated ancillary works. All matters reserved with the exception of the main vehicular access. | Land at Rook Farm, St Marys Road, Hayling Island 17.0174

Thank you for consulting me on this application. In summary, the submitted ecological information is not adequate and there is potential for this proposal to result in impacts to nationally- and internationally-designated habitats and species. Additional information is required.

The site is featured within the Solent Waders & Brent Goose Strategy (SWBGS) as Site H46B. The site has previously been considered to be of low value for wintering brent geese but recent evidence has come to light that significant numbers of brent geese do indeed use this site. For example, up to 500 birds have been present regularly during the winter of 2014/15 and birds have again been present this winter. These records have been verified by photography and there is no doubt that they are correct. The submitted Ecological Appraisal (Baker Consultants, December 2016) has not been informed by these records: unfortunately an administrative error has meant that the records for H46B were assigned to another nearby site (H45). This error has now been rectified and all data will be published within a refreshed SWBGS due in the coming few weeks. Similarly, the 'Status of' document produced by Havant Borough Council has now been amended to reflect these new data.

On a more general point, the ecology report does not really comprehend the high importance of Hayling Island as a refuge for SPA/Ramsar species. Thousands of brent geese utilise fields within Hayling throughout the winter and large numbers of waders are also present inland. Some of the largest concentrations of brent geese in the eastern Solent are found on Hayling. The applicant's ecologist will need to revisit the SWBGS data and consider the need to undertake further field survey effort to establish the use of the site by SPA/Ramsar species. The presence of significant numbers of brent geese on this site will require the provision of a suitable mitigation strategy.

The loss of this site will therefore likely have a significant impact on bird species associated with the nearby Chichester & Langstone Harbours SPA/Ramsar. The proposed layout offers no space for adequate mitigation of this issue and, in any case, the proximity of built development is likely to render any retained greenspace unattractive to geese. The only feasible mitigation option would be to secure the protection of suitable habitat nearby so that geese would have an equivalent field within which to rest and feed. The use of sites by SPA/Ramsar bird species on Hayling is complex and is influenced by the availability of land in suitable crop type.

In terms of general ecology, the site is unremarkable but does offer potential for supporting species such as roosting/foraging/commuting bats and reptiles. Further survey works are recommended for the on-site building and I would concur with the

need for bat activity surveys. If there is suitable reptile habitat within the site then further surveys are also appropriate. The nearby pond has been recommended for great crested newt surveys.

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.

I would expect Natural England to object to this proposal in its current form due to the potential for likely significant effect on the SPA/Ramsar.

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

Kind regards,

Tristan

Tristan Norton

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