

Mr David Eaves
Havant Borough Council
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16th February 2017

Dear Mr Eaves

Proposal: 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.

Location: Land at Rook Farm, St Marys Road, Hayling Island

Ref: APP/17/00007

We were made aware of this application by local residents who are concerned about the impacts resulting from the above proposal on Brent Geese that use the application site. The RSPB **objects** to the application based on insufficient information and assessment provided in support of this proposal.

The application site lies within 800m of Chichester Harbour to the east and Langstone Harbour to the west, areas designated as Sites of Special Scientific Interest (SSSI), Special Protection Areas (SPA) and Ramsar sites in recognition of their national and international importance for wildlife, notably wintering waterfowl. The application site is used by wintering Brent Geese (*Branta bernicla bernicla*), which have been recorded feeding on these fields in large numbers. The preservation of these feeding sites is essential to the protection of the wintering population of Brent Geese in the harbours and in turn to ensuring that the designated sites are not damaged.

We are increasingly concerned by the incremental loss of SPA supporting sites on Hayling Island and across the Solent as a whole. We urge the Council to apply a high standard of protection to these sites, as required under the Birds and Habitats Directives. The Preliminary Ecology Appraisal submitted with the application makes reference to Solent Brent Goose and Wader Strategy (2002 and 2010); however, as you will be aware a recent update (2017) of this strategy has been produced based on data collected since 2010. This update classifies the site as 'Important', with multiple records for hundreds of Brent geese feeding in field H46B, the field proposed for development.

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The RSPB is part of BirdLife International,
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working to give nature a home around the world.

Patron: Her Majesty the Queen **Chairman of Council:** Professor Steve Ormerod, FIEEM **President:** Miranda Krestovnikoff
Chief Executive: Dr Mike Clarke **Regional Director:** Chris Corrigan

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In addition a project, led by the Hampshire and Isle of Wight Wildlife Trust, which we support, is currently underway to continue improving our understanding of the core network of sites used by the Brent Geese in the Solent, to further inform appropriate protection of important feeding and roosting areas.

We fundamentally disagree with the assessment in Paragraph 3.4.23 of the Preliminary Ecology Appraisal which states that *"these fields (the site) are of low potential for geese or waders"* and Paragraph 4.4.16 *"In terms of wintering dark-bellied brent geese and waders, it is considered unlikely that the loss of open areas within the site will have a negative impact on the species"*. This appraisal is not based on up to date data on use of these fields by Brent Geese nor has sufficient survey work / assessment been provided to support such a conclusion.

As identified the site lies in close proximity to the SPA. Havant Borough Council recognises that additional growth in the borough, in combination with neighbouring authorities, could lead to an adverse effect upon the SPA as a result of increased recreational pressure. It cannot be seen that these in-combination impacts on the SPA have been assessed or considered.

Based on the current information provided, we do not consider that it will be possible for the Council to conclude no adverse effect on the integrity of the Chichester and Langstone Harbour SPA/SSSIs and its features, and therefore the application should be refused.

I hope that these comments are helpful. Please do get in touch if we can be of any further assistance.

Yours sincerely



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