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28th March 2017

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

Dear Lewis

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 – ADDITIONAL INFORMATION

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 with regard to the submission of additional information by the applicant in support of the development proposals. We note that the information provided seeks to address issues raised by the Havant Borough Council landscape officers and Chichester Harbour Conservancy in relation to the AONB. Natural England (NE), Havant Borough Council, via HCC Ecology and Chichester Harbour Conservancy (CHC) comments in relation ecological issues are responded to via an amended HRA Stage 1 Screening Report. Given that issues we raised relating to the adjacent designated Natura 2000 sites are broadly similar to those raised by NE, HCC Ecology and CHC, there is sufficient information for us to comment further. Otherwise,

our comments relating to protected species and habitats appear to have been ignored and no additional information is ~~provided,provided~~; therefore we are unable to remove our objection.

Designated Sites

With regard to potential impacts on the nearby designated sites we are pleased to see the detailed work that has been carried out in order to address concerns raised by the statutory and non-statutory consultees. However, whilst the desktop study is very detailed it is important to consider the resolution of the background data used and in particular the gaps in it. It is for this reason that the Solent Wader and Brent Goose Strategy is currently being revised and intensive survey work being carried out in order to update the strategy.

Supporting text (paragraph 9.21) to Policy DM23 (Sites for Brent Geese and waders) of Havant Borough Council's Local Plan states that *'Where data on sites of 'important' or 'uncertain' value is limited or out of date, site surveys should be undertaken to determine level of importance. It goes on to say that 'The authority recommends that the survey methodology set out in the Solent Wader and Brent Geese Strategy (2010) is followed. Appropriate methodologies should be approved by a professional ecologist and prepared in conjunction with Natural England. For surveys to be considered valid, reasonable measures should be taken not to reduce the sites suitability for Brent Geese and waders during the survey period. **In all cases** [our emphasis], three consecutive years of recent survey data should ideally be carried out across the overwintering seasons and a record of any sightings on or adjacent to the application site will be required.'*

Whilst the applicant's ecologist has carried out a detailed desktop study, the level of survey work carried out is significantly less than what would normally be required, with survey visits on 8th and 14th February 2016 and a further observation during a planning visit on 16th February 2017. Based on the desktop study and field surveys the site is assessed as being of negligible importance for brent geese and waders. It appears that this assessment is based on the fact that only a small number of geese were recorded using the site, nonetheless they were recorded on both survey dates and also during a planning visit, therefore on all three dates that the site was visited. Had further surveys been carried out, it is probable that more usage of the site would have been recorded, and this would likely demonstrate that the site is actually more important for geese than is currently being suggested as such the potential impacts could be greater than current being suggested in the HRA. We note that data included in the interim update of the SWBGS, which was recently published, holds a record for 36 and 103 brent geese in December 2015 and January 2016, respectively. There is also a December 2015 record of 4 oystercatchers feeding on the site.

During surveys across the eastern Solent over the winter of 2016/17 as part of the SWBGS surveys, geese were regularly recorded using fields where there was standing fresh water, and where puddles had formed after heavy rain these were quickly sought out and used by geese for drinking and bathing. It therefore would appear that the presence of freshwater in close proximity to a feeding resource maybe an important component. As such it may be the case that geese do not visit a site in large numbers, but visit it regularly in smaller numbers in order to drink and bathe, and therefore an increase in disturbance could have a significant impact; this has not been considered.

We acknowledge that a mutually agreeable solution was identified by the key stakeholders attending the planning meeting, but question that an assessment that impacts associated with recreational disturbance will be negligible, can be made with any certainty based on two surveys. We therefore recommend that further surveys are carried out across a winter period in order to inform a robust mitigation strategy that can be delivered with certainty.

We support measures aimed at informing visitors to the holiday camp of the special qualities of the area, and these could be enhanced by the owners inviting stakeholders, such as the Solent

Recreation Mitigation Partnership (SRMP) to provide talks/presentations to guests visiting the camp during the winter months. In addition, a contribution could be made to the SRMP since this an additional disturbance which falls outside of a new residential development.

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



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