

Consultee Comments for Planning Application APP/24/00968

Application Summary

Application Number: APP/24/00968

Address: Beachlands, 5 Sea Front, Hayling Island

Proposal: Full planning application for the development of 4No commercial units (E Use) and 32No residential units (C3 Use) over 4 floors with associated open space, public realm enhancements, demolition of the existing Beachlands Amusement Arcade Buildings and dwelling and associated works.

Case Officer: Lesley Wells

Consultee Details

Name: Consultee Principal Ecologist

Address: Public Service Plaza, Civic Centre Road, Havant PO9 2AX

Email: Not Available

On Behalf Of: Ecologist

Comments

Dear Lesley,

APP/24/00968 | Full planning application for the development of 4No commercial units (E Use) and 32No residential units (C3 Use) over 4 floors with associated open space, public realm enhancements, demolition of the existing Beachlands Amusement Arcade Buildings and dwelling and associated works. | Beachlands, 5 Sea Front, Hayling Island

Thank you for consulting me on this application.

The application is accompanied by a Preliminary Ecological Appraisal and Roost Assessment (Arbtech, September 2024), a Biodiversity Net Gain Assessment (Arbtech, October 2024) and a Biodiversity Net Gain Metric (Arbtech, October 2024).

The application site is within an extremely sensitive location, immediately adjacent to or in very close proximity to areas of international, national and local nature conservation value namely the Solent Maritime Special Area of Conservation (SAC), Solent & Dorset Coast Special Protection Area (SPA) and Sinah Common Site of Special Scientific Interest (SSSI). Various Sites of Importance for Nature Conservation (SINCs) lie to the east. Priority Habitats such as Coastal Vegetated Shingle and Lowland Dry Acid Grassland are either within the site or in close proximity. In particular, the southern section of the site is listed as Coastal Vegetated Shingle Priority Habitat and would appear to be directly impacted by the proposed development. I appreciate that this area has been subject to intense amenity use and it would appear that there is little-to-no shingle vegetation remaining, but it has been reasonably well-vegetated in the recent past and will almost

certainly retain a seed bank. I would tentatively suggest that the correct assessment of this habitat using the UK Habs system would be s3b Vegetated Shingle and not, as submitted, t2h Beach.

My view is that any development in this location should seek to enhance the local natural environment. There is a very clear opportunity for imaginative landscaping proposals to incorporate appropriate local habitats such as vegetated shingle and acid grassland these habitats can be provided through roof-level landscaping, within planters or more generally as part of an innovative landscaping scheme that truly reflects the landscape for which Hayling sea front is renowned. Vegetated shingle habitat in particular would provide an achievable and attractive landscaping element to any proposal, and would accord with existing and forthcoming policy on protecting and enhancing coastal habitats on Hayling. There is huge potential to restore/enhance vegetated shingle habitat within the heavily compacted areas in the south of the site this is an obvious easy-win measure that would greatly benefit the local natural environment, businesses, residents and visitors. Traditional landscaping schemes will not sit well within this dynamic semi-natural mosaic of coastal habitats and may well be a vector for the introduction of unwelcome, invasive plant species (as has occurred elsewhere along the sea front). Whilst acknowledging the desire to redevelop in this location and provide welcome amenity improvements for residents and visitors, a suitable landscaping scheme would be a key requirement for the acceptability of any development in this location. There is also an obvious opportunity for interpretive infrastructure here to showcase the islands natural environment and how businesses, residents and visitors can help protect it.

There are several other potential concerns in relation to the natural environment. Residential development in this location, alongside redeveloped commercial/amenity facilities, would be highly likely to result in increased recreational pressure. Whilst acknowledging that redevelopment of coastal amenities is desirable, the potential impacts of increased human presence do need to be considered within this application. Issues arising from such development may include trampling/damage to sensitive vegetation communities such as vegetated shingle and coastal grassland, both of which occur locally, are Priority Habitats and a material considerations in planning. In addition to vegetation impacts, the adjacent beach supports habitats used by roosting wader species there are known roost sites to the east and west of the application site and increases or changes in recreational use could well impact the suitability of habitats to support these crucial undisturbed roost sites. Consideration of these matters should be included within the application.

I am content that the site overall offers minimal potential for supporting protected species and I consider that further species survey works are unnecessary.

On the issue of Biodiversity Net Gain (BNG), I would maintain that some habitat within the site is best categorised as s3b Vegetated Shingle (or a subset thereof) rather than t2h Beach (sand or pebble intertidal sediment). This would potentially change the outcome of the BNG calculations. The Priority Habitat within the site would certainly be considered to be within a strategically

significant area. Priority Habitats are within the existing Ecological Network Map for Hampshire and will most certainly be included in the forthcoming Local Nature Recovery Strategy (LNRS). Again, this may influence the BNG calculations. The submitted BNG Metric shows a shortfall in biodiversity units and the target of 10% gain is not met. As BNG is a post-permission matter it is for the applicant to provide details of any gains within a Biodiversity Gain Plan prior to commencement. I would very strongly advise that continuing discussion with the Council on the matter of BNG would result in better outcomes and a smoother process.

In summary, I consider that there is an outstanding issue related to the presence/categorisation of vegetated shingle Priority Habitat within the site: a large area within the site is listed as Coastal Vegetated Shingle and this should be reflected in the submitted information. I would also wish to see a more innovative landscaping proposal for this site that incorporates not only restoration of coastal vegetated shingle but also the use of locally-appropriate coastal habitats within the developed area: this special and very sensitive location deserves an imaginative scheme that serves to enhance the natural environment. There is much opportunity here for habitat restoration and enhancement and this can be included to the benefit of the application within BNG calculations.

NPPF, Circular 06/2005 and Natural England Standing Advice, 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 Local Planning Authority prior to determination, particularly in the case of protected sites, habitats and species, which are a material planning consideration. This will enable the Local Planning Authority to determine the application on the basis of full knowledge about the potential ecological impacts of the proposal and to ensure that any impacts can and will be mitigated.

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

Kind regards,

Tristan

Tristan Norton

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