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14th October 2015

Your Ref: APP/15/00760
Our Ref: 13.79.3.8

Dear Rachel

PROPOSAL:
CHANGE OF USE OF THE LAND TO ALLOW FOR THE INSTALLATION OF UP TO 40 BEACH HUTS

LOCATION:
HAYLING ISLAND SEAFRONT CAR PARK, SEA FRONT, HAYLING ISLAND

DESIGNATED SITES:
CHICHESTER AND LANGSTONE HARBOURS - SPECIAL PROTECTION AREA (SPA)/RAMSAR
SOLENT MARITIME - SPECIAL AREA OF CONSERVATION (SAC)
SINAH COMMON – SITE OF SPECIAL SCIENTIFIC INTEREST
BEACHLANDS EAST – SITE OF IMPORTANCE FOR NATURE CONSERVATION (SINC)

Thank you for consulting the Wildlife Trust on this application, we welcome the opportunity to comment and **object** to the proposals for the following reasons.

This application is one of a number of similar applications for beach huts along the south coast of Hampshire that we have recently been consulted on. In combination these applications, if consented, will result in an attritional loss of coastal vegetated shingle habitat. As you will be aware coastal vegetated shingle (outside the reach of the waves) or 'perennial vegetation of stony banks' is classified as a priority habitat under Section 41 of the Natural Environment and Rural Communities Act 2006 (NERC), it is also included on Annex I of the Habitats Directive and is a nationally rare habitat type.

Paragraph 117 of the National Planning Policy Framework (NPPF) requires promotion of *"the preservation, restoration and re-creation of priority habitats"* and as the Local Planning Authority, Havant Borough Council in exercising its duties should have regard for the conservation of priority habitats. This proposed site is situated between the Sinah Common SSSI and Beachlands East SINC and will result in the direct loss of this rare habitat type if consented. Paragraph 5.1.2 of the Ecological Assessment states *"in order to avoid direct impacts to the vegetated shingle and unimproved acid grassland habitats...it is recommended that the beach huts are installed behind the existing dragon's teeth which form the boundary between the car park and the beach. This would result in direct impacts to the habitats and designated site being negligible in magnitude."*

Recommended mitigation measures include the provision of interpretation boards with the aim of educating users, but it is acknowledged within the report that *"the scale of the impacts associated with the increase in recreational pressure is difficult to quantify in the absence of detailed information regarding the use of the beach huts"*. Recommended compensation and enhancement measures include;

- Carrying out a visitor survey to determine how existing beach hut occupiers use the beach;
- Increase the extent of vegetated shingle by collecting seeds and sowing in bare areas;
- Undertaking habitat management measures to the area of unimproved grassland; and
- Carry out management works to grassland areas, such as selective scrub removal.

Currently, according to the Ecological Assessment, it would appear that there is insufficient evidence to determine how the existing beach huts are used and therefore exactly what impacts may occur if these new ones are permitted. Whilst siting the proposed new beach huts behind the dragon's teeth, and in the existing car park, may limit the magnitude of a direct impact, it will result in an increase in recreational pressure directly in front of them, since activity will be concentrated in that area. Given that vegetated shingle habitat is so susceptible to trampling, we question how the magnitude of impact could be considered to be negligible.

With recreational pressure along the coast set to increase as a result of proposed new developments, impacts on this fragile vegetated shingle habitat are likely to increase. We consider that the only way to protect it from increased trampling would be to take a strategic, Solent-wide approach to its protection and re-creation. Proposals could include creating permanent exclusion areas that would enable vegetation to develop, the management of which could be funded by new development proposals. The proposal to collect seeds to grow as plug plants and sow in bare areas may seem viable, but areas of shingle are likely to be bare because of existing trampling or because they are in dynamic locations and do not have the opportunity to naturally colonise. As such without planted areas being protected they are unlikely to be successful.

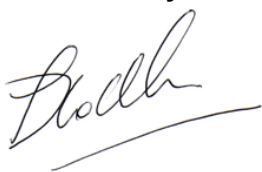
It should be remembered that the Local Authority has a duty to promote the preservation, restoration and re-creation of priority habitats under the NPPF and the NERC Act. Therefore measures protecting against impacts of existing beach users should be in place currently and not as a mitigation measure to facilitate the granting of this application. As such this measure cannot really be considered to be mitigation linked to the proposals.

Conclusion

In conclusion the Wildlife Trust objects to the proposals since they will directly impact on a priority habitat that is included on Annex I of the Habitats Directive and under Section 41 of the NERC Act. Insufficient evidence has been provided to demonstrate how existing beach hut owners use their huts and therefore it is not possible to fully determine the impacts. Mitigation measures need to be implemented at a Solent wide strategic level, with exclusion areas set up to protect the fragile vegetation.

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 in determining this application and if you wish to discuss these matters further, then 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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