

Mrs Daphney Haywood
Havant Borough Council

By Email only: Daphney.Haywood@havant.gov.uk

29/09/2015

Dear Mrs Haywood

Proposal: Outline planning permission for mixed-use development comprising up to 76 dwellings and 1,000sqm of light-industrial accommodation (Use Class B1)

Location: Land north of Station Road/East of Furniss Way, West Town, Hayling Island

Ref: APP /15/00919

Thank you for your email of 3rd September to Carrie Temple. Apologies for the delay in our reply and we are grateful that our comments will still be considered.

We are pleased to see that the applicant intends to make financial contributions to the Solent Recreational Mitigation Partnership (SRMP) Strategy. The SRMP Interim Strategy is currently being progressed into the definitive strategy and the developer would need to ensure that the current contribution per dwelling is provided consistent with Havant Borough Council's policy.

We support the advice set out in Natural England's response (18th September) that in addition to providing mitigation as detailed in the Brent Goose Addendum Report (October 2013) and Updated Preliminary Ecological Assessment (August 2015) the northern site boundary, adjacent to H34E, is planted and maintained **in perpetuity**, as a **continuous hedge** thereby preventing access / disturbance of supporting SPA habitat.

Although we note the mitigation for Brent Goose proposed we still have concerns in terms of how effective some of these measures will be as detailed below:-

- We feel that the effect of the proposed access restrictions to H34C may be overstated. The Brent Goose Addendum report suggests that (informal) access from the end of North Shore Road only takes people along the shoreline. However, without baseline visitor surveys, we do not know whether some people chose to walk in an easterly direction from this access point, thereby potentially counteracting any enhancement effect of the closure of informal access points along the Hayling Billy Trail. Conversely, there is no evidence to show whether people currently accessing from the Hayling Billy Trail cause disturbance to the part of the site that is indicated will be enhanced. We consequently question whether the whole of the area marked as "minimum area likely to be enhanced" will therefore be significantly improved for the geese as a result of the proposed access restrictions.

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- We are concerned that the indirect impacts from the adjacent development, such as from artificial lighting or noise disturbance could discourage Brent Geese from using the site.
- In addition the effect of the ditch bisecting this remaining area of land, could further reduce its attractiveness to the geese.

We remain concerned that the proposed measures may not be sufficient to ensure that this group of fields (H34) will continue to support the current numbers of SPA birds, in particular brent geese. We are disappointed that our practical recommendation to address this uncertainty by a requirement on the applicant to undertake further reasonable mitigation measures should the proposed measures prove unsuccessful, has been dismissed on the basis that “many variables that could not be controlled by the developer that could influence the use of the site (patterns of usage of fields on around the SPA; population fluctuations; etc)”, such that this requirement would not be reasonable. We strongly disagree with this assertion, and consider that it would be entirely possible to make an assessment of the success or otherwise of the mitigation over a 3-year period, while also taking into account Solent-wide trends in SPA bird numbers or year-to-year variables such as weather conditions.

We are becoming increasingly concerned by the incremental loss of SPA supporting sites on Hayling Island and across the Solent as a whole; many of which, like this case, are subject to insufficient mitigation. We urge the Council to apply a high standard of protection to these sites, as required under the Birds and Habitats Directives.

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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