

Dear Steve,

APP/14/00627 | Construction of a new depot building (incorporating part of the existing car park) and alterations to track layout | Hayling Seaside Railway, Eastoke Corner, Sea Front, Hayling Island | 14.0965

Thank you for consulting me on this application. Please accept my apologies for the delay in responding to you – I hope this has not caused any difficulties. In summary, I consider that the ecological information submitted is of sufficient standard although, whilst there are unlikely to be any overriding ecological issues, I do consider that clarification is required in terms of potential impacts to overwintering birds as well as compensatory habitat to mitigate for impacts to a locally-designated site.

The application is accompanied by a Biodiversity Report (John Norton Ecology, June 2014) which provides a sound assessment of the existing botanical communities within the application site, as well as an evaluation of the potential for legally-protected species to occur. The application site contains areas of improved grassland which is species-poor, although there is one small area of semi-improved grassland. Overall, the vegetation is of limited value ecologically.

Whilst I have no concerns in respect to the loss of ecologically-valuable habitat, it is a fact that the proposed works will result in the net loss of land designated as Beachlands East Site of Importance for Nature Conservation (SINC) and therefore will be in contravention of Policy CS11 of the Havant Borough Core Strategy (March 2011). Where impacts to SINC are predicted, it is incumbent upon the applicant to ensure that firstly any impacts are known and secondly that said impacts can be adequately mitigated. In this instance it is clear that the proposals cannot occur without a loss of SINC land and therefore I would expect the applicant to propose compensatory measures to address this, regardless of whether the actual habitat to be impacted is of SINC quality (it appears it is not). The SINC boundary is, I suspect, the result of previous (pre-railway) surveys and so is not likely to reflect current botanical interest – however, it is true that the land within the SINC could be available for colonisation or deliberate re-establishment by species-rich coastal vegetation in the future. I would welcome further detail on this issue please, such as how any new landscaping could be used to provide ecologically-valuable native shingle vegetation (many such species (e.g. sea holly, yellow-horned poppy, sea kale, sea couch, Babington's orache etc.) are inherently attractive, are naturally salt-tolerant and would be more in keeping with the locale than standard landscaping options). I consider that coastal vegetation restoration landscaping would be in accordance with NPPF, the NERC Act 2006 and Policy CS11 and would be an imaginative step away from the norm, providing a win

Similarly, the proposed construction works will take place within relatively close proximity to the shoreline and areas confirmed as supporting roosting shorebirds. There is clearly potential for construction noise to result in disturbance to overwintering bird species and I would welcome some

measures to try and mitigate this. Any likely impacts to birds would occur during the winter months (November-March inclusive) and chiefly during higher tides when roosting birds may be resting on the shingle beach immediately to the south, only a few tens of metres away. At these times, loud construction noise (e.g. banging, piling, vehicle horns, reversing warnings) could result in disturbance. I consider that some effort to avoid or mitigate these potential issues is required. For example, could construction be limited to the spring or summer months? Could hoarding be installed to deflect/minimise noise? The noises from construction works are likely to be very different from those already operating locally.

In summary, whilst I do not consider there to be overriding ecological issues, further detail is required in respect to compensatory habitat to offset the loss of SINC land, as well as measures to avoid/minimise any potential disturbance to adjacent overwintering bird habitat.

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

Kind regards,

Tristan

Tristan Norton