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13th September 2013

Your Ref: APP/13/00639

Our Ref: 13.79.3.7

Dear Daphney

**APP/13/00639 - OUTLINE PLANNING PERMISSION FOR MIXED-USE DEVELOPMENT
COMPRISING UP TO 60 DWELLINGS AND 1,250SQM OF LIGHT- INDUSTRIAL
ACCOMMODATION (USE CLASS B1) - LAND NORTH OF STATION ROAD/EAST OF
FURNISS WAY, WEST TOWN, HAYLING ISLAND**

Thank you for sending the Wildlife Trust a copy of the additional information¹ your authority has received in relation to brent geese *Branta bernicla* and the above application.

We note that since our previous correspondence additional anecdotal evidence in the form of more recent records of both brent geese and waders using the site has been identified. This information was provided by a local resident, whose property overlooks the site. This additional information prompted objections to the proposals from Natural England, Hampshire County Council and The RSPB, and the request for a Habitats Regulations Assessment to be carried out. Subsequent to these objections the applicant has provided the additional information¹, which includes a detailed mitigation strategy aimed at alleviating impacts on brent geese and waders, associated with the designated sites.

The Trust has now had a chance to review the additional information, including the mitigation strategy and have the following comments.

Brent Geese and Waders

The proposals for the site involve the loss of 2.5ha of arable land from a field covering a total of 9.7ha. The site is included within the Solent Waders and Brent Goose Strategy² (H34E) as 'uncertain for current use' for both brent geese and waders, but as a 'potentially suitable site for the future'. Anecdotal evidence, received from a local resident, has confirmed use of the site by brent geese and waders during the winter of 2012/13, despite winter survey work by the applicant returning a negative result. Given that the site has been confirmed as being used by brent geese

¹ Tyler Grange (September 2013) Land off Station Road, Hayling Island – Brent Goose Mitigation Strategy

² King, D. (2010) Solent waders and Brent Goose Strategy 2010 - Hampshire and Isle of Wight Wildlife Trust.

and waders, it will be important to ensure the proposals for the site are appropriately mitigated in order that the issue of developing on land supporting the European designated sites is dealt with.

The mitigation proposals involve returning 1.5ha (the western part) of horse grazed pasture that abuts the northern boundary of H34E, back to agricultural use. This field is included in The Brent Goose Strategy as H34D and 'no recorded use'. The proposals also involve the removal of a section of defunct hedgerow that forms the boundary between the eastern part of H34E and H34D. The aim of this is to create an open vista that will be more appealing to the geese. A cropping regime, in line with that used for fields H34E and H34C will then be implemented. This will involve having winter cereals and stubble on alternate years. It is considered that by returning the field to agriculture, implementing the above cropping regime and removing the hedgerow that bisects the two fields, the site will become suitable for brent geese and waders.

In addition to the proposals detailed in the above, the applicant is also proposing to block a short cut that is used by walkers, across field H34C, to access the Hayling Billy Line. This path is currently well used and therefore by closing it, disturbance levels to brent geese will hopefully be reduced.

The Trust welcomes the mitigation measures proposed by the applicant, to provide an additional area of land measuring approximately 1.5ha, as mitigation for the development proposals. However, we note that this still leaves a net loss of 1ha as a result of this project or 2.5ha if the mitigation proposals are not successful. If the mitigation proposals are to be successful, it will be essential to ensure that the proposed mitigation measures are delivered prior to the development being occupied and be secured in perpetuity. We note that ensuring that the fields are farmed in an appropriate way and maintaining control of the path across H34C, is the responsibility of the farmer. There is currently no detail as to how this will be secured and enforced. We look forward to seeing what mechanisms will be put in place to ensure that the proposed mitigation measures are implemented in perpetuity, prior to this application being determined.

With regard to the removal of the hedgerow, it will be important to ensure that this work is carried out to avoid impacts on breeding birds and reptiles. Therefore a detailed method statement will be required including timings, working practices and mitigation measures for these species.

Recreational Space and Disturbance

We acknowledge the applicant's commitment to providing contributions to The Solent Disturbance and Mitigation Project (Phase III) (SDMP3), and welcome this. However, in our previous correspondence we drew attention to the apparent lack of recreational space included within the development plan. As a consequence, new residents will have nowhere to go for recreation other than areas on or adjacent to the designated sites. We wish to reaffirm our position on this matter and ask that you request that some form of recreational space be included within the development. As we have already stated we consider that contributions to SDMP 3 should not be considered a replacement for on-site open space, but as an additional contribution towards alleviating adverse impacts on the nearby European designated sites.

Conclusion

In conclusion, The Wildlife Trust is generally supportive of the proposed mitigation measures, with regard to brent goose habitat. However we are disappointed that the proposals overall will result in a net loss of suitable habitat. In addition we wish to see the detail of how it is proposed to ensure that the mitigation measures detailed are delivered in perpetuity. We wish to see the detail of the methods proposed for removal of the hedgerow, and protecting breeding birds and reptiles. Finally we require the inclusion of some recreational green infrastructure within the proposed new 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. 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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