

Daphney Haywood
Havant Borough Council

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

12 November 2013

Dear Mrs Haywood

Proposal: Outline planning permission for mixed-use development comprising up to 60 dwellings and 1,250sqm of light-industrial accommodation (Use Class B1): Brent Goose Mitigation Strategy - ADDENDUM

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

Ref: APP/13/00639

We welcome the additional clarification provided by the applicant in the Brent Goose Mitigation Strategy Addendum, which specifically responds to points raised by the RSPB in our letter of 7 October 2013.

We are grateful for the updated information regarding the current cropping patterns (which more closely agrees with the reports we have received of brent goose presence on the application site), and confirmation that the new area of cropped land will be managed under the same regime.

We also welcome clarification of the proposed visitor access restrictions to land west of the Hayling Billy Trail (H34C), and the role it is considered this will play in offsetting the reduced area of available brent goose feeding resource. Nevertheless, we agree with the Addendum report (para 1.9) that it will be difficult to quantify any reduction in disturbance to this area without any baseline data of current access and disturbance levels.

We are also concerned that the effect of the proposed access restrictions to H34C may be overstated. The 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.

We note the clarification concerning access to farmland directly north of the application site. However, our point about this area concerned indirect impacts from the adjacent development, such as from artificial

South East England
Regional Office
1st Floor Pavilion View
19 New Road
Brighton
BN1 1UF

Tel 01273 775333
Fax 01767 685535

rspb.org.uk

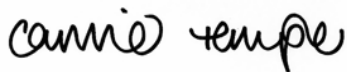
lighting or noise disturbance. Apologies if this was unclear from our previous response. However, this point does remain unaddressed, as does our concern about the effect of the ditch bisecting this remaining area of land, which could further reduce its attractiveness to the geese.

In summary, despite the welcome additional details concerning the mitigation proposed by the applicant, 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 further 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 inadequate mitigation. We urge the Council to apply a high standard of protection to these sites, as required under the Birds and Habitats Directives.

We would be happy to meet with the Council (and the other nature conservation bodies) to discuss this matter more broadly, and to discuss options for the strategic mitigation of piecemeal losses to this important network of sites. Please do get in touch if you would like to go ahead and set up a meeting.

Yours sincerely



Carrie Temple

Senior Conservation Officer

Email: carrie.temple@rspb.org.uk

Direct dial: 01273 763605