

Daphney Haywood
Havant Borough Council

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

1 August 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)

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

Ref: APP/13/00639

The above application has been brought to our attention. The RSPB **objects** to the application based on the current information provided.

We have seen Natural England's comments (letter dated 30 July 2013), and we broadly support the advice set out in their response. In summary, we consider that the application and its supporting information fail to address the following matters in respect of the nearby internationally important sites (principally, Chichester and Langstone Harbours Special Protection Area (SPA)/Ramsar site) and their interest features:

1. **The need to secure mitigation to address the effects of increased recreational pressures on the Solent SPAs/Ramsar sites.**

We note that a commitment has been made by the applicant to provide a contribution towards the upcoming Solent-wide avoidance and mitigation strategy. We welcome this commitment, however given that the Solent-wide strategy has yet to be agreed, we question whether local mitigation measures have been identified by the Council towards which interim contributions can be secured (in line with Natural England's advice to the Solent local authorities, letter dated 31 May 2013).

2. **Loss of a significant brent goose feeding site, which provides a supporting function to the Chichester and Langstone Harbours SPA/Ramsar site.**

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Throughout the Local Plan process, the RSPB has repeatedly advised against the development of this site due to its uncertain importance to feeding brent geese. The RSPB, Natural England and the Hampshire & Isle of Wight Wildlife Trust have been working closely with the Council to develop a suitable policy to ensure that sites identified in the Solent Waders and brent Goose Strategy¹ are protected from the direct and indirect effects of this and other proposed new development in the draft Site Allocations Local Plan. The draft policy explicitly requires that **“Planning permission will be granted for development provided that it does not have a negative impact on identified Brent Geese and Waders sites”** and that **“Where sites are identified [in the Strategy] as ‘uncertain’, studies will be required to be completed in accordance with an appropriate survey methodology in order to determine their level of importance.”** We support Natural England’s advice that a minimum of 3 years recent survey data is necessary to determine the importance of a site.

We do not, therefore, consider that the two winters’ data presented by the applicant represents a sound picture of the importance of the application site to brent geese or waders. Nor do the data presented provide a complete account of all available records for the site. Together, this has led to the conclusion that the application site is no longer used by SPA/Ramsar species.

The RSPB has in recent years received approximately annual photographic evidence of significant numbers of brent geese grazing on the application site, from a local resident whose property overlooks the site. These anecdotal sightings indicate that the site regularly supported numbers in the order of 200+ geese during the winters of 2009/2010 and 2011/12. In the most recent winter (2012/13), the same local resident observed that the site was waterlogged due to the exceptionally wet weather, and that dense stubble was present on the site, which was likely to have been less attractive to the geese. Nevertheless, his observations of other wildlife using the site did include up to 30 feeding lapwing, which also form part of the SPA/Ramsar site assemblage population.

We understand that these local observer records have been submitted to the Wildlife Trust, who will have subsequently passed them on to HBIC. However, it appears (from the records received from HBIC by the applicant) that they may not have been assimilated into HBIC’s database. We recommend that Debbie King of the Hampshire & Isle of Wight Wildlife Trust is contacted for confirmation of all available brent goose and wader records for this site.

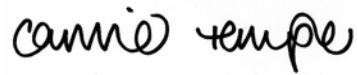
Due to the potential for the proposals to lead to a *likely significant effect* on the interest features of the Chichester and Langstone Harbours SPA/Ramsar site, we consider that an *appropriate assessment* should be carried out under Regulation 61(1) of the Habitats Regulations. Based on the current information provided by the applicant, we do not consider that the Council will be able to

¹http://www.solentforum.org/forum/sub_groups/Natural_Environment_Group/Waders%20and%20Brent%20Goose%20Strategy/

reach a conclusion of *no adverse effect* on the integrity of the SPA/Ramsar site, and the application should therefore be refused.

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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Annex to RSPB comments on the planning application

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