

Hi Daphney,

**APP/13/00639 Outline Planning permission for mixed-used development comprising up to 60 dwellings and 1,250 sq.m of light-industrial accommodation (Use Class B1) Land north of Station Road/East of Furniss Way, West Town, Hayling Island 13.0759**

Many thanks for consulting me on this application.

As discussed in our meeting held at HBC's offices on 15<sup>th</sup> August and via subsequent conversations, I consider that the mitigation strategy proposed (Brent Goose Mitigation Strategy Addendum, Tyler Grange, 17<sup>th</sup> October 2013) (which was influenced in no small part by the detailed discussions between the applicant, HBC, HCC and NE on 15<sup>th</sup> August 2013 plus subsequent discussions) is a sensible and pragmatic scenario which provides deliverable mitigation for the identified impacts – both Natural England and I considered the mitigation proposed to be perfectly reasonable. The two key threads of the mitigation strategy – the incorporation of H34D into arable use (effectively adding it to H34E) and the enhancement of H34C through boundary security – will provide both replacement habitat for that being lost to the development as well as offering enhancement (in terms of secure boundaries) to an adjacent important Brent goose site. This would seem to be a sound result which, on balance, provides a sensible outcome. Agreed, there will not be a like-for-like replacement in terms of area (2.5 Ha lost to development, 1.5 Ha provided) but it was discussed and agreed at our meeting on 15<sup>th</sup> August that the two-pronged approach to mitigation here (plus developer contributions through SDMP) was robust. The additional boundary strengthening of H34C will, it is expected, ensure that birds utilising that field are subjected to fewer and less frequent disturbance events than at present. This would seem to be a perfectly rational assumption.

The issue of crop rotation was discussed at our meeting. The applicant stated that to the best of his knowledge the existing farmer (there is apparently a single farmer responsible for the overwhelming bulk of agricultural land on Hayling) employs a crop rotation system (winter wheat every other year, with other economically-viable crops in intervening years) and had done so for many years. I do not see it as the applicant's role to attempt to influence the agricultural practices of local landowners in perpetuity: the mitigation proposed should seek to address, as far as is reasonably practicable, the identified impacts of the proposed development. If my understanding is correct and the winter of 2012/13 is the first winter in 19 years in which geese have not been seen on H34E, then this would suggest that the geese are not overly concerned with the existing crop rotation and that this is less of an issue to geese than disturbance.

In this case, the combined approach of providing a chunk of 'new' arable farmland (albeit not an exact like for like area, but nevertheless at least contiguous with the application site and thus more ecologically-coherent than off-site mitigation), increased security for an adjacent site and contributions to the SDMP Phase III scheme (when implemented by HBC) is a useful outcome

– this is, I would argue, a perfectly sensible and above-all, realistic approach to ecological mitigation.

There is a wider issue here in that there is at present no coherent, strategic approach to mitigation for the loss of brent goose/wader supporting habitat – this applies to all coastal district authorities in Hampshire. The SDMP provides a good example of how such a strategic approach can provide a suitable framework for planning authorities, developers, conservation bodies and commercial ecologists – it is only to be hoped that a similar approach can be taken towards habitat loss, rather than continuing with a site-by-site approach which inevitably results in unnecessarily complicated mitigation proposals.

Please don't hesitate to contact me if you have any queries.

Kind regards,

Tristan

**Tristan Norton**

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