

Daphney Haywood
Havant Borough Council

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

7 October 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

Many thanks for consulting the RSPB on the further information submitted in respect of the above application. We welcome the applicant's new Brent Goose and Wader Mitigation Strategy (herein referred to as 'the Strategy'), but we do have a number of concerns regarding its recommendations.

The Strategy acknowledges the importance of the application site to wintering brent geese and (to a lesser degree) waders, following evidence of local observations highlighted in our previous response. Accordingly, the Strategy makes a number of recommendations to mitigate the loss of an estimated 2.5ha of feeding resource by undertaking the following measures:

- Farm H34D (currently a 1.5ha grass paddock) on same rotation as H34E and H34C, with cereals in alternate years
- Maintain clear, open sight lines between H34D and H34E
- Control access from Hayling Billy Trail into H34C
- Monitor efficacy of mitigation for up to 3 (alternate) years
- Implement the management and monitoring plan in perpetuity

The stated objective of these measures is to ensure that there is no net loss in winter foraging resource. However, we are concerned that the above may not be successful in achieving that objective, for the reasons set out below.

The Strategy suggests that the farmland within H34E is currently managed on a rotation, meaning that it is only suitable for winter foraging in alternate winters (when a winter wheat crop is present). It is proposed that the replacement habitat (H34D) will be managed in the same way. However, this information is inconsistent with the reports we have received from a neighbouring landowner, whose observations suggest that this last winter (2012/13) was the first in the last 19 years that that brent geese have been absent from the site. If rotational farming of H34E is a relatively new introduction to this land, then this

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means that there will already be a 50% reduction in available foraging resource, based simply on the current management regime.

Further, while the area of foraging habitat lost as a result of the development is calculated as 2.5ha, no assessment appears to have been made of the impacts on adjacent land which may be subject to disturbance from the development, deterring wintering birds from using a further area of land. The ditch bisecting the remaining area of H34E may also mean that geese in particular avoid the remaining southern area of field, as it may be perceived as being too small/enclosed. Nevertheless, even on the basis of a conservative estimate of 2.5ha of lost foraging resource, it is clear that the replacement habitat will be smaller than that lost by the footprint of the development. No explanation is offered in the Strategy as to why this smaller area might be sufficient to support the same number of geese as the area lost.

The relatively narrow shape of the replacement habitat also creates uncertainties in its attractiveness to brent geese, which the Strategy acknowledges prefer large open sites. The improved connectivity between the remaining arable land within H34E and that of H34D may help counteract the narrow shape, but it will not be apparent how attractive this area is until the mitigation works have been undertaken. According to the Strategy, these measures will not be put in place until after the development has been constructed, leaving little opportunity to alter the measures and ensure continuity of feeding resource if they prove unsuccessful.

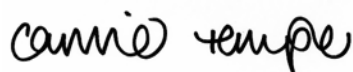
The proposed control of informal access to the adjacent field (H34C) is a welcome additional measure, however it is not clear how much this will reduce disturbance to brent geese and waders using that site, given that access will still be possible along the north and eastern boundaries of the site. It is also unclear whether this measure is seen as compensating for the smaller area of replacement habitat and if so to what extent.

Therefore, in order to provide greater confidence that there will be no net loss of wintering bird feeding resource as a result of the proposals, we consider that the following measures are required:

- A minimum area of 2.5ha replacement feeding habitat to be secured on open, flat land, as close as possible to the H34 network of brent goose and wader feeding sites.
- The replacement habitat to be planted with either winter cereal, oilseed rape or permanent improved grassland, to ensure that it provides a suitable replacement resource for brent geese and waders on an annual basis.
- The replacement habitat to be in place before construction of the proposed development, and managed as such in perpetuity.
- Measures put in place to limit informal recreational access to the network of H34 brent goose and wader feeding sites.
- Monitoring carried out of the replacement habitat for a minimum period of 3 years, with a requirement in place for the applicant to undertake further reasonable mitigation measures should the replacement habitat prove unsuccessful.

I hope these further comments are helpful. Please do not hesitate to get in touch should you wish to discuss any of the points we have raised in further detail.

Yours sincerely



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