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Your Ref: 13/00639
Our Ref: 13.79.3.7

Dear Daphney

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

The Wildlife Trust has been made aware of this outline planning application through our weekly screening of applications, and having reviewed the information provided we would like to raise the following concerns and object to the proposals.

The proposals for the site involve the erection of up to 60 dwellings and 1,250sq metres of light industrial accommodation. The site comprises an area of agricultural land, and is enclosed within residential development and industrial units. The site is located at National Grid Reference SU 710 998, and is situated in an area that is highly designated for its nature conservation interest. These designations include Chichester and Langstone Harbours Special Protection Areas (SPAs)/Sites of Species Scientific Interests (SSSIs) which are designated for the internationally important numbers of wintering waterfowl that use the site, including dark bellied brent geese *Branta bernicla bernicla*. The site itself, is designated a Site of Importance for Nature Conservation (SINC) due to its use by dark bellied brent geese.

The site is included within the Solent Waders and Brent Goose Strategy¹ as 'uncertain for current use for both brent geese and waders', but as a 'potentially suitable site for the future'. However, the site was included as of 'high importance' within the previous Brent Goose Strategy (South-east Hampshire Coast)², since it was used by the species at that time. There is one recent record on the Hampshire Biodiversity Information Centre (HBIC) database of 70 brent geese using the site on one date during the winter of 2010.

¹ King, D. (2010) Solent waders and Brent Goose Strategy 2010. Hampshire and Isle of Wight Wildlife Trust.

² Hampshire Brent Goose Strategy Group (2002) Brent Goose Strategy (South-East Hampshire Coast)

Brent Geese and Waders

This application is supported by an Ecological Assessment³ which includes winter survey work carried out over two winters, November 2011 to March 2012 and October 2012 to March 2013. During these surveys no brent geese or other wading birds were recorded using the site, and therefore it is stated within the ecological assessment³ that *'none of the bird species that are qualifying features of the SPA/SSSI are using the site'*. However birds were recorded using fields approximately 300m north of the sites northern boundary.

We would like to draw your attention to the fact that brent geese were recorded using the site during the survey period of the previous brent goose strategy² (1989 – 2000), and there is also a record of the species using the site during the winter of 2010. To suggest that brent geese are not using the site based on two winters survey effort is perhaps a little naïve, since clearly the species will modify its feeding behaviour if the cropping regime at the site were to change. The ecological assessment identifies that the field was sown with grass during the winter of 2011/2012, but was a stubble field during the winter of 2012/2013, and subsequently unsuitable. Given that the site was seeded with grass during the winter of 2011/2012, it was considered suitable, but not used. However there may be several factors that determine why a site is or isn't used, for example there may have been more nutritionally rich grassland/crops elsewhere or there may have been higher disturbance levels during that winter at this site. The reasons are not explored/discussed within the ecological consultant's report other than to state that *'the site was not used'* and that *'the 2010 record is at odds with their survey results'*. The Trust considers that the recent survey results are useful additional information illustrating that the site was not used during the two recent winters. But we maintain that if the conditions at the site are suitable that it could still be used by brent geese in the future and therefore if this application is consented it will be yet another loss of suitable grazing habitat for wintering waterfowl from the adjacent European designated site.

Recreational Space and Disturbance

The ecological assessment³ identifies correctly (Paragraph 5.9) that the SPA is protected under the Conservation of Habitats and Species Regulations 2010, as amended. Regulation 61 requires that the competent authority can only agree to a plan or project which could have a likely significant effect, either alone or in-combination, once it has been determined that it will not affect the integrity of the European designated site. The ecological assessment³ identifies that impacts associated with recreation can be linked to such plans or projects and therefore should be avoided. The Solent Disturbance and Mitigation Project (Phase III), has recently been published and its principles are to address the impacts of recreation on the SPA. This will be achieved by contributions from each developer, secured via CIL or Section 106 Agreement, towards the mitigation package.

The Design and Access Statement⁴ included with this application states that 'a green landscape framework will be provided throughout the development within private and public spaces to soften the built environment and add visual interest'. However, following review of the Illustrative Masterplan within the Design and Access Statement⁴, it does not appear to include any recreational space, other than paved footpaths, through the development. As a result the new residents of the development will be forced to use recreational areas outside of the development boundary, and most likely on or adjacent to the designated sites, thereby increasing the levels of disturbance. The Trust would like to point out that, contributions to The Solent Disturbance and Mitigation Project (Phase III) should not be used as a replacement for on-site mitigation, but as an additional contribution, aimed at enhancing on-site mitigation. We therefore consider that this application should be redesigned to include appropriate and functional on site recreational space, aimed at minimising impacts on the designated sites, prior to it being determined.

³ Tyler Grange (June 2013) Land off Station Road, Hayling Island – Ecological Assessment

⁴ CSa (June 2013) Land off Station Road, Hayling Island – Design and Access Statement

Conclusion

In conclusion, The Wildlife Trust is concerned at the loss of further potentially suitable grazing land for wintering brent geese from the adjacent European designated site. In addition we would like to **object** to this application due to the lack of on-site recreational space included within the proposals.

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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