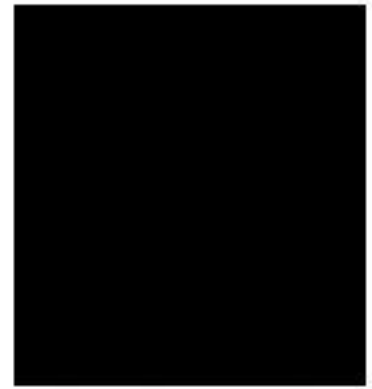




18th December 2020

Havant Borough Council
Public Services Plaza
Havant
PO9 2AX
FAO (Planning Department)

Dear Sir/Madam

Reference: Application APP/20/01093. Erection of 195 dwellings North of Sinah Lane.

Firstly we would like to understand why Havant Borough Council (HBC) have permitted Barratt David Wilson Homes (BDWH) to ostensibly submit a duplicate to the application APP/18/00724 currently under consideration by the Planning Inspectorate. This frivolous second application is a waste of tax payers money and HBC planning department resource.

We are also most concerned that this new application doesn't divert consideration of the previous 500 plus objections to this development already submitted by local residents and organisations. The very short time allowed by HBC for comment on this application is unlikely to give many residents time to respond in appropriate detail.

The following submission will highlight major compliance failures by HBC and its officers in the assessment of this current and previous application. It is clear that the overriding view in the HBC planning team is that they want to get this application 'over the line at any cost' and any deficiencies/cut corners due to lack of oversight become a 'Fait Accompli' which can be resolved or brushed under the carpet, after approval is given.

This letter highlights a number of general concerns relating to the development and in addition specific failures and misinformation within the BDWH submission.

Traffic/Transport

The BDWH submission data has indicated that this development will add in the region of 1000 additional car journeys per day into an already crowded Hayling Island (HI) road network. Many of these journeys are commutes off island because there is no provision for island jobs in the proposal. This additional traffic will exacerbate the regular gridlock on the A3023. We all know that the mitigation funding offered by BDWH alongside this development is inadequate and will not make a dent in the islands traffic problem but if redirected to improved cycle routes and public transport it could actually make a meaningful difference. That said this option has been ignored by HBC, who remain obsessed with encouraging more motor vehicle traffic through the Hayling Bridge choke point.

What lockdown has taught us all is that what the Island needs is an alternative Dutch style commuting route strategy with dedicated off island cycle lanes and proper investment in the Billy Trail. It is central Government Policy to create a carbon neutral future but the HBC strategist seems to be stuck in the past where the car is king.

Surely every penny of traffic mitigation funding should be directed towards this goal.

100 year rule.

The proposed development area is adjacent to the fast eroding shoreline of Langstone Harbour SSA and HBC have documented that they have no interest in funding more coastal protection in this area. BDWH wanting to limit their liability have been very silent on the issue and have also been silent on the fact that commercial organisations such as Southern Water understandably do not want to pick up the future liabilities associated with flood risk and SUDS as they relate to this development. The planning requirement for the development and refuge (as a primary support area for brent geese) to be viable for at least 100 years has not been met.

Flawed protected species refuge mitigation and inaccurate net gain bio diversity claim by BDWH and there consultants WYG.

The net gain biodiversity is a legal requirement that the developer must comply with and HBC must then check and enforce. Neither the original application (00724) or this new one (01093) meet this requirement. The strategy by both BDWH and HBC planners has been to deflect and confuse the issues to date in the hope that shortcomings in the proposal will be overlooked by those questioning the efficacy of this development and mitigation solutions offered.

The developers consultant WYG are proposing that the refuge area can support considerably more than the 400 geese that currently use the field once it is designated as a core site. BDWH have effectively used this same strategy in the past to justify other island developments.

The proposed refuge is at its widest 250 metres across and the birds currently congregate in the centre of the field only. Much of the area is too close to the boundary to give suitable sight lines. Therefore the fixed geography of the field will limit greater use by migratory geese in future. If anything the 'enhancement' to 'improved grassland' offered by the developer will reduce sightlines and may decrease geese population.

If we look at the history of other Brent geese mitigations offered by this developer on the island then their past behaviour raises real concern for the validity of this new proposal.

In 2014 the section 106 agreement between HBC and BDWH relating to the Oysters development stated:

1. The loss of habitat as a result of the Oysters development could be mitigated by encouraging additional birds onto an enhanced field H34C by preventing loose dogs and walkers access the area thereby preventing them disturbing the foraging birds. The same Tyler Grange report also stated that foraging birds were disturbed when approached from approx. 50 metres to 110 metres.
2. BDWH would install fencing to block existing desire lines between the Billy Trail and all of field H34C. N.B. *This fence needed to be a complete approx. 400 metre livestock style fence to be effective. This is the same fence the developer has offered to surround the new refuge.*
3. BDWH would check that annually, in the autumn, that the fence was intact and make necessary repairs.
4. BDWH would undertake monitoring for 3 winters of the Dark Bellied Brent geese population in the field H34C when winter wheat was planted to confirm that the actions taken by them to secure the boundary were effective.

It has subsequently been proven that Barrett homes ignored the requirement of the Oysters 106 agreement and took none of these actions.

In a meeting with the HBC planning team in November 2018 they confirmed that BDWH had failed to comply and also HBC failed to enforce any of these required actions. At that time HBC committed to take this up with BDWH to ensure they rectified the situation.

At time of writing the Hayling Billy trail boundary with field H34 is still fully porous and loose dogs regularly disturb the foraging geese.

It should also be noted that HBC planning team have failed to ever acknowledge in writing the minutes of the meeting with residents where they verbally admitted that Barrett were in breach of contract and committed to doing something about it.

See appendix 1 for more detailed evidence and extracts.

Why is this important?

BDWH and their consultant WYG state in the proposal that the action to secure the Hayling Billy boundary was completed. (see the extract below)

As has been proven this statement is incorrect however WYG use this falsehood to then justify both the suitability of the Brent Geese refuge and justify a perceived net gain in biodiversity.

WYG also state that accurate annual brent geese surveys were undertaken over 3 years. WYG did fail however to observe that approx. the 400 metres of boundary was not secured as it should have been under the Oysters 106 agreement. Did WYG actually attend or did they just cut and paste from the previous Tyler Grange mitigation document?

Also why did HBC not take into consideration the irreputable fact that the crop rotation on the site for development has been manipulated in recent years (leaving parts of the field fallow) thereby

making it impossible for the Oysters 106 agreement on Brent Geese monitoring to be accurately completed?

The only assessment of brent geese numbers and views on the design suitability of the refuge being considered seems to have been undertaken solely by the developers consultant WYG. This proposal must be reviewed by appropriate experts who will not benefit from mitigation funding offered so that we can be assured of impartiality.

How can we be confident that HBC is capable of monitoring the many future 106 agreement commitments by the same developer associated with this proposal when there has been an abject failure to do so to date?

Can HBC legal counsel review and advise why there was a lack enforcement of the Oysters Development 106 agreement as this has direct consequences on this new proposed development? How do they propose to rectify this situation?

8.0 Consideration of In-Combination Effects

The main potential for in-combination effects is through recreational disturbance from this and other residential developments. However, the payment of fees as part of the Solent Disturbance and Mitigation Project will mitigate for both alone and in-combination effects. Any other residential developments will likewise pay this sum.

Part of the winter bird mitigation strategy for the nearby residential development at The Oysters was to prevent access to H34C from the Hayling Billy Trail, works which have been completed. Although the proposals seek to develop part of H34C it proposes to retain the larger part as a wader and brent goose refuge. Therefore the measures undertaken in relation to The Oysters will still have a benefit by preventing access from the Billy Trail to the new refuge. This development includes additional measures to prevent access or disturbance from the development and from North Shore Road.

As such it is concluded that although there is a likely significant in-combination effect as a result of recreational disturbance, when taking into account embedded mitigation there will be **no significant effect** on the conservation objectives of the SPA.

The new proposal states that extensive ongoing monitoring will be required (see below) What do HBC propose to do inhouse so that residents of the island can regain trust in the robustness of their overseeing processes?

Monitoring will be required to make sure that the management activities are proceeding and to identify any necessary changes to management to continue achieving the management objective (maintain the mitigation area as a 'core' site for brent geese). It is anticipated that three years of winter bird monitoring will take place followed by annual site visits to monitor management actions.

The new proposal includes a comprehensive bat mitigation document by WYG for the 4 species of bat that forage and transit the site. It is noted that the document focuses in the Hayling Billy boundary and northern hedgerows however fails to observe that the greatest bat activity is at the southern end of the site where the population and activity is greatest. **Large numbers of these**

protected animals cross the only entrance to the field in transit to feeding areas. It is inevitable that for safety reasons effective street lighting will be required but perhaps more importantly the new development will add considerable light pollution to the current bat transit routes. Can HBC ensure that the proposal includes firm commitments and mitigation to resolve this before approval is given.

Bat Activity Surveys	24 th October 2016 – 13 th June 2017	At least four, but up to six species of bat were recorded using the habitats across the site. The site is considered to be of importance at up to District level for foraging and commuting bats.
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It should be noted that WYG do still acknowledge that they do not have the answer to the bat problem and this protected species is likely to be disrupted if the development goes ahead..

Unmitigated removal of linear corridors such as sections of hedgerows and increases in habitat disturbance (through lighting, noise and vibration impacts) during construction and operational phases of a proposed development could indirectly impact bats that use the site to forage and commute.

7.2.2 Mitigation

Bat Activity

The main access into the site will be off the southern boundary which utilises the existing site entrance.

Infill planting of gaps within the hedgerows, in addition to supplementary planting to bolster the hedgerows throughout the site will utilise native species, which will enhance these hedgerow and hence loss of bat commuting/ foraging habitat will not be significant. Further mitigation and compensation for bats is included in the form of native hedgerow planting along the northern boundary of the site. Additional information in relation to hedgerow management is presented in Section 6.2 above.

Lighting

During the construction phase, security lighting will be positioned to avoid direct illumination of retained or created areas of wildlife value. This will ensure that the bats which use the site for commuting foraging will not be significantly disturbed during the construction.

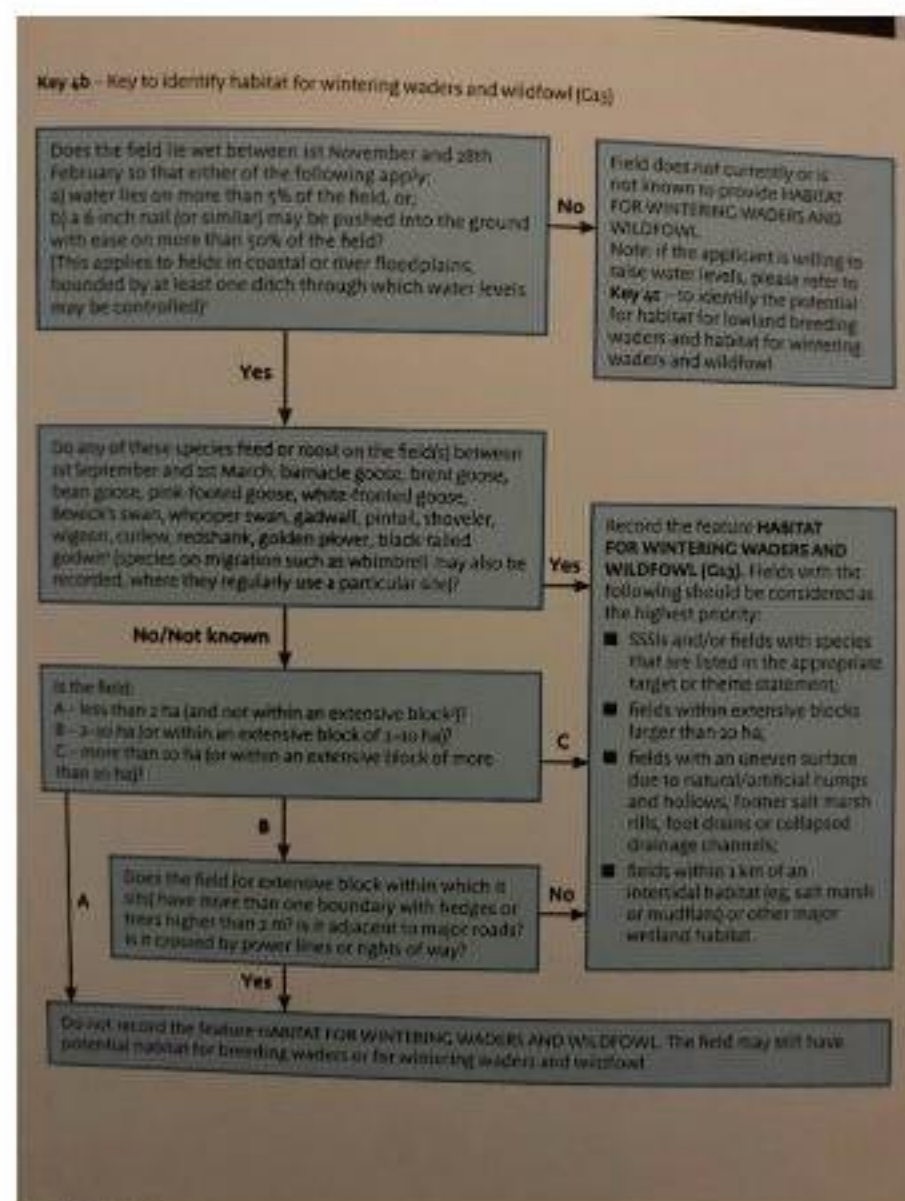
The lighting across the development footprint is to be sensitively designed with consideration for bats, so that valuable bat foraging and commuting areas are retained as existing/new roosts sites are not impacted by ambient light (at the time of writing, the associated lighting plan had not been finalised however it is understood that the lighting plan will show that light levels will not exceed 1 lux within the retained boundaries). Permanent lighting on-site will be minimised in proximity to the following habitats:

Meeting the requirements of G13 in the Farm Environmental Plan Manual

The flagship of meeting the net gain in Biodiversity by BDWH and WYG is detailed in section 4.4. of their proposal. Success for the new refuge is defined as meeting G13 criteria habitat for wintering waders and wildfowl. They anticipate that the criteria will be met. We agree it will be met!

The reason being is that the all of the field already meets this criteria regardless of the attempts of those supporting the development disrupting these protected geese through their failure to secure the Hayling Billy boundary and undertaking 'creative' crop rotation practices over recent years.

Please can the HBC planning team read the extract from the FEP manual below and advise why they do not think the field currently meets G13 criteria? If the consultant is proposing to meet the same standard how is this an improvement?



4.4 Improved Grassland

It is proposed that the northern area of the site is converted from arable crop to permanent improved grassland pasture as a wader and brent goose refuge. This grassland will include wader scrapes, however these are not assessed separately as they form part of the condition assessment criteria for the habitat.

Area	6.31ha
Distinctiveness	2 – Improved grassland is assigned low distinctiveness as a default. There is no overriding justification to vary this.
Target Condition	3 – The grassland has been assessed using criteria for G13 – Habitat for wintering waders and wildfowl. High condition is assigned as it is anticipated that all 3 criteria will be met: • Cover of rushes should be less than 40%, and on the remainder the cover of grass or sedge tussocks should be between 5% and 60%; • The sward height should be between 5 cm and 15 cm in November; and • There is standing water on more than 5% of the field and the ground is wet (a 6-inch nail can easily be pushed in) on more than 50% of the field between November and February.
Time to Target Condition	1.4 – Up to 10 years required to create.
Difficulty of Creation	1 – Low difficulty assigned as default. There is no overriding justification to vary this.

WYG have allowed 10 years to create the G13 criteria when the field is already meeting this requirement. There are mountains of research documents which support the fact that Brent Geese preference is to forage on flat arable land adjacent to sheltered waterways where a food source is readily available and sight lines clear.

The WYG proposal will change the character of the refuge to grass land as part of this development and then hopefully in 10 years it will be back to where it was to begin with in its usefulness in supporting the protected brent geese and wader populations. They also note they will do more work to secure the Hayling Billy boundary building on the good work done (actually not done) by BDWH under the Oysters 106 agreement.

The writer does acknowledge that the new refuge may encourage other animals such as reptiles and rodents but surely the priority is to protect the endangered Dark Bellied Brent Geese and it is not clear that this refuge proposal offers any real net advantage.

To achieve a net gain in Biodiversity in their tables WYG have assessed the current field as a low distinctiveness and poor habitat by default. How can an existing primary site for a rare and protected species of goose with around 5% of the world population living around the Solent be considered low distinctive and poor habitat. It is actually already a perfect habitat meeting all the G13 requirements. The reason for this detrimental scoring is clearly the only way WYG can massage the numbers to meet the net gain biodiversity requirement without allocating additional adjacent land areas (this being a requirement of the Solent Waders policy). It should also be noted that the last time adjacent land enhancement was used as justification e.g. the Oysters, the same developer ignored their responsibilities once planning approval was given.

How can HBC support the habitat distinctiveness and condition assessment by WYG when the field is already a primary site for Brent geese?

Will HBC initiate an independent review of the figures that BDWH and WYG claim achieves a net gain in biodiversity? If no, please advise why not?

Finally it should be noted that WYG claimed they did extensive hedgerow surveys as part of the net gain bio diversity assessment but again failed to notice that the hedgerows on the Billy Trail are not secure and have a number of tractor wide gaps even although they claim in the same documents this boundary was made secure by their employer Barratt Homes.

HBC Please explain how this is possible?

5.0 Assessment

Habitats

Existing habitats on site						Habitat Biodiversity Value					
Habitat distinctiveness		Habitat condition		Habitats to be retained with no change within development		Habitats to be retained and enhanced within development		Habitats to be lost within development			
Habitat description	Area (ha)	Distinctiveness	Score	Condition	Score	Area (ha)	Existing value	Area (ha)	Existing value	Area (ha)	Existing value
Habitat Creation	A		A		B	C	A+B+C+D	D	A+B+C+D+E	E	A+B+C+D+E
Arable	12.57	Low	2	Poor	1					12.57	25.14
Some improved neutral grassland	0.07	Medium	4	Poor	1					0.07	0.28
Total	12.64									12.64	25.42
Site Habitat Biodiversity Value										25.42	
Habitat Impact Score										25.42	
Proposed habitats on site		Target habitat distinctiveness		Target habitat condition		Time till target condition		Difficulty of creation / restoration		Habitat Biodiversity value	
Habitat description	Area (ha)	Distinctiveness	Score	Condition	Score	Time (years)	Score	Difficulty	Score		
Habitat Creation	A		A		B	C	D		E	F	A+B+C+D+E+F
Improved grassland	0.31	Low	2	Good	3	40 years	1.4	Low	1		27.04
Rail Environment	5.53	None	0	Poor	1	5 years	1.2	Low	1		0.80
Subsiding/Temporary Rail Environment - Waders	1.81	Low	2	Poor	1	5 years	1.2	Low	1		3.62
Wetland - Standing water	0.49	High	6	Medium	2	5 years	1.2	Medium	1.5		2.30
Wetland - Submerged flood	0.04	High	6	Poor	1	5 years	1.2	High	3		0.07
Some improved neutral grassland	0.50	Medium	4	Medium	2	5 years	1.2	Medium	1.5		2.32
Total	12.64									25.15	
Habitat Mitigation Score										25.15	

With the limited time available this respondent focussed on reviewing the environmental aspects of this latest proposal by BDWH.

In summary – detailed interrogation of just the environmental sections of the Barratt David Wilson Homes proposal identified a number of falsehoods and irregularities.

It is the duty of Havant Borough Council, as our elected representatives to assure residents of Hayling Island that they are diligently interrogating the accuracy of large planning submissions.

It is surely not acceptable for the shoddy nature of this submission to go unchallenged by our elected representative.

We all agree we desperately need more affordable housing especially for younger people but let us not allow a cynical lack of detail and honesty within the developers proposals to be overlooked in the rush for new housing especially when it can cause irreparable damage to the environment. Surely we don't have to build houses in the wrong places just because the land is speculatively offered for development.

We also hope that our councillors will take this opportunity to develop more creative and imaginative strategies on the traffic and transport issues as the traditional approach to the problem is clearly not working and is at odds with the current climate change policy.

We look forward to Havant Borough Council answering these questions and addressing the discrepancies in the developers proposal so that a fair and reasonable assessment of this application can be made.

Until these matters are satisfactorily clarified we formally object to this planning application.

Yours faithfully

A solid black rectangular box used to redact the signature and name of the respondent.

This document highlights the failure by Havant Borough Council and Barratt Homes to meet their contractual commitments alongside a flawed and cynical interpretation of existing regulation and guidelines to enable them to jointly overcome the issues relating to the protection of Brent Geese as a result of the proposed development App/18/00724.

1. Barratt Homes Oyster development contractual commitment

17th October 2013

Tyler Grange Brent Goose Mitigation Strategy – ADDENDUM

This document was submitted as part of the site planning approval which enabled Barratt Homes to build the Oysters Development. The Addendum was written as a result of concerns by RSPB over the displacement of Brent geese on the land to be developed and adjacent land areas being enhanced for foraging and roosting.

The commitments made in the report in respect of the Oysters development detailed below were submitted by Hayling Builders (HB commissioned the Tyler Grange report) and the developer Barratt Homes.

The contractual actions contained in that report pertain specifically to the area of 'The proposed development North of Sinah Lane : APP/18/00724'

Objective	Prescription	Timing	Responsibility
Control access from Hayling Billy trail into H34C	Install fencing to block existing desire lines	. By September 2014*	Developer Barratt Homes
Ensure paths are not recreated, which would increase disturbance to birds.	The fence should therefore be checked annually in autumn, before geese arrive, and if necessary repaired.	Annually in September	Developer Barratt Homes
Monitor efficacy of mitigation	Undertake up to three winters of monitoring surveys post completion of mitigation and only in years where winter wheat present; if numbers equivalent or greater in year 1 or 2 then stop monitoring.	Developer October to March; 2 visits per month	Developer Barratt Homes/ecologist

The same document that was submitted with the Oysters development approval by HBC also stated the clear sight lines required to ensure that foraging birds were not disturbed and the relevant extract is below :

*In the absence of better predictors, the data from intertidal studies has been used to approximate the area that might be improved by preventing access from the Billy Trail. The median distance of 51.5m where disturbance occurred to Brent goose as a result of visitor use (Ref. 1; table 6.1) was used to calculate the likely area that would be more attractive to Brent geese after modifications to prevent access; the greatest distance where disturbance occurred (178m) was used to estimate the 'worst case' (this was also considered, in accordance with the precautionary principle introduced by the Habitats Directive for protected sites). In reality, the area of H34C that would be more attractive to Brent geese is likely to be somewhere in between the two since the mid part of the field is relatively narrow and may be less used than more open parts. There may well be other factors that influence the pattern of use. Table 1 and **Plan 1435/P03** set out the areas.*

	Distance where disturbance* occurred used to calculate area (m)	Area (ha)
Total area of H34C	-	11.8
Likely area made more attractive	51.5	9.4
Minimum area made more attractive	178	5.8

Of course, it is not possible to state quantitatively what the benefit of this approach will have in terms of compensation for habitat lost. But when considered together, it is concluded that the enhancement of 1.5ha of H34D together with access management in H34C to make at least 5.8ha of the field more attractive to Brent geese is likely to compensate for losses of 2.5ha of H34E. Natural England and Hampshire County Council's ecologist agreed with this conclusion.

2. Solent Waders designation of field H34C as a primary site for Brent Geese.

October 2018

Solent Waders and Brent Goose Offsetting strategy. Final report published

https://www.fareham.gov.uk/PDF/planning/local_plan/MitigationStrategy.pdf

This states the following regarding primary sites (H34C subject of App/18/00724 is a primary site).

Primary Support Areas

17. The Primary Support Areas are land that, when in suitable management, make an important contribution to the function of the Solent waders and brent goose ecological network. However, it is generally considered that, where on-site avoidance or mitigation measures are unable to manage impacts, there may be opportunities for the loss.

*Please note that the term 'in perpetuity' is defined in this document to be a minimum of 80 years. Damage to these areas to be off-set by the provision of **new sites** to ensure a long term protection and enhancement of the wider wader and brent goose ecological network.*

*18. The options for off-setting impacts on Primary Support Areas will be considered on a case by-case basis and will be subject to ensuring the continued ecological function of the wader and brent goose sites is maintained and enhanced i.e. ensuring that there are significant **net benefits to the wader and brent goose ecological network** through the creation and ongoing management of replacement (off-setting) sites. This may be a site identified within the Strategy provided there is sufficient scope*

for enhancing and securing its function within the wader and brent goose ecological network, or a site that if brought into appropriate condition has the potential for future use.

19. There will be a requirement for the off-setting area to fulfil the same special contribution and particular function of the areas lost or damaged for the same species of birds. The appropriateness of any off-setting areas in respect of fulfilling the required ecological function will be judged against the following criteria, ranked in order of importance: A. Habitat Type – the proposed off setting site must support habitats, or be suitable for recreating habitats that provide the same, or enhanced, ecological function as those that are to be lost or damaged. B. Disturbance – the ecological function of an off-setting site is likely to be seriously undermined if subject to regular disturbance from recreational use and unmanaged public access. The appropriateness of the location of the off-setting site and the proposed measures to prevent indirect effects will need to be fully assessed. C. Area of habitat – where the replacement habitat would be of equal ecological quality the area required should be of a similar extent to the site being lost or damaged. There may be situations however, where a greater area is required when habitat created may be of poorer quality to that lost or damaged, or there is a high level of risk involved. Similarly, if significant ecological enhancements are possible that increase the carrying capacity of the replacement site above that of the Primary Support Area affected then a smaller area of replacement habitat might be acceptable. This might include the partial loss of a Primary Support Area providing the remainder can be made significantly improved in habitat quality with long term management so as to provide for a greater capacity for the target species than the original site. In all such cases the test will be to ensure the replacement habitats provide a clear and permanent net gain for the target species. D. Timing and availability of habitat – operational at the time it is required. Essentially, 'in time' to offset the adverse effects which are being addressed, with evidence to show it is functioning and readily available to SPA birds prior to any loss or damage to the original site. E. Geographic location – for ecological reasons of structure and function it is considered appropriate for the off-setting habitat to be provided as close to the original site as practicable. The solution should also be capable of being: F. Validated in respect of achieving its ecological function / purpose; and G. Monitored for effectiveness; and H. Adapted to adjust to unfolding circumstances in future management; and Final Report October 2018 8 I. Resilient in the face of predictable future pressures such as natural population fluctuations and climate change.

20. The land will need to be restored to a suitable condition and managed specifically for the waders and / or geese, ideally as a nature reserve owned or leased by LPA or NGO partner (or similar stable management body such as Land Trust) in perpetuity.

21. The management of the land must be set out in an agreed costed management and monitoring plan and sufficient funds provided to the agreed manager of the site to cover full costs in perpetuity. The preferred approach to secure long term funding for all off-setting areas is to provide an endowment whereby the interest is used for on-going management. This approach secures long term funds in perpetuity.

22. Given the difficulty of 1) justifying the need for a scheme and 2) providing the appropriate level of mitigation up front (i.e. making the off-setting area available prior to the loss or damage to the original site), it is the preferred approach that acceptable schemes affecting Primary Support Areas should come forward through the local plan process. This will ensure an early assessment of viable off-setting areas and consider how the necessary management can be secured and delivered upfront. A local planning authority could adopt a habitat banking approach to release potential sites provided that the above criteria can be met.

23. Joint working between the local planning authority, Steering Group and applicant is advised in all cases. However, it is ultimately the applicant's responsibility to identify and secure viable replacement sites for the loss of any non-designated wader and brent goose sites.

3. HBC response to failure to secure the Billy Trail western boundary adjacent the H34C

14th November 2018

Meeting with Havant Borough Council Planning Department and Sinah Lane Residents.

In this meeting HBC planning Dept confirmed :

The Oysters contractual Mitigation actions had not been carried out.– namely

Barratt Homes had failed to meet there commitment to build a fence on the West side of the Billy Trail to block existing desire lines. At the time of the meeting Barratt had belatedly arranged for a partial fence (which all agreed was not fit for purpose) to be installed however this was poorly installed, did not effectively block access by loose dogs into the field H34C to prevent worrying of Geese and these sections of fence have subsequently been removed, damaged or fallen into disrepair. Barratt homes have had a lot to say recently but have ignored and avoided commenting on these commitments throughout the period 2014 to 20.

Barratt homes have not subsequently checked or maintained the fence.

Barratt Homes did not arrange for 3 years of monitoring of Brent Geese numbers.

HBC stated that their enforcement team had failed to enforce the Oysters contract and that they were in negotiation with Barratt Homes to rectify the situation. This has not happened.

HBC stated at the meeting that they have the challenge of finding net Bio Diversity gain to make approval of this development possible.

4. Barratt Homes submission for the proposed refuge for Geese at the northern end field H34C.

17 March 2020

Barratt Homes latest mitigation to protect migratory Brent geese and wading birds is to offer a small refuge at the Northern End of Field H34C

https://planningpublicaccess.havant.gov.uk/online-applications/files/83B2611A512471284566C73C9D1BC44F/pdf/APP_18_00724-WINTER_BIRD_MITIGATION_PLAN-1379594.pdf

The above link details the reduced area brent geese refuge that Barratt homes are proposing as the mitigation for the development. It can be observed that as this area is already occupied by Brent geese, when favourably planted through crop rotation, the refuge offers no new areas for Brent geese to mitigate the development under the criteria set out in Para 3 by Solent Waders.

Conclusion

November 2020

HBC have now indicated that they would have given approval to the development if it was still in there control however a number of key facts, regulations and contractual obligations have been ignored during the consultation process and in particular the following.

The verification of the field as a primary site for Brent geese by HBC was undertaken without the field not being enhanced for geese as required by the Oysters development contract . It can be argued that the true status may have been assessed to a higher status i.e. a core site for Brent Geese, if HBC and Barratt Homes had honoured their contractual commitment to undertake further ecological protection and monitoring of the field H34C in 2014

In the current planning application Barratt homes have adopted their usual tactic of offering an inducement consisting of a small area of the field as a refuge for geese whereas the Tyler Grange consultant's report above sighted that Geese are disturbed between 51 metres and 110 metres from a passing visitor such as a dog or human. At its maximum width the allocated geese refuge area is 258 metres wide. The maths speak for themselves. This refuge will not be optimised for Geese.

Barratt Homes have also failed to meet the Solent Waders off set requirement for suitable same or greater space allocated for geese as a result of the development. They have offered land that the geese already used by geese without enhancement but this is just double counting.

The offsetting strategy for the mitigation area(refuge) should be 'ensuring that there are significant net benefits to the wader and brent goose ecological network' which is clearly not the case.

HBC have missed by a mile the requirement to offer a credible 'net bio diversity gain' .

Perhaps most disappointingly is the clearly cynical approach by both the developer and the council throughout the consultation process in the manipulation of compliance by rewriting their own regulations and disappointment with our elected officials in allowing them to do this unchallenged.



17 October 2013

Land off Station Road,
Hayling Island

Brent Goose Mitigation
Strategy - ADDENDUM

Report Number: 1435_2011_R04a_JA_RW
Author: Julian Arthur MCIEEM CENV
Checked by: Laura Sanderson MCIEEM CENV

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Appendix

Appendix1: RSPB letter dated 7 October 2013

Plan

Area of Brent Goose Habitat likely to be Improved by Access Management
1435/P03 October 2013 JSA/JTF

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Land off Station Road, Hayling Island
Brent Goose Mitigation Strategy

1435_2011_R04a 17 October 2013 JA_RW

Section 1: Introduction

- 1.1 This report has been prepared by Tyler Grange LLP on behalf of Hayling Island Builders Ltd in respect of Land off Station Road, Hayling Island, Havant ('the site'). It is an addendum to a mitigation strategy agreed with Natural England and Hampshire County Council to compensate for loss of Brent goose foraging habitat to ensure there is no impact to the integrity of the SPA and Ramsar as a result of proposed development of the site (Tyler Grange report ref. 1435_R03b; hereafter referred to as 'the strategy').
- 1.2 This addendum has been prepared to address concerns raised by the RSPB in its letter dated 7th October 2013 (**Appendix 1**) in respect of the strategy. The RSPB states the strategy is modified as follows (excerpt from letter in **Appendix 1**):
- *"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."*
- 1.3 Each of the RSPB's points is considered below. This addendum should be read in conjunction with the strategy.

Area of Replacement Habitat

- 1.4 The area of H34E that would be removed from the foraging resource for Brent geese is 2.5ha (i.e. the area of the development footprint). The strategy states that 1.5ha of land at H34E would be made more suitable for Brent geese to compensate for these losses. This does not compensate like-for-like in terms of area.
- 1.5 However, in addition, existing recreational use of H34C to the west (also used by Brent geese) will be reduced by blocking off uncontrolled points of access to H34C along its eastern boundary with the Billy Trail. The informal footpath on the western boundary of H34C adjacent to Langstone Harbour is outside of the developer's control and hence would not be affected (anecdotal evidence from surveys suggests that this path is well used, and use results in birds in the northern part of H34C being flushed to the harbour). This will increase the area of habitat that is suitable for Brent geese to forage.
- 1.6 As a crude estimate of the area that is likely to be improved for Brent geese it is necessary to consider the likely area that would remain affected alongside the path next to the harbour.



- 1.7 The Solent Disturbance and Mitigation Project (Ref. 1) refers to data obtained by Liley *et al.* 2010 (Ref. 2) in respect of the behavioural responses of both waders and Brent Geese to disturbance from visitors. These responses were “*measured in intertidal habitats, and so do not measure the response of Brent Geese in the full range of habitats they exploit*” (pg. 57). The report goes on to state that “*Brent Geese may be more habituated to disturbance in terrestrial habitats and so have shorter disturbance distances than in intertidal habitats*”.
- 1.8 In the absence of better predictors, the data from intertidal studies has been used to approximate the area that might be improved by preventing access from the Billy Trail. The median distance of 51.5m where disturbance occurred to Brent goose as a result of visitor use (Ref. 1; table 6.1) was used to calculate the likely area that would be more attractive to Brent geese after modifications to prevent access; the greatest distance where disturbance occurred (178m) was used to estimate the ‘worst case’ (this was also considered, in accordance with the precautionary principle introduced by the Habitats Directive for protected sites). In reality, the area of H34C that would be more attractive to Brent geese is likely to be somewhere in between the two since the mid part of the field is relatively narrow and may be less used than more open parts. There may well be other factors that influence the pattern of use. Table 1 and **Plan 1435/P03** set out the areas.

	Distance where disturbance* occurred used to calculate area (m)	Area (ha)
Total area of H34C	-	11.8
Likely area made more attractive	51.5	9.4
Minimum area made more attractive	178	5.8

Table 1: Area of H34C likely to be made more attractive to Brent geese following access restrictions. *distances taken from Liley *et al* 2010

- 1.9 Of course, it is not possible to state quantitatively what the benefit of this approach will have in terms of compensation for habitat lost. But when considered together, it is concluded that the enhancement of 1.5ha of H34D together with access management in H34C to make at least 5.8ha of the field more attractive to Brent geese is likely to compensate for losses of 2.5ha of H34E. Natural England and Hampshire County Council's ecologist agreed with this conclusion.

Treatment of Replacement Habitat

- 1.10 Table 2 below sets out the cropping regime since 1999 in H34C and E. Contrary to what was stated in the strategy, information from the tenant farmer has confirmed the fields are not on rotation of cereals and legumes on alternate years. Winter wheat (which is a known forage crop; Ref. 3) is grown biennially, with alternate years either rape (another forage crop), linseed, soya or peas. Since 1999 the fields have not supported crops known to be used by Brents in only four

winters (circa 25% of winters). The situation is therefore considerably (25%) better than previously thought.

- 1.11 The farmer chooses crops based on market forces. It is not reasonable to require him to grow only those crops suitable for Brent geese, indeed Natural England and Hampshire County Council's ecologist agreed that this was not necessary.

Year	Crop	Year	Crop
1999	Rape	2007	Peas
2000	Wheat	2008	Wheat
2001	Soya	2009	Linseed
2002	Wheat	2010	Wheat
2003	Rape	2011	Rape
2004	Wheat	2012	Wheat
2005	Rape	2013	Peas
2006	Wheat		

Table 2: Crop rotation at H34C and E since 1999 (data provided by Simon Walter). Crops in bold are of known value to foraging Brent geese (Ref. 3)

Timing of Provision

- 1.12 It was agreed with Natural England and Hampshire County Council's ecologist that provision of compensatory habitat and recreation management was not required until such time as impacts were likely, with the objective to ensure that there is no net loss in availability of winter foraging.
- 1.13 Based on what was known, the strategy stated that provision would be before winter 2015/16 when the next winter wheat crop was sown. However, given the crop rotation in Table 2, the timing of the next suitable forage crop (and the fact the birds may use stubble in other years) may well be sooner, hence provision should instead be made before winter 2014/15.
- 1.14 The heads of terms of the management and monitoring plan in the strategy have been modified accordingly in Table 3 below.

Limit Informal Recreational Access

- 1.15 RSPB was concerned that recreational access might be possible from the new development on to the remaining part of H34E to the north of the development. However, the development plans show no access to H34E from the development site. H34E is not currently used for recreational use (unlike H34C, there is no obvious destination from accessible locations around the field), and it is therefore not likely that there would be use of this field – and hence disturbance to birds – once constructed.

Monitoring

- 1.16 It was agreed with Natural England and Hampshire County Council's ecologist that if monitoring in the first three years post construction confirmed that Brent geese were using H34E in equivalent numbers, and H34C in greater numbers (i.e. that the mitigation strategy is successful), then monitoring need not continue for three seasons. However, if this was not the case then three seasons of survey would be undertaken.
- 1.17 RSPB considered that there should be *"a requirement in place for the applicant to undertake further reasonable mitigation measures should the replacement habitat prove unsuccessful"*. This point was discussed with Natural England and Hampshire County Council's ecologist at a meeting prior to production of the strategy. It was concluded that there were 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 it was not reasonable to impose such a condition on the developer. Instead, it was agreed that since there was a high likelihood of success, and that – as with other similar schemes around the SPA – the monitoring data could be used to better understand what measures are successful, rather than to require the mitigation measures to be modified by the developer in some way.
- 1.18 As stated in the strategy, a full management and monitoring strategy (modified heads of terms in Table 3) would be controlled by planning condition, with its implementation secured in perpetuity by planning obligation.

Objective	Prescription	Timing	Responsibility
Ensure H34D is farmed in such a way that it supports suitable habitat for foraging geese and waders	Farm H34D on same rotation as H34E and H34C, with cereals in alternate years, and other crops that may be suited to foraging geese at other times.	In line with usual farming practice	Farmer
Maintain clear, open sight lines between H34D and H34E	Vegetation along the retained ditch cut/ploughed annually to ground level in autumn.	By September 2014*, then annually in September	Farmer
Control access from Hayling Billy trail into H34C	Install fencing to block existing desire lines.	By September 2014*	Developer
	Ensure paths are not recreated, which would increase disturbance to birds. The fence should therefore be checked annually in autumn, before geese arrive, and if necessary repaired.	Annually in September	Developer
Monitor efficacy of mitigation	Undertake up to three winters of monitoring surveys post completion of mitigation and only in years where winter wheat present; if numbers equivalent or greater in year 1 or 2 then stop monitoring.	October to March; 2 visits per month	Developer/ecologist

*Assuming development commences in 2014, otherwise in September following commencement of development

Table 3: Modified heads of terms of management and monitoring plan



Section 2: References

- 1 R. A. Stillman, A. D. West, R. T. Clarke & D. Liley (February 2012) Solent Disturbance and Mitigation Project Phase II - Predicting the impact of human disturbance on overwintering birds in the Solent
- 2 Liley, D., Stillman, R. A. & Fearnley, H. 2010. *The Solent Disturbance and Mitigation Project: results of disturbance fieldwork 2009/10*. Report to the Solent Forum
- 3 Rowell, H.E. & Robinson, J.A. 2005. *Identifying and characterising the feeding areas of Dark-bellied Brent Geese Branta bernicla bernicla in and around Special Protection Areas in the UK*. *Waterbirds around the world*. Eds. G.C. Boere, C.A. Galbraith & D.A. Stroud. The Stationery Office, Edinburgh, UK. pp. 517-518.



Appendix 1: RSPB letter dated 7 October 2013



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


Carrie Temple
Senior Conservation Officer



Plan

Area of Brent Goose Habitat likely to be Improved by Access Management
1435/P03 October 2013 JSA/JTF



Land off Station Road, Hayling Island
Brent Goose Mitigation Strategy

1435_2011_R04a 17 October 2013 JA_RW

RECORD OF MEETING WITH HBC PLANNING DEPT – 14 NOVEMBER 2018

Attendees:

David Hayward – HBC Planning Policy Officer

Daphney Haywood – Case Officer for APP/18/00724

██████████ Resident ██████ Sinah Lane resident since 1994

██████████ Resident ██████ Sinah Lane resident since 1988

██████████ – Resident ██████ Sinah Lane resident since 2012

- 1. Background.** As a result of the recent planning application submitted by Barratts to develop 195 dwellings on land to the north of Sinah Lane on Hayling Island (APP/18/00724), there has been considerable concern from Hayling residents about the impact on the infrastructure and local environment as evidenced by the subsequent negative comments/responses. The issues regarding the infrastructure are being addressed by the Hayling “Save Our Island” group and the HI Residents Association. However, there is grave concern about the impact of the proposed site on the wintering of Brent Geese and Waders on the designated land (H34C). ██████████ had highlighted the conservation concerns in the email to Councillor Issy Scott dated 18 September 2018 as at Attachment A. This document also includes the issue on mitigation of certain elements on the recently complete “Oysters” development by Barratts to the north of Station Road. These points were clearly stated in letters of objection from local residents and in a deputation presented to cabinet in 2016 at the DCM in 2017 by local resident ██████████.
- 2. Aim of the Meeting.** HBC Planning Department invited the above Sinah Lane residents to meet in the Public Services Plaza to discuss the concerns previously expressed as outlined in Attachment B which formed the basis of the discussion. In addition to the environmental issues, concern was expressed on the highway safety implications at the entrance to the site off Sinah Lane.
- 3. Conservation Regulations.** Mr Hayward opened the meeting by outlining the regulations by which HBC and potential contractors are bound when assessing the implications of building on the habitat of certain species. The EU directive on “The Conservation of Habitats & Species Regulations 2017” at Attachment C para 63 provides such broad guidelines. He explained that very little guidance was offered by Natural England, any regulations were subject to frequent changes, and that they also had to consult with other agencies such as the RSPB and relevant Solent Environmental bodies. HBC now have the challenge of finding a net bio diversity gain as a result of new developments.
- 4. The Oysters Mitigation Issue.** ██████████ confirmed the reasons for attending the meeting and reinforced that it was not a case of “nimbyism” but to understand better the processes and procedures before/during and after the submission of building applications., specifically the Oysters mitigation concerning the wintering of Brent Geese on field H34C. He further stated that the residents are struggling to trust the effectiveness of the planning process if the developers can ignore their commitments.

- a. **The Oysters Development.** HBC confirmed that the post development monitoring of the Oysters site was in the hands of a management company/co-owners, having been transferred from Barratts. They also advised that the “dead end” road at the north of the site was access for Suds maintenance and for farm vehicles to the field. The field to the north of the Oysters had been suggested for development but turned down by HBC.
 - b. **Boundary between Hayling Billy Trail (HBT) and field H34C.** (Att B Questions 1, 3, and 6 refer). HBC confirmed that the Oysters Mitigation actions didn't happen as they should have been carried out. Also HBC are aware of the belated attempt by Barratts to partially meet the Oysters mitigation to prevent loose dogs from getting into the field from the HBT and disturbing foraging Brent Geese in the winter. **They accepted that this issue should have been better monitored, lessons had been learnt that would result in a much simpler and robust monitoring process going forward.** HBC confirmed that negotiations were proceeding to rectify the situation via the HBC enforcement office. It was also agreed that notices on relevant sections of the HBT to explain the reasons for the fencing would hopefully prevent further damage to the present fencing efforts - Barratts claim to have repaired this fence 3 times although this met with some scepticism from the residents who are regularly monitoring progress(or lack of). A request to dog owners to keep dogs on the leash during the migration period was also suggested. It was observed by the residents that the current fence solution are not fit for purpose and a more robust design required. The residents also observed that the current fences to fix the 'porous boundary' had only been installed at **the northern end of the field** whereas the oysters mitigation identified that the complete H34C boundary needed securing.
HBC
5. **Field to the North of Sinah Lane (H34C).** (Att B Questions 2 & 4). On recent outline plan documents the field has been split into 3 distinct areas. HBC suggested that it had been a joint HBC/Barratts decision to show the southern development area, the northern refuge area and the narrow area between the two. HBC was not aware that the field had only been sown in the northern part of the H34C field, the 'primary site for Brent geese', which would skew any geese population monitoring survey results carried out this winter and not reflect good practice or a fair test. However, it was the farmer's prerogative to manage his crop rotation strategy and the **Sinah Lane residents agreed to pursue the reasons for the change and report back to HBC for information.** [REDACTED] advised that the Northern end of the site had only sporadically if not rarely, been used by birds this year and that was after bird scarers had been used on the field North of Little Wood where a large flock of the geese (100+) appear to be foraging on winter wheat this year. The planting regime may well have made the field H34C less attractive as the area of the foraging crop, winter wheat, is considerably smaller compared to the whole of H34C being planted. The planting regime could be artificially hindering the number of geese choosing to forage in the field. The residents advised that the Southern end of the field was also used by the Brent geese especially in a strong south westerly gale when the birds benefit from the lee of the

adjacent properties. They also observed that the more general use by the birds at the southern end of the site had in recent years reduced as dog walkers increasingly used this end of the field.

6. **Brent Geese Population Monitoring.** (Att B Question 5). HBC confirmed that the monitoring of the Brent Geese population wintering on Hayling Island was an on-going activity with inputs from official agencies including the Solent Recreation Mitigation Partnership (SRMP). The SRMP strategy includes the impact of the increase in population/recreation activities on wintering birds. Inputs from the public domain were welcomed and included in the Solent Birds data gathering (note iaw Att C para 63(4) "opinions from the general public", [REDACTED] confirmed that counting/photo evidence on Brent Geese and Waders would be continuing this winter.
7. **HBC Planning Process and Timelines.** (Att B Questions 7 & 8). HBC advised that the decision as to whether to include the Sinah Lane development in the Draft Plan had not been decided. There was no longer a requirement to monitor the ratio of building on greenfield/brownfield sites (approx. 2/3rds to 1/3rd respectively), so no targets are set. Government building guidelines are treated as a starting point – a minimum rate. The HB Cabinet had until 30 January 2019 to forward the Draft Plan to HB Council. If the subject development was not included then Barratts could still appeal. If the plan was included then the HBC would comment (6-8 weeks) and pass it on to the Development Management Committee for implementation. There would be opportunities for the general public to appeal/comment during the planning decision process as promulgated in HBC Planning announcements.
8. **Public Right of Appeal.** (Att B Question 9). HBC confirmed that the public had the right to appeal against any decision made at local government level. HBC suggested that advice could be obtained from the Ombudsman as a starting point but warned that any case would need to be solid to be considered. Any formal appeal would have to be done legally and within 6 weeks of the decision date. This would be costly but [REDACTED] commented that he believed that there was enough strong feeling on the island to crowd fund a judicial appeal if it became necessary.
9. **Access to Site H34C.** (Att B Question 10). The Sinah Lane residents who all live close to the only access to the proposed development expressed concern about the issues of site lines, safety of road users especially in low sun conditions further evidenced by a recent car accident (not reported to the police, therefore not a statistic, but recorded by [REDACTED] at Att D), parking on the road, and pedestrians crossing the site access road and at the bottom of the HBT. **HBC advised that they would pass on the concerns to the relevant Highways authorities.** The residents agreed to supply documentary evidence to support the above concerns.

Attachments:

- A. Comments by [REDACTED] on "Oysters" and Barratts Planning Application – Environmental issues. E-mail to Councillor Issy Scott dated 18 September 2018

RECORD OF MEETING WITH HBC PLANNING DEPT – 14 NOVEMBER 2018

- B. Questions proposed by Sinah Lane Resident attendees to HBC Planning
- C. EU directive on "The Conservation of Habitats & Species Regulations 2017"
- D. Notes by [REDACTED] on the Car Accident on Sinah Lane on 9 October 2018.

Distribution:

Attendees plus Councillor Issy Scott

[REDACTED]

Draft 1 dated 15/11/18