

Subject: APP/25/00781 | Change of use from commercial fair site to residential site for 55 flats in 5No. 4 storey blocks with associated parking and landscaping. | 1 Sea Front, Hayling Island, PO11 0AG

Dear Lesley,

APP/25/00781 | Change of use from commercial fair site to residential site for 55 flats in 5No. 4 storey blocks with associated parking and landscaping. | 1 Sea Front, Hayling Island, PO11 0AG

Thank you for consulting me on this application.

The application is accompanied by a Preliminary Roost & Nest Assessment (ESL, September 2025), a Biodiversity Net Gain Assessment (Arbtech, September 2025), and a Biodiversity Net Gain Statutory Metric (Arbtech, September 2025). The application site is within an extremely sensitive location, immediately adjacent to or in very close proximity to areas of international, national and local nature conservation value namely the Solent Maritime Special Area of Conservation (SAC), Solent & Dorset Coast Special Protection Area (SPA) and Sinah Common Site of Special Scientific Interest (SSSI). Various Sites of Importance for Nature Conservation (SINCs) lie to the east. Priority Habitats such as Coastal Vegetated Shingle and Lowland Dry Acid Grassland are within close proximity. Further details of the potential impacts to these sensitive protected sites and habitats are required.

I note comments from the Environment Agency and Coastal Partners in relation to coastal flood and erosion risk: these matters are of more fundamental importance than ecological impacts in my view, although the potential impact to sensitive ecological features is clearly of concern.

In terms of BNG, I would highlight that since the completion of the BNG Metric calculations, the Hampshire Local Nature Recovery Strategy (LNRS) has been published and now forms the only source for determining strategic significance in the context of BNG. I would advise that the BNG calculations should be reviewed in light of the LNRS to see if revisions are needed.

The submitted BNG Metric states that the proposal would result in a habitat unit increase of 439.87%, comprising the addition of areas of modified grassland, introduced shrub and urban trees. Although procedurally 'correct' in the context of BNG, this is an uninspiring vision for such a prominent coastal site, surrounded by habitats of national and international importance, and appears to take no account of the distinctive landscape setting. I am not convinced that this is an appropriate outcome for this site.

My view is that any development in this location should seek to reflect and enhance the local natural environment. There is a very clear opportunity for imaginative landscaping proposals to incorporate appropriate local habitats such as vegetated shingle and acid grassland – these habitats can be provided through roof-level landscaping, within planters or more generally as part of an innovative and inspiring landscaping scheme that truly reflects the landscape for which Hayling sea front is renowned. Vegetated shingle habitat in particular would provide an achievable and attractive landscaping element to any proposal and would accord with existing and forthcoming policy on protecting and enhancing coastal habitats on Hayling. There is huge potential to restore/enhance vegetated shingle habitat within the heavily compacted areas in the south of the site – this is an obvious easy-win measure that would greatly benefit the local natural environment, businesses, residents and visitors. There is also much potential for acid grassland habitats to be incorporated into any landscaping scheme, again taking inspiration from the immediate landscape. Traditional ornamental landscaping schemes will not sit well

within this dynamic semi-natural mosaic of coastal habitats and may well be a vector for the introduction of unwelcome, invasive plant species (as has occurred elsewhere along the sea front). Whilst acknowledging the desire to redevelop in this location and provide welcome amenity improvements for residents and visitors, a suitable landscaping scheme would be a key requirement for the acceptability of any development in this location. There is also an obvious opportunity for interpretive infrastructure here to showcase the island's natural environment and how businesses, residents and visitors can help protect it. The submitted landscaping/planting details are unimaginative.

There are several other potential concerns in relation to the natural environment. Residential development in this location, alongside redeveloped commercial/amenity facilities, would be highly likely to result in increased recreational pressure. Whilst acknowledging that redevelopment of coastal amenities is desirable, the potential impacts of increased human presence do need to be considered within this application. Issues arising from such development may include trampling/damage to sensitive vegetation communities such as vegetated shingle and coastal grassland, both of which occur locally. These are Priority Habitats and material considerations in planning. In addition to vegetation impacts, the adjacent beach supports habitats used by roosting wader species – there are known roost sites to the east and west of the application site – and increases or changes in recreational use could well impact the suitability of habitats to support these crucial undisturbed roost sites. Consideration of these matters should be included within the application and mitigating measures proposed where necessary.

NPPF, Circular 06/2005 and Natural England Standing Advice, require that planning decisions are based on full, up-to-date ecological information and it is essential that all necessary survey, assessment and mitigation information is available to the Local Planning Authority prior to determination, particularly in the case of protected sites, habitats and species, which are a material planning consideration. This will enable the Local Planning Authority to determine the application on the basis of full knowledge about the potential ecological impacts of the proposal and to ensure that any impacts can and will be mitigated.

If you have any queries, please don't hesitate to contact me.

Kind regards,

Tristan

Tristan Norton

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