



Report to the Partnership for South Hampshire Joint Committee

Date: 14 February 2022

Report of: Deborah Whitfield
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Subject: PFSH SUPPORT FOR THE SOLENT WADERS AND BRENT
GOOSE STRATEGY

SUMMARY

The purpose of this report to Joint Committee is to agree continued PFSH support for the Solent Waders and Brent Goose Strategy (SW&BGS) and commit to an annual contribution towards the cost of an officer post that will facilitate the delivery the SW&BGS. The SW&BGS aims to identify, conserve and enhance sites that functionally support the Special Protection Areas (SPAs) of the Solent sub-region, and advise on mitigation for unavoidable impacts. This proposal is aligned to, and complements, the work of Bird Aware Solent, and seeks to benefit local planning authorities by monitoring the impact of development on SPAs.

RECOMMENDATION

It is RECOMMENDED that Joint Committee:-

- a) FORMALLY ACKNOWLEDGE the Solent Waders and Brent Goose Strategy 2020 and Mitigation Guidance 2018 (**Appendix A**) as key reference documents for policy and decision-making by PFSH and its partners as appropriate;
- b) AGREE the Solent Waders and Brent Goose Steering Group's request for annual PFSH funding of £14k. The funding will be a contribution to an officer post (commencing in April 2022) that will improve communications, access to mapping and data, and help with identifying suitable low-use site mitigation projects; and
- c) AGREE that costs be met by LPAs by way of each contributing a proportion based on the sites that fall within each LPA boundary.

BACKGROUND

1. The Strategy

- 1.1 The Solent Wader and Brent Goose Strategy (SW&BGS) aims to identify, conserve and enhance inland sites that form the ecological network used by overwintering wading birds and brent geese. These sites functionally support the Special Protection Areas (SPAs) of the Solent sub-region and any losses or impacts of development to these sites must therefore be mitigated. The SW&BGS has proven to be a useful tool for planners, developers, statutory consultees, and the NGO sector to support these aims.
- 1.2 The SW&BGS includes a strategy document which explains the conservation need, survey and analyses methodologies, and recommended conservation policies. This is supported by interactive mapping of SW&BGS sites and mitigation guidance (**Appendix A**), which aims to inform mitigation and offsetting requirements where impacts cannot be avoided.
- 1.3 The Strategy is a vital tool for local planning authorities (LPA's), informing decision-making by providing key spatial information, as well as a mechanism for effective mitigation. This has been demonstrated recently in the cases of on-site provision, for example, developments at Forty Acres and Sinah Lane and off-site provision for Newlands Lane (mitigation project located at Gunner Point).

2. Project Governance

- 2.1 The strategy is overseen by a steering group consisting of representatives from Hampshire and Isle of Wight Wildlife Trust (HIWWT), Coastal Partners, the RSPB, local authority planning ecologists, Hampshire Ornithological Society and Natural England. The steering group meets quarterly to discuss survey updates, mitigation guidance, planning casework, local plans and mitigation projects.
- 2.2 Mapping and data analyses for the Strategy are carried out by HIWWT; all updates are shared electronically with the LPA's directly, and via Hampshire Biodiversity Information Centre (HBIC) which also share the data with consultants and others making requests via their biological data request service.
- 2.3 The mitigation guidance, informed by the strategy and available data, is produced by Natural England with input from the Steering Group. In 2017, the LPAs were consulted on offsetting and mitigation guidance and their comments included in the final published version. The guidance was then sent to Natural England's legal team, reviewed by a solicitor, and a Habitats Regulations Senior Specialist. The publication of the mitigation guidance was noted in PfSH meeting minutes in 2017. The update to the strategy document published in 2020 was disseminated to the LPAs in May 2020.
- 2.4 The Strategy has a website where the strategy document, mitigation guidance and a summary of the mapping are published. The website can be found [here](#).

3. Support from PfSH member LPAs

3.1 The SW&BGS Steering Group are seeking LPA support for the strategy. We recognise that as key users of the strategy, and as decision-makers, it is vital that LPAs understand, have confidence in, receive regular updates and have full access to it. We are therefore seeking the formal acknowledgement by the PfSH Joint Committee that it recognises the strategy and mitigation guidance as key reference documents for policy and decision-making. The mitigation guidance has been previously noted/approved by the PfSH joint committee (in 2017). Since then, the strategy document and mapping have been revised to reflect updated data.

4. Future of the Strategy

4.1 The latest update the “Solent Wader and Brent Goose Strategy 2020” was published in May 2021. The 2020 strategy includes the updated survey findings from three years of bird movement studies up to 2019, all additional bird survey records submitted to date, and a new method for assessing the importance of individual sites. Furthermore, mitigation guidance, issued by Natural England in 2018, for all development proposals that impact sites within the SW&BGS ecological network, is now in place and being used in conjunction with the strategy to guide decision-making.

5. Relationship to Bird Aware Solent

5.1 The Strategy and Bird Aware Solent are separate programmes of work; the strategy is principally concerned with the physical loss of overwintering habitat, grasslands and fields, used by SPA coastal birds and mitigation for where losses are unavoidable. Bird Aware Solent aims to manage mitigation impacts as well, but from increases in recreational disturbance to birds associated with increased development.

5.2 There are commonalities in terms of bird species concerned, mitigation solutions and delivery organisations involved. Furthermore, data from the strategy underpins the evidence base for the Bird Aware Solent research papers, commissioned by the Bird Aware Solent partners.

5.3 The proposal outlined below is for the officer post (recently approved by Bird Aware Solent to deliver the Bird Aware Solent mitigation monitoring) to also deliver the SW&BGS work needed. With the same dedicated officer working on both projects, added value outcomes such as knowledge sharing could be made, potential efficiencies gained e.g. for site monitoring as well as opportunities to develop strategic mitigation sites where multiple mitigation requirements could be developed.

6. Funding Proposal

6.1 In order to continue to maintain and update the strategy, an annual update and re-analysis of all sites is required. Electronic data gathering needs to be developed and promoted to make the process of gathering and analysing survey data as efficient as possible. In order to communicate updates and advise on use of the strategy to all PfSH partners, dedicated officer time is needed. Officer time is also needed to help all LPAs identify projects for mitigating impacts on low use sites. This would be facilitated by active

identification, a call for projects and an assessment of suitability of project applications.

- 6.2 The SW&BGS steering group collectively hold the knowledge and expertise to lead the delivery of these tasks but no funding is currently available to support this vital work. The LPAs have funded the SW&BGS in the past, the last funding for the bird movement surveys was provided in 2016, and therefore we are approaching again, via PfSH, to ask for funding to continue delivery and support of the SW&BGS.
- 6.3 We suggest the funding could be made as a grant to Hampshire and Isle of Wight Wildlife Trust which currently host the data analysis work in a voluntary capacity although the final mechanism would need to be agreed. A longer-term commitment to fund the work by way of an annual grant would ensure updates and communications were consistent and reporting to the LPAs via PfSH Planning Officers Group would be made on a regular basis. Access to the steering group via a dedicated officer would also provide a direct channel to the Steering Group.
- 6.4 The Bird Aware Solent Board recently approved funding for an officer to deliver the monitoring of Bird Aware Solent mitigation project sites, and as part of this funding model there will be some unfunded capacity within this post. It seems a natural synergy for these two programmes to work more closely together and it is likely the skills and experience required for both areas of work could be found in the same individual, therefore recruiting specifically for this person would be preferred.
- 6.5 It is also proposed that the officer represent the LPA's on the steering group, circulate the minutes and agenda in advance of meetings to LPA officers and that the officer have a regular communications with the SEPO officer with regard to strategic mitigation site development.

The funding asked for would specifically cover the following SW&BGS work:

- An annual meeting held with each LPA to identify priority areas for survey in relation to forthcoming development.
- An annual data and mapping update to LPA's, tailored to LPA's and in advance of wider publication.
- A regular progress report to LPAs via PfSH POG (frequency and format to be agreed).
- Identification and a suitability assessment of strategic and site-specific mitigation projects, managing and promoting a call for sites and assessment of project suitability against agreed criteria.
- Collation of information on site mitigation monitoring conditioned as part of planning approvals.

7. Costing Options

7.1 Based on estimated costs for dedicated officer time spending 30% of a full-time post with a level of senior staff support, a total of £15,000 per annum is required to support the SW&BG Strategy, calculated as follows:

- Costings for an officer level post £28,000 and a proposed start date of April 2022: Salary (including NI and pension) = £31,928, plus overheads of £12,000 = £43,928. 30% requirement is £13,178.40
- An additional £1,821.4 is sought to cover senior HIWWT staff support and oversight making a total of £15,000
- The Isle of Wight Council and Chichester District Council have been approached separately and if approved, their contributions will bring the remainder required from PfSH authorities to **£14,000**

Options for LPA contributions:

7.2 Having previously agreed to support the proposals in principle, at its meeting on 14 January, PfSH Planning Officers Group discussed how funding them should be fairly apportioned across LPAs. Options were later discussed at the PfSH Chief Executives' meeting and the preferred suggested approach is shown below with costs shared proportionately according to the number of sites within each LPA boundary. Costs are, as below:

LPA	Proportion of Sites %	Proportionate Cost £
Eastleigh Borough Council	3	462
East Hampshire District Council	N/A	N/A
Fareham Borough Council	15	2,047
Gosport Borough Council	11	1,486
Hampshire County Council	N/A	N/A
Havant Borough Council	29	4,127
New Forest District Council	8	1,057
New Forest National Park Authority*	13	1,849
Portsmouth City Council	16	2,179
Southampton City Council	4	627
Test Valley Borough Council	N/A	N/A
Winchester City Council	1	165
	Total	14,000

*NFNPA contribution yet to be confirmed and dependent on its upcoming budget announcement.

7.3 Joint Committee is asked to agree that LPAs fund a contribution to the work of the SW&BGS strategy by way of a proportionate share of sites that fall within each boundary.

7.4 When considering this report, PfSH chief executives discussed the merits of taking a more strategic approach to funding initiatives, such as this and others (nutrient and phosphate mitigation, biodiversity net gain, Bird Aware Solent), given the challenges this presents, and will present, to the development industry. It is recognised that land use policy for environmental gain is rapidly changing in a number of different ways. These changes are through instruments such as the Environment Act and policies such as Net Zero with Nature. In order to understand the potential impacts on sustainable growth the PfSH Strategic Environmental Planning officer intends to work with the Greenprint for South Hampshire work to report on the current relationship between development and environmental gain, as well as a review of the potential impact of future proposed changes such as biodiversity net gain requirements. This is all likely to be needed as part of the LPA response to the Environment Act and PfSH is well placed to develop a coordinated approach for the sub-region.

RECOMMENDATION

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- c) AGREE that costs be met by LPAs by way of each contributing a proportion based on the sites that fall within each LPA boundary.

Background Papers: None

Appendices: Appendix A - Solent Waders and Brent Goose Strategy 2020 and Mitigation Guidance 2018

Enquiries: For further information on this report please contact:

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Solent Waders and Brent Goose Strategy

Guidance on Mitigation and Off-setting Requirements



Final Report

October 2018

Produced by the SWBGS Steering Group, which includes representatives from wildlife and conservation organisations, with funding received from local planning authorities and other organisations including:

Chichester District Council, Chichester Harbour Conservancy, Eastleigh Borough Council, Fareham Borough Council, Gosport Borough Council, Hampshire Ornithological Society, Havant Borough Council, Isle of Wight Council, New Forest District Council, New Forest National Park, Portsmouth City Council and Southampton City Council



Solent Waders and Brent Goose Strategy Guidance on Mitigation and Off-setting Requirements

Introduction

1. The Solent Waders and Brent Goose Strategy (SWBGS) aims to protect the network of non-designated terrestrial wader and brent goose sites that support the Solent Special Protection Areas (SPA) from land take and recreational pressure associated with new development. The preferred approach is for development to be located outside the network of sites. However, this document outlines the mitigation and off-setting requirements to inform assessments of plans and projects made under the Habitats Regulations and to protect the network should sites come forward for development.
2. The terrestrial wader and brent goose sites are located on land that falls outside of the Solent SPAs boundaries. However, as this land is frequently used by SPA species (including qualifying features and assemblage species), it supports the functionality and integrity of the designated sites for these features. This land will contribute to the achievement of the SPAs' conservation objectives and is therefore protected in this context. This land supports the ecological network by providing alternative roosting and foraging sites.
3. A framework for guidance on mitigation and off-setting requirements has been prepared by the SWBGS Steering Group¹ to achieve the long-term protection of the wider brent goose and wader network of sites. The network extends across a number of local planning authority boundaries in Hampshire, the Isle of Wight and Sussex. This network is under pressure from the growth planned in this area and formal guidance was considered necessary to define an approach for the non-designated sites.
4. The level of mitigation and off-setting required is dependent on the importance of the site within the ecological network and how these non-designated sites support the wider designated Solent SPA network.
5. This framework has been agreed by the SWBGS Steering Group. It will be reviewed every 5 years in line with the SWBGS Project Reports, or ad hoc, if required due to changes to evidence and legislation. Whilst it provides guidance, each development proposal will be examined by Natural England and the Local Planning Authorities (LPA) on a case by case basis including assessment under the Habitats Regulations², and it is recommended that early discussions are held with Natural England through their Discretionary Advice Service³ (DAS) and the relevant LPA to ensure appropriate mitigation and off-setting schemes are designed.
6. This guidance relates to non-designated sites in Hampshire, the Isle of Wight and Sussex. It is separate to the Solent Recreation Mitigation Partnership's Bird Aware Solent Definitive Strategy⁴ which refers to the designated SPA sites and sets out a strategic approach to mitigate for the recreational visits arising from planned housing.

¹ The Solent Waders and Brent Goose Strategy Steering Group includes representatives from the Hampshire and Isle of Wight Wildlife Trust, Natural England, RSPB, Hampshire County Ecologists and East Solent Coastal Partnership

² The Conservation of Habitats and Species Regulations 2017 (or 'the Habitats Regulations 2017')

³ <https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals>

⁴ www.birdaware.org

Site Classification

7. The non-designated sites are classified as Core Areas, Primary Support Areas, Secondary Support Areas, Low Use and Candidate Sites and a map of sites can be viewed [here](#). Sites have been classified based on the following criteria:
- **Core Areas:** All sites that were identified as having:
 - a network value – this relates a site’s importance to a network score for birds moving to and from the intertidal areas to inland sites, and between inland sites. This identified two types of site: those that function as ‘hubs’, with connections to lots of other sites, and those that function as ‘bottlenecks, linking two areas of the network together
 - and/or the max score of 7 in 3 metrics (GB Importance, SPA Importance and SPA Assemblage – see Appendix 1 for details),
 - and/or sites that have a max count of bird use of 1000 or more.
 - **Primary Support Areas:**
 - Sites that score 3-6 in the 3 metrics (GB Importance, SPA Importance and SPA Assemblage – see Appendix 1 for details)
 - **Secondary Support Areas:**
 - Sites that score 1-2 (GB Importance, SPA Importance and SPA Assemblage – see Appendix 1 for details),
 - and/or have max counts of 100 plus birds for any species
 - **Low Use:**
 - Sites that have records of birds but in low numbers (score 0)
 - **Candidate sites:**
 - Sites that have records of high numbers of birds (max count equal to or greater than 100) and/or a total score equal to or greater than 1 but have less than 3 records in total.
8. Further details of the site classification methodology are included in Appendix 1 and the detailed methodology is set out in the Solent Waders and Brent Goose Strategy 2019 Interim Project Report: Year One⁵.

Reclassification

9. If site classification, and the associated level of mitigation or off-setting requirements, is disputed, reclassification of a site will be considered if confirmed by 3 consecutive years of survey to the agreed survey methodology under appropriate habitat management conditions for waders and / or brent goose usage throughout the survey period.
10. The Solent waders and brent goose network is regularly monitored and new evidence is continually submitted by surveyors which provides the knowledge base and evidence to support the Strategy. Continual review is necessary to ensure the Strategy is up-to-date. New evidence and survey data will be regularly analysed as part of the Strategy and reclassification of sites may result. There may also be cases where the site classification boundary is disputed, for example due to mapping errors. In these instances, the site boundary will be examined on a case by case basis and may be amended if supported by site visits and ecological surveys, as necessary. The latest survey data and site

⁵ <https://solentwbgs.wordpress.com/page/>

classification can be obtained from the Hampshire Biodiversity Information Centre⁶ and the Isle of Wight Records Centre⁷.

Special Sites

11. The aim of the Strategy is to ensure that the current geographical spread of sites across the network is maintained and enhanced. In order to achieve this, there is scope for the strategy to identify a number of special sites. These are sites that are considered more important than the statistical analysis would suggest as their locality contributes significantly to maintaining a cohesive and resilient ecological network spread across the geographical range. For example, if there is a Secondary Support Area inland from an adjacent Core Area, and the Core Area is low-lying and at risk from sea level rise, there may be a case to raise the importance of the Secondary Support Area to a Primary Support Area. In this case, there is a risk that the Core Area will be lost over time and the Secondary Support Area would become more important to the SPA birds in the future. In order to safeguard this alternative resource and ensure resilience within the network, there may be a case to raise the importance of the Secondary Support Area to Primary Support Area.
12. A set system will be put in place to identify and agree sites with special status. This system will set out the qualification criteria for special sites, in a process similar to the designation of Sites of Importance for Nature Conservation and Local Nature Reserves. The organisations involved will include the local planning authorities, Natural England, Hampshire and Isle of Wight Wildlife Trust and the RSPB and will meet on an ad hoc basis. A list of designated special sites will be included on the Solent Waders and Brent Goose Strategy website supported by a list of sites that have been considered but rejected, with justification. Sites can be recommended for inclusion by local planning authorities and the Steering Group.

⁶ <https://www.hants.gov.uk/landplanningandenvironment/environment/biodiversity/informationcentre>

⁷ <http://www.wildonwight.co.uk/lrc/>

Mitigation and Off-setting Requirements

Core Areas

13. The Core Areas are considered essential to the continued function of the Solent waders and brent goose ecological network and have the strongest functional-linkage to the designated Solent SPAs in terms of their frequency and continuity of use by SPA features. Securing the long term protection and appropriate management of the Core Areas is a key objective for the Solent Waders and Brent Goose Strategy.⁸ The unmitigated loss of these sites would impact on the integrity of the SPA over the long term. For clarity, it is recommended that the Core Areas will be identified for protection by policy within the relevant Solent local authority Local Plans.
14. For many of the Core Areas, the lack of opportunities, eg alternative sites in close proximity to the SPA, will make it difficult to replace sites in a suitable location to ensure the critical importance of these sites within the ecological network is maintained. Elsewhere, where sufficient suitable and appropriately located land is available the provision of a suitable alternative site(s) may be possible. If this is the case, an assessment of replicability will need to be undertaken through discussions with Natural England and the Local Planning Authority. This assessment should determine the ecological function of the Core Area by firstly examining site classification criteria and ensuring any alternative off-setting areas can replicate this ecological function. For example, for sites with network value the assessment should examine whether the site is a hub or a bottleneck and how the off-setting site can replicate and enhance this function. Where sites support an assemblage of species, the ecological function of each species will need to be replicated at any off-setting site. Viable alternative sites should be discussed with the Steering Group, and via Natural England's DAS, at the earliest opportunity.
15. Where impacts cannot be avoided, any risk of potential damage to or deterioration of the integrity of the Core Areas will be considered likely to have a significant effect on the SPAs and should be subject to an Appropriate Assessment under the Habitat Regulations in order to ascertain whether an adverse effect on the site integrity can be excluded.
16. Development that would result in impacts to a Core Area will therefore need to be carefully assessed on a case-by-case basis. In order for such developments to demonstrate no adverse effect on the integrity of the SPA(s) then, as a minimum, the full criteria for the replacement of Primary Support Areas (criteria A to I in following section) must be met along with the following additional requirements:
 - A suitable replacement site of an equal, or in some circumstances greater, size and quality must be provided in close enough proximity to the Core Area affected to fully replace its ecological function.
 - The freehold or long term lease (in perpetuity⁹) of the replacement site must be passed to an appropriate conservation body, or the LPA, in a suitable condition and managed in perpetuity as a nature reserve for waders and / or brent geese.

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 or

⁸ <https://solentwbgs.wordpress.com>

⁹ 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 on-going 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

- 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 (ie 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.

Secondary Support Areas

24. The Secondary Support Areas offer a supporting function to the Core and Primary Support ecological network, but are generally used less frequently by significant numbers of SPA geese and waders. These sites become important when wader or brent goose populations are higher or when the habitat is in suitable management. In-combination, these sites are essential to secure a long term, permanent network as this ensures a geographical spread of sites across the wider ecological network, thereby meeting the needs of each discrete subpopulation. The Secondary Support Areas network also provide suitable and favoured sites in years when the population includes high numbers of juveniles, as well as ensuring future resilience.
25. Loss of or damage to Secondary Support Areas should be discouraged, and on-site avoidance and mitigation measures considered wherever possible. However, where impacts cannot be avoided or adequately mitigated on-site, there may be scope for a more flexible approach to off-setting the impacts to these sites, provided the continued ecological function of the network is maintained and significant enhancements additionally delivered, for example by improved long term management.
26. There is a preference for some on-site provision to maintain a network of sites across the region. The loss of secondary sites could be off-set on a like-for-like basis within the locality, similar to the replacement of Primary Support Areas. As Secondary Support Areas are generally utilised less frequently than Core Areas or Primary Support Areas (usually due to less optimal management, crop rotation patterns or disturbance), it may also be acceptable for replacement habitats to be located at a greater distance from the current sites, provided that the location is appropriate for the discrete subpopulation.
27. In addition, if Secondary Support Areas are currently available on crop rotation, it may be acceptable to take account of the value of providing permanent optimal waders / brent

goose conditions equivalent to the current resource, as determined on a case-by-case basis.

28. It is expected that in most cases the loss, or partial loss, of Secondary Support Areas will be off-set by the provision of suitable replacement habitats which are supported by an agreed costed habitat management plan and funding secured in perpetuity. The provision and ongoing management of replacement habitat might be delivered by a suitable third party (such as HIWWT, RSPB, Local Planning Authority, Hampshire County Council, Land Trust etc) through a legally binding management agreement.
29. If a management company is used to undertake the management and maintenance of an on-site bird refuge, the local planning authority will need to be satisfied that financial arrangements are in place that will guarantee the provision of sufficient funds to ensure the full delivery of the agreed management plans in perpetuity. The financial arrangements will need to be sufficiently robust to allow the local planning authority to agree to take over the legal responsibility of delivering the management plans should the management company fail. In addition, it is recommended that a NGO partner (such as the Hampshire and Isle of Wight Wildlife Trust or RSPB) or an accredited ecological consultancy is involved with at least the first ten years of the management of the site. This expertise will help ensure the success of site and allow management to be modified in the early stages, if necessary.
30. If replacement habitat is to be provided on a non like-for-like basis (i.e. a smaller site / functional area provided than currently available), then the scheme should also provide additional off-setting funding for the management and enhancement of the wider wader and brent goose ecological network. The value of funding required may be calculated using a Biodiversity Compensation Framework approach, or through similar mechanisms, such as the Environment Bank.
31. The Biodiversity Compensation Framework approach calculates the equivalent cost of managing an equivalent area of land elsewhere in a suitable condition for the target species under a suitable stewardship scheme in perpetuity. In addition the DEFRA offsetting multipliers are applied to take account of the additional risks associated with replacing established habitats with compensation funding.
32. Appendix 2 sets out a suggested methodology to calculate the costs of a replacement site and a summary of the compensation funding amounts are set out in Table 1. Worked examples are set out in Appendix 3. Alternative approaches to calculating the cost of replacement sites are possible and will be examined on a case-by-case basis.

	Compensation Costs per hectare
Secondary Support Area	£85,464
Low Use site	£35,610

Table 1 – Summary of Indicative Compensation Costs for Creating and Managing Replacement Habitat (per hectare) – Based on Countryside Stewardship Grants 2017¹⁰. (Future changes to these costs will be revised in line with any changes to Countryside Stewardship Payments or equivalent, and subject to review)

33. Where the functional area of a Secondary Support Area is to be lost in its entirety with no direct replacement of habitats by the applicant then additional measures will be necessary to ensure the continued ecological function of the network. Appropriate measures include the use of companies such as the Environment Bank to ensure appropriate sites are

¹⁰ <https://www.gov.uk/countryside-stewardship-grants>

provided elsewhere within the network, the funding of an identified strategic offsetting site or project that has been agreed by the SWBGS Steering Group, or in addition to Table 1, an additional agreed level of funding for land purchase. In such cases the final compensation package will be determined on a case-by-case basis.

34. The funding secured, via section 106 agreements, will be used to enhance, manage and monitor the wider solent wader and brent goose ecological network. This funding will be managed by the respective local authority and will be used to support schemes across the network, this includes those in neighbouring authority boundaries.

Low Use

35. All Low Use sites have the potential to be used by waders or brent geese. These sites have the potential to support the existing network and provide alternative options and resilience for the future network. The in-combination loss of these sites would impact on the continued ecological function of the wader and brent goose network. In all cases proportionate mitigation, off-setting and/or enhancement measures will be required.
36. In the first instance, consideration should be given to on-site mitigation, off-setting and/or enhancement. Where this has been demonstrated to not be practical or feasible and impacts cannot be avoided or adequately mitigated on-site, off-site options and / or compensation funding should be considered. Compensation funding may include payment towards the management and enhancement of the wider waders and brent geese ecological network.
37. The cost of compensating for the loss of a Low Use site is £35,610 per hectare (see Table 1). This figure is equivalent to the costs of the Secondary Support Areas without Defra offsetting multipliers (see Appendix 2). The lower rate is applied to reflect that while Low Use sites have records of birds the numbers involved are low enough to ensure there is only a negligible risk of not successfully offsetting the loss of a Low Use site through enhancements of the wider network. Nevertheless, all Low Use sites have the potential to be used by waders and brent geese and the unmitigated loss of these sites would in combination negatively affect the long term resilience of the network. Worked examples are included in Appendix 3.
38. The funding secured, via section 106 agreements, will be used to enhance, manage and monitor the wider solent wader and brent goose ecological network. This funding will be managed by the respective local authority and will be used to support schemes across the network, this includes those in neighbouring authority boundaries.

Candidate Sites

39. Candidate sites have records of large numbers of waders or brent geese. However, the large numbers have been recorded less than 3 times from 2006/2007 to present day. Further surveys are necessary to determine the classification of the site and it is likely that these sites will fall into the higher use categories, for example Core Area, Primary Support Area and Secondary Support Area.
40. As such, the maps identify the Candidate Core Areas, Candidate Primary Support Areas and Candidate Secondary Support Area. Depending on the existing records for the site, a minimum of one year survey, in appropriate management conditions, will be necessary to confirm the classification of the site. For some sites, where there has only been one survey to date, two years' of data may be necessary. Development proposals which are likely to affect these sites will need to undertake this survey work, as per the agreed survey methodology, to confirm the site's classification prior to assessing off-setting and mitigation requirements.

41. The agreed survey methodology is:

- To be undertaken by a suitably qualified and experienced ecologist
- A minimum of 12 surveys, equally spaced, between late October and early March to be undertaken 2 hours either side of high-tide and at a range of times (dawn, midday, dusk) throughout the season.
- Field evidence such as feathers, droppings to be recorded
- Using a standard recording form (in the Appendix of 2010 Strategy) to capture: observer name, date, time, species, count (or no birds seen), site code from the Strategy Maps, feeding/roosting behaviour, disturbance.

Indirect Effects

42. There is the potential for new development on land adjacent to or in close proximity to Solent waders and brent goose sites to impact on the ecological function of the network. Indirect effects may arise from increased recreational pressure and access to sensitive sites; overshadowing and lighting from new buildings; or noise and visual disturbance from construction work on land adjacent to sensitive sites. These activities and the presence of built form may reduce the functional area of a site available to roosting and foraging SPA birds.
43. Appropriate mitigation will be required where new development or changes to access and management has the potential to adversely impact the function of the ecological network. Detailed consideration will need to be given to the design and layout of new development adjacent to sites used by SPA birds to ensure there is no disturbance. Consideration should be given to potential impacts from new walking and cycling routes, access to open space, over-shadowing from built development and lighting. In the first instance, consideration should be given to avoidance measures, following which bespoke mitigation should be proposed.
44. The level of mitigation necessary will be determined on a case by case basis. Mitigation could include a range of access management measures such as fencing, signage, interpretation and timing of works / operation. Consideration could be given to improving the management of the site or, if this is not possible, improved management of an alternative site within the network. The provision of funding for wider management of the sites within the network is also an option for consideration.
45. There may be situations where the indirect effects cannot be mitigated by access management measures and the potential for an adverse effect on the integrity of the site remains. In these cases, the loss of the function of a site would need to be off-set by a replacement site.

Appendix 1 - Solent Waders and Brent Goose Strategy – Interim Project Report Year One : Site Analysis

In order to assess the importance of each site, a metric-based analysis technique was developed.

- 1) The first metric assesses each site in relation to population thresholds for species at national levels. The BTO publishes national and international thresholds for each species (BTO, 2017), after which a count of that species should be considered important, scoring as follows:
 - 0: Site has less than the GB threshold for any species
 - 1: Site has more than the GB threshold for any species.

- 2) The second metric assesses each site in relation to population thresholds for species at local levels. It compares records for species that are designated a 'feature of interest' in the closest SPA i.e. the number of birds recorded compared to the population size listed in the SPA designation (JNCCa, 2017; JNCCb 2017), scoring as follows:
 - 0: Site has >1% of SPA's designated population
 - 2: Site has 1-5% of SPA's designated population
 - 3: Site has ≥5% of SPA's designated population

- 3) The third metric assesses the 'feature of interest' for the closest SPA for species assemblage. The total of all max counts for all species recorded, compared to the assemblage population size listed in the SPA designation (JNCCa, 2017; JNCCb 2017), scoring as follows:
 - 0: Site has >1% of SPA's designated assemblage population
 - 2: Site has 1-5% of SPA's designated assemblage population
 - 3: Site has ≥5% of SPA's designated assemblage population

- 4) The fourth metric is the max count of any target species recorded on the site

- 5) The fifth metric this relates a site's importance to a network score for birds moving to and from the intertidal areas to inland sites, and between inland sites. This metric uses data from the HIWWT bird movement surveys. The network of sites used by brent geese and waders were mapped, and all movements where both the origin and destination were observed by a surveyor analyses. The properties of this network were then assessed, this identified two types of site: those that function as 'hubs', with connections to lots of other sites, and those that function as 'bottlenecks, linking two areas of the network together.

Appendix 2 - Methodology to Calculate the Costs of a Replacement Site

46. A suggested methodology to calculate the costs of a replacement site is set out below. Alternative approaches to calculating the cost of replacement sites are possible and will be examined on a case-by-case basis.

1) Costs of managing the existing sites

The level of funding per hectare of un-replaced secondary sites may be calculated using the DEFRA biodiversity multipliers, or similar mechanism, with funding to the equivalent value of an 80 year Countryside Stewardship Payment – Creation and management of wet grassland for wintering waders and wildfowl (GS12 and GS10), with threatened species supplement and single farm payment.

2) Use of Defra multipliers as replacement habitat off-site

As replacement habitat will be provided off-site, Defra multipliers are used to take into account the difficulty of successfully re/creating the habitat to be lost (risk multiplier), the difficulty of securing land for off-setting habitats (spatial multiplier) and the length of time for habitat creation (time multiplier).

Habitat creation and maintenance over 80 years	GS12 Creation of wet grassland for wintering waders and wildfowl	£310 per hectare Year 1 – 10
	GS10 Management of wet grassland for wintering waders and wildfowl	£157 per hectare Year 11 – 80
	Threatened Species Supplement	£120 per hectare Year 1 – 80
	Single Farm Payment	£149 per hectare (based on 2016 prices) Year 1 – 80
	Total costs per hectare	£35,610
Defra Metric multiplier	Risk Metric Low Risk – creation of arable field margins, coastal floodplain grazing marsh, improved rough grasslands	X 1
	Spatial Metric Compensation habitat (CH) is provided but is located elsewhere, but is nevertheless considered to be significantly contributing to the buffering, linking, restoring or expanding of existing habitat. To be used for the partial compensation of Secondary Support Areas not directly fully replaced, either onsite or elsewhere, but through the provision of funding towards the management and enhancement of the wider waders and brent geese ecological network.	X 2
	Time Metric	X 1.2

	Years to condition < 5 years	
Secondary Support Areas	Total offsetting costs per hectare of functional habitat lost to development and not directly replaced on site, or elsewhere.	£85,464

Table A Indicative Compensation Costs for Creating and Managing Replacement Habitat (per hectare) – Based on Countryside Stewardship Grants 2017¹¹. (Future changes to these costs will be revised in line with any changes to Countryside Stewardship Payments or equivalent, and subject to review)

¹¹ <https://www.gov.uk/countryside-stewardship-grants>

Appendix 3 - Worked Examples

Example 1

A new housing application on a Secondary Support Area will result in the loss of 8 hectares of functional area. No on-site avoidance or mitigation measures will be provided, therefore a cost to manage an equivalent area off-site is required. In this situation, the cost per hectare is £85,464, as set out in Table 1.

The off-setting costs area $£85,464 \times 8 \text{ ha} = £683,712$.

Where the functional area of a Secondary Support Area is to be lost in its entirety with no direct replacement of habitats by the applicant then additional measures will be necessary to ensure the continued ecological function of the network. Appropriate measures include the use of companies such as the Environment Bank to ensure appropriate sites are provided elsewhere within the network, the funding of an identified strategic offsetting site or project that has been agreed by the SWBGS Steering Group, or in addition to Table 1, an additional agreed level of funding for land purchase.

Example 2

A new housing application on a Secondary Support Area will result in the loss of 50 hectares of functional area. On-site mitigation will be provided in the form of a 5 hectare SPA bird refuge area. This is supported by an agreed costed habitat management plan and funding secured in perpetuity. The provision and ongoing management of replacement habitat will be delivered by a suitable third party (such as HIWWT, RSPB, Local Planning Authority, Hampshire County Council, Land Trust etc) through a legally binding management agreement.

However, the on-site mitigation only partially offsets the loss of the 50 hectares of functional land and costs to manage an area off-site are required. In this situation, the cost per hectare is £85,464. A detailed assessment of the site identified that an equivalent area of 5 hectares was required.

In addition, to the on-site provision, off-setting costs are required - $£85,464 \times 5 \text{ ha} = £427,320$.

As there is a direct replacement of habitat on site. No other additional measures are necessary as this on-site provision will ensure the continued ecological function of the network.

Example 3

A new housing application on a Low Use site will result in the loss of 10 hectares of functional area. The application includes 4 hectares of open space, but no on-site mitigation for the SPA birds. The off-setting costs are calculated based on the loss of function area of 10 hectares.

In this situation, the cost per hectare is £35,610.

The costs required are $£35,610 \times 10 \text{ ha} = £356,100$.

