

Appendix I: Summary Responses to Consultation

HRA Report Reference	Comment	Response	Action Required
Natural England (05 May 2016)			
General	Natural England is of the opinion that the draft HRA focusses too heavily on Brent geese over other wintering bird species, and so is skewed in its assessment, especially around the potential effects of disturbance. The assemblage of wintering wildfowl and waders is an important interest feature and the HRA needs to consider this; rather than just focussing on those individual species which are present in internationally or nationally important numbers in their own right.	<p>The draft HRA concentrated on Brent Geese as they are the main qualifying species under the SPA and Natura 2000 site associated with habitats adjacent to site. However, the reasoning for limited human disturbance detailed in the draft HRA applies to the generic bird population. This includes the minimal intertidal habitat that can be utilised by forging birds within close proximity to the proposed development.</p> <p>The EECOS 2012 report identified that the five year peak mean counts for water bird assemblage on the Crouch-Roach Estuaries displays a consistent upwards trend since 2000, suggesting that increasing human disturbance is not currently having an adverse effect upon wintering bird numbers. Additionally, the associated SSSI designation and survey data from the EECOS 2012 report suggest the adjacent intertidal habitats to the application site are only frequented by notable wintering bird numbers in times of severe weather. These periods of severe weather conditions will generally in turn cause reduced human disturbance along the coastal footpath.</p>	No further action required.
	Although the survey work carried out for the Hayes Farm Leisure Park development was very limited, one of the three counts was carried out in more severe weather conditions and did indicate that this part of the estuary to the west of Hullbridge supports greater numbers of birds during such conditions. In addition, the SSSI citation includes the statement that: "Several more species of wader	<p>Of the bird species listed in the SSSI citation, only Teal, Lapwing, Dunlin and Black-tailed Godwit were recorded during the EECOS 2012 survey at levels that may be significant to the integrity of the estuaries complex. These numbers were recorded after a period of severe weather as stated in the SSSI citation. However, these periods of severe weather conditions will generally in turn cause reduced human disturbance along the coastal footpath.</p> <p>The reasoning and logic for limited human disturbance along the coastal path detailed in the draft HRA also applies to the generic bird population.</p>	No further action required.

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	<p><i>and wildfowl reach nationally important levels during harsh winters, using upstream areas of the Crouch and Roach which provide relatively sheltered conditions". The HRA should therefore include consideration of this issue.</i></p>		
	<p>With regard to the loss of supporting habitat, paragraph 3.10 concludes that the fields to be built on are not very attractive to Brent geese because of their proximity to the noise, lighting and visual impact of Hullbridge. It could be argued that the development would itself be likely to have a similar effect upon the adjacent undeveloped fields further to the west. However Natural England accepts that this area is apparently only currently used by relatively small numbers of Brent geese, so this effect may not be of particularly great importance.</p>	<p>Only small numbers of a limited range of bird species were identified utilising the agricultural land within the surrounding landscape. It is therefore considered that development is not likely to have a significant effect as a result of increased disturbance on the agricultural fields to the west.</p>	<p>No further action required.</p>
	<p>Paragraph 3.16 suggests that only 55 of the proposed 500 new households will own a dog and that therefore there will be about 55 additional dogs. It is our understanding that the figure of 23% is the percentage of all households that own dogs; not just of pet-owning households. In any case, this doesn't take into account that a significant proportion of dog-owning households will actually own more</p>	<p>Although there is the possibility of multiple dogs per house hold. The general disturbance activity does not increase proportionally. The householder will walk the dogs simultaneously equating to a single disturbance event. Despite this, the HRA report will be updated to reflect this comment.</p>	<p>Section 3 updated to reflect this comment.</p>

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	<p>than one dog (ie 55 dog-owning households would be likely to equate to significantly more than 55 dogs). According to the 2011 census, the human population of the UK was around 63,182,000. An RSPCA report in 2014 suggested that the canine population of the UK was about 9,000,000. This would suggest a ratio of approximately 1 dog for every 7 people in the UK. Applying this ratio to the proposed 500 dwellings would imply that there would be likely to be approximately 170 additional dogs; or about three times as many as suggested by the draft HRA.</p>		
	<p>The following paragraph (which incidentally is currently also numbered 3.16) suggests that the section of the Crouch to the west of Hullbridge is already too disturbed to be very attractive to birds: however this does not necessarily imply that additional disturbance won't have an effect. Notwithstanding the current relatively low levels of bird usage, this area may still provide functional habitat, particularly in severe weather conditions, and additional disturbance could potentially result in it reaching a 'tipping point' beyond which this functionality is lost or severely degraded.</p>	<p>Noted. However, as described previously, disturbance events will decrease during periods of severe weather.</p>	<p>No further action required.</p>
	<p>Paragraph 3.18 concludes that, as</p>	<p>Noted. Para 3.18 does not conclude that a lot of residents would</p>	<p>Section 3</p>

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	<p>residents would be likely to walk past the Kendal Park LNR to get to the Crouch, a lot of them would stop there and not proceed further to the Crouch. The LNR in question is quite small (2.77ha) and may not provide a sufficiently large area for some users, particularly for the exercising of larger dogs. This also pre-supposes that residents will access the Crouch via the main road; rather than via 'shortcuts' through existing residential areas; or the footpath to the west to form a circular dog-walking route of about 2.8-3km, including about 550m beside the Crouch.</p>	<p>stop at the Kendal Park LNR, it merely states that it provides an alternative leisure resource that would alleviate some of the human disturbance along the southern bank of the River Crouch. The paragraph should also note that there is a significant level of green and public open space being provided as part of the development (22.38 ha). It should also be revised to state that there is a large area of flexible public open space being provided in the north west of the site and there are links/connections from this area to the majority of other GI and open space being provided as part of development.</p>	<p>amended to provide additional clarification in terms of the level of GI and open space provided as part of the development.</p>
	<p>Paragraph 3.18 also appears to imply that, as the days get shorter with the onset of winter, so the period during which the birds might be disturbed will also reduce as a proportion of the whole day. There is a valid counter-argument that, as the shortening day length will also reduce the daylight period available for feeding, so each incident of disturbance will affect a greater proportion of this available feeding period and is therefore likely to be more serious in its effects upon the birds.</p>	<p>Noted.</p>	<p>No further action required.</p>
	<p>In order to reduce the impacts upon the SPA / Ramsar site, we recommend that Rochford District Council should apply a planning condition to secure</p>	<p>Noted and agreed. To reflect this comment, the HRA will recommend that the Council should apply a planning condition to secure the detailed design of the on-site green infrastructure, to ensure that opportunities are taken to design-in circular walks / dog-</p>	<p>Section 3 and 4 of the HRA Report amended to</p>

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	the detailed design of the on-site green infrastructure, to ensure that opportunities are taken to design-in circular walks / dog-walking routes and associated facilities as an alternative to walking along the SPA / Ramsar site.	walking routes and associated facilities as an alternative to walking along the SPA / Ramsar site.	reflect this comment.
	Having reviewed the HRA, Natural England considers that there are points of weakness in the assessment and some of the data used: however we do not, at this time, wish to state that the above points will necessarily alter the conclusions reached by the draft HRA.	Noted.	No further action required.
	Nonetheless, these are important issues which do need to be properly addressed, and seen to be addressed, by the HRA in order that Rochford District Council can place reliance upon its conclusions. In the current absence of clarity regarding these points, we do not yet feel able to support the overall conclusion of the draft HRA that the project is not likely to have an adverse effect upon the integrity of the Crouch and Roach Estuaries SPA / Ramsar site.	Noted, these issues have been addressed in turn above.	No further action required.