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By email only

RE: Request for supporting evidence from RSPB in relation to Natural England's statutory advice provided to Lancaster City Council (specifically relating to Local Plan Policy SG14)

The Royal Society for the Protection of Birds (RSPB) supports the position of Natural England in this case and is in agreement with the statutory advice provided in the letter from Elizabeth Knowles to Lancaster city council dated 5th February 2019, reference 269386.

Heysham helipad and the adjacent seawall has historically been one of the most important high-tide roosting sites for wintering wading birds within Morecambe Bay and the Duddon Estuary. The combination of an open aspect, shorter vegetation or hardstanding and the close proximity to feeding habitat on Heysham flat mussel skewer in addition to the restricted public access preventing disturbance makes the site one of the most suitable roosting areas for wading birds within the wider bay.

The site is utilised by a suite of SPA species throughout the winter including but not limited to; knot, oystercatcher, ringed plover and redshank. Historically numbers utilising the site have exceeded 20,000 individual birds (Lancashire bird report 2004). More recently the site utilisation has fallen, likely due to anthropogenic factors but the site remains frequently used by significant numbers of SPA species. Any detrimental development or change of use of the helipad or adjacent seawall risks disturbing and/or displacing these species. This may result in a loss of site integrity by restricting the ability of SPA species to access and utilise important areas of supporting habitat.

To reiterate the points raised within Natural England's statutory advice;

- Heysham helipad and the adjacent sea wall should not be included within the site allocation proposals (SG14 Imperial Road/Port of Heysham expansion).
- If the helipad roost site is to remain in the site allocation the HRA needs to fully assess the impacts and provide evidence that inclusion of the site within the plan will not adversely impact the integrity of Morecambe Bay and Duddon Special protection area (SPA) and Morecambe Bay Ramsar. The current HRA fails to do this.

Yours sincerely

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