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Keith Morgan
Adur District Council
Civic Centre
Ham Road
Shoreham by Sea
West Sussex BN43 6BR

27 August 2010

Dear Mr Morgan

Application Number: ADC/0296/10
Proposal: Temporary mooring (for 6 months), of barge 'Redwood' on north side of houseboat 'Myrtle' during its conversion to a houseboat to replace 'Myrtle'.
Location: Houseboat Myrtle 2 Riverbank, Brighton Road, Shoreham by Sea

Thank you for consulting the RSPB on the above application.

As you are aware, the RSPB owns the intertidal area to the west and north of the application site, and manages it as a nature reserve. The application site and RSPB reserve is also designated as part of the Adur Estuary Site of Special Scientific Interest (the SSSI). The RSPB wishes to ensure that the application does not significantly impact either the SSSI or RSPB reserve. Our view is that it is possible to avoid a significant impact through conditions, as set out below. Therefore, subject to these conditions being put in place, the RSPB does not object to the application.

In order to bring 'Redwood' in to its proposed mooring, it will have to come across the SSSI and RSPB reserve. The application documents state that the intention is to bring the barge in on the high tides of 9/10/11 September. This is a tight timescale to gain planning permission. The RSPB is concerned that bringing the barge in does not damage the intertidal habitat. Therefore, we recommend a condition being placed on any permission granted that the barge be brought in on sufficiently high tides so that it is not necessary to dig a channel through the intertidal area.

The application documents state that once 'Redwood' is converted to a houseboat, the owners will try to sell 'Myrtle' to one of the other houseboat owners. The RSPB would like to ensure that any subsequent movement of 'Myrtle' is done on a sufficiently high tide so that it does not impact on the intertidal habitat of the SSSI or RSPB reserve. However, we note that the disposal of 'Myrtle' is not part of this application, so are unclear whether this could be conditioned.

Whilst the barge 'Redwood' is moored in its temporary position to the north of 'Myrtle', it will mean the loss of part of the intertidal habitat of the SSSI. The SSSI is important for wintering waders that feed in the intertidal mud. Therefore, whilst 'Redwood' is in place this area of mudflat would not be available to the birds for which the SSSI is designated. As the area is small, the RSPB does not feel the loss would result in a significant adverse effect on the SSSI provided that 'Redwood' is not moored to the north of 'Myrtle' for more than one winter.

The application documents note that foul sewage is currently discharged straight to the estuary, but that the applicant would connect to the mains sewer if and when this is extended along the footpath as part of the flood defence works currently proposed by the Environment Agency. If such a connection were able to be ensured by the Council, this would clearly be a definite improvement on the current situation.

In summary, the RSPB does not object to the application for temporary mooring of the barge 'Redwood', provided that conditions are placed on any permission granted such that boat movements occur on sufficiently high tides to avoid damage to the intertidal habitat of the SSSI, and that 'Redwood' is not moored to the north of 'Myrtle' for longer than one winter. If it is possible ensure connection to the mains sewer, the RSPB would strongly recommend this as an enhancement to the SSSI.

I hope these comments are useful. Please get in touch if you would like further detail.

Yours sincerely

[redacted]

Alison Giacomelli
Conservation Officer

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cc. Emma Kelman, Natural England