

Dear Daphney,

APP/19/01101 | Hybrid planning application comprising; full planning application for the erection of 130 dwellings with the creation of new access onto College Road, landscape, drainage, car parking and associated works; and outline planning application for up to 650 dwellings, community and nursery facility (use class D1 and D2), retail unit (use class A1), public open space, landscaping, diversion of public right of way and associated works and infrastructure. | Land East Of, College Road, Campdown, Purbrook, Waterloooville 19.2581

Thank you for consulting me on this application. In summary, I have concerns in relation to the impact on biodiversity and consider that additional information is required. I have set out the most significant issues below.

The application is accompanied by an Environmental Statement (WYG, October 2019), a Wintering Bird Survey Report (WYG, March 2017), a Bat Survey Report (WYG, October 2019), a Hazel Dormouse Survey Report (WYG, October 2017) and a Winter Bird Mitigation Strategy (WYG, August 2018).

SPA supporting habitat

The application site is listed within the Solent Waders & Brent Goose Strategy (SWBGS) as Sites H02A, H04B, H113 and H125 with records of both dark-bellied brent geese and wader species using these sites. I have personally observed both brent geese and curlew within H02A, the latter in substantial numbers, and both were directly observed flying to the site from Chichester & Langstone Harbours SPA/Ramsar. The birds I observed used the site for feeding, resting and bathing. The proposals would result in the direct loss of substantial areas of SWBGS Primary and Secondary Support Areas and Low Use Areas, entailing essentially all available habitat at the site and would therefore clearly have a demonstrable impact on the nearby SPA/Ramsar via impacts to functionally-linked habitat. There is no provision for on-site mitigation in the submitted proposals and it is evident that avoidance of impacts has not guided development proposals.

The loss of this SPA supporting habitat will need to be compensated in order to provide a site of comparable function for the same population of SPA birds. Given the size of the area to be lost this is by no means a straightforward situation. Of particular concern is the ability to provide a suitable compensatory site for curlew. It is clear that the Campdown area is attractive to significant numbers of curlew (potentially the single largest terrestrial site for this species in the Chichester & Langstone Harbours SPA catchment, with c.4% of the total SPA wintering population occurring at this site) and thus of very high conservation value. Curlews are a fast-declining species and are currently the subject of much attention in the scientific conservation community.

The proposed mitigation strategy is for a new bespoke wintering bird refuge located at Broadmarsh in Havant, c.1km south of the site. Whilst this site has been mooted as a potential permanent bird refuge, no firm details of this have been agreed between the applicant and Havant Borough Council, the landowners. The use of the Broadmarsh area is, on paper, sensible: the entire site lies within local authority ownership and it is immediately adjacent to intertidal habitat which supports substantial numbers of SPA

bird species, including brent geese and curlew. It is to be hoped that by providing a permanent refuge in such close proximity to the SPA intertidal, the birds will choose to use it when conditions are to their liking.

However, the success of any proposed mitigation is essential. The key issue deterring bird use of the existing Broadmarsh site is likely human disturbance. The Broadmarsh fields are heavily used by walkers and dog walkers, with a network of informal paths present across all open areas, and birds do not have sufficient disturbance-free habitat to use. It is also unclear whether birds using the Campdown site will use Broadmarsh if available, or whether they are most likely to continue use of the 'traditional' habitat at Campdown. Curlew in particular are unlikely to settle in habitats with regular disturbance.

Whilst the proposal for a permanent wintering bird refuge at Broadmarsh is acceptable in principle (it is the only potentially-viable option other than to reduce the developed area and retain existing habitat), no details have been provided that demonstrate if this deliverable and there is minimal confidence that it would be successful. I am not aware of any detailed discussions between the applicant and Havant Borough Council that would provide confidence that mitigation is achievable. Additionally, given the importance of the Campdown site there would need to be confidence that any proposed mitigation would be likely to succeed in attracting birds. In early pre-application discussions the idea was floated of trial experiments at Broadmarsh: the use of temporary fencing (perhaps with decoys) to create undisturbed habitat and monitoring of birds' reactions. This has not occurred. If trials had proven successful then there would be a much-increased confidence in the proposed mitigation.

On the issue of SPA supporting habitat I cannot support the current proposals: there will be a net loss of important supporting habitat and with no demonstrable compensatory solution. It is not clear if the proposed mitigation is either deliverable or likely to succeed: on that basis I do not see how the loss of SPA supporting habitat is consistent with the requirements of the Habitats Regulations. A carefully-crafted bespoke solution is required and this must be based upon detailed evidence that provides reassurance that any mitigation package is deliverable and is more likely than not to prove effective.

Other issues

The site appears to be a remnant of an older farmed landscape on the northern edge of Portsdown Hill. Early maps show the area to have been woodland in the mid-19th century, then cleared for pasture. The grassland has been described as neutral semi-improved pasture and is grazed by ponies. I am concerned that the only survey of vegetation was carried out in November 2016. A late-autumn/early winter assessment of vegetation has the potential to result in some species being missed altogether and thus an inaccurate valuation of habitat. Semi-improved grasslands can be species-rich or species-poor and everything in-between, but deciding on which requires surveys at the appropriate time of year. The difference is sometimes subtle and requires proficient botanical knowledge. A species-rich or 'good' semi-improved grassland would be included within the definition of Priority Habitat and its presence is therefore of importance in determining impacts and subsequent mitigation requirements.

The adjacent golf course and immediate surrounding fields support several notable plant species including fly orchid and autumn lady's-tresses as well as some interesting remnant calcareous grassland species. I would expect areas of semi-improved and lightly-grazed 'old' pasture locally to include some notable plant species and am therefore concerned that the true composition of these fields has been under-recorded through the out-of-season timing of the survey visit. Clarification is requested on the botanical value of these fields and additional survey effort should be employed as necessary.

The field boundaries contain a network of valuable hedgerows and trees. These features will predominantly be retained, although a section of central east-west aligned hedge is to be lost as is a collection of trees within the south-east of the site.

Hazel dormouse is present within the site boundaries and more widely in the surrounding landscape. Impacts to dormouse habitat will occur – directly through habitat loss and indirectly through the proximity of development. Some mitigation/compensation measures are provided, although these date from 2017 and are seemingly not informed by the latest site proposals (e.g. *'If any hedgerows are to be removed...'*). Again, it would appear that no effort has been made to avoid impacts to this species e.g. by retaining suitable habitat.

Bat surveys have been carried out. These comprised three walked transects – in late October, early April and mid-June – as well as three bouts of automated detector surveillance. It is not clear where the single automated detector was positioned: it is not shown on Figures 3-5 as stated in the bat report. For such an extensive site of 31 hectares, a single automated detector is wholly inadequate. In addition, the automated bat detector in autumn 2016 was stolen and the detector in summer 2017 failed: there is no automated detector data for either of these periods, which is a very significant limitation.

The bat report states that an updated assessment would be required after October 2019. I suspect that this will conclude that site conditions remain similar and no further work is required. I would query whether the limitations in the bat survey methods – transects at the extreme end of the autumn period (late October) and very early spring (6 April), as well as the failed automated detector surveys – have provided anything like an adequate assessment of bats at this extensive site. We have no automated detector data for the entirety of 2016 except for five days in early April. Bat activity at this period is likely to be limited (it is very early in the bat active season) and therefore we cannot be said to have an accurate representation of bat activity at the site. Automated surveillance is much more likely to provide a robust assessment of bat species than a walked transect. I am unsure why, in the intervening two/three years, no surveys were carried out in order to fill in the obvious gaps. Again, we currently have a total of five consecutive days' data from early April as a basis for assessing the value of the site for bats.

The site, comprising an expanse of semi-improved pasture with grazing animals present and in close proximity to woodland, is likely to be used by various bat species. I am surprised at the relative paucity of bat species recorded here: one would expect at least twice as many species to occur in most comparable sites in the Havant area. The site is also within range of the very rare Bechstein's bat which is known to occur

in nationally-important numbers c.3km to the north-east at Havant Thicket and surrounding woodlands. The site is within the 'Bechstein's Area of Search' as defined by Policy E15 of the Havant Borough Local Plan 2036. This area of search was determined using the Bat Conservation Trust's recommended Core Sustenance Zone for Bechstein's bat of 3km. Policy E15 expects any development within 3km of known Bechstein's bat records, and which will result in the loss of suitable habitat, to consider this species in impact assessments.

The above are what I consider to be the most pressing issues at this site. If satisfactory outcomes can be achieved for these then I would expect additional information to be provided of fully-detailed ecological mitigation, compensation and enhancement measures which should include demonstrable biodiversity net gain.

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

Kind regards,

Tristan

Tristan Norton

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