

From: Norton, Tristan <Tristan.Norton@hants.gov.uk>
Sent: 29 April 2020 12:09
To: Haywood, Daphney
Cc: Havant Planning and Development Mailbox New
Subject: APP/19/01101 Land East Of, College Road, Campdown, Purbrook, Waterlooville 20.0451

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, Waterlooville 20.0451

Thank you for consulting me on this application: please accept my apologies for the delay in responding. In summary, I maintain that there are significant concerns in relation to biodiversity impacts, primarily relating to the suitability and deliverability of compensatory habitat for wintering bird species.

The application is accompanied by two letter reports (WYG, March 2020) providing responses to comments raised by Natural England and myself. A revised Mitigation Area Creation, Management & Monitoring Strategy (WYG, March 2020) is also included. This last document contains details of the proposed management of the Broadmarsh refuge and is essentially identical to a document submitted for the nearby Forty Acres development site (e.g. text refers to three wader scrapes although proposed plan shows many more).

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. The total area of SPA supporting habitat being impacted is 23.3 hectares. I concur with comments made by the RSPB in relation to the focus on the loss of H02B: the loss of supporting habitat is much greater than this one field.

The proposed mitigation strategy is for a new bespoke wintering bird refuge located at Broadmarsh in Havant, c.1km south of the site. In principle, the use of Broadmarsh as a potential permanent bird refuge makes sense: it is immediately adjacent to one of the most well-used intertidal habitats for SPA birds, there are previous records of SPA birds using the Broadmarsh fields, there is a proven connection between the intertidal here and the application site (birds observed flying directly between the two) and its local authority ownership means that management options are relatively straightforward.

However, there are a number of issues with the proposed use of Broadmarsh. The proposed compensatory area is c.8Ha in size, resulting in a substantial net loss of habitat. Whilst the published Mitigation Guidelines for SPA supporting habitat allow for some uplift in value from a move to seasonally- to permanently-available habitat, any uplift gained here would be insufficient to address the net loss. The application site is permanent grassland and has been so for many years: the fields are all available to birds every year and are all used.

It is unclear whether the proposed land is available and whether the proposed changes to this well-used public greenspace are acceptable/desirable to the local planning authority. The proposals would entail changes to the current use of the site by the public and would need to be carefully managed: unfettered open access to these fields is well-established and may prove unpopular and lead to issues with new infrastructure.

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.

The latest iteration of the Havant Local Plan contains a policy on potential permanent bird habitat at Warblington Farm c.4km to the south-east. Some fields at Warblington are already used by wintering curlew and large numbers of brent geese. It is unclear whether Warblington, if habitat was made permanently available and could be secured, would attract curlew or other birds from the application site. From recent surveys it is apparent that birds within the Solent occur in generally discrete populations, favouring traditional sites and with little mixing. I am unsure whether the loss of habitat at Campdown would mean that birds would switch to a new site at Warblington. Would Warblington provide the same function?

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 and deliverable compensatory solution that provides the same function as the impacted site. 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. The submitted strategy is essentially identical to that at Forty Acres and not a bespoke strategy for the very different impact at Campdown.

Other issues

I maintain that the bat data are insufficient, despite the additional clarifications. 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 not provided an adequate assessment of bats at this extensive site. The single transect in June 2017 was the only walked survey carried out in optimal conditions and cannot be used as a representative sample of all bat activity. I would suggest that a large, livestock-grazed site adjacent to ancient woodland and containing trees and hedgerows should not be considered as a 'low suitability' site in the first place. There are suitable habitat linkages east-west and north-south – these are at the site boundaries but the site clearly has suitable foraging/commuting routes which would increase its suitability. In essence, we do not have any idea of bats' use of the site for most of the year. Again, the last bat surveys were carried out in 2016/17, with no updating surveys undertaken to address the very obvious limitations, particularly the automated surveys. It is only on p.15 of the bat report that any indication of missing data is provided. The report also states that 'the automated bat detector at the site recorded up to three bat species between September 2016 and August 2017, when in fact it was only operational for five days in April 2017.

Bat activity at this period is likely to be limited (it is very early in the bat active season, despite the apparently suitable weather conditions) 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 which is insufficient.

Clarification on hazel dormice and plant species is acknowledged.

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

Kind regards,

Tristan

Tristan Norton

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Coronavirus (Covid-19)

Hampshire County Council's response to the Covid-19 is available here (<https://www.hants.gov.uk/socialcareandhealth/coronavirus>).

In line with Government advice to reduce non-essential travel and work from home where possible, Ecology officers are now working remotely. Whilst we will endeavour to conduct our services in a timely manner and to meet statutory timescales where we can, there may be some impact to the services we deliver. We will ensure that we keep all applicants / interested parties informed of any further impacts to our services should they arise. The Council's response also means that no non-essential site visits or face to face meetings will be undertaken until further notice. Essential and contractual surveys may continue take place where there is no risk to the surveyor or the public, and in line with Government advice. This will be reviewed on an on-going basis.



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Please note that this advice is given in accordance with the Service Level Agreement that has been signed between Hampshire County Council and your Council. These comments are expressed as a professional view provided to Havant Borough Council and should not, therefore, be interpreted as those of Hampshire County Council.