



PLANNING APPLICATION APP/19/01101- HOS FORMAL RESPONSE

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 19.2581

For the attention of the Planning Department, Havant Borough Council

Dear Sir/Madam

I am writing to you on behalf of Hampshire Ornithological Society (HOS) to object to the planning application APP/19/01101 as detailed above, for the following reasons.

- 1) The proposed site is listed within the Solent Waders and Brent Goose Strategy (SWBGS) sites HO2A, HO4B, H113 and H125. The site is a designated area for wintering populations of Curlew and Brent geese.
- 2) The Eurasian Curlew is undergoing a significant population decline. It is included on the red list of birds of conservation concern¹ and is considered to be the most important bird conservation priority in the UK. In Hampshire the breeding population has declined from 100 – 140 pairs in 1991 to 40 – 50 in 2017.
- 3) Observers have regularly recorded both species feeding and roosting on the site in winter months.
- 4) Both species have been observed directly commuting between the proposed site and the SPA/RAMSAR sites of Chichester and Langstone Harbours, as such the proposed site must be considered to be functionally linked land and protected as such.
- 5) Any loss of habitat will not only require an alternative location of similar value to be located and designated; but under new planning laws issued by the Government, the new site would require an additional 10% net gain assurance in terms of biodiversity.

¹ Eaton MA, Aebischer NJ, Brown AF, Hearn RD, Lock L, Musgrove AJ, Noble DG, Stroud DA and Gregory RD (2015) Birds of Conservation Concern 4: the population status of birds in the United Kingdom, Channel Islands and Isle of Man. *British Birds* 108, 708–746.

This does not appear to be apparent in the current proposal. More information on this requirement can be found at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/819823/net-gain-consult-sum-resp.pdf

HOS has a significant concern that no suitable alternative site for Curlew and Brent geese has been found. One suggestion of Broadmarsh Coastal Park is likely to be woefully inadequate due to low level power lines, significant public access resulting in disturbance by walkers with dogs.

- 6) Finally, it is worth noting that Curlew tend to be faithful to a small number of wintering sites and simply providing a new location will not guarantee that the current birds will move. They are often committed to traditional wintering grounds; and the loss of these sites can have a long-term negative impact on the success of curlew as a species. Reputable reports that support this include:

<https://ec.europa.eu/environment/nature/conservation/wildbirds/hunting/docs/curlew.pdf>

In summary HOS opposes the development in its entirety and can see no viable solution at this stage that could make the proposal viable. Havant Borough Council would be well advised to reject the proposed development at the soonest opportunity.

Kind regards

A handwritten signature in blue ink, appearing to read 'Andy Lester', with a stylized, flowing script.

Andy Lester CEnv MCIEEM

Conservation Liaison Officer-HOS

Please direct correspondence to: andy.lester@arocha.org