

Mrs D Haywood
Havant Borough Council
Public Service Plaza
Civic Centre Road
Havant
Hampshire
PO9 2AX

Beechcroft House
Vicarage Lane
Curdridge
Hampshire
SO32 2DP

By email only:
planning.development@havant.gov.uk

e feedback@hiwwt.org.uk
t 01489 774400
www.hiwwt.org.uk

5th February 2020

Your Ref: APP/19/01101
Our Ref: 13.60.3.54

Dear Mrs Haywood

PROPOSAL: 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.

LOCATION: LAND EAST OF COLLEGE ROAD CAMPDOWN, COLLEGE ROAD, PURBROOK, WATERLOOVILLE

**STATUTORY DESIGNATED SITES:
CHICHESTER & LANGSTONE HARBOURS – RAMSAR, SPECIAL PROTECTION AREA (SPA)
SOLENT MARITIME – SPECIAL AREA OF CONSERVATION (SAC)
LANGSTONE HARBOUR – SITE OF SPECIAL SCIENTIFIC INTEREST (SSSI)**

Thank you for giving the Wildlife Trust the opportunity to comment on this hybrid planning application consultation. The Wildlife Trust has previously commented on development proposals at this site and have had a long-term involvement in providing evidence and strategic guidance regarding the key features of wildlife interest. From this point of view we share concerns with other respondents on matters of ecology.

The Solent Waders and Brent Goose Strategy¹ identifies H106, H02A, H02B, H113 and H125 as important sites within the ecological network; the area is regularly used by Brent Geese and waders; H106 and H02B are classified as a “primary support area” for the high numbers of curlew, with maximum counts of 133 birds having been recorded. It is considered that the loss of this site will negatively impact on the function of the SPA; under the Habitats Regulations compensation must be secured to ensure no net loss of roosting or feeding resource whilst maintaining the ecological coherence of the network of statutory sites.

¹<https://solentwbgs.files.wordpress.com/2017/02/solent-waders-and-brent-geese-strategy.pdf>

The proposed mitigation site proposed does not follow the recommendations in the Mitigation Guidance² for primary support areas:

“19. There will be a requirement for the off-setting area to fulfil the same special contribution and particular function of the areas lost or damaged for the same species of birds.”

The proposed mitigation site fails in all site guidance criteria (A-I), vitally in terms of both size and suitability; it's ecological character, levels of disturbance make it unsuitable and unlikely to be used. We consider that the mitigation site has a high likelihood of recreational disturbance, and there is a real risk of displacement of existing recreation at the mitigation site onto the SPA. A smaller site has the potential to be effective if it has high certainty of increased functional value to SPA birds, but we are very sceptical that this is the case here. We consider that the proposals do not provide net gains for the biodiversity features lost and furthermore will lead to loss of function to the Local Ecological Network.

In summary, the development proposal results in significant lost habitat and function for SPA birds; we consider that the off-site mitigation proposed is insufficient in both size and scope for effectiveness. For these reasons the Wildlife Trust **objects** to the proposals.

The above advice is given based on the information made available at this time and may change should further or amended details be submitted. We trust that you will find our comments helpful and if you wish to discuss these matters further, please do not hesitate to do so. I also ask that you keep the Trust informed of the progress of this consultation.

Yours sincerely



Dr David Rumble
Senior Policy & Evidence Advisor

Direct Dial: 01489 774433

Main Switchboard: 01489 774400

Email: David.Rumble@hiwwt.org.uk

² <https://solentwbgs.files.wordpress.com/2018/11/swbgs-mitigation-guidance-oct-2018.pdf>