

Mr L Oliver
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19th November 2018

Your Ref: APP/18/01033
Our Ref: 13.70.3.42

Dear Mr Oliver

PROPOSAL: RESIDENTIAL DEVELOPMENT COMPRISING 69 NO. DWELLINGS WITH ACCESS FROM ST GEORGE'S AVENUE TOGETHER WITH ACCESS, CAR PARKING, LANDSCAPING, ELECTRICAL SUBSTATION AND ASSOCIATED WORKS.

LOCATION: LAND EAST OF, CASTLE AVENUE, HAVANT

**DESIGNATED SITES: CHICHESTER AND LANGSTONE HARBOURS – RAMSAR, SPECIAL PROTECTION AREA (SPA); SPECIAL AREA OF CONSERVATION (SAC).
CHICHESTER HARBOUR – SITE OF SPECIAL SCIENTIFIC INTEREST (SSSI)**

Thank you for consulting the Wildlife Trust in relation to this application. We have reviewed the ecological report¹ and have the following comments;

The proposed development site has been identified as one of the network of sites included within the Solent Waders and Brent Goose Strategy. The site is classified H19 a 'low use' site by virtue of previous use by curlew *Numenius arquata* during the winter months. H19 comprises two fields that are divided by a hedge; the western part covers approximately 1.6 hectares with the eastern part covering approximately 6.7 hectares.

We are pleased to see that the applicant's ecologist has referred to the Strategy and the Mitigation and Off-setting Guidance, which has now been finalised and no longer in draft. We note that additional winter bird survey work has been carried out during February 2017.

The ecological report considers the proposed development site to be unsuitable for over-wintering birds linked to the nearby SPA given its size and generally enclosed nature. It goes on to state that the larger parcel of land, which falls outside of the development footprint, but still forms part of H19, is more suited. As such, the recommendations and conclusions section of the report considers that there will be no requirement for the applicant to contribute to the strategy to offset the loss of part of the low use site, and that modest mitigation measures, such as new hedge planting and signage would be sufficient.

¹ ECOSA (October 2018) Land at Castle Avenue, Havant, Hampshire – Ecological Assessment Final Rev.2

We acknowledge the comments made by the applicant's ecologist and agree that the larger parcel of land may be more suited for use by SPA birds. However, we do not agree that a site approximately 60 metres by 300 metres covering 1.6 hectares and comprising predominantly semi-improved grassland, is completely unsuitable. In our opinion a precautionary approach should be adopted considering that the curlew may have been using the smaller area, and robust mitigation measures should be provided as detailed in the mitigation and off-setting document.

With regard to the measures proposed, we are concerned that additional hedge planting and signage do not provide sufficient certainty to ensure that new residents will not stray into the field, in the short-term or for perpetuity. The purpose of the contributions, as detailed in the Guidance on Mitigation and Off-setting Requirements document are to ensure that mitigation measures are robust and provide certainty that a network of sites will be available for waders and brent geese for the future. Therefore further consideration should be given to mitigation measures being proposed in our opinion.

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 planning application.

Yours sincerely

T D Codlin

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