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Your Ref: 13/00548
Our Ref: 13.60.3.33

Dear Heather

13/00548/FUL - Engineering works to improve drainage, groundworks to remodel golf course and landscaping works to increase land levels. (Revised Application) - Portsmouth Golf Club, Crookhorn Lane, Waterloo, PO7 5QL

The Wildlife Trust has been made aware of the above proposals which involve works to Portsmouth Golf Club, Crookhorn Lane, Waterloo. Whilst the Trust has no specific objection to the scope of the proposed works, we are very concerned at the lack of consideration and survey work with regard to dark-bellied brent geese *Branta bernicla bernicla* and **object** on these grounds. In addition, we note in the 'Design Rationale' letter (un-dated) that *'Every effort will be taken to ensure that there are minimal impacts on the surrounding playing areas during the course of the works'*, yet there appears to be no such statement concerning impacts on wintering birds nor a timetable of works aimed at minimising any impacts on the species'. Furthermore we have concerns with the extent of work proposed on part of the site which is designated for its nature conservation interest. Our concerns are provided in more detail below.

Wintering Birds

This application is supported by three ecological survey reports¹ for survey work carried out by ENiMS during 2011 and 2012. The survey work includes an initial extended Phase 1 habitat survey, carried out in November 2011 and further more detailed reptile and botanical surveys carried out in May 2012. The extended Phase 1 habitat survey includes a desktop study which details consultations with Hampshire Biodiversity Information Centre and the Multi-agency Geography Information for the Countryside website. The report documents the results of this desktop study but appears to make no mention of the potential presence of dark-bellied brent goose nor any reference the Brent Goose and Wader Strategy. As you will be aware internationally important numbers of wetland birds (geese, ducks and waders) winter along the south coast of Hampshire, as a result the whole area is highly designated. During periods of high water or as food resources on the intertidal diminish, birds move onto terrestrial sites near the coast to feed. These areas have been the subject of several studies and due to their importance for birds from the Special Protection Areas (SPA) and Ramsar sites, a

¹ ENiMS (December 2011) Extended Phase 1 Habitat Survey, ENiMS (May 2012) Botanical Survey, ENiMS (May 2012) Reptile Survey

strategy² was drawn up to protect them. The underlying principle of the strategy was conserving extant sites, creating new sites and enhancing the quality and extent of the feeding and roosting resources on the sites. This strategy was updated over three winters (2006 – 2009) to provide the Solent Waders and Brent Goose Strategy (November 2010). Within the 2002 strategy the Portsmouth Golf Course (site H01) site was classified as being of high importance for brent geese, and in the updated 2010 strategy it was identified as an ‘uncertain’ site. Havant Borough Council have recognised the difficulties in such assessing sites. The Borough’s site allocation plan has a policy and accompanying text which is set out below. We do not believe the lack of an assessment accompanying this application satisfies the intentions of the Borough’s policy.

Policy DM23 Sites for Brent Geese and Waders

Planning permission will be granted for development provided that it does not have a negative impact on identified Brent Geese and Wader sites, defined by the Solent Waders and Brent Goose Strategy (2010).

Development will only be permitted on sites identified as ‘important, in the strategy when studies have been completed that identify appropriate mitigation measures and a programme for the implementation of those measures is put in place. Where sites are identified as ‘uncertain’, studies will be required to be completed in accordance with an appropriate survey methodology in order to determine their level of importance.

In all cases, an appropriate survey methodology requires three consecutive years of survey data recording any sightings on the application site.

The accompanying text includes;

“Sites of important or uncertain value to Brent Geese and waders have been identified within the Solent Waders and Brent Goose Strategy (2010). Where sites are of uncertain value, site studies should be undertaken in accordance with an appropriate survey methodology in order to determine their level of importance. Appropriate methodologies should be approved by a professional ecologist and prepared in consultation with Natural England. One such methodology is outlined in the Solent Waders and Brent Geese Strategy (2010)”.

The Trust has recently received records from a volunteer who had recorded brent geese feeding on the field adjacent to Portsmouth Golf Course (site H02A) on eight dates between 25th January and 2nd February 2013. The numbers of geese recorded ranged from 70 to 180 birds, and on one date they were accompanied by Eurasian curlew *Numenius arquata*. Given that H01 and H02A are adjoining sites we would urge the council to refuse this application until such times as appropriate survey work is carried out on wintering wetland birds at the site, and a suitable mitigation package is provided.

Breeding Birds

The extended Phase 1 habitat report identifies that areas of scrub to be removed could impact on any breeding bird species that may be present. The enhancement measures suggested include the clearance of suitable nesting habitat outside of the breeding season, specifically October to February inclusive and the erection of nest boxes on trees. Whilst we acknowledge and agree with the removal of suitable breeding bird habitat outside of the breeding bird season, this is the period when it is most likely that brent geese will be present. Works carried out on the site during this period could have significant impacts on wintering birds, but as we have previously stated this report does not even consider the potential for wintering bird species, such as brent geese or waders, to be present therefore the recommendations have not fully considered the potential impacts of the proposals on all bird species.

² Brent Goose Strategy July 2002

In addition, the mitigation proposals for breeding birds suggests erecting nest boxes on trees, yet no detail of design of box or the number has been provided. Furthermore, much of the suitable bird nesting habitat to be removed consists of scrub and woodland. The species likely to breed on the site that typically nest in scrub type habitats, for example common whitethroat *Sylvia communis* and blackcap *Sylvia atricapilla*, do not readily use nest boxes, therefore the proposed mitigation would appear not to be particularly relevant to the species that may impacted upon.

Site of Importance for Nature Conservation (SINC)

We note that part of the site proposals are for works to the Portsmouth City Golf Course Copse SINC which is designated for the following criteria;

- 1B woodland where there is a significant element of ancient semi-natural woodland surviving;
- 2D grasslands which have become impoverished through inappropriate management but which retain sufficient elements of relic unimproved grassland to enable recovery; and
- 6A sites which support one or more notable species. The notable species for which this site was designated is the fly orchid *Ophrys insectifera*.

The SINC covers an area of approximately 2 hectares and the re-landscaping proposals will apparently result in a loss of approximately one quarter its area. A specific botanical survey was carried out on the SINC by ENiMS on 19th May 2012. The aim of this survey was specifically to establish the presence of fly orchids at the site. Within the survey report³ it states that “*no fly orchids were recorded at the site*”. The Trust is generally opposed to the use of sites which have been designated for their nature conservation value for recreational purposes, and would wish to see the plans changed to avoid impacts on the SINC. We are also concerned at the timing of the botanical survey which was carried out at the very beginning of the flowering season for fly orchid. Recent cold springs have seen many plant species flowering much later than usual, and therefore it would be very easy to overlook young/low flower’s amongst dense vegetation.

The report also states that “*Works should take care to avoid the Ancient Woodland site designated as a SINC but it is unlikely that the current proposed works will impact the designation features*”, but no mention is made of the impoverished grasslands (criteria 2D), which are also part of the reason for the sites designation. It appears the grassland may be lost as part of the proposals.

If the Local Authority was minded to grant permission for this element of the work, the Trust would be looking to see more firm statements detailing what mitigation **will** be provided rather than recommendations suggesting what **should** be done. We would also expect to see detailed management prescriptions aimed at enhancing the remaining features of the SINC post development, rather than the current recommendations included within the report, which state; “*Following the required cut and fill works within this area, replanting should be carried out to ensure that the botanical communities present are unchanged in the long term*”.

Conclusion

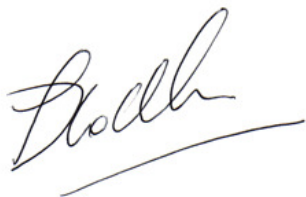
In conclusion, the Trust objects to this application due to the lack of consideration and survey work in relation to brent geese and other wetland birds, the proposed mitigation measures proposed for breeding birds and potential impacts on the SINC.

The above advice is given based on the information made available at this time and may change should further or amended details be submitted. If you wish to discuss these matters further, then

³ ENiMS (May 2012) Botanical Survey

please do not hesitate to do so. I also ask that you keep the Trust informed of the progress and outcome of this application.

Yours sincerely



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