

Mrs Sally Smith
Havant Borough Council

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

Hampshire & Isle of Wight
Wildlife Trust
Protecting wildlife. Inspiring people.



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2nd April 2014

Your Ref: APP/14/00232
Our Ref: 13.60.3.36

Dear Mrs Smith

PROPOSAL:

CONSTRUCTION OF 47 DWELLINGS, INCLUDING 30% AFFORDABLE, COMPRISING 10 NO. 5 BED, 21 NO. 4 BED, 10 NO. 3 BED AND 6 NO. 2 BED HOUSES, WITH ASSOCIATED ACCESS FROM BEDHAMPTON HILL, LANDSCAPING AND ANCILLARY WORKS.

LOCATION:

DEVELOPMENT SITE AT PORTSDOWN HILL, WEST OF GLEBE PARK AVENUE AND NORTH OF BEDHAMPTON HILL, HAVANT

DESIGNATED SITES:

**LANGSTONE HARBOUR SITE OF SPECIAL SCIENTIFIC INTEREST (SSSI)
CHICHESTER AND LANGSTONE HARBOURS SPECIAL PROTECTION AREA (SPA)/RAMSAR
SOLENT MARITIME SPECIAL AREA OF CONSERVATION (SAC)**

Thank you for consulting the Wildlife Trust on this application. As you will be aware we are the long term lease holders and managers at Farlington Marshes Local Nature Reserve and therefore we have an interest in development in the local area. In commenting on this application we have reviewed the Interim Wintering Bird Survey Report¹, produced by White, Young, Green and the Aluco Ecology report² from 2009. We have also seen the objection letter to this application by Natural England ref. 115243, dated 27th March 2014. Having reviewed the above documents we would like to make the following comments:

Wader and Brent Goose Strategy

Our primary concern with this application is that the proposed development is on land that was formerly an important site for brent geese *Branta bernicla bernicla*, and identified within the Wader and Brent Goose Strategy³ as such (H03). Through the mid to late 1990's this site regularly supported counts of brent geese in excess of 200 birds, and on one date in December 1997, 850 birds were recorded. This latter figure is significant since a count of 900 birds is considered to be of National

¹ WYG Planning and Environment (2014) Land at Portsdown Hill, Havant – Wintering Bird Survey (Interim Report)

² Aluco Ecology (2009) Brent Geese use of Land Adjacent to Havant Road/Fortunes Way, Havant

³ King, D. (2010) Solent Waders and Brent Goose Strategy 2010. Hampshire and Isle of Wight Wildlife Trust.

importance in its own right. As a result of the importance of the site for brent geese, the site was designated a Site of Importance for Nature Conservation (SINC) in 2005. Recent changes in farming practices have seen the site become unsuitable for brent geese as a foraging resource, and in recent years there has been no recorded use. However the site has still been used to a lesser extent by wading birds, with 101 lapwing *Vanellus vanellus* recorded at the site by Hampshire County Council⁴.

Survey work has been carried out at the site by Aluco Ecology in 2009², in 2012/13 by Hampshire County Council (no information) and White Young Green in 2013/14¹. The latest surveys have been carried out in order to clarify the current use of the site by waders and brent geese, since it was classified as 'uncertain' in the latest Wader and Brent Goose Strategy, due to insufficient survey data. Whilst the surveys have demonstrated that the site is no longer used by brent geese during the winter months, it is evident that the most likely cause of this is the change in farming practices. It is therefore also likely that if the farming practices were changed again, with a preference for winter wheat, the site would again become suitable, and used by brent geese for foraging.

If planning permission is granted this site will be rendered permanently unsuitable as a foraging resource for brent geese and/or a winter refuge for waders. It will see the development of a site that has been designated for its nature conservation value. We are concerned that to grant planning permission for this application will set a dangerous precedent which may result in other important brent goose sites and Sites of Importance for Nature Conservation, being developed in the future. Therefore we ask Havant Borough Council to consider this application in the context of the conservation status of the whole SPA population, and the impacts that this proposed development may have on that population and not just consider it in isolation.

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 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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⁴ Source Natural England (2014) Letter Response to this Application Ref. 115243