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Date 19th December 2012

Your Ref: APP/12/00338

Our Ref: 13.60.3 CC

Dear Mr Cantwell

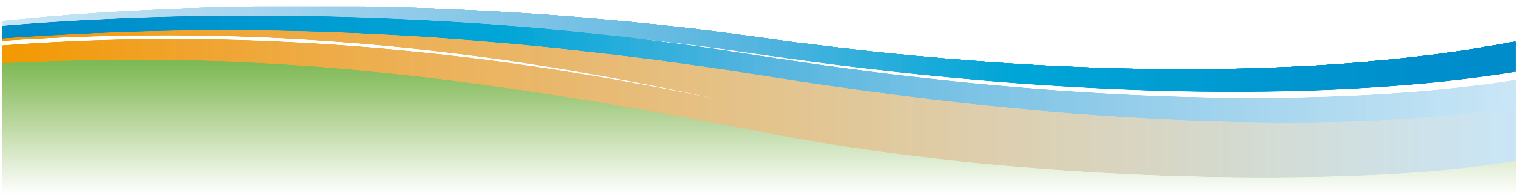
Dunsbury Hill Farm
Hybrid application for employment uses, hotel, link road and associated works.

Thank you for consulting the Trust on the above planning application. This letter sets out our reasoning as to why the Wildlife Trust **objects** to the application as it stands.

The application site represents a substantial proportion of the green spaces which provide definition to the separate communities of this part of the Borough. It is with regret we note that the applicant has not sought to describe the wildlife of the site as a whole. Whilst descriptions of individual components of the countryside are helpful they are not effective in articulating the qualities of sites such as Dunsbury Hill where the whole may be greater than the sum of the parts. The landscape and wildlife of Dunsbury Hill, partially derived from the ancient Forest of Bere, is an area of diverse countryside whose loss will diminish the character of the Borough together with the quality of life of its residents.

We welcome that the applicant has sought to retain the designated wildlife sites within the application site. We however note that the application does not provide proposals as to how the woodlands and grasslands retained within and around the site will be managed in the future. We recognise such details may become available at a later date. We are concerned that what little information is available on management suggests an over reliance on tree planting, the removal of species which may well have a considerable invertebrate interest (aspen), the lack of recognition of the importance of woodland management and open habitat matrices together with a lack of recognition that effective woodland management may periodically change the landscape of the site including views into the site. We would be happy to offer advice on future management options.

We welcome the applicant's expressed intentions to better manage other land they own around the application site to enhance the natural environment. We are unclear as to whether this will include all the land owned by the applicant in this part of the Borough or whether this is a commitment they are content will be formalised through a section 106 agreement or similar.



Should the information discussed above become available we would be better placed to consider the balance of opportunities and impacts on wildlife arising from the application.

The Habitats Regulation Assessment accompanying the application recognises that the application site may be used as a high water wader roost (Pages 23 & 24 of the HRA). Such roosts are known to be present around the Borough and contribute to the structure and functioning of the coastal Special Protection Areas. The issues are addressed through the "Solent Waders and Brent Goose Strategy" of 2010.

We are in agreement with the consultant's judgement that the application site may support Brent Geese as indicated by the data provided by HBIC. We are however unimpressed by the wintering bird survey undertaken to investigate the issue. Whilst we recognise the survey methodology needs to be proportionate to the likely interest there is no record of consideration as to whether the survey is proportionate. The discussion of what limited data were gathered then fails to recognise Brent Geese populations fluctuate and their use of roosting and feeding sites is determined by a range of factors including tide times, weather conditions and the availability of alternative sites.

Havant Borough Council have recognised the difficulties in assessing such sites. The Borough's site allocation plan has a policy and accompanying text which is set out below. We do not believe the assessment accompanying this application satisfies the intentions of the Borough's policy.

Policy DM23 Uncertain Sites for Brent Geese and Waders

Where sites are identified as having an uncertain value within and as defined by the Solent Waders and Brent Goose Strategy (2010), studies will be required to be undertaken in accordance with an appropriate survey methodology in order to determine their level of importance.

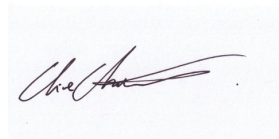
The accompanying text includes

" 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)".

We note the advice the Borough Council has received on protected species from the HCC ecologist and we do not wish to add to this advice.

Given the unsatisfactory nature of the information provided by the applicant, resulting in uncertainty as to the impacts of the proposed development on wildlife, the Wildlife Trust **objects** to the application as it stands. Should greater clarity and certainty be offered on the matters raised above we would be happy to review our position.

Yours sincerely



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Hampshire & Isle of Wight
Wildlife Trust
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