

Ms D Haywood
Planning Department
Public Service Plaza
Civic Centre Road
Havant
Hampshire, PO9

13 Feb 2020

Planning application APP/19/01101 at Campdown, Crookhorn, Havant, Hampshire

Dear Ms Haywood,

Thank you for providing us with the opportunity to comment on the above planning application. We wish to **object** to this application, on the grounds that it would have a significant negative impact on a nationally important Eurasian Curlew population and we do not believe that the proposed mitigation will compensate for this impact.

The Wildfowl & Wetlands Trust (WWT) is the UK's leading wetland conservation organisation, with headquarters in Gloucestershire, but operating globally. Our mission is to conserve, restore and create wetlands, save wetland wildlife, and inspire everyone to value the amazing things healthy wetlands achieve for people and nature. We have around 400 staff, 200,000 members, and 1 million visitors per year to our ten wetland centres. For over 70 years, WWT has been at the forefront of efforts to conserve the UK's and Europe's waterbird populations. Our Conservation Evidence department is a leading exponent of the science of waterbird monitoring and research. We are one of six organisations globally who act as International Organisational Partner's (IOP) to the Convention on Wetlands of International Importance (Ramsar), and our staff chair the Technical Committee of the Agreement on the Conservation of African-Eurasian Migratory Waterbirds (AEWA).

As part of efforts to recover the depleted UK Curlew population, WWT runs a major project aiming to conserve the breeding population in lowland Britain (<https://www.wwt.org.uk/our-work/projects/eurasian-curlew-recovery/>). We manage a Curlew recovery project in the Severn Vale of Gloucestershire, and in partnership with others are launching major new projects in Dartmoor and Norfolk in 2020. We co-manage the Curlew Forum

(www.curlewcall.org), a national umbrella group that supports lowland Curlew conservation efforts, and are on the committee of the UK & Ireland Curlew Action Group. Our staff attended the two Curlew Summits organised by HRH the Prince of Wales (2018 and 2020) and the Downing Street Curlew Summit (2019).

Eurasian Curlew is arguably the highest priority bird conservation issue in the UK¹, because it is a species for which the UK holds a high responsibility (ca.25% of the world population)², which is of global conservation concern³, and which is declining rapidly in the UK⁴. The African-Eurasian Migratory Waterbird Agreement, which is a legally binding international agreement to which the UK is a signatory has produced an Action Plan for Eurasian Curlew⁵. The Plan includes *inter alia*, a critical action to “1.2.4. Respond to potential negative impacts from proposed developments using Ramsar’s Avoid-Minimise-Compensate planning framework. Potential threats are likely to involve those arising from proposals relating to drainage, large-scale agricultural change, forestry, wind turbines, residential/commercial developments, oil/gas developments, tourism, and increased disturbance or pollution that may be associated with each”.

The Chichester and Langstone Harbours Special Protection Area (also SSSI’s), includes non-breeding Curlew as a supporting feature, and the population is internationally important. Natural England’s Supplementary Advice on Conservation Objectives (SACOs) for the site⁶ includes targets for Eurasian Curlew to “Maintain safe passage of birds moving between roosting and feeding areas”; to “Reduce the frequency, duration and / or intensity of disturbance affecting roosting, foraging, feeding, moulting and/or loafing birds so that they are not significantly disturbed”; to “Restore the extent and distribution of suitable habitat (either within or outside the site boundary) which supports the feature for all necessary stages of the non-breeding/wintering period (moulting, roosting, loafing, feeding)” (including *inter alia* freshwater and coastal grazing marsh). It specifically mentions the use by Curlews of grasslands outside the site boundary, and the sensitivity of the site’s features to habitat loss due to development.

¹ <https://britishbirds.co.uk/article/the-eurasian-curlew-the-most-pressing-bird-conservation-priority-in-the-uk/>

² https://www.unep-aewa.org/sites/default/files/publication/ts58_eurasian_curlew_issap_website_version.pdf

³ <http://datazone.birdlife.org/species/factsheet/eurasian-curlew-numenius-arquata>

⁴ <https://app.bto.org/birdfacts/results/bob5410.htm>

⁵ https://www.unep-aewa.org/sites/default/files/publication/ts58_eurasian_curlew_issap_website_version.pdf

⁶ <https://designatedsites.naturalengland.org.uk/Marine/SupAdvice.aspx?SiteCode=UK9011011&SiteName=&SiteNameDisplay=Chichester+and+Langstone+Harbours+SPA&countyCode=&responsiblePerson=>

We understand that the application site includes fields that support up to 150 wintering Eurasian Curlews and has been identified as a key site in the Solent Waders and Brent Goose Strategy (SWBGS)⁷. These birds are undoubtedly part of the wintering population of the SPA and the area should therefore be considered Functionally Linked Land. In fact in a recent SPA Review⁸, the UK's Joint Nature Conservation Committee noted that the Chichester and Langstone Harbours SPA boundaries should be considered for extension in order to provide ecological sufficiency for Curlew. It is particularly important to maintain a network of suitable feeding locations for Curlews around estuarine environments and in heavily disturbed areas, because they need to move between sites according to tides, disturbance and weather conditions.

We further believe that the proposed mitigation site is inadequate. It is very small relative to the area that would be lost at Campdown. It is currently subject to high levels of recreational disturbance, particularly by dog walkers; this is known to be a major deterrent to Curlews and is of course a known pressure in the Solent area. Overhead electricity transmission pylons at the site would potentially pose a collision risk to the birds and/or would deter them from using the site. The habitat at the site is not currently used by Curlews and is not apparently suitable for Curlews, and there is rather low certainty that Curlews could be attracted to the site.

We therefore believe that a substantial and important feeding area for a species that is legally protected at the site would be destroyed, and that the proposed mitigation would be very likely to fail to provide suitable replacement habitat and net biodiversity gain.

We also know that the Solent's non-breeding Curlew population includes birds that breed in southern England. This population is now critically low – perhaps 400 pairs remain – and is the subject of intense conservation effort by many conservation groups, including WWT, in the New Forest, the Somerset Levels, Salisbury Plain, Severn Vale, Shropshire, Dartmoor and the Brecks. Much of this work has been supported by UK government and its agencies (including Defra and Natural England). It would be a perverse outcome were these localised populations to be adversely affected by permitted housing development in the same region.

⁷ <https://solentwbgs.wordpress.com/>

⁸ <http://data.jncc.gov.uk/data/d1b21876-d5a4-42b9-9505-4c399fe47d7e/ukspa3-status-uk-spas-2000s-web.pdf>



WWT Wetlands for life

Yours sincerely,



Dr Geoff M Hilton

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