

Mr L Oliver
Planning Department,

By e-mail only; planning.development@havant.gov.uk

25th March 2019

Dear Mr Oliver,
Location: Land East of Castle Avenue, Havant

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.

Application No: APP/18/01033.

Many thanks for giving the RSPB opportunity to comment on the proposed development at the Land East of Castle Avenue.

We welcome the subsequent revised report which aims to address comments raised and provide further assessment and mitigation in relation to potential impacts on functional land associated with the Solent SPAs.

The RSPB has reviewed the revised documents and **objects** to the application on the following grounds: The proposal does not include **full** payment into the mitigation scheme outlined in the Solent Waders and Brent Goose Strategy: Guidance on Mitigation and Offsetting Requirement 2018 (SWBGS); this is a requirement for new developments in this area.

We disagree with the proposal of a 50% reduction to the Low Use rate of the functional area of the western part of the H19. This site as part of the strategy has been classified as being Low Use and therefore has the potential to be used by waders or Brent geese. These sites have the potential to support the existing network and provide alternative options and resilience for the future network. The in-combination loss of these sites would impact on the continued ecological function of the wader and Brent goose network. In all cases proportionate mitigation, off-setting and/or enhancement measures will be required (Para 35).

If the classification of a site, and the associated level of mitigation or any off-setting requirements are disputed, the strategy requires 3 consecutive years of survey to the agreed survey methodology under appropriate habitat management conditions for waders and / or Brent goose usage throughout the survey period (Para 9). Only then can the site be considered for reclassification.

The Ecological Assessment accompanying the application only shows that the developer's ecologists carried out four winter bird survey visits in February and March 2017 (3.10.3). Due to the survey limitations no

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surveys were undertaken between October and January and therefore the surveys did not cover an entire wintering bird survey season as recommended in the Solent Waders and Brent Goose Strategy. Nor have they run over 3 consecutive years.

Therefore, the survey work done is insufficient to support the conclusion; "it is not considered that the site itself is of importance for wintering birds and therefore, the site itself would not be classified as a 'Low Use' site (5.4.3.)". The suitability of the site supporting wintering birds cannot be determined at this stage and thus the suggested 50% contribution to the scheme fully undermines the strategy.

13 curlew were recorded feeding on the H19 parcel in 2011, and it is unclear whether this was associated with the site itself or the remainder of H19 to the east, so it has not been demonstrated that there will be no impact from the loss of part of the H19 parcel. Additionally, the requirement for paying into the mitigation scheme is not only based on the immediate impacts but on the increased recreational pressure on the designated sites and therefore we consider that it is necessary for this development to contribute to the mitigation in **full**, in line with the SWBGS offsetting requirements.

Therefore, the contribution to the strategy should be based on £35,610 per hectare resulting in the compensation figure as £78,342 (2.2ha site).

We have serious concerns about the effectiveness of the potential mitigation in the application in terms of keeping people and dogs out of the remainder of the site, which would seem to offer an obvious circular walk adjacent to the development. In addition, there is no mention of the maintenance of the eastern hedgerow (boundary) in perpetuity. The Site Proposals Plan states the eastern hedgerow will be "retained where possible" and also illustrates gaps in the existing hedgerow, as well as "land potentially allocated for new access road" and "access point for future development" at the north and south ends of the development respectively, both of which appear to lead directly from the development to SWBGS block H19.

We welcome the updated version of the EA which states that the existing hedgerow along the eastern boundary will be retained by bolster planting and fencing it off from the new properties 6.2.5. The EA further states that the current ownership will remain in place, however the assessment fails to specify that this will be appropriately maintained in perpetuity and only in the 'long-term'. We recommend the wording in 6.2.5 to read as; "*appropriately managed to retain visual/boundary in perpetuity.*"

We hope you have found these comments useful.

Yours sincerely



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