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13<sup>th</sup> January 2020

Dear Mrs D Haywood,

**Location:** Land East of College Road, Campdown, Purbrook, Waterlooville

**Proposal:** Hybrid planning application comprising; full planning application for the erection of 130 dwellings with the creation of new access onto College Road, landscape, drainage, car parking and associated works; and outline planning application for up to 650 dwellings, community and nursery facility (use class D1 and D2), retail unit (use class A1), public open space, landscaping, diversion of public right of way and associated works and infrastructure.

**Application No:** APP/19/01101

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Many thanks for giving the RSPB opportunity to comment on the proposed development at the Land East of College Road, Campdown. The RSPB **objects** to these proposals due to the direct loss of large areas of SPA supporting habitat for wintering brent geese and waders and the inadequacy of the proposed mitigation plan to compensate for this loss. The proposed mitigation area is inadequate both in scale and quality to mitigate impacts from this proposal upon qualifying species of wintering birds using functionally linked land to the Chichester and Langstone Harbours Special Protection Area (SPA). Further details of our objection are outlined below.

The application site lies 1.3km to the north of Langstone Harbour, designated as a Site of Special Scientific Interest (SSSI), and forming part of the Chichester and Langstone Harbours Special Protection Area (SPA) and Ramsar site in recognition of its national and international importance for wildlife, including wintering waterfowl and breeding seabirds. A large part of Langstone Harbour is owned and managed by the RSPB. The proposed application site is used by wintering brent geese (*Branta bernicla bernicla*) and wader assemblages including curlew, interest features of the designated sites. The preservation of these feeding sites is essential to the protection of the wintering population of brent geese and waders in the harbours and in turn to ensuring that the designated sites are not damaged.

We are increasingly concerned by the incremental loss of SPA supporting sites around Langstone Harbour and across the Solent as a whole. We urge the Council to apply a high standard of protection to these sites, as required under the Birds and Habitats Directives.

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a partnership of conservation organisations  
working to give nature a home around the world.

### Mitigation site

In the mitigation plan it is identified that 31ha of foraging habitat for brent geese and waders (curlew included) will be lost through the proposed development, which comprises of sites H02A, H04B, H113 and H125 listed in the Solent Waders & Brent Goose Strategy (SWBGS) which are classified as primary and secondary importance in the strategy.

Policy E17 of the Pre-Submission Havant Borough Local Plan 2036 states that developments such as Campdown, which is located on a Primary Support Area, will *'only be permitted where suitable replacement habitats are provided, which:*

- d. Contributes to a biodiversity net gain to the SWBG network;*
- e. Are suitable in terms of habitat type and quality for at least the number of SWBG recorded on the site being lost; and*
- f. Is secured through a costed Habitat Management and Monitoring Plan.'*

The RSPB find the proposed mitigation area to be wholly inadequate due to its size and current use. The proposed mitigation area is only 7ha which is considerably smaller than the 31ha of important foraging grounds for brent geese and waders proposed to be lost. The SWBGS Mitigation Guidance (October 2018) states that where replacement habitat would be of equal ecological quality the area required should be of a similar extent to the site being lost or damaged. There may be situations where a greater area is required when there is a high level of risk involved. As the proposed mitigation site has had no records of any use of the two fields, there is little confidence that brent geese and waders will use the proposed mitigation site post-development.

The winter bird surveys conducted during 2015/16 and 2016/17 at the proposed site location found up to 150 curlew present. Curlew (*Numenius arquata*) are a species on the Red List of Conservation Concern in the UK, and a priority species for the RSPB due to extremely worrying population declines of over a third in the UK since 1995. Curlew breed in the UK predominantly in upland areas, and the UK is host to up to 25% of the global breeding population. In winter there is a major influx of European birds, with curlew using foraging habitats around coastal mudflat and surrounding wet grassland areas.

The mitigation area that is proposed comprises of two fields; H07A and H07B that are part of the SWBGS network. The proposed mitigation area is currently used for recreation, notably dog walking, whilst the proposed development site showed no significant disturbance events during any of the surveys conducted, with only unofficial use by walkers/dog walkers. Curlew are particularly sensitive to recreational disturbance; research of wader flight response to human disturbance has shown that the mean distance to cause curlew to initiate flight is 340m<sup>1</sup>. This distance is likely to be enhanced further by the presence of dogs. Despite the inclusion of screening in the mitigation plan to provide a visual barrier from recreational users for species using the site, concerns still remain regarding noise disturbance, especially involving dog walkers. The Winter Bird Mitigation Strategy (WYG, August 2018) also acknowledges that it is unlikely that the public will be excluded from the entirety of the mitigation area.

It is uncertain that the proposed refuge as a mitigation site (H07A and H07B) will attract waders such as curlew due to the nature and size of the site. The total proposed mitigation area of 7ha is also very unlikely to be able to provide suitable space for up to 150 wintering curlew amongst other wading birds, and therefore is extremely likely to contravene Policy E17 (sections d and e).

Under requirements of the Habitats Regulation, there is a need to ensure there are no likely significant effects on the integrity to Chichester and Langstone Harbours SPA. The RSPB does not think it is possible to discount likely significant effects due to the scale of loss of SPA functionally linked land and the failure to provide mitigation which would deliver the same function. Therefore, the RSPB **objects** to the proposals for Land East of College Road, Campdown.

We hope you have found these comments useful. Please do not hesitate to get in touch should you wish to discuss any of our comments further.

Yours sincerely



**Jack Thompson**

**Conservation Officer**

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**References:**

1. Collop, C., Stillman, R.A., Garbutt, A., Yates, M.G., Rispin, E. and Yates, T. (2016), Variability in the area, energy and time costs of wintering waders responding to disturbance. *Ibis*, 158: 711-725.