

Objection to planning application APP/19/01101 at Campdown, Crookhorn, Havant, Hampshire based on the following points:

1. Having lived in south Hampshire since 1975 & until 1990 at Widley, Portsdown Hill, & have been part of the monthly Langstone Harbour wader & wildfowl (WeBS) count team throughout this period & have counted Brent and Curlews returning from Campdown site in the evenings on the harbour edge since the late 1970s, I know the area well. I am also chair of the Farlington (bird) Ringing Group & founder & was chair of the Solent Shorebird Study Group in the 1990s who's work led directly to the formation of the Solent Wader & Brent Goose Strategy (SWBGS).
2. This is a new site within emerging Havant BC Local Plan 2036 & has not been subject to public examination or a Planning Inspector ruling & indeed HBC Local Plan 2036 is not yet adopted.
3. Natural England's response to Local Plan policy H40 with reference to Campdown & the proposed Broadmarsh mitigation site raised various concerns which have not been addressed.
4. The application site includes the sites highlighted within the SWBGS as primary & secondary sites of importance to feeding Brent Geese & Curlew i.e. H02A, H125, H106 and H113. Havant BC have been and may still well be partners and part funders of the SWBGS.
5. As such the site is classified as functionally linked land & integral to the Special Protection Area (SPA) Chichester & Langstone Harbours designated under EU Habitats Directive & now adopted into UK law & is therefore protected as such
6. The site supports good numbers of Brent with 150-200 seen in recent winters & many more in earlier years - Brent are listed as features of the SPA
7. The site also supports good numbers of Curlew with up to 150 feeding here in recent winters - part of the SPA assemblage & a supporting feature
8. 150 Curlew represents c.30% of the current Langstone Harbour wintering population
9. GPS studies of wintering Curlew in the UK show that they are highly site faithful, using exactly the same sites (mudflats, wet grassland and saltmarsh roost sites) within a few meters every day through the winter, with no change in sites use whatsoever; a similar study in Langstone Harbour would most probably show similar patterns of use. Most waders are highly site faithful to their winter-feeding sites & territories and roost sites, as shown by colour-ringing studies.
10. Inland feeding Curlew are known to be mainly males, with females mainly staying on estuarine mudflats - therefore the loss of a site like Campdown would have a considerable adverse effect on the population by pressurising males to feed elsewhere, most likely on sub-optimal sites or restricting short billed males to the inter-tidal where there is less food available as it buries deep in mid-winter. This would lead to decreased adult survival, at a time when the population is already under significant pressure. Work done at Teesmouth by Dave Townshend, Durham University showed a sexual bias for inland feeding by male Curlew (ref www.thesis.dur.ac.uk/7598) Robin Ward pers com has found the same sex bias in inland wintering flock at Wensleydale, Yorkshire.
11. Curlews & Brent need a series of sites close to estuaries to feed so they have options if a site is not suitable or disturbed for a high tide period (e.g. by Peregrines or dog walkers).
12. The conservation of Curlews & other waders that require wet grassland requires a landscape scale approach with a whole series of sites available for wintering birds to use especially in wet winters. They are also needed to accommodate birds arriving in cold winter from further east & north to escape cold weather species like Golden Plover, Lapwing, but also Curlew and other wader species too flock to The Solent and adjacent

farmland in cold winters to use it as a refuge. The loss of this large area will further reduce the options for wintering shorebirds

13. The recent decision by Havant BC to grant permission for housing development at Marsh Farm (Forty Acres) also a SWBGS site, currently used by smaller numbers of Brent Geese, Curlew, Oystercatcher and Lapwing was very disappointing, especially as it is also clearly functionally linked land supporting shorebirds from the adjacent SPA & in theory legally protected. Therefore, the any further losses of functionally linked land in this area would be extremely bad news for shorebirds and should not be permitted.
14. With the loss of other important terrestrial sites, in combination effect and of events need to be considered. Therefore, the loss of this site would result in a major impact on the adjacent SPA and two key species of its waterfowl assemblage
15. The proposed alternative mitigation site (SWBGS sites H07A & H07B) identified in the application is in fact Broadmarsh Coastal Park, a Havant BC facility which is:
 - Public Open Space, well used in part by dog walkers
 - the site is considerably smaller in area than the proposed development site
 - if this site is to become a sanctuary area then Havant BC will have to provide a new coastal park & alternative public open space of the same size elsewhere & without itself disturbing & displacing wintering shorebirds on functionally linked land elsewhere adjacent to the harbours
 - the proposed mitigation site includes a tarmacked road & a popular car park (with excellent views over Langstone Harbour) within the proposed mitigation area & this part is therefore unsuitable for use by birds
 - the mitigation site is divided in two by the road & car park
 - the western area (H07A) is rank & reasonably herb rich grassland, scrub with trees which has its own interest for biodiversity e.g. invertebrates, nesting birds & probably reptiles, especially given the south sloping aspect - any loss of this habitat will need to be replaced somewhere else – in its current state it is unsuitable for feeding shorebirds
 - the western side (H07A) of the proposed mitigation site is also crossed by low level electric pylons with associated power poles & would be completely unsuitable for flocks of shorebirds. Flocks potentially trying to land to feed under the wires would face a collision hazard – overhead cables are known to be a problem for birds.
 - the eastern area (H07B) is occasionally used by feeding Oystercatchers & historically by Brent Geese but never by Curlews, so it would seem that it is completely unsuitable to them - even if the area was fenced off with the hope of attracting in displaced Brent & Curlew it would, if successful, result in a carrying capacity issue especially given the small site size. Oystercatchers & Curlews both feed on the worms & other invertebrates within wet swards, they would be competing for food.
 - The White Young Green report proposes that the Broadmarsh Coastal Park mitigation site would have a series of shallow scrapes created for waders and presumably Brent Geese – this is a bizarre concept given that the site is an old landfill site with a clay cap and would therefore seriously risk exposing old dumped waste which surely the Environment Agency & Havant BC would be concerned about. It also misses the point that the Brent and Curlew visit Campdown to feed on wet grassland not to roost or feed on scrapes! It is the potential loss of a large area of wet grassland that is key.
 - in summary this is completely & woefully inadequate as a mitigation site which will not accommodate displaced shorebirds from the proposed development site.

In addition:

- The lack of botanical, invertebrate and reptile surveys for the proposed development site is more than concerning
- especially as the grassland is old permanent grassland & probably floristically rich
- well grazed sites with areas of bare earth can be very important to specialist inverts e.g. mining bees & wasps
- The area is well known to be good for adders, with large populations known immediately to the NE (across the A3) & are therefore likely to be on the site, if only around the periphery. The site has not seemingly been grazed in 2019 so is now getting rank and will be now attractive to reptiles & invertebrates.

Notes on Curlew conservation:

- Curlews have suffered a serious national & international decline and are now on the IUCN Red List (as Near-threatened) and the UK red list of Birds of Conservation Concern www.iucnredlist.org (Eaton et al., 2015)
- The south coast from Poole to Paghams Harbours supports >1% of the European and 10% of the UK Curlew wintering population
- The Solent supports 8% of the UK wintering Curlew population
- The Solent wintering population declined by 42% in period 1985-2010 (Hampshire Bird Atlas 2007-2012 - Hampshire Ornithological Society) - & continues to decline
- The Langstone Harbour 5-year mean based on WeBS mid-winter peak counts have shown a decline from c.1000 in late 1970s/early 1980 to c.500 in 2019
- The Chichester & Langstone Harbour SPA wintering Curlew population is nationally & internationally important
- Curlew ringing recoveries show that The Solent wintering population comprises birds from breeding grounds across a wide Europe & Scandinavia i.e. from: Belgium, The Netherlands, Germany, Poland, southern Sweden & Finland, as well as a few British breeders e.g. New Forest - so any loss of essential wintering feeding habitats in & around The Solent's coast line will put further pressure on these populations.