

## **Comments on Matters and Issues related to the Examination of the Havant Borough Local Plan on behalf of Havant Climate Alliance and Havant Friends of the Earth**

### **Matter 5 – Large Site Allocations without Planning Permission**

#### **Policy H8 – Land North of Long Copse Lane**

##### **5.1**

Hollybank Lane and Long Copse Lane cannot be effectively widened without the loss of some mature and veteran trees, which provide valuable habitat for wildlife.

#### **Policy H29 – Land north of Sinah Lane**

##### **5.12**

This site previously formed part of a mitigation scheme for the Oysters, with the intention of providing a crop rotation scheme to support Brent Geese and Waders. The bird refuge area which is now proposed, will be of insufficient area to provide mitigation for both sites.

#### **Policy H40 – Campdown**

##### **5.15**

##### **Constraints to development**

As detailed in the comments on MIQ 4.15. Campdown has played an important functional role in providing foraging and roosting for Brent Geese and Waders, especially Curlew. Its use has become much less since it ceased to be managed as fenced off grazing land, and has opened up to walkers and dogs. This is a deterrent to Curlew and other waders. Curlew are on the Red List of UK Birds of Conservation Concern. They have specialist requirements and seek rough damp pastureland for foraging, without any nearby buildings or human presence. This Campdown used to provide. Lack of use now does not mean that the site will not be needed in future. At CR10 Appendix 3, Timothy Leader states “mitigation must maintain the extent and distribution of habitat in a way that is judged will maintain the SPA’s population of Curlew and Brent Geese”. It is doubted whether Warblington Farm could adequately mitigate as it is already densely used by other Brent Geese and Waders. People walking the coastal footpath at Warblington will also act as a deterrent. Curlew will not feed or roost near houses, and are very sensitive to disturbance, so if Campdown is developed, a nature reserve on part of the site, would not meet their needs. Although Campdown is currently little used, Curlew continue to need a site of that size, coastal location and type of grassland. As far as providing mitigation, Timothy Leader (CR10. Appendix 3) states that there is “no evidence of a functional link between Campdown and Mitigation sites at Warblington and Northney” He argues that it does not have to be the same birds returning to particular sites, but the Solent Wader and Brent Goose Strategy describes how Geese, which can live for 30 years, are very faithful in their attachment to particular areas of the Harbour which highlights the importance of foraging grounds which are also familiar and within easy flying distance from those areas.