

In response to ‘Aquinds plans’ are you aware of (The protected habitats and animals) along the eastern side of Portsmouth, a (coastal habitat) where the proposed route will be.

GREAT CRESTED NEWT

Activities that can harm great crested newts

Activities that can affect great crested newts include:

- maintaining or restoring ponds, woodland, scrub or rough grassland
- restoring forest areas to lowland heaths
- ploughing close to breeding ponds or other bodies of water
- removing dense vegetation and disturbing the ground
- removing materials like dead wood piled on the ground
- excavating the ground, for example to renovate a building
- filling in or destroying ponds or other water bodies

Building and development work can harm great crested newts and their habitats, for example if it:

- removes habitat or makes it unsuitable
- disconnects or isolates habitats, such as by splitting it up
- changes habitats of other species, reducing the newts’ food sources
- increases shade and silt in ponds or other water bodies used by the newts
- changes the water table
- introduces fish, which will eat newt eggs or young
- increases the numbers of people, traffic and pollutants in the area or the amount of chemicals that run off into ponds.

THE BRENT GOOSE The geese regularly seen in this area are the sub-species called Dark-bellied Brent Geese, *Branta bernicla bernicla*. They breed on the Taimyr Peninsula in Northern Siberia, and spend the winter on the east and south coasts of England, and other sites in north-western Europe. The total (world) population is about 300,000 geese, and about 100,000 come to the UK,

with around 30,000 coming to the Solent harbours and coast. Up to 6,500 geese use Langstone Harbour, and about 2,700 use Portsmouth Harbour (Source : BTO in Brent Goose Strategy). The first arrivals for the winter are mainly in mid September, although this date is becoming earlier as the population increases. Geese have proved to be adaptable and are able to feed on a wide range of plants. In Autumn they eat algae and eelgrasses in the shallow waters of the harbours. As these sources become depleted, they move on to grass pastures, winter wheat and other crops. In Spring, most geese migrate north by the end of March.

In April, Brent geese leave the UK and Ireland and head north again. The pale-bellied Brent geese stop over in Iceland. Here they fatten up, increasing their weight by up to 40 per cent in preparation for the final 3,000 km (1,865 mile) flight over frozen Greenland to their breeding grounds in Canada.

Mudflats

Mudflats are globally recognised as important habitats for birds. Invertebrates occur in such high abundances that they provide a bounty of food for millions of waders and wildfowl such as the curlew (*Numenius arquata*), oyster catcher (*Haematopus ostralegus*), knot (*Calidris canuta*) and dunlin (*Calidris alpina*) all year round.

Migratory birds, including species of geese (e.g. the Brent goose, *Branta bernicula*) and duck species (e.g. teal, *Anas crecca*) also take advantage of the feast and use mud flats as refuelling sites on their long migrations.

Habitat loss not only jeopardises the survival of individual species, but also destabilises the complex interactions between organisms and undermines the ability of ecosystems to function effectively as a whole. These impacts are likely to be exacerbated by climate change, especially in species-rich areas.

So may I remind you of the;

Wildlife and Countryside Act 1981

1981 CHAPTER 69

An Act to repeal and re-enact with amendments the Protection of Birds Acts 1954 to 1967 and the Conservation of Wild Creatures and Wild Plants Act 1975; to prohibit certain methods of killing or taking wild animals; to amend the law relating to protection of certain mammals; to restrict the introduction of certain animals and plants; to amend the Endangered Species (Import and Export) Act 1976; to amend the law relating to nature conservation, the countryside and National Parks and to make provision with respect to the Countryside Commission; to amend the law relating to public rights of way; and for connected purposes.

[30th October 1981]

May I also point out;

PM commits to protect 30% of UK land in boost for biodiversity

[PM commits to protect 30% of UK land in boost for biodiversity](#)

Please look at this interactive map on the Governments website.

[Magic Map Application](#)

Appropriate assessment

Guidance on the use of Habitats Regulations Assessment

4.1. Conservation Objectives

Defra Guidance indicates that disturbance to a species or deterioration of a protected site must be considered in relation to the integrity of that site and its conservation objectives⁵. It

states that “the integrity of a site is the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was designated”.

The Habitats Regulations and the Offshore Habitats Regulations are pieces of domestic law that transposed the land and marine aspects of the Habitats Directive (Council Directive 92/43/EEC) and certain elements of the Birds Directive (Directive 2009/147/EC). As required by the Directives, ‘conservation objectives have been established by Natural England. When met, each site will contribute to the overall favourable conservation status of the species or habitat feature across its natural range. Conservation objectives outline the desired state for a protected site, in terms of the interest features for which it has been designated. If these interest features are being managed in a way which maintains their nature conservation value, they are assessed as being in a ‘favourable condition’. An adverse effect on integrity is likely to be one which prevents the site from making the same contribution to favourable conservation status for the relevant feature as it did at the time of its designation. There are no set thresholds at which impacts on site integrity are considered adverse. This is a matter for interpretation on a site-by-site basis, depending on the designated feature and nature, scale, and significance of the impact.

Natural England has issued generic conservation objectives, which should be applied to each interest feature of the site. Supplementary advice for each site underpins these generic objectives to provide site- specific information and give greater clarity to what might constitute an adverse effect on a site interest feature. Supplementary advice on conservation objectives is subject to availability and is currently being updated on a rolling basis.

4 <https://www.gov.uk/guidance/appropriate-assessment#what-must-an-appropriate-assessment-contain> 5 <https://www.gov.uk/guidance/appropriate-assessment#what-must-an-appropriate-assessment-contain>

I sincerely hope with all my heart, that you will take our areas of biodiversity, nature reserves, habitats and protected species

into careful consideration when making your decision about
'The Aquind interconnector and data cable'.

Yours sincerely

Paula Ann Savage

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