

Your Ref – APP/18/00109 HRA & Appropriate Assessment & Nitrate Calculation - Erection of four dwellings with associated access, landscaping and replacement culvert. Land adjacent to 15 Billett Avenue, Waterloo, PO7 7SZ.

Our Ref - 343074

Thank you for consulting Natural England on the Habitat Regulations and Appropriate Assessment for the above application. Please see our comments below.

Water Quality / Nutrient Budget – Further Information

We note the application is supported by a nitrogen budget, we advise the calculation should be updated in line with latest version of the Solent nutrient neutrality guidance (v5June 2020). We have the following additional comments to make:

- We note the calculation uses a current land use classification as 'Urban'. We advise that the calculation should use a current land use class of 'Greenfield' and carry a nitrogen loading rate of 5kg/ha/yr. This is due to the change in nitrogen loading through new nitrogen sources which include atmospheric deposition, pet waste, fertilisation of lawns and gardens and inputs to surface water sewers. The nitrogen leaching from urban land equates to 14.3 kg/ha/yr.

Solent Recreation Mitigation Strategy

Since this application will result in a net increase in residential accommodation, impacts to the coastal Special Protection Area(s) and Ramsar site(s) may result from increased recreational pressure. Havant Borough Council has measures in place to manage these potential impacts through the agreed strategic solution which we consider to be ecologically sound.

Subject to the appropriate financial contribution being secured, Natural England is satisfied that the proposal will mitigate against the potential recreational impacts of the development on the site(s). It is Natural England's view that the Solent Mitigation Recreation Strategy Contribution adequately mitigates the effects of the development on potential recreational impacts on the designated sites.

Protected Species and Biodiversity Net Gain

Natural England does not hold locally specific information relating to protected species, local or national biodiversity priority habitats and species, local sites (biodiversity and geodiversity) and local landscape character. These remain material considerations in the determination of this planning application and we recommend that you seek further information from the [Hampshire Biodiversity Information Centre](#) and other appropriate bodies. In some instances, further surveys may be necessary through an ecological appraisal to be agreed by an HCC ecologist.

Natural England has published [Standing Advice on protected species](#). Please note Standing Advice is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation. If you have any specific questions not covered by our Standing Advice, or have difficulty in applying it to this application please contact us at consultations@naturalengland.org.uk.

In order for your authority to be assured that the proposal meets the requirements of the standing advice and the additional requirements for biodiversity enhancement and net gain as set out in National Planning Policy Framework paragraphs 8, 118, 170, 174 and 175d, Natural England recommends that the application is supported by a Biodiversity Mitigation and Enhancement Plan (BMEP), or equivalent, that has been agreed by district ecologist or biodiversity officer.

The submission of an approved BMEP will help ensure your authority meets the requirements of Section 40 of the Natural Environment and Rural Communities Act (2006), which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'. Biodiversity 2020: A strategy for England's wildlife and ecosystem services and Making Space for Nature (2010) also provide strong drivers for the inclusion of biodiversity enhancements through the planning process.

Please note that provided the district ecologist or biodiversity officer is satisfied with the submitted biodiversity mitigation and enhancement measures and the measures are secured by any permission then no further consultation with Natural England on this aspect of the proposal is required.

If you have any queries, please contact me.

Regards,

Joseph Forster

Sustainable Development Advisor
Thames Solent Team | Natural England