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Tina Pickup
Havant Borough Council
BY EMAIL ONLY

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Dear Tina,

Planning consultation: Change of use from grazing land to campsite with 28 fully serviced pitches, including construction of two new shower/toilet blocks, office building and ancillary structures.

Location: Poundcroft Stables adjacent 175, Havant Road, Hayling Island

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Further Information Required

The application site is within 20m of the Chichester and Langstone Harbours Special Protection Area (SPA) and Ramsar and the Solent Maritime Special Area of Conservation (SAC). The site is also identified within the Solent Waders and Brent Goose network as a Secondary Support Area,

Further information is required to determine the impact of the proposal on the SAC, SPA and supporting habitat, specifically in relation to the increase in recreational disturbance, loss of SPA supporting habitat and impact of the nutrients from the development.

Solent Recreation Mitigation

This application is in close proximity to the Chichester and Langstone Harbours SPA and will lead to a net increase in residential accommodation. Consideration therefore needs to be given to alone and in-combination effects arising from an increase in recreational pressure from the development. Natural England is aware that Havant Borough Council has adopted planning policy to mitigate against adverse effects from recreational disturbance on the Solent SPA sites, as agreed by the Solent Recreation Mitigation Partnership (SRMP).

The applicant has proposed an area of land to be designated SANG in order to provide mitigation for the impact of recreational disturbance on the designated sites and associated species. The purpose of a SANG is to provide an alternative recreational resource to the designated sites. The efficacy of the SANG depends on a number of factors including its location, size, ecological sensitivity and management.

It is Natural England's view that the SANG proposal raises a number of issues for further consideration due to its proximity to the sensitive international sites and the existing sensitivity of the site as it is part of the Solent Waders and Brent Goose (SWBG) network of support sites (H53A). Use of the area as a SANG may be incompatible with the purpose of the SWBG network to protect and enhance sites of importance to supporting the functionality of the designated sites.

Natural England would require further information on the objectives of the proposed SANG, supported by a costed management and monitoring plan in perpetuity. Details of the organisation to deliver the agreed management should be provided. Depending on the management organisation,

the proposal may need to include 'step-in' rights for Havant Borough Council to take over management of the SANG if necessary. We also advise that the management plan includes the impacts and proposed mitigation of use of the SWBG support site to fully assess the impact of this part of the application on the integrity of the European sites.

It is Natural England's preference that full contributions are paid to SRMP in line with the Definitive Strategy to cover the wider in-combination impacts. The Solent Recreation Mitigation Strategy provides further guidance on calculating a mitigation contribution figure for proposals of this type.

It may then be possible to provide on-site measures to address site-specific issues associated with the proposal. For example, this could include the provision of a dog friendly holiday park, with a dog exercise area within the park, appropriate interpretation and signage.

We would be happy to discuss the options with the applicant further under our Discretionary Advice Service.

Loss of SPA supporting habitat

The proposals have the potential to affect SPA functional land, which forms part of a network of terrestrial sites located outside of the Solent SPAs boundaries used by SPA species (including qualifying features and assemblage species) as alternative areas for roosting and foraging. These sites support the functionality of the designated sites and are therefore protected in this context.

The site affected (H34A) is classed as a Secondary Support Site and supports significant numbers of feeding Oystercatchers and includes the proposed holiday park area and SANG. As such mitigation for the loss of the function of this area should be proposed in line with the SWBG Mitigation Guidance; <https://solentwbgs.files.wordpress.com/2018/11/swbgs-mitigation-guidance-oct-2018.pdf>

Natural England would strongly recommend that the applicant consider the potential to reconfigure the proposal and avoid the need to mitigate for the loss of the entire support site through addressing the mitigation for recreational impacts through SRMP contributions and the on-site design of the holiday park.

There is the potential that a suite of enhancements and appropriate management of the northern fields could provide suitable mitigation for the loss of the southern field as a SWBG support site. Consideration would need to be given to the long term management of the northern fields and further information is included in the above guidance.

We would be happy to discuss the options with the application through our Discretionary Advice Service

Nutrient Neutrality

With regard to the integrity of the designated sites, we advise that there is currently uncertainty as to whether the increase in waste water from new housing in the Solent catchment will have an adverse effect on the international sites.

The applicant has provided a nutrient neutrality statement, however Natural England has a number of clarifications which should be addressed;

- Stage 1; the waste water treatment limit for Budds Farm is 9.7mg/l.
- Stage 1; evidence to support a reduced occupancy rate in this case should be provided as part of the application.
- Stage 2; includes the entire southern portion of the field under the campsite use, which from the aerial, appears to include an area of hardstanding and buildings. This area does not appear to be changed by the proposals and should be excluded from this part of the budget.
- The nutrient statement would benefit from a plan showing the areas of land used in the

calculation and the proposed offsetting land.

An updated nutrient budget should be provided which addresses the above points in order for us to fully assess the impact of the proposal on the designated sites in relation to nutrient neutrality.

Biodiversity Mitigation and Enhancement

In order for your authority to be assured that the proposal meets the requirements of Natural England's 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 a Hampshire County Council (HCC) Ecologist. In some instances, further surveys may be necessary through an ecological appraisal to be agreed by an HCC ecologist.

The submission of an HCC 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 HCC Ecologist is satisfied with the submitted biodiversity mitigation and enhancement measures and the measures are secured by any permission then

Further comments

The application expresses specific questions to Natural England and Havant Borough Council;

1. Is the designated water consumption rates for camping lower per person?

We recommend that the standard water use figure, as per the June 2019 guidance, is used for nutrient assessments. However, if sound evidence can be provided to support alternative water use figures, this evidence will be reviewed on a case by case basis by Natural England and the competent authority.

2. Is the camping area SANG?

The camping area should not be proposed as SANG as it does not provide the required function.

3. As the site does not drain into the mains sewer can consideration be given to the use of a WwTW outside the area for some of the waste water, thus lowering nitrogen input from the development and allowing retention of some horse grazing in the lower fields?

We would advise that the waste water is taken to the closest WwTW in order to comply with the Government's other objectives on carbon emissions and climate change. We advise against the approach of transporting waste to an alternative catchment as it would be difficult to meet the Habitat Regulations tests of achieving certainty of delivery and enforceability in perpetuity. Furthermore, other WwTWs may also have similar constraints which will need to be assessed.

4. What is the Environmental permit limit at Budds farm WwTW?

9.7mg/l

5. Where does Hayling Island sit in terms of the statistical occupancy rates between 38.3% and 54.6%?

Natural England does not have any evidence to address this question, however we would advise that a precautionary approach is taken with regard to the occupancy rate and, it is our view that, a regional occupancy rate (i.e. South East) is at an appropriate level of detail.

Discretionary Advice Service

Natural England has raised a number of concerns regarding the proposals and would strongly suggest the applicant make use of our Discretionary Advice Service to fully address these concerns. Use of this service can provide detailed advice on the proposals and potential avenues to address our concerns and can help to avoid delays in the planning permission process.

<https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals>

I trust this advice will assist you and the authority in considering the application further. Please contact me if you have any queries relating to this advice.

Yours sincerely

Rachel Jones
Natural England - Thames Solent Team