

Thank you for consulting the nutrient team on application APP/21/00893.

Having reviewed the information submitted I have the following comments:

The nutrient budget has not used Natural England's excel calculator. The applicant needs to use this calculator instead of a bespoke calculator, Natural England's calculator can be found here <https://www.push.gov.uk/2020/06/11/natural-england-published-nutrient-calculator-and-updated-guidance-on-achieving-nutrient-neutral-housing-development/>.

From reviewing the bespoke calculator submitted the applicant has classified the current land use a lowland grazing and no use. In order for lowland grazing use to be used as a land classification, evidence needs to be submitted to support the classification, this can be in the form of land deeds, images, or historic records. The classification of 'no use' is not a land classification within Natural England's methodology the applicant should apply the classifications set out in Natural England's methodology or provide scientific evidence to support a different nutrient load classification type.

With regards to the mitigation scheme the applicant has not submitted scientific information to support the Habitat Regulations Assessment which the LPA as a statutory obligation to undertake. Therefore, the applicant needs to submit a shadow HRA for the planning application which provides the evidence to support the scientific link between the planning application and the mitigation scheme for nutrient neutrality. The shadow HRA would also need to cover recreational disturbance, nutrients, construction impacts and habitat loss (protected species).

Once the information has submitted it will then be reviewed before Natural England are formally consulted. For the nutrient neutrality element of the application the information will be reviewed by our consultants due to the bespoke nature of the mitigation. The cost of the review by the consultants in order to complete the HRA will need to be paid for by the applicant.

Kind regards,

Gill Glover

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