

FAO Miss S Donophy,

Our ref: 395453

Your ref: APP/21/01380

RE: Conversion of ground floor to the rear of Unit 1 The Clockhouse, to create 1No. 2 bedroom / 3 person flat with bin and bike provisions, as well as relocation of bins and bike provision for approved development on site. | The Clock House, 83-91 London Road, Waterloooville.

Natural England notes that your authority, as competent authority under the provisions of the Habitats Regulations, has undertaken an Appropriate Assessment (AA) of the proposal, in accordance with Regulation 61 of the Habitats Regulations. Natural England is a statutory consultee on the Appropriate Assessment stage of the Habitats Regulations Assessment (HRA) process. Please see our comments below.

Habitats Regulations Assessment

Natural England notes that your authority, as competent authority, has undertaken an Appropriate Assessment (AA) of the proposal in accordance with Regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process, and a competent authority should have regard to Natural England's advice.

Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for any adverse effects, it is the advice of Natural England that **it is not possible** to ascertain that the proposal will not result in adverse effects on the integrity of the sites in question.

Natural England advise that the assessment does not currently provide enough information and/or certainty to justify the assessment conclusion and that your authority should not grant planning permission at this stage.

Further assessment and consideration of mitigation options is required, and Natural England provides the following advice on the additional assessment work required:

Custom Water Usage Figures

Natural England notes that the nutrients budget uses a custom water usage rate of 110 litres/day/person instead of the precautionary 120 litres/day/person advised in the renewed Solent nutrients budget methodology. If tighter water use restrictions are used in the nutrient calculation – with or without greywater recycling systems – these restrictions should reflect the wastewater expected to be generated over the lifetime of the development. There is a risk that when occupants change kitchen and bathroom fittings over the years, less water-efficient models could be installed. It is Natural England's view that it would be difficult to evidence and secure delivery of tighter restrictions at this time. However, if sound evidence can be provided, this will be considered on a case-by-case basis.

Nevertheless, Natural England would recommend against using a custom water usage figure in nutrient budget calculations for privately-owned developments. The local authority would need to be confident that they could monitor and secure the custom water usage in perpetuity.

Recreational Disturbance

Provided that the applicant is complying with the Bird Aware Definitive Strategy, Natural England are satisfied that the applicant has mitigated against the potential adverse effects of the development on the integrity of the European site(s), and has no objection to this aspect of the application

Warm regards,

Joshua Smith (MRes)

Sustainable Development Adviser

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