

Dear Lewis,

Thank you again for updating the AA and clarifying some information. Please see our updated responses below, based on this further information.

Consultation: APP/20/01127 HRA & Appropriate Assessment - Redevelopment of holiday site for siting of 112 caravans etc - Mill Rythe Holiday Village, 16 Havant Road, Hayling Island PO11 0PB (Havant)

Thank you for consulting Natural England on the above HRA and AA, received on 19/07/2021 and adjusted and re-submitted on 12/08/21.

Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment 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 we concur with the conclusion of the HRA, provided all mitigation measures are adequately secured with any permission.

Solent Recreation Mitigation Strategy – no objection subject to mitigation

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.

Nutrient Neutrality – no objection subject to mitigation

Natural England is aware that your authority has adopted a position statement, to ensure that development achieves nutrient neutrality through the agreed site specific nutrient budget. Specifically, mitigation measures for this development involve the use of a specific on-site avoidance measure as well as the use of Warblington Farm as a specific off-site mitigation measure.

The nutrient budget calculated for this development, with an equivalent net increase of 18 dwellings is 36.40 kg/TN/yr. As set out in the Position Statement and Mitigation Plan for Nutrient Neutral Development, an appropriate scale of mitigation for this scheme would be £45,195.40.

Provided that the applicant is complying with the requirements of the Interim Strategy for 36.40 kg/TN/yr and that the Council, as competent authority, is satisfied that the approach will ensure the proposal is nutrient neutral and the necessary measures can be fully secured; Natural England raises no further concerns.

Loss/Degradation of Supporting Habitat- no objection subject to mitigation

A financial contribution (£64,098.00) has been agreed to address the partial loss of supporting habitat as a result of the development. It is noted that this will be secured through the legal agreement and Natural England agrees with this approach.

For the remaining area of the Low Use site (H43) a fully costed management plan, to be included within a Landscape and Ecological Management Plan (LEMP) is to be submitted prior to the commencement of development on site, in order to rule out impacts to the SPA and SPA functionally linked land. This should set out how management will be secured, monitored and enforced in perpetuity (normally 80 years), the council should also consider appropriate step in rights.

Provided that a fully costed management plan, included within a LEMP, is secured by a pre-commencement condition and submitted to and approved in writing by the district ecologist, Natural England raises no further comments.

Construction Impacts- no objection subject to mitigation

It is noted that a CEMP will be secured with any planning permission to address impacts from construction work on supporting habitat. The CEMP should identify the steps and procedures that will be implemented to avoid or mitigate constructional impacts on the adjacent designated sites and its functional land. The CEMP should include measures to prevent noise, lighting and visual disturbance. Provided a CEMP is submitted to and approved in writing by the district ecologist and secured by condition, Natural England raises no further comments.

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

If you have any queries relating to this advice, please feel free to contact me on amelia.cockings@naturalengland.org.uk.

Many thanks,

Amelia Cockings (MEnvSci)

Advisor Sustainable Development

Thames Solent Area Team

Natural England