

Project	Berewood Phase 8 (Park View)	Date	September 2025
Note	Habitats Regulations Assessment Review	Ref	UE0761
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Status	Final		

1 Introduction

- 1.1 Urban Edge Environmental Consulting (UEEC) has been instructed by Havant Borough Council to undertake a review of the shadow Habitats Regulations Assessment (HRA) submitted in support of the Berewood Phase 8 (Park View) Reserved Matters Application (RMA) (ref: APP/24/00939). The RMA follows an outline application for the wider West of Waterlooville Major Development Area which was approved by the Havant Borough Council on 18 April 2012 (ref: APP/10/00828) and by Winchester City Council on the 30 March 2012 (ref: 10/02862/OUT). A series of other RMAs for different phases of the Major Development Area have subsequently been approved by the two Councils.
- 1.2 The purpose of this review is to provide an independent evaluation of the applicant's conclusion of no adverse effects to the integrity of any European site as a result of the Phase 8 development, particularly in the context of Natural England's consultation comments regarding recreational disturbance effects.

2 Review Findings

- 2.1 The HRA report accompanying the Berewood Phase 8 RMA (Aspect Ecology, 2025) screens in three impact pathways for Appropriate Assessment: recreational disturbance, air quality and water quality (nutrient pollution). The assessments against each of these impact pathways are considered in turn below to consider whether the applicant's conclusion of no adverse effects to the integrity of any European site is justified.

Recreational disturbance

- 2.2 Likely significant recreational disturbance effects in combination are screened in for Chichester and Langstone Harbours SPA / Ramsar, and Portsmouth Harbour SPA / Ramsar. The Appropriate Assessment (Aspect Ecology, 2025) cites open space and green infrastructure (GI) provision within the wider West Waterlooville Major Development Area to mitigate any adverse effects to the integrity of these European sites.

2.3 To review the robustness of this conclusion, two key points are considered:

- ▶ Do the mitigation proposals comply with the Solent Recreation Mitigation Strategy (SRMS)?
- ▶ Will sufficient open space / GI be 'operational' prior to occupation of the Berewood Phase 8 development to avoid any temporary adverse effects?

Solent Recreation Mitigation Strategy

- 2.4 Informed by visitor research, the SRMS identifies a zone of influence of 5.6km around the Solent SPAs within which new housing development is likely to contribute to in combination recreational disturbance effects. The strategic approach provided by the SRMS allows a housebuilder to pay a financial contribution to cover the costs of mitigation over a wider area instead of needing to provide bespoke mitigation themselves.
- 2.5 The SRMS is an 'opt-in' Strategy, which allows developers to provide their mitigation through a bespoke scheme if they choose – this is emphasised more strongly in the 2024 Revised Strategy (paragraphs 1.17, 1.19), compared to the 2017 Strategy. The 2017 Strategy advises caution in using Suitable Alternative Natural Greenspace (SANG) as mitigation measures at the Solent SPAs. However, the quoted Footprint Ecology study (Liley & Tyldesley, 2013) recognises the potential of SANGs where there is good evidence that they may be effective at a particular location, and where they are close to people's homes and attractive. The study also notes that large developments may be the best way to deliver SANG (paragraphs 5.60 to 5.63).
- 2.6 The Aspect Ecology HRA alone is not considered to provide sufficient justification for the provision of SANG and evidence of its effectiveness in deterring visits to the Solent coastline to provide the necessary "certainty" under the Habitats Regulations. This could be the additional information that Natural England are seeking in their consultation response dated 20 June 2025 although no clarification is provided. However, the HRA submitted in support of the outline application (UE Associates, 2011) accepts evidence submitted by the applicant (Biodiversity by Design, 2010) regarding the likely increase in visitor numbers at coastal sites as a result of the unmitigated development, drawing on distance from site, household density, and proportions of visitors from existing developments within similar distance zones. The evidence states that, even in the absence of mitigation, the number of additional visits to the Solent coastline as a result of the wider development would be *de minimis*. When considered together with the package of GI provided within the wider development area, likely significant effects would be avoided¹.
- 2.7 On this basis, it is our view that the applicant's mitigation proposals do comply with the SRMS, with the evidence for the effectiveness of the GI provision in avoiding significant effects to the Solent SPAs alone and in combination provided within the Biodiversity By Design evidence document (2010).

¹ Note this conclusion was drawn prior to the People over Wind legal judgement which precludes consideration of mitigation at the screening stage of HRA.

Green infrastructure phasing

- 2.8 A total of 102ha of open space / GI is quoted by the applicant across the West Waterlooville Wider Development Area. In order to mitigate against any temporary adverse effects to integrity associated with Berewood Phase 8, sufficient open space needs to be operational to cater for the recreational needs of the Berewood Phase 8 residents together with all residents from already permitted phases of the development. It is acknowledged that the 102ha exceeds green space requirements under local planning policy (Aspect Ecology, 2025). The HRA accompanying the outline application (UE Associates, 2011) provides a breakdown on the GI phasing (Table 5) suggesting that the GI delivery was to be front-loaded. Section 4 of the Berewood Phase 8 HRA Technical Note (Holbury, 2025) provides an account of the status of GI at Berewood, but there is no quantification of completed provision in relation to operational / consented population figures.
- 2.9 On behalf of the applicant, Savills provided a response to version 1 of this report dated 8 September 2025 providing further clarification on this matter. The Savills letter sets out that approximately 78ha of GI has been completed to date within the Wider Development Area. It is noted that 1,776 dwellings have been consented, including the 185 dwellings in Phase 8. A current population of around 4,400 dwellings is estimated. The completed GI provision of 78ha exceeds the policy requirement for 4ha per 1,000 population and also exceeds the Natural England SANG standard of 8ha per 1,000 population.
- 2.9.1 This is considered to provide the necessary levels of “certainty” required under the Habitats Regulations to confirm that temporary adverse effects to the integrity of the Solent SPAs can be ruled out.

Air quality

- 2.10 Likely significant air quality effects in combination are screened in for Chichester and Langstone Harbours SPA / Ramsar, Solent Maritime SAC, Portsmouth Harbour SPA / Ramsar and Butser Hill SAC. At the Appropriate Assessment stage, the applicant has ruled out adverse effects to integrity on account of the distance between the development site and the European sites, and therefore considers it unreasonable that any potential increase in AADT past the European sites, including for the wider West Waterlooville Major Development Area, would be detectable against current levels of traffic flow.
- 2.11 It is also acknowledged that the HRA accompanying the outline application drew on supporting air quality modelling evidence submitted by the applicant (AEA study quoted within: Biodiversity by Design, 2010) to reach a conclusion of no significant effects associated with atmospheric pollution.
- 2.12 Natural England has not commented on air quality in their Berewood Phase 8 consultation response.

Water quality

- 2.13 Likely significant water quality effects associated with nutrient surplus in combination are screened in for Chichester and Langstone Harbours SPA / Ramsar and the Solent Maritime SAC. There is no reference to the nutrient budget within the Aspect Ecology HRA, but we note this has been provided on the planning portal for APP/24/00939 and calculates an annual nitrogen load to mitigate of 203.81 kg/TN/yr.

- 2.14 The applicant has secured nitrate mitigation with Warnford Park Estate. The Council's AA (dated 29/05/2025) notes that 'A Confirmation of Exchange' has been provided to them to demonstrate that sufficient nitrate mitigation for the proposed Phase 8 development has been reserved at the Estate subject to the grant of permission. The Council has also entered into a legal agreement with the mitigation provider to secure the mitigation for the lifetime of the development (in perpetuity). On these grounds, the conclusions of no adverse effects with regard to water quality are considered robust.

3 Summary

- 3.1 The conclusions of the Aspect Ecology HRA are considered robust with regard to air quality and water quality. For recreational disturbance, whilst the Aspect Ecology HRA does not itself provide sufficient evidence to support GI provision as an alternative mitigation approach to contributions to the SRMS, evidence submitted in support of the outline application is considered to support the applicant's approach. The applicant's response to version 1 of this report provides additional information to determine with necessary certainty, that there is no potential for temporary adverse effects to integrity whilst the GI provision is completed in its entirety. The conclusions regarding recreational disturbance are considered to be robust.
- 3.2 The status of previous RMA HRAs and previous comments made by Natural England, are considered to be immaterial to our review as the Appropriate Assessment of the Berewood Phase 8 application needs to provide certainty of no adverse effects to integrity in its own right.

References

Aspect Ecology (2025): *Berewood, Phase 8, Havant. Shadow Habitats Regulations Assessment (including an Appropriate Assessment)*, File reference: 1006898 Shadow HRA vf3 /MM/DS, 24/04/2025.

Biodiversity by Design (2010): *Evidence to Inform a Habitats Regulations Assessment Screening for the Proposed Newlands Development, Waterloooville*. November 2010

Bird Aware Solent (2017): *Solent Recreation Mitigation Strategy*, December 2017

Bird Aware Solent (2024): *Bird Aware Solent, Revised Strategy*, September 2024

Havant Borough Council (2025): *Draft HRA for the Berewood Phase 8 Development Site, London Road, Waterloooville*, application reference: APP/24/00939, dated 29/05/2025

Holbury Consultancy Service (2025): *Berewood: Phase 8 – On-site green space provision*, 9 July 2025

Liley, D. & Tyldesley, D. (2013): *Solent Disturbance and Mitigation Project: Phase III. Towards an Avoidance and Mitigation Strategy*. Unpublished report. Footprint Ecology/David Tyldesley & Associates

Natural England (2025): *Consultation response for the Berewood Phase 8 Development Site*, NE ref: 514469, dated 20/06/2025

Savills (2024): *Planning Statement Berewood Phase 8 (Park View)*, Bloor Homes Ltd, November 2024

Savills (2025): *NEWLANDS, WEST OF WATERLOOVILLE MAJOR DEVELOPMENT AREA – RESERVED MATTERS APPLICATION FOR 185 RESIDENTIAL DWELLINGS – PARK VIEW PHASE 8 (APP/24/00939). INDEPENDENT PEER REVIEW RESPONSE*. 8th September 2025

UE Associates (2011): *Habitats Regulations Screening Assessment for the Proposed Newlands Development, West of Waterloooville*. For Winchester City Council and Havant Borough Council, March 2011. Report No.: UE-0085_HRA_Screening_Report_4_110311CALnp