Habitats Regulations Assessment (HRA)
Screening and Appropriate Assessment (AA)

PLEASE NOTE: Undertaking the HRA process is the responsibility of Havant Borough Council as the Competent Authority for the purpose of the Habitats Regulations. However, it is the responsibility of the applicant to provide the Competent Authority with the information that they require for this purpose.

HRA drafting date:	25/09/2025
HRA completion date:	
Application reference:	APP/24/01027
Application address:	Land at Northney Farm, south and west of Northney Road, Hayling Island, PO11 0RX
Application description:	Prior approval for siting, design and external appearance of a polytunnel and a metal storage container for the purposes of cut flower growing.
Lead Planning Officer:	Kayleigh Taylor
Please note that all references in this assessment to the 'Habitats Regulations' refer to The Conservation of Habitats and Species Regulations 2017 (as amended).	

Stage 1 - details of the plan or project	
European site potentially impacted by planning application, plan or project:	▪ Chichester & Langstone Harbours Special Protection Area (SPA) ▪ Chichester & Langstone Harbours Ramsar site ▪ Solent Maritime Special Area of Conservation (SAC) ▪ Solent and Dorset Coast Special Protection Area (SPA) ▪ Solent and Southampton Water SPA ▪ Solent and Southampton Water Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent and Isle of Wight Lagoons SAC (Hereafter known as the Solent European Sites) ▪ Singleton & Cocking Tunnels SAC
Is the planning application directly connected with or necessary to the management of the site (if yes, Applicant should have provided details)?	No
Are there any other projects or plans that together with the planning application being assessed could affect the site?	Yes. All new development within Havant Borough that is either a) located in proximity to and may affect directly or indirectly the qualifying habitats and species of the Solent Marine Sites,

	b) new residential development within 5.6km of the Solent Marine Sites where recreational disturbance is likely to result, and c) new housing schemes and other proposals which include a net gain in overnight accommodation or development which has a high volume of water use and which are located in river catchments draining to the Solent Marine Sites.

Stage 2 - HRA screening assessment

Screening under Regulation 63(1)(a) of the Habitats Regulations – The Applicant to provide evidence so that a judgement can be made as to whether there could be any potential significant impacts of the development on the integrity of the SPA/SAC/Ramsar.

Draft HRA Screening completed on 25/03/2025:

The proposed works are situated approximately 320m south of the Chichester & Langstone Harbours Special Protection Area (SPA) and Ramsar site. The application site comprises the south-eastern corner of a large 3.4 hectare agricultural field that is currently permanent improved grassland used for silage. The site is within an agricultural landscape containing a mix of permanent grassland and arable fields interspersed with boundary hedgerows and occasional farm buildings and residential dwellings.

The field within which the application site sits is included within the Solent Waders & Brent Goose Strategy (SWBGS) as Site H60J, a Secondary Support Area providing supporting habitat to bird species associated with the nearby SPA and Ramsar site. H60J is included in the SWBGS on the basis of records of Brent Geese (peak of 750 recorded) and Curlew (peak of 24). This field forms part of a network of habitat within the wider Northney Farm used by these and other species, and it is certainly the case that birds occur across the wider landholding by using various fields at different times.

The proposed works – entailing the use of approximately 0.3 hectares for the siting of a polytunnel, storage container and cut flower growing area – do have potential to result in impacts to internationally and nationally designated nature conservation sites and the species they support. The potential impact pathways are: loss of functionally linked land, and noise and visual disturbance.

Loss of functionally linked land

The proposed works would entail the potential loss of c.0.3 hectares of land at the south-eastern corner of Site H60J. This loss would be functional, in that the application site would not be attractive to the bird species associated with Site H60J. The presence of 'temporary' buildings/structures and new screening hedging has the potential to deter bird species such as Brent Geese and Curlew from settling in the immediate surrounds of the application site.

For context, it is considered unlikely that the south-eastern corner of Site H60J would be attractive to wintering bird species. This is due to the presence of tall boundary hedging with mature trees, in addition to the existing farm vehicle access at the south-eastern corner. This area is also in close proximity to a residential dwelling (The Homestead) off Northney Road. Other factors considered likely to reduce the attractiveness of the southern/eastern parts of Site H60J include the presence of public footpaths along the entire southern boundary.

There are no data to indicate where within Site H60J wintering birds have been recorded, although photographic evidence from the applicant (photo dated 3 January 2025) shows a sizeable flock of Brent Geese located in the central section of the field immediately north, Site H60B. Sites H60J and H60B are effectively functionally contiguous, with only an incomplete low line of bramble scrub forming a partial boundary between the two fields. Based on field observations from other rural agricultural fields on Hayling Island and elsewhere it is usually the case that birds such as Brent Geese and especially Curlew will aggregate in field centres, where all-round visibility is optimised. The presence of field boundary hedges at the south-eastern end of H60J and the adjacent residential dwelling are very likely to be unattractive to the key bird species. It is therefore considered that the functional area of Site H60J is the core central area and that the use of the south-eastern corner would not result in direct loss of functional bird habitat.

The proposed cut flower business is stated as operating primarily during the spring and summer period and therefore activity at the site will be significantly reduced during the key overwintering period.

Detailed discussions have taken place between the applicant and Havant Borough Council in order to reduce the potential visual/landscape impacts of the proposed development. This has entailed changes to the proposed layout and appearance of the site which in turn has had the effect of removing potential sources of impact to overwintering bird species.

The site will be screened using new native species hedging, and the temporary structures (a shipping container and small polytunnel) will be situated at the southern end of the area of activity and be entirely screened by the hedging. In addition, the container building will be clad with timber, thereby further reducing its visual impact.

It is considered that these intrinsic design amendments will serve to effectively screen the area of activity from the remainder of Site H60J to the extent that the potential impacts from habitat loss and visual disturbance are de minimis.

Noise and visual disturbance

There is some potential for noise and visual disturbance during construction and operational activities. This could result in disturbance impacts to any SPA/Ramsar qualifying bird species present within the wider Site H60J.

The proposed development will be constructed outside the overwintering period of October – March inclusive and therefore impacts from construction will be avoided.

Would the proposal lead to a likely significant effect on European site integrity?

No, it is considered that the proposed works would not result in impacts to European site integrity.

Natural England Comments received 22/04/2025:

As submitted, the application could have a likely significant effect on the Solent and Southampton Water Special Protection Area (SPA). Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

The following information is required:

• Further detail on the location of wintering birds within the SWBGS site H60J in order to support the screening conclusion of no likely significant effect.

• If likely significant effects cannot be avoided, suitable mitigation should be provided in line with the SWBGS strategy

The proposals have the potential to affect SPA functionally linked 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. Please see the Solent Wader and Brent Goose Strategy (SWBGS) for more information.

This prior approval application includes the loss of 0.3ha of SWBGS site H60J, classified as a 'low use' site.

It is advised that the impact is properly assessed and any identified impacts are addressed in line with the SWBGS Guidance on Mitigation and Offsetting Requirements. To help inform this assessment, we advise that consideration of the location of bird records on H60J is included. These data are available via the Hampshire Biodiversity Information Centre (HBIC). It is advised that a sufficient level detail of any mitigation measures informs your authority's appropriate assessment, in order to provide the necessary confidence and certainty that such mitigation will be effective and
deliverable in perpetuity.

It is advised that any indirect impacts from these proposals are properly assessed and any identified impacts are addressed in line with the SWBGS Guidance on Mitigation and Offsetting Requirements.

Amended HRA screening

Would the proposal lead to a likely significant effect on European site integrity?

Having regards to the above consultation response from Natural England, it is considered that the proposed works could result in impacts to European site integrity.

Stage 3 - Appropriate Assessment

Appropriate Assessment under Regulation 63(1) - if there are any potential significant impacts, the applicant must provide evidence showing avoidance and/or mitigation measures to allow an Assessment to be made. The Applicant must also provide details which demonstrate any long-term management, maintenance and funding of any solution.

The applicant is proposing the following mitigation measures;

- To plant an area of 1000sqm of winter wheat annually to provide feeding habitat for Brent Geese during the winter months for the length of time that the proposed structures (polytunnel and storage container) are in situ.
- Structures have been located adjacent to the neighbouring property, high hedges and the public footpath where there is already significant disturbance to Brent Geese.
- Provide screening for structures with native hedging and shrubs.
- Construction will be undertaken outside the winter months.
- There will be no artificial lighting as part of the proposals

Stage 4 – Summary of the Appropriate Assessment (To be carried out by the Competent Authority (the local planning authority) in liaison with Natural England

It is considered that appropriate and proportionate avoidance and mitigation measures are proposed. The implementation of these measures will remove the potential for impacts to the identified European sites.

Natural England Officer:

Summary of Natural England’s comments: