Date: 14 October 2025
Our ref: 529663
Your ref: APP/25/00766

Ms Selina Donophy
Havant Borough Council
planning.development@havant.gov.uk

BY EMAIL ONLY

Hornbeam House
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Crewe
Cheshire
CW1 6GJ

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Dear Ms Donophy,

Planning consultation: Application to determine if Prior Approval is required for a proposed Change of use from Commercial, Business and Service (Use Class E) to mixed use including up to two flats (Use Class C3).
Location: 13 Elm Grove, Hayling Island, PO11 9EA

Thank you for your consultation on the above dated 08 October 2025 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

The proposed development has the potential to have a harmful effect on terrestrial Sites of Special Scientific Interest (SSSIs) and those Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites that they underpin.

Natural England's statutory advice on these potential impacts is set out below.

Designated sites

Further information required - potential water quality/nutrient impacts to European Sites (habitats sites)

This development site is within the catchment of a European Site (habitats site) vulnerable to nutrient impacts.

Within this location, proposals with the potential to affect water quality may have a likely significant effect on the qualifying features of the European Site (habitats site) through adverse nutrient impacts.

Natural England advises that such developments require a **Habitats Regulations Assessment (HRA)**, which has been informed by nutrient budget calculations (Using the nutrient neutrality

calculators - GOV.UK (www.gov.uk) or local calculator if preferred), to consider the impacts, alone and in combination with other plans/projects, proceeding to appropriate assessment stage where likely significant effects cannot be ruled out.

The HRA should take into consideration the Natural England Access to Evidence - Conservation Objectives for European Sites and it will need to set out in detail any mitigation measures that will be secured in this case, along with the necessary justification of their likely efficacy to ensure there is no adverse effect on the integrity of the site in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended).

Natural England must be consulted on any proposals which reach the appropriate assessment stage of HRA. With the consultation, please include a nutrient mitigation strategy including information on the management and monitoring of the proposed mitigation measures along with details of how they will be secured and funded in perpetuity.

Please refer to Strategic Solutions: Nutrient Neutrality (naturalengland.org.uk) for further information.

Please be aware that if the information is not supplied, Natural England may need to consider objecting to the proposal based on potential harm to the habitats site(s).

Further information required - recreational pressure impacts to Solent SPAs

This development site is within the zone of influence (ZoI) for recreational pressure impacts to the Solent SPAs.

Within this ZoI, proposals for any net increase in residential units will have a likely significant effect on the qualifying features of the Solent SPAs through increased recreational pressure when considered either alone or in combination with other plans and projects.

Your authority has measures in place to manage these potential impacts through a strategic solution which Natural England considers will be effective in preventing adverse impacts on the integrity of the site(s).

Notwithstanding this, Natural England advises that these measures should be formally checked and confirmed by your authority, as the competent authority, via an **appropriate assessment** in view of the Natural England Access to Evidence - Conservation Objectives for European Sites and in accordance with the Conservation of Habitats & Species Regulations 2017 (as amended).

Providing the appropriate assessment concludes that the measures can be secured, it is likely that Natural England will be satisfied that there will be no adverse effect on the integrity of the Solent SPAs in relation to recreational disturbance.

Where the proposal includes bespoke mitigation that falls outside of the strategic solution, Natural England should be consulted.

Reserved Matters applications, and in some cases the discharge/removal/variation of conditions, where the permission was granted prior to the introduction of the strategic approach, should also be subject to the requirements of the Conservation of Habitats & Species Regulations 2017 (as amended) and our advice above applies.

Discretionary Advice

Natural England may provide further advice to the applicant through the discretionary advice service (DAS). Refer to Developers: get environmental advice on your planning proposals - GOV.UK (www.gov.uk) for more information.

Impact Risk Zones for Sites of Special Scientific Interest
We strongly recommend that local planning authorities (LPAs) use Natural England's Impact Risk Zones for Sites of Special Scientific Interest (SSSI IRZs) (available from the Natural England Open Data Geoportal (arcgis.com) and to use on MAGIC (defra.gov.uk) along with guidance) to decide when to consult Natural England on development proposals that might affect a SSSI.

The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances. Use of the SSSI IRZs avoids the need for a formal email consultation on some development proposals, reducing unnecessary delays in the planning process. In turn this allows Natural England to concentrate resources on development proposals with the highest risks and opportunities for nature recovery.

Planning and transport authorities: get environmental advice on planning - GOV.UK (www.gov.uk) provides further guidance on when LPAs must consult Natural England on development proposals.

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries, please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Nikki Smart
Consultations Team