

From: Glover, Gill

Sent: 12 March 2026 10:40

To: Eaves, David

Cc: Crowther, Beth

Subject: Re: Consultation Request for APP/21/01434 Rook Farm, land off St Marys Road, Hayling Island

Good morning David,

I have the following comments to make in relation to the application.

Due to the application being an outline I am satisfied that an occupancy figure of 2.4 is suitable for the nutrient budget as the applicant will need to at reserved matters submit another nutrient budget reflecting the true number of dwellings and occupancy at that stage.

The nutrient budget has not been submitted in full. We are missing the SUDs tab of the nutrient budget therefore I cannot conclude it has been completed correctly.

Also, with regards to the nutrient budget, I would require one nutrient budget for the development site and a separate nutrient budget for the mitigation scheme. Due to the merging of the nutrients budget into one calculator it is unclear whether the nutrient calculation for the mitigation scheme is accounted for correctly.

In relation to the mitigation scheme, I cannot find any scientific information submitted as part of the application. As set out in the [Council's Position Statement](#) :

3.8 Applicants may also wish to propose their own mitigation scheme. In such cases, applicants are encouraged to enter into early discussions with Natural England through the Discretionary Advice Service¹⁰. It will also be necessary to discuss the proposals with the Council as the competent authority.

3.9 In all cases it will need to be established that there is a clear scientific link between the proposed development and the mitigation scheme to ensure the development in question is nutrient neutral. Any third-party mitigation scheme would also be required to provide supporting evidence to the Council as the competent authority for the proposed development to conclude that the mitigation principles set out in Natural England's guidance have been met. This will need to constitute robust information bespoke to the scheme in question which can be assessed as part of the AA for the planning application in question.

3.10 Third-party mitigation may be bespoke to that development and the mitigation scheme in question. The mitigation provider would normally be expected to provide Natural England and the Council with the necessary information to demonstrate the scientific link between the mitigation site and the catchment in which the development is located. In some cases, it may be necessary for the project level HRA associated with that planning application to be undertaken by a contractor. The cost of this will need to be met by the applicant.

I cannot see that the above information has been submitted other than referencing the sites location in the conclusions of Appendix 7.2 Information to Inform Habitat Regulations Assessment paragraph 4.49. In order for the land to be suitable for nutrient purposes it would need to be managed in a nutrient neutral way. As it stands, it is not clear how nutrient mitigation can be provided alongside all the other mitigation practices taking place on the same mitigation site, and how they interact with one another. That is why it is important we have a separate nutrient budget for the mitigation site, and it is clearly set out how the mitigation land will be managed for nutrient neutrality alongside the bird refuge.

Kind regards,

Gill Glover

Principal Planning Policy Officer | E: gill.glover@havant.gov.uk | T: 02392446534 | M: 07918586528

Planning Services, Havant Borough Council, Public Service Plaza, Havant, PO9 2AX