

Osmond, Gary

From: SM-Defra-PlanConsAreaTeamThamesSolent (DEFRA)
<PlanConsAreaTeamThamesSolent@defra.gov.uk>
Sent: 21 December 2022 10:03
To: Osmond, Gary
Subject: RE: F/22/93876 - Bassett House, 36 Leigh Road, Eastleigh, SO50 9DT

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Gary,

Our Reference: 414133

Your reference: F/22/93876 Updated HRA & Appropriate Assessment & Nutrient Budget Calculator - Conversion of existing offices to a Sui Generis HMO, including ground & 1st floor rear extensions & alterations to the roof, including raising the ridgeline etc. Bassett House, 36 Leigh Road, Eastleigh SO50 9DT

Thank you for your consultation on the above proposal and please accept our sincere apologies for the delay in responding to you. Please find our formal response below.

OBJECTION - Recreational impacts on the New Forest SAC, SPA and Ramsar

The HRA identifies that the development will contribute to an increase in recreational pressure on the New Forest designated sites, in combination with other planned development within the identified 13.8km catchment zone. The Appropriate Assessment outlines that mitigation will be provided in the form a financial contribution towards Eastleigh Borough Council's Interim Mitigation Strategy to address recreational impacts on the New Forest designated sites. Natural England understands this strategy was approved at a cabinet committee meeting in March 2022, to last for 5 years up to March 2027, while cross-boundary partnership work with other affected local authorities and Natural England progresses the development of a longer term, strategic, proportionate, and co-ordinated approach to suitably address the impacts from planned growth across the area.

Natural England have serious concerns with various elements of the interim strategy, including the reduced provision of Suitable Alternative Natural Greenspace (SANG), the lack of information on increasing visitor capacity at the Itchen Valley Country Park (IVCP) and lack of an accompanying monitoring strategy. This leads to a significant level of uncertainty remaining as to the effectiveness of the proposed in-borough measures. Additionally, we have concerns that the approach will harm ancient woodland at the proposed SANG site east of Allington Lane due to pressure from increased access.

We do not consider the approved Interim strategy is precautionary enough. We advise that further information is provided that demonstrates the effectiveness of providing SANG at a 2ha/1000 people standard, an assessment of current visitor levels/increased capacity at IVCP and agreed measures, and an accompanying monitoring strategy. Without this information, we advise it is not **currently possible to conclude no adverse effects on the integrity of the New Forest designated sites.**

Additionally, information on how impacts on ancient woodland from increased access will be avoided and/or mitigated at the proposed SANG site should be provided to demonstrate alignment with requirements in the National Planning Policy Framework regarding irreplaceable habitat and Natural England's [standing advice on ancient woodland, ancient trees and veteran trees](#).

IMPACTS ON DESIGNATED SITES FROM PHOSPHORUS LOADING— FURTHER INFORMATION REQUIRED

Natural England have considered the Council's Phosphate Mitigation Strategy, which relies on the strategic land use change the Council has already secured for nitrogen mitigation. We note that the P baseline figures for the relevant

parcels of land have been ascertained using the Natural England Itchen calculator (2022). We are largely supportive of the scheme as an interim approach, however some further detail and clarification is required in order to ensure the approach is robust and precautionary:

- **Geohydrology and surface flow pathways** - there is no supporting evidence regarding the geohydrology of the land parcels and how this may affect P leaching rates into the Itchen and which drainage pathways are taken. It appears that roughly a fifth of the strategic land discharges into the Itchen SAC (the river itself) approximately 1.5km below the discharge point at Chickenhall WwTW. A key principle of P mitigation is that it has to take effect prior to the discharge – on a river this means upstream of the wastewater discharge. It is advised these aspects are reassessed for the purpose of the calculations. Any land draining below the point of wastewater discharge from new development is likely to have to be discounted.
- **Baseline P loading figures** – further clarification is required regarding the baseline figure for Parcel 35, in relation to differing soil types and drainage at the site. We recommend the figures underpinning the strategy are clearly set out within an appendix or similar supporting document for clarity and transparency purposes, confirming soil and drainage types and previous land uses, and how these have been applied to the calculator.
- **Define development this scheme can support** – clear confirmation is needed of which development within Eastleigh borough this approach can be applied to, i.e. development discharging below the point of mitigation taking effect.

Until the above aspects can be addressed and the overall interim strategy agreed with Natural England, we advise it is not yet possible for your appropriate assessment to make a conclusion of no adverse effect on integrity in relation to phosphorus impacts.

IMPACTS ON DESIGNATED SITES FROM NITROGEN LOADING - NO OBJECTION SUBJECT TO SECURING APPROPRIATE MITIGATION

With regards to nitrogen loading, 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 adverse effects that could potentially occur as a result of nitrogen loading from the proposal, Natural England advises that we concur with the assessment conclusions. This advice is provided on the basis that that your authority is assured and satisfied that the nutrient budget calculations are suitably precautionary and accurately reflect the proposal. We recommend that water use of 110 litres per person per day is secured.

Your authority has measures in place to manage potential nitrogen impacts through contributions to an agreed strategic solution which we consider to be ecologically sound. Natural England is of the view that if these measures, including contributions to them, are implemented, they will be effective and reliable in preventing harmful effects from nitrogen on the Habitats Site(s) for the duration of the proposed development.

This advice is provided on the basis that all mitigation measures will be secured as planning conditions or obligations by your authority to ensure their strict and timely implementation for the full duration of the development. Your authority should be assured that proposed financial contribution rates are proportionate to the identified effects of the proposed development, suitably precautionary, and in line with the Retail Price Index, where relevant.

Sites of Special Scientific Interest (SSSIs)

The above impact(s) may also affect SSSIs. Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 281 (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.

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.

Kind regards,

Amy

Amy Kitching
Senior Adviser
Thames Solent Area Team

Natural England

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www.gov.uk/natural-england



Many Natural England staff are working remotely. Although some offices and our Mail Hub are now open, please continue to send any documents by email or contact us by phone to let us know how we can help you.

From: Osmond, Gary <Gary.Osmond@eastleigh.gov.uk>
Sent: 24 November 2022 18:02
To: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Subject: F/22/93876 - Bassett House, 36 Leigh Road, Eastleigh, SO50 9DT

Dear Sir/Madam,

Please find attached a completed updated HRA and nutrient budget calculator for the above proposed development, further details of which can be found on the Council's website via the link below.

<https://planning.eastleigh.gov.uk/s/papplication/a1M4J000001x6Ur/f2293876>

Should you have any queries or wish to discuss the application, please do not hesitate to contact me.

Regards,

Gary Osmond
Senior Planning Officer
Service Delivery - Specialist Services - Housing and Development
023 8068 8490



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Eastleigh Borough Council

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