

APPENDIX 6

From: [Louise Cutts](#)
To: [Louise Cutts](#)
Subject: FW: F/22/94422 nitrate offer
Date: 15 September 2023 15:02:50
Attachments: [image001.png](#)
[image002.png](#)
[phosphate-scheme-information-200922.pdf](#)

From: Nutrient Offset Scheme <nutrientoffset@eastleigh.gov.uk>
Sent: Thursday, September 14, 2023 8:55 AM
To: Louise Cutts <LouiseCutts@wessexplanning.com>; Nutrient Offset Scheme <nutrientoffset@eastleigh.gov.uk>; Joe Cutts <joecutts@wessexplanning.com>
Subject: RE: F/22/94422 nitrate offer

Good Morning,

Thank you for getting in touch.

I can tell you that after considering the application for phosphate mitigation, we would offset West End land. This is appropriate for drainage in Chickenhall WWTW.

I have attached the scheme information to this email for you to look through.

Please do not hesitate to get back in touch if you have any further questions.

Kind regards,
Lucy
Nutrient Mitigation Scheme

From: Louise Cutts <LouiseCutts@wessexplanning.com>
Sent: Tuesday, September 5, 2023 12:21 PM
To: Nutrient Offset Scheme <nutrientoffset@eastleigh.gov.uk>; Joe Cutts <joecutts@wessexplanning.com>
Subject: RE: F/22/94422 nitrate offer

Hi Lucy

I will need a plan of the area for the phosphate mitigation. Otherwise the appeal inspector will support Natural England's concerns that some areas of the EBC phosphate mitigation discharge downstream of the Chickenhall Waste Water works.

Are you able to supply this before too long?

Kind regards

Louise Cutts BA (Hons) Dip TP MRTPI
Director



Meadowsweet Cottage, Morleys Lane, Ampfield SO51 9BJ

Tel: 07940 033645

Email: louisecutts@wessexplanning.com

Website: <http://www.wessexplanning.com/>

From: Nutrient Offset Scheme <nutrientoffset@eastleigh.gov.uk>

Sent: Tuesday, September 5, 2023 9:47 AM

To: Louise Cutts <louisecutts@wessexplanning.com>; Nutrient Offset Scheme <nutrientoffset@eastleigh.gov.uk>; Joe Cutts <joecutts@wessexplanning.com>

Subject: RE: F/22/94422 nitrate offer

Good morning,

Thank you for confirming your wish to go ahead with the below offer. I have requested both nitrate and phosphate invoices from accounts and will be in touch as soon as I have received them.

Many thanks

Lucy

Nutrient Mitigation Scheme

From: Louise Cutts <louisecutts@wessexplanning.com>

Sent: Friday, September 1, 2023 3:32 PM

To: Nutrient Offset Scheme <nutrientoffset@eastleigh.gov.uk>; Joe Cutts <joecutts@wessexplanning.com>

Subject: RE: F/22/94422 nitrate offer

Importance: High

Thank you Lucy

My client would like to go ahead with this purchase, but cannot until his appeal has been decided. However we have to show the Inspector that the credits are available to purchase, so an invoice would be good.

We also need an invoice and a plan for the phosphate mitigation to show that the area of land offered is upstream from the Waste water works. This is so the planning inspector doesn't set any store by the inevitable natural England objection!

Kind regards

Louise Cutts BA (Hons) Dip TP MRTPI
Director



Meadowsweet Cottage, Morleys Lane, Ampfield SO51 9BJ

Tel: 07940 033645

Email: louisecutts@wessexplanning.com

Website: <http://www.wessexplanning.com/>

From: Nutrient Offset Scheme <nutrientoffset@eastleigh.gov.uk>
Sent: Wednesday, August 30, 2023 1:58 PM
To: Joe Cutts <joecutts@wessexplanning.com>; Nutrient Offset Scheme <nutrientoffset@eastleigh.gov.uk>
Cc: Louise Cutts <louiseCutts@wessexplanning.com>
Subject: RE: F/22/94422 nitrate offer

We would like to follow up your Expression of Interest for Nitrate Credits with an offer to purchase.

The cost of 3.410kg of Nitrate Mitigation Credits would be £10,230 plus VAT, there is also a fee for legal and administration costs of £500 plus VAT. Please note that all charges are subject to CPI with the base date of December 2022 which will be calculated and added to the cost at the point of raising our invoice.

Should you wish to go ahead with the purchase, please reply to this email confirming the below statements:

- . You wish to go ahead with the purchase.
- . Confirmation from your LPA that Planning Permission has been granted.
- . Your LPA will accept a Vesting Certificate as evidence of Nitrate Mitigation, and proof of purchase.

On receiving the above confirmations, we will issue you an invoice requesting payment. Once payment has cleared, we will issue you your Vesting Certificate.

Should you require any further assistance please do get back to me.

Kind regards

Lucy
Nutrient Mitigation Scheme

From: Joe Cutts <joecutts@wessexplanning.com>
Sent: Friday, August 4, 2023 9:11 AM
To: Nutrient Offset Scheme <nutrientoffset@eastleigh.gov.uk>
Cc: Louise Cutts <louiseCutts@wessexplanning.com>
Subject: FW: F/22/94422 - 63 Underwood Road
Importance: High

Hi Lucy,

Further to the below, please find attached the completed Expression of Interest forms, as requested.

Kind Regards

Joe Cutts

Director



Meadowsweet Cottage, Morleys Lane, Ampfield SO51 9BJ

Tel: 07825 363850

Email: joecutts@wessexplanning.com

Website: <http://www.wessexplanning.com/>

Eastleigh Borough Council Phosphate Scheme Information



Nutrient mitigation land at Stoke Park Farm in Bishopstoke

About Eastleigh Borough Council's Phosphate Scheme

Eastleigh Borough Council's Phosphate Scheme provides Phosphate credits for developers looking to offset nutrient runoff from new developments. The credits being offered by the Council are derived from land-use change (the cessation of farming practices) across the Council's strategic land holdings within the Itchen SAC catchment. Council-owned strategic land that falls outside of the Itchen SAC catchment has been excluded from the Phosphate scheme.

This land is already secured for nutrient mitigation and other complimentary uses through entries on Title with the land registry, and is already being used by the Council to provide Nitrate mitigation.

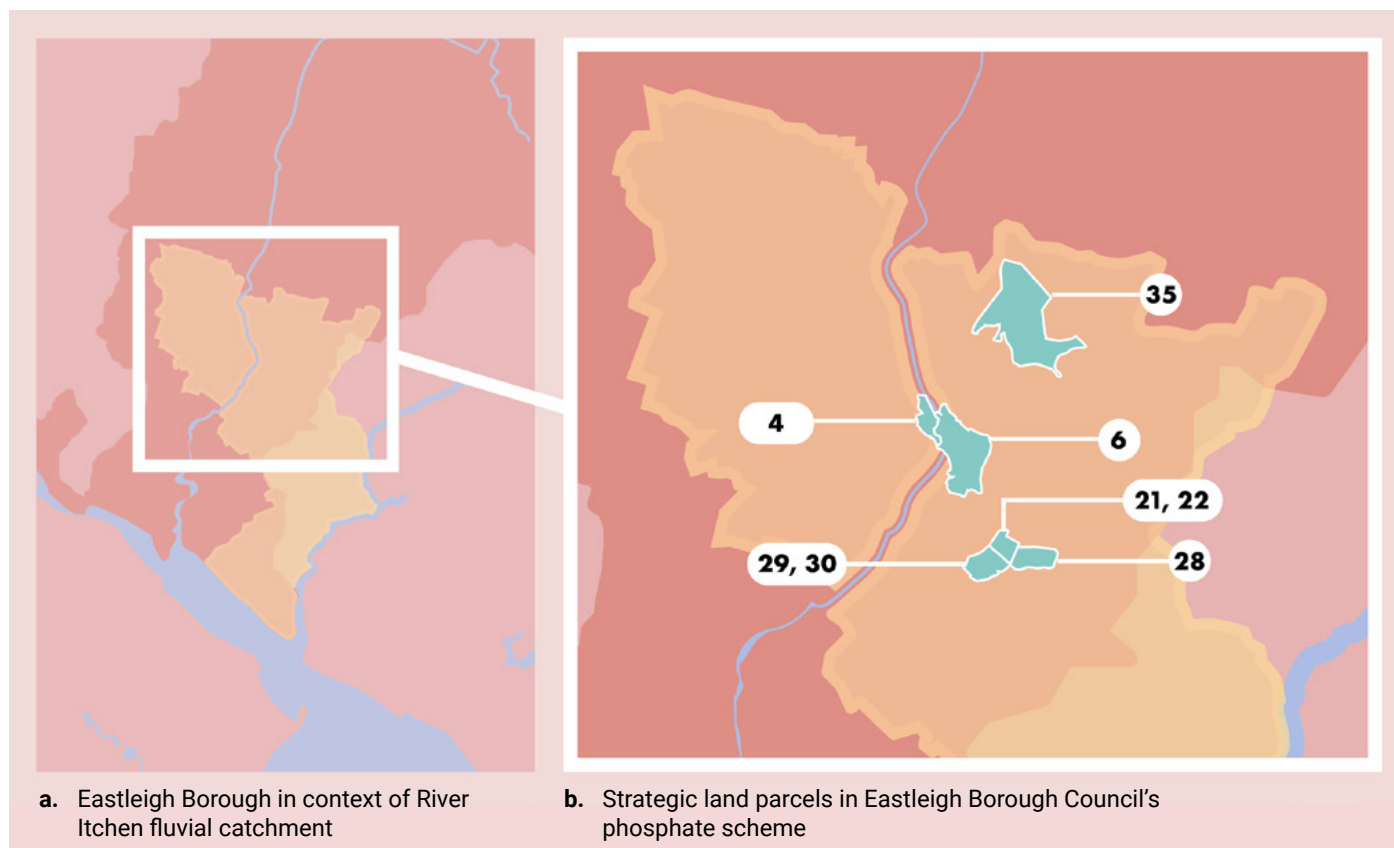
Details of Credits

The amount of Phosphate credits has been taken from Farmscoper work conducted in 2021 by Hilson Moran. This work was peer reviewed and confirmed by Dr Richard Gooday of ADAS.

From the Farmscoper results, 0.02kg/P/ha/yr has been deducted to reflect background Phosphate load from greenspace and/or woodland in accordance with Natural England's March 2022 guidance.

Supporting information from Hilson Moran of the approach taken and outputs of Farmscoper are included in Appendix 1.

The map below indicates the different strategic land holdings owned by the Council within the River Itchen fluvial catchment. This map is for illustrative purpose - see appendices 2-7 for details.



The table below identifies location, Farmscoper output and net Phosphate credits available across the Councils relevant land strategic holdings.

LR Title Number(s)	Locale	Map ID	Catchment	Owner	Area (Ha)	Farmscoper kg/TP/yr	Imposed P-load from new land use	Net Impact kg P/yr
HP585566, HP717268	West End	21,22	Itchen	Gosney	9.38	10.63	0.19	9.80
Unregistered	West End	28	Itchen	Gosney	15.11		0.30	
HP503665, HP474351	West End	29,30	Itchen	Gosney	16.93		0.34	
HP279019, HP632865	Bishopstoke	4	Itchen	Morris	9.74	19.20	0.19	19.01
HP618985	Bishopstoke	6	Itchen	Dunford	55.73	32.88	1.11	31.77
HP727269	Fair Oak	35	Itchen	Dunford	90.94	88.42	1.82	86.60
					197.83	151.13	3.95	147.18

Appendices

Strategic land maps

1. Hilson Moran Farmscoper Results
2. HP727269 - Fair Oak. Map reference 35
3. HP279019, HP632865 - Bishopstoke. Map reference 4
4. HP618985 - Bishopstoke. Map reference 6
5. HP585566, HP717268 - West End. Map reference 21, 22
6. HP503665, HP474351- West End. Map reference 29, 30
7. Unregistered, West End. Map reference 28

1. Hilson Moran Farmscoper Results



Chris Payne
One Horton Heath Project Director
Eastleigh Borough Council
Eastleigh House
Upper Market Street
Eastleigh
SO50 9YN

12th August 2022

25709_NN/220812/PB1

Dear Chris

EASTLEIGH BOROUGH COUNCIL STRATEGIC LAND PARCELS – BASELINE PHOSPHOROUS LOSS METHODOLOGY

Following Natural England's (NE) recent inquiry regarding the robustness of our approach for calculating agricultural nitrogen (N) loss from the various Strategic Land Parcels acquired by Eastleigh Borough Council (EBC), and our response dated 6th June 2022, we have been requested to provide a similar statement for our approach for calculating agricultural phosphorous (P) loss from EBC's Strategic Land Parcels. Consequently, I have the following comments:

- None of the Strategic Land Parcels include residential dwellings, other than Stoke Park Farm Dairy. As a precautionary measure, the sewage contributions of P from the existing Stoke Park Farm dwellings have not been accounted for in the previously reported baseline figures. Consequently, none of the NE Solent Nutrient Budget Calculator (SNBC) (Version 2, 21.04.22) Stage 1 input parameters are relevant.
- With regard to Stage 2 of the NE SNBC (*i.e.* pre-development land use) and with reference to the NE "Nutrient Neutrality Generic Methodology" (Issue 1: February 2022), "*Estimates of the nitrogen and phosphorus export from agricultural land [within the new NE tool] have been derived using Farmscoper, an industry standard tool for assessing the pollution risks posed by agriculture. Farmscoper outputs values for kilograms of nitrate and total Phosphorus export per hectare of farmland. These values are termed export coefficients. Using an add-on to Farmscoper called the Upscale tool, nitrate and total Phosphorus export coefficients can be generated without requiring additional data.*" The new NE SNBC tool is pre-populated with P (and N) export coefficients suitable for the Solent, based on broad scale modelling of the various catchments conducted by Ricardo for NE. However, the "Nutrient Neutrality Generic Methodology" also states that "*If there is good evidence, such as the output from farm-specific Farmscoper modelling or a detailed monitoring exercise, this can be used to support a different export efficient.*"

As comprehensive data was available for current and historic agricultural operations for the various Strategic Land Parcels (including fertiliser and farm yard manure (FYM) applications, crop types, livestock types and number *etc*), then improved accuracy in P (and N) export rates has been achieved by using this data (which was obtained through questionnaires, walkover surveys and interviews with farmers and their agents) and input into Farmscoper modelling.



All land parcels lie within the “*Hamble Estuary Eutrophic Nitrate Vulnerable Zone*” (NVZ), designated for the purposes of the Nitrate Pollution Prevention Regulations 2015. Specific farming practices are controlled in the designated area to reduce N losses from agriculture to water. Consequently, the NVZ designation:

- Requires farmers within the NVZ to reduce nitrate pollution;
- The farmers must follow a set of mandatory rules, known as the Action Programme Measures; and
- The Action Programme Measures are based on Good Agricultural practice and require the careful management and recording of fertiliser and manure use.

In addition, voluntary measures may be employed by farmers within NVZs, which derive from advice and incentives to farmers and landowners and include Catchment Sensitive Farming projects, Environmental Stewardship Schemes and other measures detailed in the Test and Itchen and Solent Diffuse Water Pollution Plans.

Many of the above measures also serve to reduce P inputs into the Hamble, Test and Itchen.

As such, within the Strategic Land Parcels N budget calculations, NVZ compliance should be regarded as the baseline condition from which any modifications in P (and N) export values resulting in land use changes should be referenced.

Consequently, Farmscoper input parameters supplied by farmers and/or their agents were then checked by Chris Coxon BSc(Hons) Agric, FACTS, Director of Tiller Farm Consultancy Ltd, Eastleigh for any potential anomalies and to confirm that all operations were NVZ compliant. Chris Coxon has over 20 years hands on experience working in agriculture, both managing and consulting for farm businesses. He is well known in the industry for working with farmers on a national scale and Tiller Farm Consultancy Ltd provides, technical, practical and financial advice to farmers, including achieving NVZ compliancy. Chris’s review lead to a couple of the questionnaires being revised after he questioned farmers on anomalies and these were used to update the Farmscoper model inputs accordingly. Nevertheless, Chris verified that all of the fertiliser and FYM applications were NVZ compliant.

The use of Farmscoper and its specific application to the Strategic Land Parcels of interest was then peer-reviewed by Dr Richard Gooday of ADAS UK Ltd. Dr Gooday specialises in modelling and data analysis and is the lead advisor at ADAS on Farmscoper, and was one of the original creators of the Farmscoper software. Dr Gooday made a number of helpful suggestions with regard to the modelling, which were all addressed to his satisfaction. Consequently, he concluded that *“I confirm that the Farmscoper model appears to have been applied correctly, using appropriate input data for the farms being modelled, and that the outputs are sensible for the model and data used.”*

Therefore, the Farmscoper modelling used to provide the P export values for the Strategic Land Parcels is robust and, as it is based on site specific farm operational data, will provide more accurate results than the approach based on the default values within the new NE SNBC tool.

- Within the new NE SNBC tool, the type of drainage for the pre-existing land is derived from the Cranfield Soil and Agrifood Institute Soilscape drainage descriptions of “*Freely draining*”, “*Slightly impeded drainage*”, “*Impeded drainage*”, “*Variable*”, “*Surface wetness*” and “*Naturally wet*”. These are derived by going to the Soilscape website (refer to <http://www.landis.org.uk/soilscales/>), selecting the location of interest and then reading off the drainage type, which is then input in to the new NE tool by means of a drop-down list. With



reference to the “Lookups” tab in the new tool these are then directly related to the available Farmscoper soil types as per the table below:

Table 5: Stage 2 and 3 Soil Drainage Lookup

Soilscape drainage term	Farmscoper term	Definition
Freely draining	FreeDrain	Free Draining
Slightly impeded drainage	DrainedAr	Drained for arable
Impeded drainage	DrainedArGr	Drained for arable and grassland
Variable	DrainedAr	Drained for arable
Surface Wetness	DrainedAr	Drained for arable
Naturally wet	DrainedAr	Drained for arable

Consequently, as the drainage characteristics of the Strategic Land Parcels have also been derived from Soilscape in order to be input into our bespoke Farmscoper modelling, this approach is consistent with that used in the new NE SNBC tool.

- With regard to rainfall – Farmscoper is divided into 6 rainfall classes. At first glance, the new NE tool would appear to have greater resolution for rainfall range, being divided into 12 rainfall classes. However, with reference to the “Lookups” tab on the tool, the 12 NE rainfall classes are distilled down to the 6 Farmscoper rainfall classes when looking at pre-existing agricultural land use. The 12 more detailed classes are only used for the derivation of post-development urban runoff P (and N) export values. As such, as the Farmscoper modelling is only used to derive P export values for pre-existing agricultural land use, the resolution of the rainfall data used in our modelling is the same as that used in the New SNBC tool.

It has been demonstrated, therefore, that the same approach has been used in our baseline Farmscoper modelling for drainage and rainfall as that used in the new NE SNBC tool, whilst the accuracy of our outputs have been enhanced by using farm specific operational data (including fertiliser and FYM applications, crop types, livestock types and number *etc*), which have been peer-reviewed and approved by experts in the field, including one of the original creators of the Farmscoper modelling tool. Consequently it can be concluded that the results from our modelling are robust and would not be improved by remodelling with the new NE SNBC tool.

The P export values derived with the above methodology, for agricultural land parcels acquired by EBC within the Itchen Catchment, are presented in the table below:

LR Title Number(s)	Locale	Parcel ID	Catchment	Owner	Area (ha)	Farmscoper P export value (kg P/yr)
HP585566, HP717268	West End	21 & 22	Itchen	Gosney	9.38	10.63
Unregistered	West End	28	Itchen	Gosney	15.11	
HP503665, HP474351	West End	29 & 30	Itchen	Gosney	16.93	
HP279019, HP632865	Bishopsgate	4	Itchen	Morris	9.74	19.20
HP618985	Bishopsgate	6	Itchen	Dunford	55.73	32.88
HP727269	Fair Oak	35	Itchen	Dunford	90.94	88.42
TOTAL					197.83	151.13



If you have any queries regarding the above, please do not hesitate to get in contact.

Kind regards

A handwritten signature in black ink, appearing to be 'P. Bond', enclosed in a thin black rectangular border.

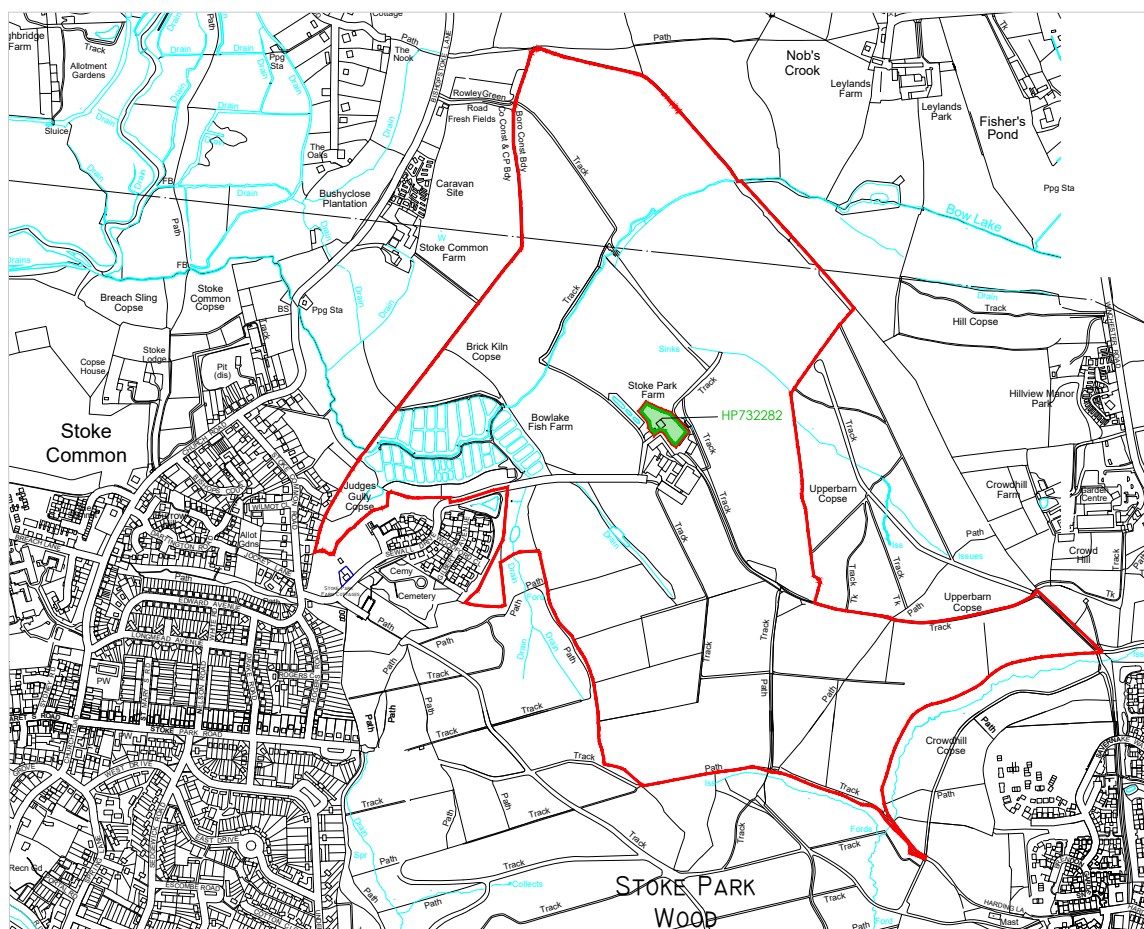
Paul Bond

PhD MSc BSc CEnv CSci MEnvSc MCIEEM

Associate Sustainability Consultant,

Hilson Moran Infrastructure and Environment Group

2. HP727269 - Fair Oak. Map reference 35



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- Title HP732282
- Part Title HP727296
- Part Title HP727296 excluded from purchase

Scale 1:5000 @ A2



ADDRESS: [Dunford]
Land at Stoke Park Farm
Bishopstoke
Eastleigh

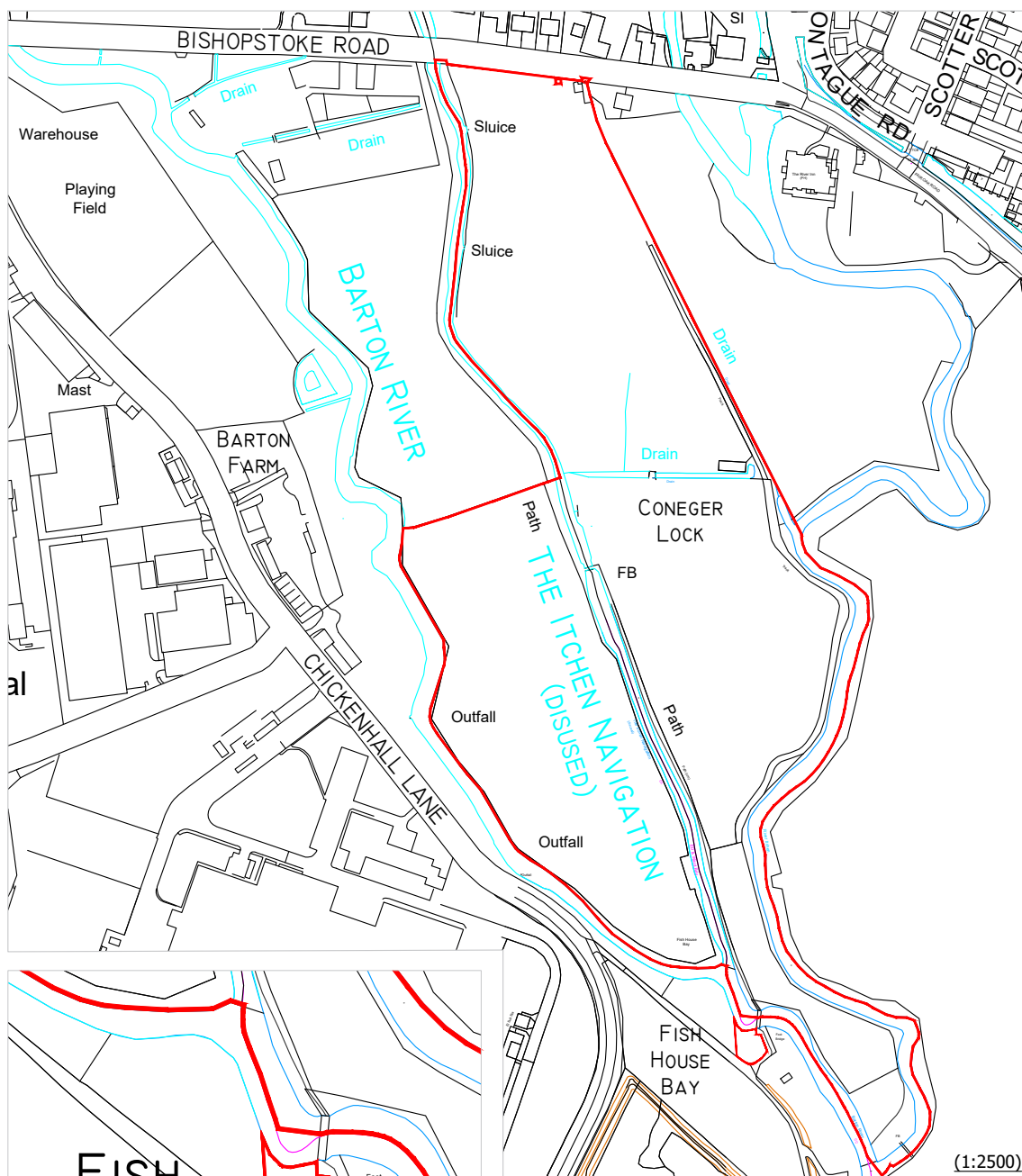
TITLE: Transfer Plan

Ref. 228 SLP DUN-LR02

Date: 12th of November 2021

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3. HP279019, HP632865 - Bishopstoke. Map reference 4



Scale as marked @ A3



Inset - HP362865

Area (HP362865): 0.034 H.A.
Area (HP279019): 10.13 H.A.

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ADDRESS: [Morris]
Land East of Chickenhall
South Bishopstoke
Eastleigh

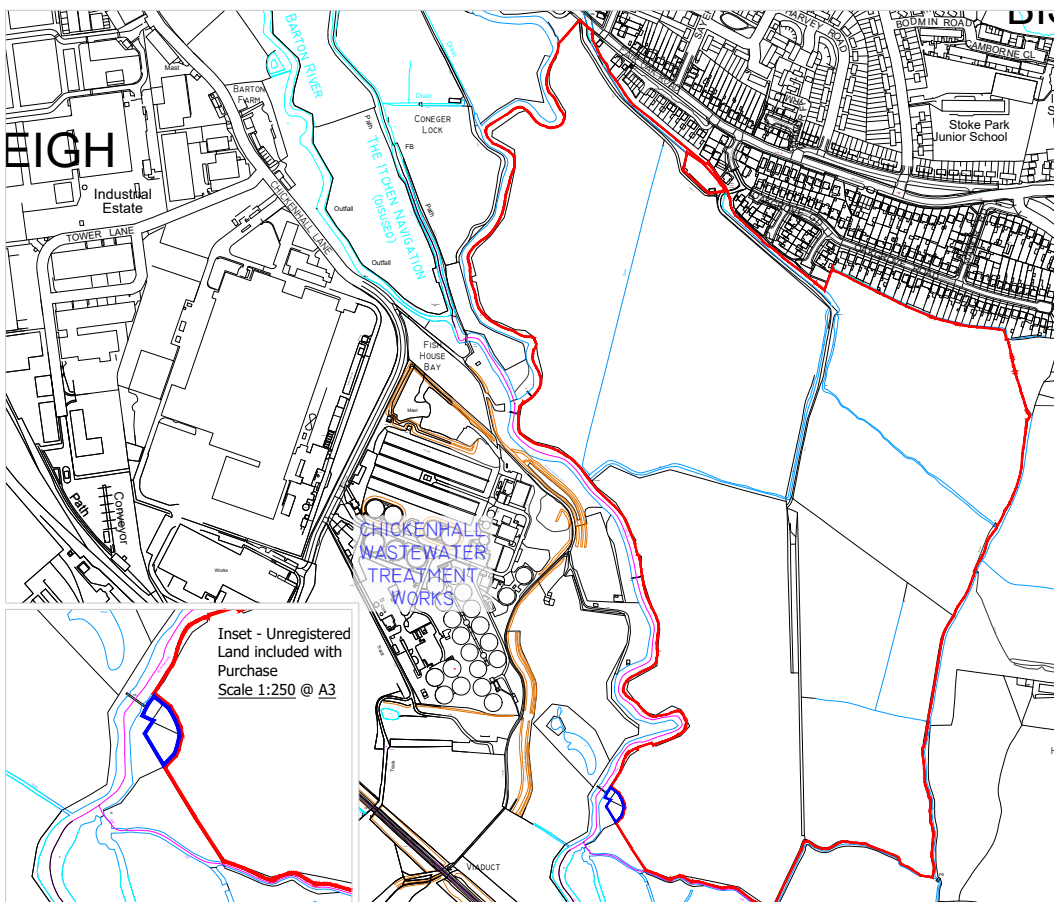
TITLE: Transfer Plan

Ref. 228 SLP MOR-LR01

Date: 25th of September 2020

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4. HP618985 - Bishopstoke. Map reference 6



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Area: 56.00 H.A.

— Title HP618985

— Unregistered land included with purchase

Scale 1:5000 @ A3



ADDRESS: [Dunford]
Land East of Chickenhall
South Bishopstoke
Eastleigh

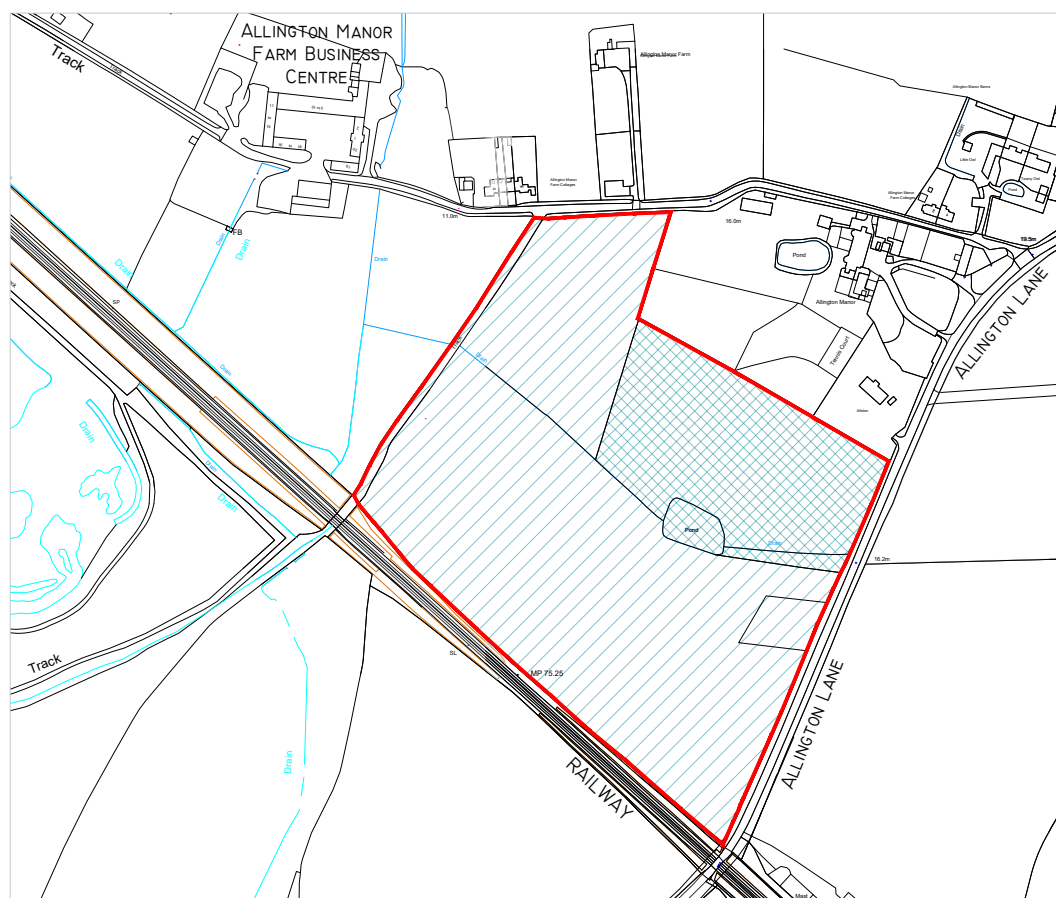
TITLE: Transfer Plan

Ref. 228 SLP DUN-LR01

Date: 4th of January 2021

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5. HP585566, HP717268 - West End. Map reference 21, 22



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Area: 9.58 H.A.

HP585566

HP717268

Scale 1:2,500 @ A3



ADDRESS: [Gosney]
Land North-West of Allington Lane
South Bishopstoke
Eastleigh

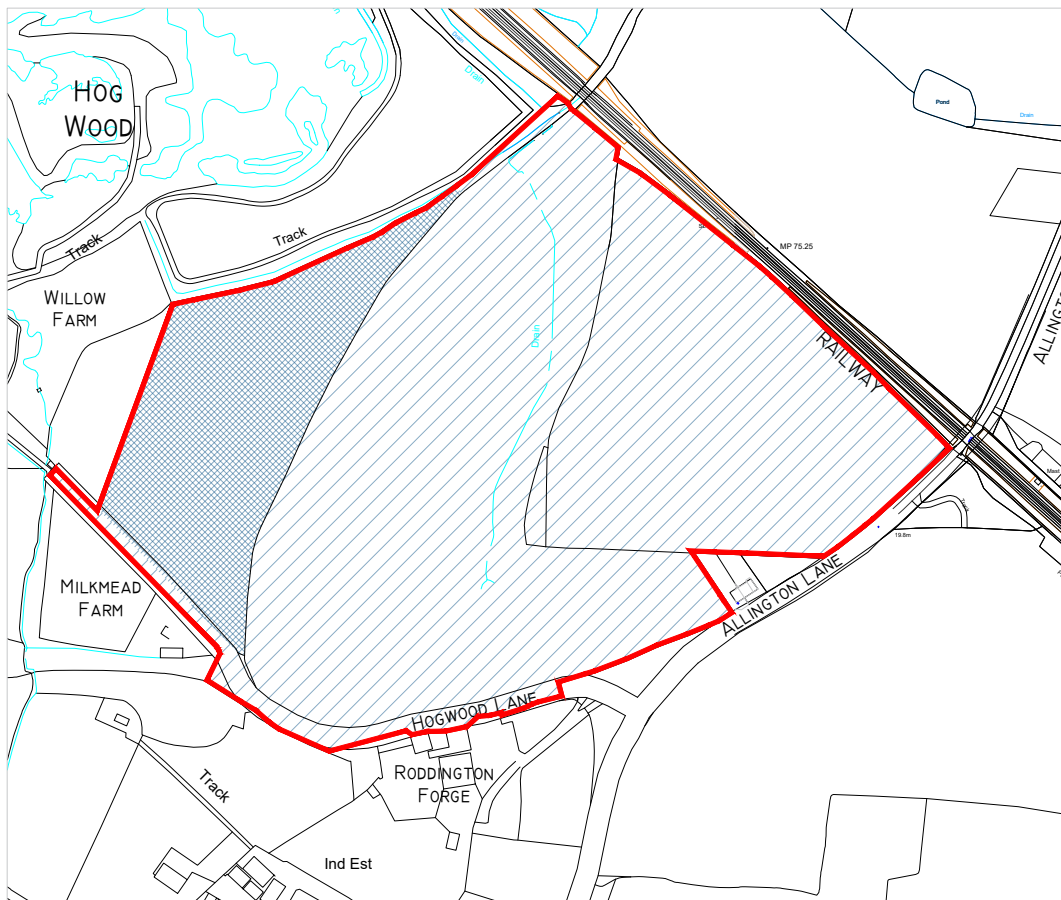
TITLE: Transfer Plan

Ref. 228 SLP GO-LR02

Date: 23rd of September 2020

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6. HP503665, HP474351- West End. Map reference 29, 30



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Area: 17.30 H.A.

HP474351
HP503665

Scale 1:2500 @ A3



ADDRESS: [Gosney]
Land North of Allington Lane
South Bishopstoke
Eastleigh

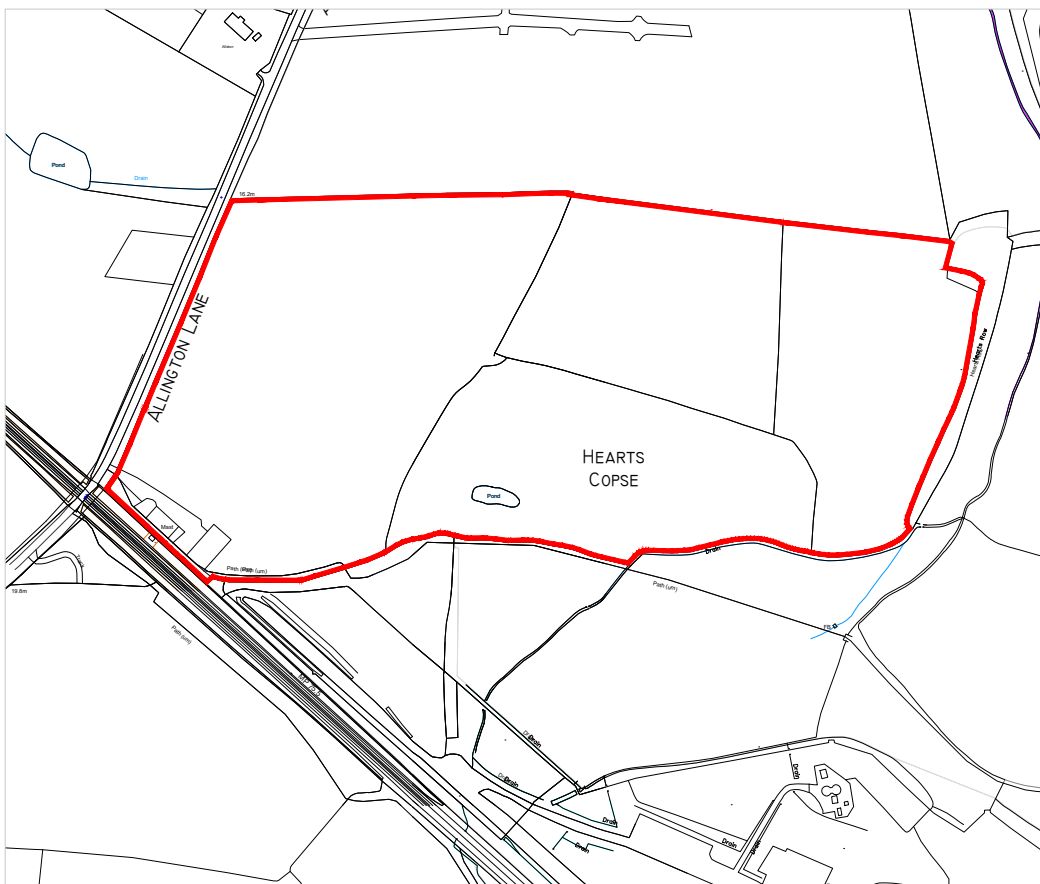
TITLE: Transfer Plan

Ref. 228 SLP GO-LR03

Date: 23rd of September 2020

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7. HP503665, Unregistered, West End. Map reference 28



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Area: 14.90 H.A.

Scale 1:2500 @ A3



ADDRESS: [Gosney]
Land East of Allington Lane
South Bishopstoke
Eastleigh

TITLE: Transfer Plan

Ref. 228 SLP GO-LR01

Date: 23rd of September 2020

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